

## Written evidence submitted by Eurostar (COR0249)

### IMPROVING THE IMPLEMENTATION OF CURRENT BORDER CONTROLS

1. I am writing to support the points made by Emma Gilthorpe, the Chief Operating Officer of Heathrow, in her evidence to the Committee on Wednesday 10<sup>th</sup> March.
2. In a normal year, Eurostar carries 11m passengers and contribute over £2bn to the UK economy. We are the critical link between the UK and Paris, Brussels and increasingly the Netherlands. The pandemic has hit Eurostar uniquely hard. We are essentially 95% down in volumes since last March, and currently as much as 98% since the enhanced quarantine measures in response to the new variants. Nevertheless, we continue to operate, not because it is currently commercial to do so, but because all governments want to sustain a minimum link and the limited number of journeys, we currently facilitate are genuinely essential.
3. In this context, we support the restrictions that have been introduced by the UK Government to respond to the current public health crisis. However, the implementation of those restrictions is not being managed in a structured and consistent manner and this is resulting in a system which is currently confused and ineffective. This results in unnecessary distress, cost and delay to the few passengers trying to make essential journeys, often in stressful circumstances. This is challenging enough at present, but the real risks lie ahead. Eurostar wants to continue to support the government towards the managed resumption of travel, but we worry that, if the current approaches continue into the recovery phase, the system will simply collapse. This would fatally undermine the objective of restarting the economy safely.
4. On the same day as you were taking evidence from Heathrow, we had thirty-three passengers booked on our only train from Lille station. Not a single passenger had the correct paperwork correctly completed. That same day nearly one third of passengers were rejected from Amsterdam for errors on their forms (most of which stemmed from a yet another change introduced in the past few days). In Paris Nord, for similar reasons, over the past weekend between about thirty and sixty passengers each day were unable to cross the UK border in time to board their train to London, despite often having arrived hours in advance. As a result, we see more and more passengers totally distressed following refusal access to travel for reasons such as funerals and child custody, even though they had in good faith completed all the requirements they understood.
5. Most passengers are not trying to evade the system; they want to comply, but the complexity of the system has made it almost impossible for them to do so. This is not just an issue about passenger convenience – or the very considerable stress and burden it places on our staff and the frontline Border Control Officers with whom we maintain an excellent working relationship. It is about the effectiveness of the system and how it is planned and implemented.
6. From a Eurostar perspective, **the issue is not with the rules, *per se*, or the political decision-taking which we fully understand and support in this critical period. It is with the current weaknesses we perceive in governance, project management and the culture of their implementation.** In the spirit of helping to create a more effective system we would like to suggest introducing the following elements:
  - A single point of governance (the equivalent of a project Board) which owns and takes responsibility for the effectiveness, implementation and communication of the system.
  - A feedback loop between the implementation and performance of the controls experienced by operators. This will enable everyone to learn, adapt and fine-tune the process.

- A tight system of change control governing the approval of changes and the setting of new policies, and the prior evaluation of their impact on the system as a whole.
  - A close collaboration with the carriers so that the processes that are implemented are practical, achievable and legal across the territories in which we operate and that carriers have sufficient time to introduce and communicate the rules in an effective and timely manner.
7. In making these suggestions, Eurostar is drawing on our own experience of managing safety critical systems. The culture which underpins this is the key factor. If a passenger trips and falls on a station platform we do not think of it as their fault; it is our responsibility as an operator to have identified the potential hazard and take steps to mitigate it, including in our communications with customers and our management of their journey. The same approach should be applied here as passenger safety and wellbeing is at stake. Those designing, managing and communicating the system need to make it their mission to ensure passengers arrive informed and equipped. It is their responsibility to ensure the system is effective, not passengers'.
  8. By adopting this approach, we would avoid the kind of scenario we faced last week with the change to the Passenger Locator Form that required an invoice number rather than a booking reference. We were given just 30 minutes notice of this change which was not compliant with the regulations (which refer to the booking reference), or the communications on the Government's own website or the official guidance accompanying the form. Furthermore, the invoice number does not arrive with the test confirmation but is sent separately - often some hours after the test has been booked. The result was that nearly a third of passengers were rejected. It was not their fault.
  9. Eurostar wants to be a trusted part of an effective system. Earlier in lockdown, even prior to any carriers' liability being introduced, we were achieving 98% compliance on our routes. We will strive to support the government in plotting a safe return to travel, but the system needs to be managed in a way which makes that possible. If the current approach to implementation and governance is extended into the managed re-opening of services (with at least ten times the current volumes) we believe that the system will collapse, and the passenger experience will be significantly degraded at a time when we need to instil confidence.
  10. We very much hope the Committee can support this need for change and would be happy to engage further with the Committee on these matters.

Yours sincerely,

Jacques Damas  
Chief Executive Officer

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