

9 September 2020

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

Dear David,

I am writing to you in response to the call for evidence for your inspection of e-Passport Gates. My [Strategic Plan 2019-20](#) emphasises that more needs to be done by Border Force to ensure that potential victims of modern slavery and human trafficking (MSHT) are identified and safeguarded. I therefore welcome the inspection's focus on the measures taken by Border Force to identify and protect vulnerable travellers using e-Passport Gates, and the effectiveness of these measures.

Border Force officers have a limited window of opportunity to identify and safeguard vulnerable individuals, including potential victims of MSHT. These opportunities are further limited where passengers are able to use the e-Passport gates, presenting obvious risks. I am aware that you have previously raised concerns as to whether the e-Passport gates are sufficiently dealing with vulnerable passengers such as children and victims of MSHT¹, and I too remain concerned about this. This is not an area in which my office has undertaken any specific work. As such, I am unable to provide an informed assessment of the effectiveness of safeguarding measures in place at e-Passport gates. There are, however, three things that strike me as crucial: appropriate resourcing and consistency at e-Passport gates, the effective use of data, and adequate training for roving officers.

Resourcing and consistency at e-Passport gates

You have raised concerns as to whether sufficient roving officers are deployed at e-Passport gates, both in your 2017 reinspection² and with the Home Affairs Committee. Having reviewed the current roving officer guidance, I have concerns about both resourcing levels and consistency in deployment. The guidance stipulates that deployment of a roving officer is only mandatory for terminals with 6 or more e-Passport gates. For smaller terminals and the juxtaposed controls, there is no mandatory requirement for roving officers to be deployed at all times. Instead, the monitoring officer is the mandatory mechanism for controlling the flow of children through the e-Passport gates. This

¹ House of Commons, Oral evidence to the Home Affairs Committee, Home Office Delivery of Brexit: Immigration, 29 November 2017

² ICIBI (2018) [‘A re-inspection of Border Force’s Identification and Treatment of Potential Victims of Modern Slavery September to November 2017’](#)

obviously does not account for potentially vulnerable adults and I would encourage your inspection to further investigate the rationale behind this policy.

Effective use of data

The recommendations regarding data collection in the inspection and subsequent reinspection could be examined further in relation to the e-Passport gates. For example, I would hope that data on potential victims of MSHT now consistently differentiates between cases identified at staffed desks and the e-Passport gates. It is also important that decisions on resource deployment are evidence-based. Local managers are urged to deploy additional resources based on threat and risk levels, demonstrating the importance of your previous recommendations around robust data collection, intelligence assessments and trend analysis. These steps could also be used to support greater use of targeted closures for high-risk flights as highlighted in the re-inspection³.

Training for roving officers

Roving officers will not always be Safeguarding and Modern Slavery (SAMS) officers. Essential training requirements are currently limited to mandatory e-learning packages, although I understand there are plans to introduce a one day safeguarding course for all Border Force officers. I am aware that Heathrow Terminal 2 staff also currently undertake behavioural detection training. I would urge the inspection to consider current roving officer training provisions and whether it would be beneficial to make targeted courses such as this mandatory.

I hope that the information above is useful in informing your inspection of e-Passport gates. Should you require further information, please contact my office's International Lead, Jenna Teasdale: jenna.teasdale@iasc.independent.gov.uk.

Yours sincerely,



Independent Anti-Slavery Commissioner

³ ICIBI (2018) '[A re-inspection of Border Force's Identification and Treatment of Potential Victims of Modern Slavery: September to November 2017](#)'