



# TOWARDS A SMOOTH AND IMPROVED BORDER

**AOA**  
THE VOICE OF UK AIRPORTS

[www.aa.org.uk](http://www.aa.org.uk)

# Foreword

**With the UK preparing to transition out of the European Union, the Border will be centre stage in our future relationship with the wider world. As the Brexit negotiations continue and the future of our Border arrangements becomes clearer, the UK needs to ensure it has the right regime in place to manage the changes which come in the wake of this. For aviation, these developments will come in parallel to a new Government Aviation Strategy which seeks to place the consumer at the heart of the sector.**

---

In the spirit of that focus, the Airport Operators Association (AOA) welcomes the recent announcement that the Government will be recruiting additional Border Force staff as well as the commitment by the former Home Secretary that the Home Office will step up investment for a smoother experience for visitors at the Border. It is vital that the UK demonstrates it is open for business by providing a welcoming border experience to legitimate travellers. We will work with the Government and Border Force to ensure that the new recruits provide much needed additional capacity in airports to achieve this.

**The Government has been clear about its aim to ensure that the UK continues to be a successful, global trading nation post-Brexit. Delivering an improved experience to travellers arriving here will play a crucial part in achieving that aim.**

These developments are positive first steps, nevertheless the frontier will have a starring role to play in Britain's pitch to attract businesses and tourism from across the world. Baroness Sugg, the Aviation Minister, acknowledged this vital service in her speech at the AOA Annual Dinner, outlining the Government's desire to "deliver a secure border, that allows swift entry to the country for legitimate passengers and goods, and that demonstrates Britain is open for business."<sup>1</sup>

As this report sets out, there is still some work to be done before the Border is ready to handle the challenges of the future. The current metrics for Border Force performance create an, at times, distorted image of the Border, while data collected from UK airports and public polling demonstrate that the Border continues to be a pinch point in the passenger journey.

With the consumer being a focal point for Government reform efforts, the AOA commissioned a survey (conducted by ComRes) asking passengers a variety of questions about their experience at the Border when returning to the UK<sup>2</sup>. One key finding was the perception among many passengers that airports, rather than Government, are responsible for their experience at the Border. Furthermore, the survey found that passengers' expectations are that they should be through the Border within 12 minutes and that non-European Economic Area (EEA) passengers should be processed within 22 minutes. That stands in stark contrast to existing Border Force waiting time targets of 25 minutes for EEA

---

<sup>1</sup> <https://www.gov.uk/government/speeches/aviation-minister-pledges-to-help-aviation-sector-prosper>

<sup>2</sup> ComRes interviewed 2,042 GB adults aged 18+ between 4th - 5th April 2018. Data were weighted to be demographically representative of all GB adults aged 18+ by age, gender, region and social grade. ComRes is a member of the British Polling Council and abides by its rules. Full data tables can be found at [www.comresglobal.com](http://www.comresglobal.com)

passengers and 45 minutes for non-EEA passengers. This goes to the heart of the disconnect between a Border Force operation which purports to be meeting its targets and a passenger experience which does not reflect this. Airports, as passenger-facing businesses, have a clear incentive to improve the experience of its customers, but the Border is one element of an airport operation over which airport operators have limited control.

The issues that currently exist can be alleviated and, in this report, we set out proposals to achieve a step-change in performance, including a call for greater transparency and communication between the main players: Government, Border Force and airports. Furthermore, a transparent long-term plan for Border Force, including technological solutions as well as improved performance metrics, would provide airports with the certainty they need about future resourcing.

The Government has been clear about its aim to ensure that the UK continues to be a successful, global trading nation post-Brexit. Delivering an improved experience to travellers arriving here will play a crucial part in achieving that aim.

**Karen Dee**  
Chief Executive



# Executive Summary

- Airports are the UK's gateways to the world: they are hives of commercial and social activity that drive international and domestic connections, business trips and holidays. They are also the first experience of the UK for the 73% of visitors to the UK who arrive by air. Given this vital role in welcoming visitors to the country, it is essential that Border Force operates effectively and to high standards. As airport operators have little control over the operation of the Border, AOA members rely on the Home Office and Border Force to have the correct regime in place. With the passenger at the heart of the Government's new Aviation Strategy, issues affecting performance of the Border must be addressed.
- The report sets out the issues UK airports, and their customers, are experiencing with the current regime. Overall, airports report that the situation could be significantly better and that the service provided by Border Force is failing to meet targets and expectations: in December 2017, 12.5% of non-EEA passengers waited more than 45 minutes (the target time set by Border Force) to pass through the border at Heathrow Airport. A similar situation can be seen across the UK, and the report sets out that current Key Performance Indicators (KPIs) do not provide a reliable picture. A more authoritative set of data is needed to allow us to better understand the problems and potential solutions.
- Advances in technology could hold some of the answers to the UK's border issues. The successful rolling-out of ePassport gates at UK airports has reduced queue times for passengers from EEA countries, with many airports reporting they are used for 80% of EEA passenger processing. However, regardless of the arrangements post-Brexit, ePassport gates are not available for use by visitors from third countries such as the United States, Australia or China. Airports are keen to trial new solutions that could help to alleviate the pressures at the Border. However, technological innovations must not lead to staff reductions that result in a degradation of baseline services.
- While industry welcomes moves by Government to examine the funding of the Border and the potential for more "premium services" to be offered, AOA is concerned that this could result in less-efficient "basic services". If the passenger is to be put first, they should not have to pay for premium services simply to enter the country within a reasonable amount of time.
- The AOA commissioned ComRes to conduct a representative survey of British adults to bring the public's perspective to this debate. The survey found that, on average, 12 minutes is seen as an acceptable time for UK or EU citizens to wait to be processed through the Border, while the average time deemed acceptable for non-EEA passengers to be processed is around 22 minutes. This highlights a gulf between public expectations and Border Force's waiting time targets. The data also support the findings from the CAA's 2017 Passenger Survey, which found that satisfaction with the Border is declining: one in ten passengers experienced delays, with 67% of those passengers dissatisfied with how the delays were handled<sup>3</sup>.
- The report concludes that a long-term resourcing plan is required. This should take into consideration feedback from consumers and airports, and be adaptable to changing circumstances. The metrics against which Border Force performance is judged also need to be altered to better reflect passenger experience and expectations. This long-term plan should be a component of a generally more transparent and collaborative approach by all parties involved in managing the Border. Issues could be tackled more effectively and with greater foresight if communication links between airports, airlines, Border Force and the Home Office were improved.

