

## **Supplementary written evidence submitted by the Immigration Services Union (COR0248)**

### Current Position

1. At the present time all travellers to the UK must have completed an online "Passenger locator form" which gives details of either the booking for a hotel in which to quarantine or the address at which the traveller will self isolate; and confirmation that two covid tests have been booked to be taken on days 2 and 8. They must also present a negative covid test taken in the past 72 hours.
2. Failure to comply in any respect will result on the issue of a notice by UK Border Force of an intention to fine. Management and enforcement of fines does not rest with Border Force on the front line but an in country unit who deal with the associated actions.
3. In the event of an arrival of an individual who is required to quarantine management of transport etc. passes to the Isolation Assurance Service (sometimes also referred to as Quarantine Management Services)

### Challenges

#### **4. Travel without good reason**

Members are reporting encounters with travellers who do not have a good reason for travel. In many cases this can simply be addressed by refusing entry under the Immigration Rules. However where the passenger has a presumed right of entry, either because they have a right of residence in the UK or because they have a current visa giving them an in country right of appeal, then the Officer may have no option but to admit them to the UK. Members report passengers with visit visas, issued as recently as January 2021, for the traveller to do things which are not currently lawful in the UK, for example to shop, to visit sites of attraction or to visit family where there is not a compelling reason. Members have expressed serious concern that visit visas of this nature are still being issued.

#### **5. Insufficient carrier checks**

Not all carriers are careful in checking compliance with UK requirements. A recent example of significant queuing at London Heathrow arose because 6 flights arrived in the same time frame where there was a very low compliance with the requirements. This led to delays in processing and, in turn, to an unacceptable level of queuing within which it was not possible to maintain social distancing. Although carriers can in theory be fined for non compliance; but this enforceability has not been tested in law.

#### **6. Lack of an easily verifiable international standard test form.**

The forms which are produced to determine the negative pre departure covid check are not standardized. It is extremely challenging to determine a genuine certificate from a counterfeit one. Although in some instances the forgery is more readily apparent with immediately obvious spelling or grammar errors; in most cases the form must be taken on face value. With blank forms available for easy purchase on the internet there is no way for Border Staff to be satisfied that the certificate presented is genuine.

#### **7. Insufficient port space for separation**

Alongside the issues which arise with delays is the lack of space available at many locations for passengers to socially distance. This gives rise to uncomfortable images circulated in the media.

Not only are travellers from different aircraft shoulder to shoulder within the queue “snake”; travellers who are required to quarantine cannot be effectively and safely separated from those who are not. This undermines the stated intent to protect the UK from new variants.

#### **8. Increased length of interaction with Border Staff**

The recent move from spot checking compliance with the locator form system to attempts to check all arrivals has led to significantly increased interaction with Border Force Staff. Although protected, in most cases, by a single sheet front facing Perspex screen the interaction requires documents, mobile phones and other items to be handed back and forth between the passenger and the officer. It appears to be human nature to lean around the screen rather than remain in front of it. The screens do not wrap around. Border Force is correct that PHE (and devolved authority) guidance is that being behind a Perspex screen means that you do not have to wear a face covering. However many members are deeply uncomfortable with the ease that a passenger can interact to the side of the screen which does not always wrap around or provide any protection at the side or rear. This has also led to negative comment from the public and other law enforcement colleagues on the lack of a face covering.

9. The length of a basic non contentious interaction is now in the region of 5 – 10 minutes per passenger; up from 3 – 5 minutes previously. Where the matter is more complex of a notice of intention to fine needs to be issued the transaction time can often be as long as 20 – 30 minutes. The potential for infection, and the likelihood of verbal abuse, increases significantly.

#### **10. Complex and detailed forms**

Where a passenger has not complied with the locator form process the Border Officer is now required to complete a 9 page detailed form notifying the traveller of an intention to fine them for that breach. (Previously this was a shorter one page notification). This increases delay and frequently results in the officer being verbally abused. Concerns have been raised that these forms are very detailed and members have asked how many fines are overturned or not enforced because of inaccuracies. Home Office have not been able to provide any assurance.

#### **11. Travellers arriving at a non designated site.**

Although there is limited anecdotal evidence of this having occurred in practice staff remain concerned about unheralded arrivals of travellers required to quarantine a site not designated to receive them. In particular staff express concern that short straights crossing have no designated arrival point yet Portugal is 1 – 2 day drive from the northern French seaboard.

#### **12. Delays in moving to quarantine locations.**

Although not directly a Border Force responsibility members observe there can be significant delay in moving quarantine passengers on from the port of arrival. This has raised questions about any risk of infection.