---

<sup>3</sup> CAA, Third and fourth wave of the CAA Consumer Tracker, <<http://www.caa.co.uk/News/Civil-Aviation-Authority-Consumer-Tracker>> (18 December 2017)

# Contents

1. Introduction .....	06
2. Border Force: What's broken? .....	08
3. Building and delivering a passenger-friendly border .....	16
4. AOA recommendations .....	20





# Introduction

**In 2019, the UK will leave the European Union and the Government will also publish its long-awaited Aviation Strategy, setting out the Government's blueprint for aviation to 2050 and beyond. Aviation is crucial to the UK economy, contributing more than £1bn to UK GDP every week<sup>4</sup>, and creating a secure, efficient and welcoming border will be critical to our future prosperity as we make our own way in the world.**

AOA's 2017 report "Shaping the UK Aviation Strategy for Sustainable Growth", emphasised that the Aviation Strategy should be an opportunity to work cross-government to put the passenger first, including supporting Border Force to provide not only a secure UK border but also excellent customer services to travellers.

The AOA is encouraged that the Government is itself reflecting this aim and welcomes the stated desire to work with industry to make the arrivals process as smooth and welcoming as possible. In the initial call for evidence, the Government spoke of the need to 'alleviate pinch points', acknowledging that passengers often experience queuing and inconvenience at security and border control points. The document also talks of the need to 'keep pace with consumer expectations', acknowledging that consumers have changing expectations from aviation,

---

<sup>4</sup> Capital Economics, InterVISTAS, 2017. Economic impact of European Airports (InterVISTAS, Bath).



including the services available at airports and Border waiting times. This was further recognised in the Government's recent response to the call for evidence, published in April, which highlighted the low satisfaction levels with Border queue times at the country's largest airports.

However, while the mood music is positive, there is much work still to be done. For the most part, UK airports are privately financed and operate in a highly competitive environment, competing for business and traffic in a liberalised market. The Border is one area of operation over which airports have little influence, despite the profound impact it has on a passengers' overall experience. Presently, airports continue to find Border Force's service below par and have little visibility over its future plans. Border Force resources have decreased since 2012 while passenger numbers have increased, and this has led to a deterioration in the passenger experience, as the CAA's recent consumer tracker data shows. If allowed to continue, this will have a number of detrimental effects including, in a post-Brexit world, potentially making it less attractive for companies to do business in the UK, reducing the desire of international tourists to visit the UK, and hampering the competitiveness of the UK's aviation sector vis-à-vis continental counterparts.

While the greater use of ePassport gates is welcome and can bring benefits to airports and passengers, the AOA is concerned that technology is utilised as a replacement of existing staff rather than an enhancement of the Border Force service offering. With the expansion of ePassport gates, and the distribution of larger numbers of them to a single Border Force officer, a question of diligence with regard to human trafficking and illegal migration is also raised; a concern which has also been expressed by the Independent Chief Inspector of Borders and Immigration<sup>5</sup>. While the AOA welcomes the ability to achieve greater throughput with similar numbers of staff, the ICIBI's finding is a cause for concern and thus any further expansion of the use of ePassport gates must be managed responsibly.

This report looks at the Border as it is today, examining current challenges and trends, and details passengers' experiences and expectations. The report concludes by exploring potential solutions and considering how Government and Industry can work together through the aviation strategy and beyond to provide a first-rate passenger experience at the Border, which is fit for the challenges of the 21st century.

**Aviation is crucial to the UK economy, contributing more than £1bn to UK GDP every week, and creating a secure, efficient and welcoming border will be critical to our future prosperity as we make our own way in the world.**

<sup>5</sup> The Independent Chief Inspector of Borders and Immigration, 2017. An Inspection of Border Force's Identification and Treatment of Potential Victims of Modern Slavery, pg 21. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/614203/Potential-Victims-of-Modern-Slavery-\\_Inspection-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614203/Potential-Victims-of-Modern-Slavery-_Inspection-report.pdf)

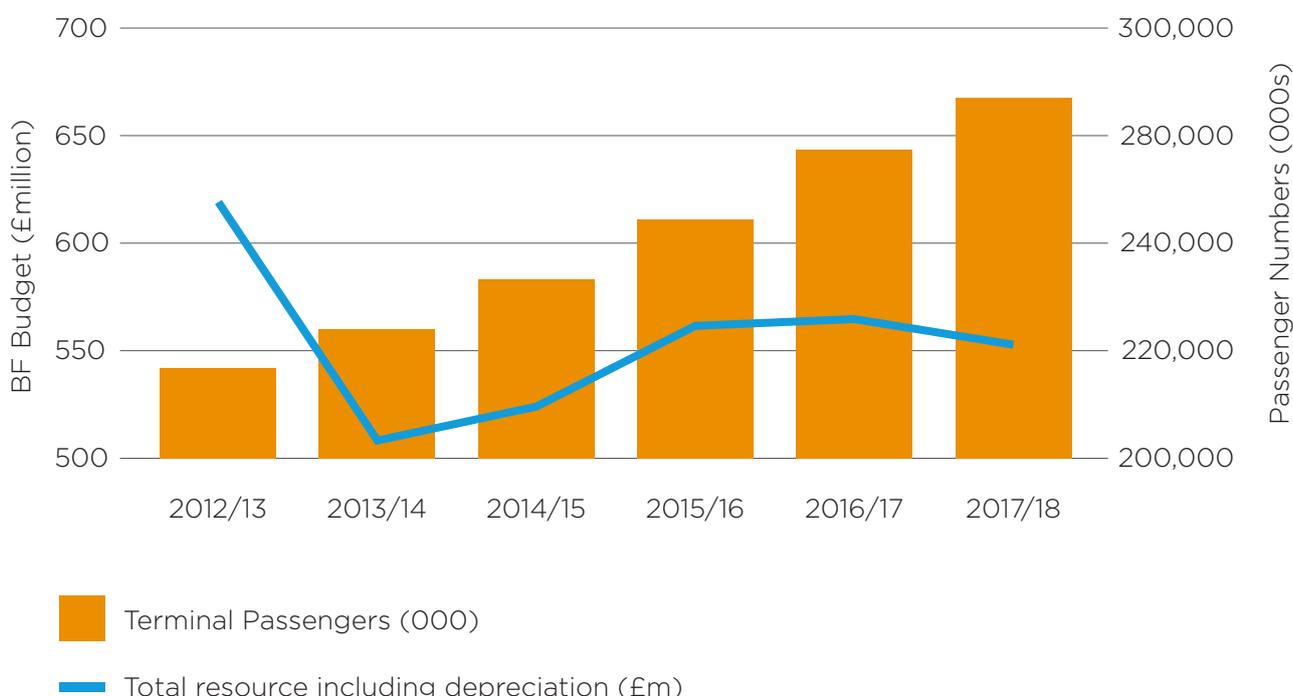
# Border Force: What's broken?

## Border Force resources insufficient to meet growing demand

Passenger numbers at the vast majority of UK airports are rising sharply, with 285 million passengers passing through UK airports in 2017, a 6% rise on 2016 figures. This growth is expected to continue in future years, with airports forecasting growth far beyond the Government's latest estimates. In parallel to this record growth, the budget for Border Force in 2017-18 is £552m, a 2.3% reduction compared with 2016-17. This follows a trend in recent years. For example, in 2012-13, the budget was £617 million while in 2016/17 it had fallen to £565m<sup>6</sup>. Over the same period, passenger numbers increased by nearly 25%, according to figures from the Civil Aviation Authority<sup>7</sup>. This means that Border Force will need more staff just to maintain basic service levels but instead, Border Force resources are not keeping pace with passenger numbers.

Airports have expressed concern that cuts to Border Force funding make it much more difficult for service level agreement targets to be met, particularly during periods such as the summer, when passenger numbers are at their peak. As the graphs below set out, plotting Border Force resources and Border Force staff against growing passenger numbers, there is also some concern that the current trend could manifest itself as a long-term problem, as efforts to reduce public spending look set to continue.

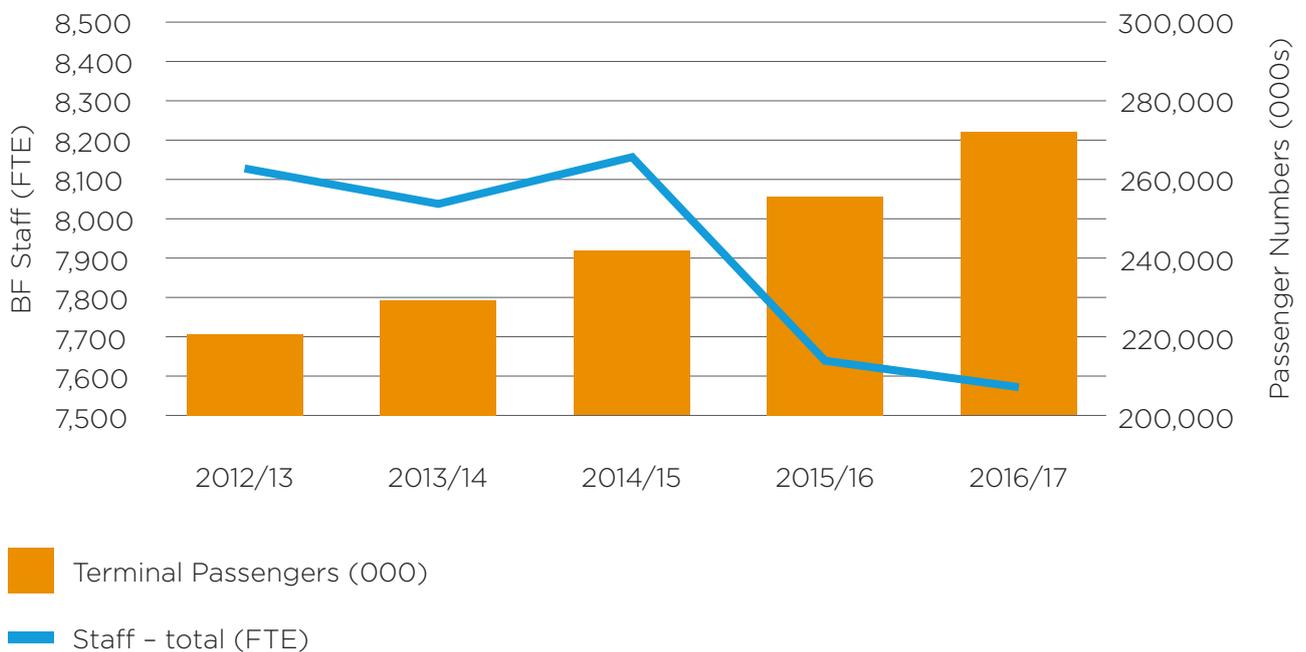
### BF Resourcing & Total Passengers



<sup>6</sup> <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Lords/2017-12-11/HL4035/>

<sup>7</sup> <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/Airport-data-2015/>

## BF Staff &amp; Total Passengers



While the Government's Aviation Strategy will look to focus on improving the consumer offer, there are also serious implications for the UK more widely in terms of inward investment, trade, tourism and the UK's overall reputation. Regular seasonal media coverage of major queues at airports across the UK will, over time, do serious damage to the UK's international reputation, the Global Britain brand and "Welcome to the UK" agenda. Given Border Force's stated ambition to facilitate economic security as well as security of the Border, there is an urgent need for reassurance about the long-term ability of Border Force to cope, given the scale of budget cuts that it is facing, when all the forecasts indicate that passenger numbers will continue to rise well ahead of Government expectations.



## Performance targets 'mask' poor performance

In responding to concerns about poor service, Border Force often cites a 99% service-level agreement (SLA) achievement rate nationally. However, because the SLAs are calculated by averaging figures over the calendar month, individual breaches – which may be very significant in themselves – are not adequately reflected.

Airports regularly experience excessive queues in border halls which are in breach of SLAs, and these contribute to the dissatisfaction of passengers. SLAs averaged over a lengthy period have little relevance for most passengers or airports, which experience large peaks on both a daily and seasonal basis.

Even within the context of current SLAs, it is clear that Border Force resourcing does not sufficiently match the demand peaks at UK airports. For example, Gatwick, even as one of the better performing airports, experienced a maximum queue time of 108 minutes in September 2017 and twice missed the monthly 95% threshold for non-EEA immigration – in July and September 2017.

Non-EEA passengers are a particularly challenging aspect of managing the Border. In July 2017, there were almost 2000 Non-EEA SLA breaches at Heathrow alone and queues of 2 hours or more are now a “once a month” occurrence for the airport. In December 2017 and January 2018, Heathrow UKBF failed to reach the 95% threshold for non-EEA immigration waiting time of 45 minutes, across all four terminals. In December 2017, at Terminal 4, only 87.5% of non-EEA passengers waited less than 45 minutes, meaning 12.5% of passengers had to wait longer than 45 minutes.

## BORDER FORCE: QUEUE TIME TARGETS

A Service Level Agreement (SLA) is set by the Home Office and is the same for all airports in the UK.

The purpose of an SLA is to provide the airport with a clear understanding of the levels of service and outcomes required to meet users' expectations.

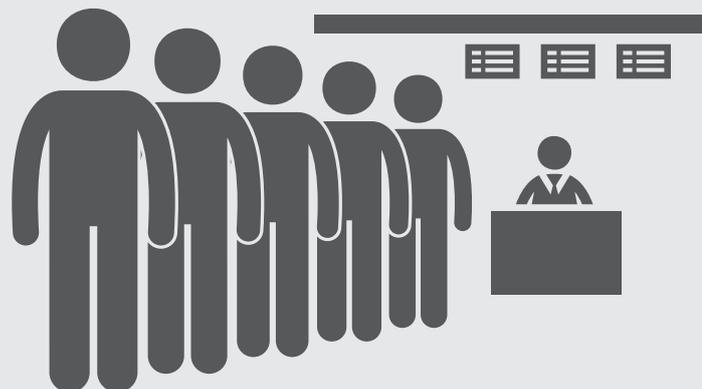
Queue times are recorded every 15-minute period for passengers using the manned desks. There are separate queue times recorded for EEA passengers and non-EEA passengers.

To pass these targets, 95% or more of queue times must be below target in a calendar month. The waiting time targets Border Force strives towards are clearing 95% of passengers with EEA nationality in 25 minutes and clearing 95% of passengers with non-EEA nationality in 45 minutes.

Should a queue time breach these targets, it is often referred to as a “hit”.

A time is recorded for how long it takes a passenger from joining the back of the queue to presenting at the border.

The queue time is measured from the back of the queue, whether that is within the Immigration Hall or not.



# CASE STUDY: HEATHROW

How are we performing?

## Key to performance

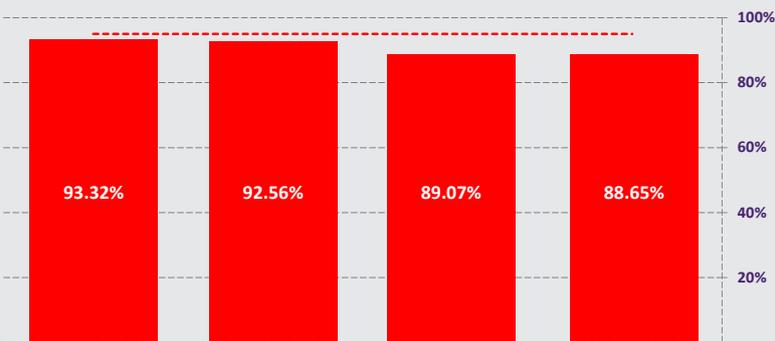
Service Level Agreement (SLA): >=95%

January 2018			
Terminal 2	Terminal 3	Terminal 4	Terminal 5



**Non-EEA Immigration waiting time 45mins**  
% of queue times measured ≤ 45 mins

Based on 15min time periods measured



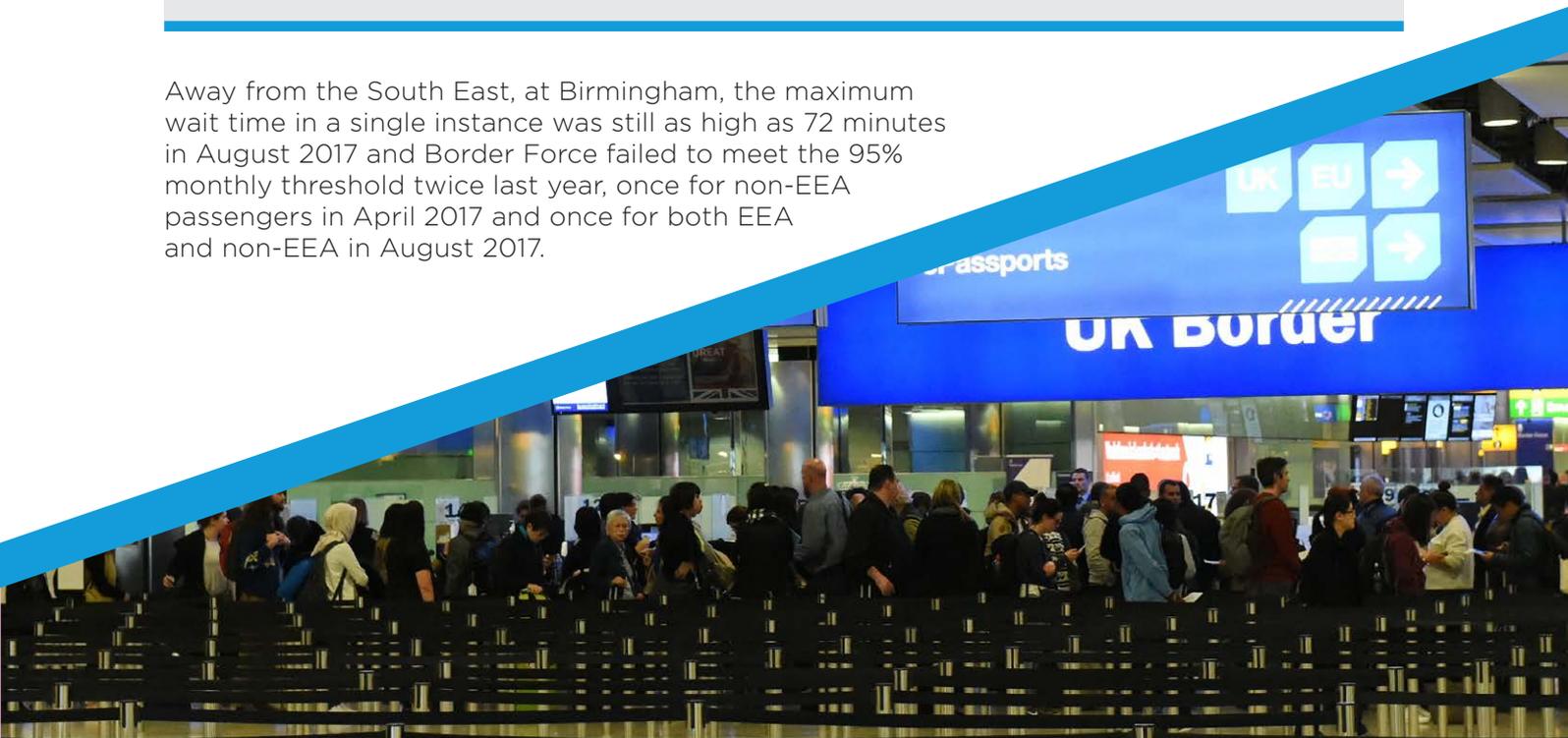
**EEA Immigration waiting time 25mins**  
% of queue times measured ≤ 25 mins

Based on 15min time periods measured



Published on the: 06 February 2018 at 11:12. For any queries, please contact: [Integrated\\_Planning@heathrow.com](mailto:Integrated_Planning@heathrow.com)

Away from the South East, at Birmingham, the maximum wait time in a single instance was still as high as 72 minutes in August 2017 and Border Force failed to meet the 95% monthly threshold twice last year, once for non-EEA passengers in April 2017 and once for both EEA and non-EEA in August 2017.



## CASE STUDY: BIRMINGHAM AIRPORT

Border Force Performance against the SLA during 2017.



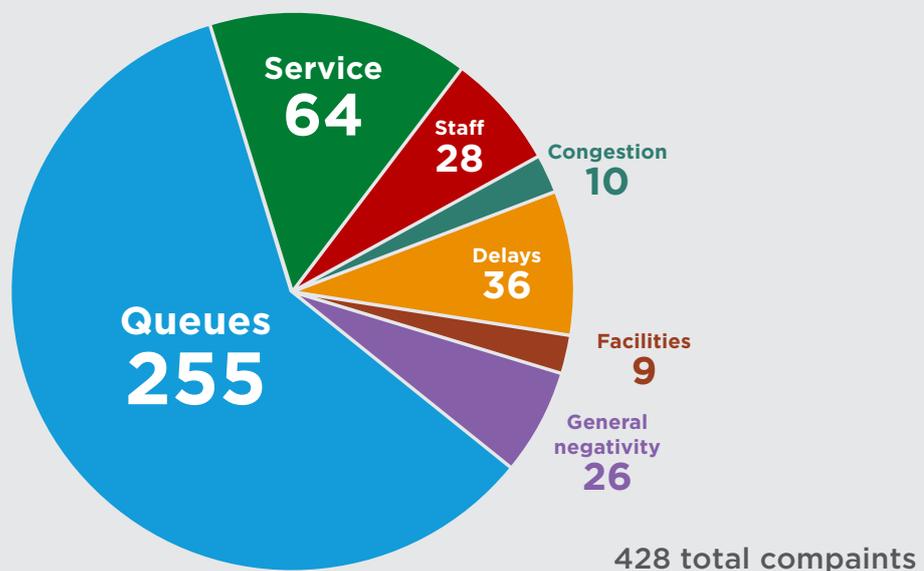
### Performance targets out of touch with consumer expectations

Airports frequently cite queuing times at the Border as a top concern and are regularly criticised by passengers if there are long queues, unmanned desks or if ePassport gates are unavailable for use. For example, of the 428 complaints received by London Luton Airport on immigration in 2017, 60% of them concerned queue times.

In a similar vein, of the 428 complaints received by London Luton Airport on immigration in 2017, 60% of them concerned queue times.

## CASE STUDY: LUTON

Breakdown of immigration complaints from 01/01/17 - 01/03/2018

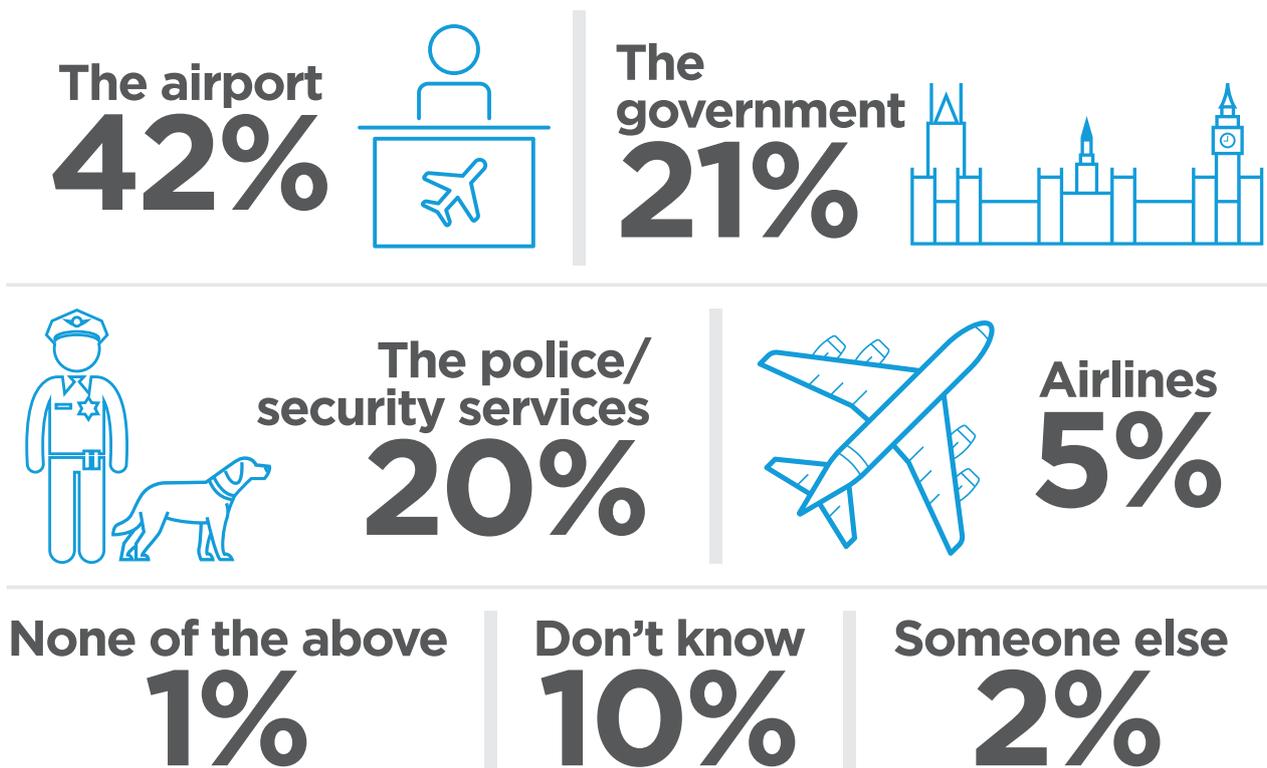


In addition, airports have been concerned that even where targets are met, passengers no longer consider a waiting time of 25 minutes (or 45 minutes for non-EEA arrivals) to be acceptable. In order to better understand this, AOA commissioned ComRes to conduct a survey to test passenger sentiment. Polling found that although those who have flown back to the UK within the last year reported an average time of about 17 minutes to get through passport control the last time they flew into the UK from a trip abroad, on average Britons thought that 12 minutes would be a more acceptable waiting time for UK/EU citizens to go through passport control, while an around 22 minutes was the average time seen as acceptable for other nationalities to wait. In each case, what is deemed an acceptable waiting time by passengers is far shorter than the current standards contained within the SLA.

## Lack of accountability for performance

While airports are responsible for providing the space within which border controls are undertaken, they have little influence over the resources provided. Despite this, the polling conducted by ComRes highlighted a lack of understanding amongst the public about who has responsibility for queue times, with the plurality believing that it lies with airports. According to the survey, two in five (42%) British adults consider airports to be responsible for providing a speedy process at passport control<sup>9</sup>.

### Public polling: responsibility for Border queue times



<sup>8</sup> Older respondents were more likely to cite shorter waiting times at border control on average; among respondents who have flown into the UK in the last year, those aged 55+ say that it took them around 14 minutes to get through border control, compared to 19 minutes among 18-34 year olds. It is not clear whether this was related to perceptions of different age groups or if this can be related to the times at which these groups are most likely to fly.

<sup>9</sup> Younger British adults are more likely to place responsibility for speedy passport control with the airport than their older counterparts (49% of those aged 18-34 say this compared to 35% of those aged 55+). Older respondents are more likely to see the government as responsible (25% 55+ vs. 16% 18-34). Those in AB social grades are more likely to think that the government is responsible for providing a speedy process at passport control (26% vs. 20% C1 and C2, 17% DE).

This is reinforced by the messages that airports receive direct from passengers.



The aviation industry prides itself on being highly customer-focused, thus this lack of clarity is a significant cause for concern. In addition, as long as airports are "taking the blame" for the problem, there is little incentive for Border Force (or Government) to deliver improvements.

## Inefficient use of technology

ePassport gates are viewed by the Government as one of the main ways in which SLAs for passengers can continue to be achieved in the face of reduced Border Force funding. In theory, this is an attractive potential solution, but AOA believes there are a number of factors which mean that, without change, this is unlikely to become the reality:

- Currently, many people who could use ePassport gates do not: polling by ComRes for AOA found that British adults who have flown back into the UK within the last year were equally likely to report that a Border agent checked their passport (46%) as having used an ePassport gate (50%).<sup>10</sup>
- Many passengers complain of ePassport gates being closed despite significant queues – something also regularly raised in Parliament. This has generally arisen where there are insufficient Border Force staff available to monitor the gates. The recent increase in the numbers of ePassport gates that can be monitored by a single officer from five to ten has been a welcome step to help address this. However, this has also seen the Chief Inspector for Borders and Immigration raise concerns over safeguarding people against modern slavery<sup>11</sup>

<sup>10</sup> ComRes – Public Border Attitudes

<sup>11</sup> The Independent Chief Inspector of Borders and Immigration, 2017. An Inspection of Border Force's Identification and Treatment of Potential Victims of Modern Slavery. pg 21. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/614203/Potential-Victims-of-Modern-Slavery-\\_Inspection-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614203/Potential-Victims-of-Modern-Slavery-_Inspection-report.pdf)

- At present there remain some passengers who are not able to use ePassport gates – particularly children under 12 years of age. Naturally a parent travelling with a child under 12 is unlikely to use the ePassport gate when their child could not. Thus, it is unlikely that usage figures could get much beyond 80% of eligible passengers (since some eligible passengers would be accompanying ineligible passengers).

It is clear ePassport gates have an important role to play going forward, but this should not simply be used as an alternative to staff resources, particularly given the current threat environment in which government has to respond to a dynamic set of risks and events in terrorism, criminality and cybercrime<sup>12</sup>. Greater uptake of ePassport gates can however deliver maximum benefit when sufficient Border Force agents are on hand to deal with peak-time rushes, passengers unable to use the gates, and passengers who are directed by the ePassport gate or a 'roving officer' to a manned desk.

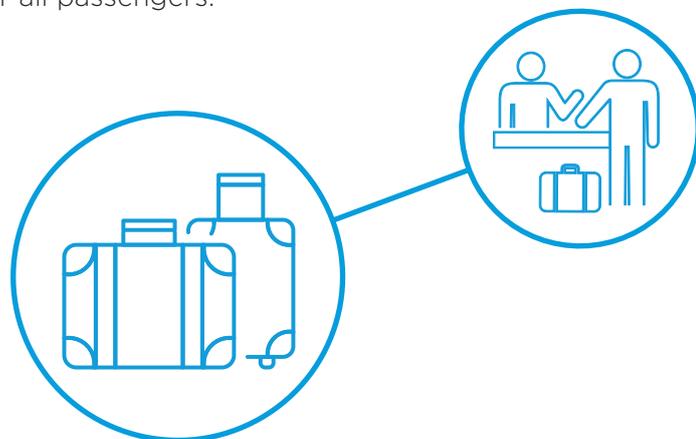
### Lack of clarity over investment responsibilities

Airports are seeking to facilitate an improved service by investing in infrastructure that will enable extra capacity in arrivals halls. However, in many cases such investments do not happen because airports receive insufficient assurance (from Border Force) that the required level of staffing will be forthcoming to enable full use of new facilities.

Similarly, some smaller airports have reported that Border Force has indicated that these airports will have to pay extra for automated gates, as well as for extra staff to ensure basic service levels. Airports should not have to pay extra for basic service levels and for smaller, regional airports, the costs of paying for apparatus such as automated gates is often prohibitive. As a result, there is a concern that these airports receive a sub-standard service.

Border Force has started to offer airports the option of "premium services" at an additional cost. While clearly this is welcome for those travellers wishing to make use of services such as fast-track checks, it is important that paid-for premium services do not come at the expense of an acceptable basic service level for all passengers.

**It is clear ePassport gates have an important role to play going forward, but this should not simply be used as an alternative to staff resources, particularly given the current threat environment in which government has to respond to a dynamic set of risks and events in terrorism, criminality and cybercrime**



<sup>12</sup> Such threats are frequently complex and require extensive cooperation by border and security agencies in the UK and elsewhere



# Building and delivering a passenger-friendly border

As the UK begins the process of leaving the European Union, it is imperative to demonstrate the UK is open for business and for that it needs a better welcome at the Border. At present passenger growth rates, Border Force will need more resources and staff just to maintain existing basic service levels. Managing the Border is a key function of Government, and as such it should continue to be funded by central taxation and Government must be accountable for how it manages the border.

Border Force has, for its part, taken some action to address the challenges it faces. In 2017, an initial trial of one officer looking after ten ePassport gates instead of five proved successful and has now been rolled out widely. In addition, the Registered Traveller scheme<sup>13</sup> has been extended, saving time at the Border.

However, these small and incremental efficiency gains are being achieved within an increasingly difficult operational context. Just as Border Force searches for ways to deal with current constraints, different challenges are emerging: for example, Border Force continues to face challenges around getting accurate predicted arrival times of incoming aircraft, while traditional holiday seasons are merging into each other, with more regular and a greater variety of peaks (e.g. not just a major peak as a result of the summer holidays but also around religious festivals like Eid and bank holidays).

<sup>13</sup> If you have a valid passport from an eligible country, you can apply to become a Registered Traveller. As a Registered Traveller you can use the UK/EU and ePassport lanes instead to speed up your entry through the UK border. Border Force officers aim to clear the majority of UK and EEA nationals within 25 minutes and non-EU citizens within 45 minutes.

Delivering a better, more efficient and more “passenger-friendly” service at the Border can only be achieved by working in partnership. The AOA has identified the following key areas for action. Government must:

- Provide urgent clarity on post-Brexit Border arrangements
- Develop a long-term plan for resourcing the Border
- Create a framework and roadmap to facilitate innovation and greater use of technology
- Adopt performance metrics which meet the needs of passengers

## Clarity on post-Brexit Border arrangements

There is an urgent need for clarity about the changes that may be required as a result of Brexit. AOA’s position is that Government should seek either to maintain the same entry-clearance system for EU nationals after Brexit or to work with airports to provide the extra capacity airports will require to meet that changed demand. If free movement of people no longer applies, it is likely that changes to the Border regime for EEA nationals will be needed. This would require Border Force to commit significantly more resource to process EEA and Swiss nationals; the increase in passport checks and processing times which would result, could act as a deterrent to visitors from the EU.

In addition, in order to facilitate such checks, additional space within the airport would need to be allocated to immigration control operations. Extending existing facilities - or indeed providing completely new facilities - would take a considerable amount of time to deliver and would come at significant cost. Airports must be given sufficient time to plan for such an eventuality.

**AOA’s position is that Government should seek either to maintain the same entry-clearance system for EU nationals after Brexit or to work with airports to provide the extra capacity airports will require to meet that changed demand.**

## A clear, long-term resource plan

To meet the growth challenge, provide a clear welcome to the UK and meet passenger expectations, Border Force needs a long-term strategy for a minimum of five years with an accompanying budget to deliver the resources that will be needed. The strategy should also take into account the rapid increases in passengers the UK has witnessed in the last few years - beyond even the most optimistic of Government’s growth scenarios - and it should be developed in close coordination with industry.

Securing a common perspective on growth can be challenging. In the past, Government has relied on the Department for Transport’s aviation forecasts. However, these are not suited to operational planning and the AOA welcomes Border Force’s recent efforts to find a more fine-tuned model, for example by working with organisations like VisitBritain on visitor forecasts and by linking Advanced Passenger Information (API) data into the Border Force planning tool.

Simple further steps on which Government and industry could collaborate include a closer examination of Border Force staff rostering policies - particularly within specific local contexts. This would ensure for plans are able to take account of, for example, that several airports regularly have concerns about the arrival of large numbers of students in September, or that Cardiff is regularly used as a diversion airport.

This forward-planning would also facilitate greater accountability by ensuring Parliament has a clear plan against which to hold Government and Border Force to account.

Alongside the call for a longer-term strategy and the desire for a more consultative approach on SLAs, it is apparent that there needs to be greater transparency and engagement in Border Force planning overall. Increased transparency would enable industry to work alongside Government, ensuring that approaches are aligned, long-term challenges are planned for and airports do not have to go through, what has become, an annual concern about resourcing in arrival halls. Further clarity from Border Force on how it analyses its performance is also sought by airports, particularly to understand why performance can be measured as improving in one period but then declining in the next.

Funding is one of the key challenges going forward, so it is crucial that Government explores how additional resources can be delivered and funded, taking account of the charges and costs which are already levied on aviation. Securing the border is an extremely important activity – but it is a requirement and responsibility of Government rather than airports. However, industry is keen to work in collaboration with Border Force to look at potential alternative funding streams: for example, one suggestion is that income from Air Passenger Duty (APD) could be hypothecated to fund additional resources. Given that there is a direct relationship between passenger numbers and the additional resources required at the Border, this could serve as a justifiable use of the tax revenue generated by UK aviation. However, there may be other alternatives available – and Government must, via the Aviation Strategy, explore all the options to ensure an improved service can be delivered in a way which does not impose any unnecessary financial burdens upon airports.

## A framework to encourage Innovation

As with so many other areas of government and business activity, digital technology has the potential to “change the game” in Border management. Better information-sharing and technology can help meet traveller demands. For example, receiving passenger information further in advance of boarding could assist with Border Force processing – through facial-recognition ePassport gates, for example. Better advanced information could facilitate action being taken before departure – thus preventing suspect travellers entering the country in the first place. In 2015, fewer than one-third of people refused access to the UK were done so before they travelled.

Currently, the government still uses outdated technology, some Border processes remain manual and there are significant gaps in data. Many operating processes at the Border rely on paper-based or legacy IT systems. For example, the Warnings Index system, which is used to collect information on persons of interest to the authorities, was introduced in 1994<sup>14</sup>. There have also been significant failures in the past when implementing programmes intended to improve the management of the Border: most notably, the Home Office e-borders programme to improve the collection, analysis and exploitation of advance passenger information which started in 2003 but was delayed and eventually cancelled in 2010, leaving government with a major contractual dispute that cost £150 million to resolve. In a resource-constrained environment, it is vital such failures and cost

**Funding is one of the key challenges going forward, so it is crucial that Government explores how additional resources can be delivered and funded, taking account of the charges and costs which are already levied on aviation.**

<sup>14</sup> Brexit and the UK Border (2017, UK Parliament)

overruns are avoided in future. With ambitious programmes to improve border management having often failed to deliver all of their planned benefits (and having experienced cost overruns), Government has more recently moved to improve its border operations through incremental projects. This has also presented challenges. As the Government has increasingly started to collect and use data to improve border management, gaps and weaknesses in the collection and sharing of data have been identified that mean Border management is not as good as it could be. A recent report by the think tank Reform reported that while Advanced Passenger Information (API) is now routinely captured by airlines and transmitted electronically to Border Force in advance of arrival, the data is not always used effectively and some of the data is not processed quickly enough to prevent high-risk individuals from travelling to the UK.

There is however, now an acknowledgment from Border Force of the need to investigate how the Border can be upstreamed, so that, for example, more information would be available prior to a passenger presenting themselves. This would be a risk-based assessment, though how this would work exactly would depend partly on technological advances. Border Force's plans therefore would need to be designed to be adaptable to future technology. Such developments could change the Border significantly from a passenger perspective and it would be important to understand this viewpoint.

Creating the Border of the future may also require a renewed legal framework. For example, there is currently a requirement for a border officer to interact with a non-EEA visitor prior to giving them entry-clearance. As a result, it is currently not possible for a non-EEA visitor to pass through an ePassport gate unless they are part of the Registered Traveller scheme.

Consequently, airports are open to new ideas and innovation: there is an appetite for pilot programmes, such as the next generation of ePassport gates, which bring a host of benefits to airports and passengers. There are also many lessons that can be learned from pioneering projects across the globe. Australia's 'offshore-border' approach, where customs officers collect data from travel agents and airline companies then cross-reference it against national databases to identify risk, has resulted in 50 per cent fewer travellers undergoing additional checks at airport immigration<sup>15</sup>. Government should therefore provide a framework which facilitates collaboration with the supplier side of industry to understand what new technologies and innovations might be practicable, and to explore the circumstances under which they could be implemented.

## Passenger-focussed performance metrics

As outlined earlier in this report, current SLAs neither reflect the "real experience" of passengers nor take account of changing public expectations. New mechanisms for measuring performance therefore are required. The forthcoming Aviation Strategy process offers a prime opportunity for Government and industry to work together on such an exercise. The new metrics should:

- Provide an accurate measure of the performance of the Border
- Measure performance at regional and individual airport level
- Be based on passenger priorities – e.g. technology versus face-to-face; queue times etc
- Be used to establish new SLAs
- Be developed and agreed with industry and consumers
- Be used to guide resourcing plans for Government and industry alike

This approach would also help to address the fact that the crucial issue of performance measurement is often a source of dispute between airports and Border Force, with Border Force questioning waiting time figures produced by airports or vice-versa.

---

<sup>15</sup> <http://www.reform.uk/reformer/a-digital-border-for-a-digital-age/>

# AOA Asks of Government

The AOA has four clear asks of Government:

1

Provide urgent clarity on post-Brexit Border arrangements; Government should seek either to maintain the same entry-clearance system for EU nationals after Brexit or to provide funding for the extra capacity airports will require to meet that changed demand.

2

A clear, long term resource plan; to meet the growth challenge, provide a clear welcome to the UK and meet passenger expectations, Border Force needs a long-term strategy with an accompanying budget to deliver the resources that will be needed.

3

A framework to encourage Innovation; Government should therefore provide a framework which allows them to work with the supply side of industry to understand what new technologies and innovations might be practicable, and to explore the circumstances under which they could be implemented.

4

Passenger-focussed performance metrics; The forthcoming Aviation Strategy process offers a prime opportunity for Government and industry to work together to explore new mechanisms for measuring performance at the border.

# Annex I

## AOA – Public Border Attitudes

---

**Methodology:** ComRes interviewed 2,042 GB adults aged 18+ between 4th - 5th April 2018. Data were weighted to be demographically representative of all GB adults aged 18+ by age, gender, region and social grade. ComRes is a member of the British Polling Council and abides by its rules.



### READ REPORT

<https://www.aoa.org.uk/wp-content/uploads/2018/06/ComRes-Survey.pdf>





# TOWARDS A SMOOTH AND IMPROVED BORDER

Airport Operators Association  
3 Birdcage Walk  
London SW1H 9JJ

**T** 020 7799 3171  
**E** [info@aoa.org.uk](mailto:info@aoa.org.uk)  
[www.aoa.org.uk](http://www.aoa.org.uk)

**AOA**  
THE VOICE OF UK AIRPORTS

The Airport Operators Association (AOA) is the trade association that represents the interests of UK airports.