



Home Office

Consultation on Home Office's Immigration Statistics – Arrivals Data

Government Response

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1. Introduction and Contact Details

This document is the post-consultation report for the consultation paper: Home Office's Immigration Statistics – Arrivals Data.

It covers:

- the background to the consultation
- a summary of the consultation responses
- the Government's decision and next steps following this consultation

Further copies of this report and the consultation paper can be obtained by contacting the Consultation Coordinator:

**Migration Statistics
Home Office Analysis & Insight
14th Floor Lunar House
Croydon
CR9 2BY**

Email: landingcardconsultation@homeoffice.gsi.gov.uk

This report is also available at: [web address]

Alternative format versions of this publication can be requested from:
landingcardconsultation@homeoffice.gsi.gov.uk

Complaints or comments

If you have any complaints or comments about the consultation process you should contact the Home Office at the above address.

2. Background

The consultation paper 'Home Office's Immigration Statistics – Arrivals Data' was published on 5 August 2017¹. It invited comments on the Government's proposal to withdraw the requirement for non-European Economic Area (EEA) passengers to produce paper based landing cards on arrival into the UK.

This proposal is one element in the Government's transformation at the border. It is intended to contribute towards the facilitation of legitimate travel while deterring and preventing individuals who would harm the national interest. This activity needs to be delivered with demonstrable effectiveness, efficiency and value for money. Instead of using landing cards presented by the passenger, the Government proposed that Border Force will in future use digitally collected data provided ahead of arrival and on arrival to provide information about passengers.

The consultation invited responses from interested parties including ports, carriers and the statistical community, offering the opportunity to comment on the proposals. Responses were invited in either hard copy or email form and were received in different formats. Some comments made by key stakeholders outside of the direct consultation process were also taken into account in considering the Government's response.

The formal consultation period closed on 2 September 2017. However, as far as possible, responses received after this date were still considered. This report summarises the responses and sets out the Government's decision following the consultation.

A list of respondents is [Annexed](#) to this report.

¹ <https://www.gov.uk/government/news/outdated-landing-cards-to-be-withdrawn-as-part-of-digital-border-transformation>

3. Analysis of Responses

- 3.1 A total of 151 individuals and organisations responded to the consultation. These included responses from internal stakeholders, including Border Force officers, who accounted for around two thirds of respondents. Airline umbrella organisations, individual carriers, tourism industry representatives, the statistical community and individual members of the public made up the remainder. Most of the responses did not relate to the statistics obtained from landing cards but to the impact of their withdrawal on border processes.
- 3.2 Responses were analysed for levels of support and to identify issues raised in response to the Government's proposed changes. The report below deals with responses relating to i) the statistics collected from landing cards, ii) the impact on border processes, and iii) related suggestions.
- 3.3 Responses from external stakeholders (from carriers in particular) to the Government's proposal were overwhelmingly positive and highlighted a number of benefits to UK business of the withdrawal of landing cards. However, a small minority pointed to negative impacts on companies directly involved in the production of landing cards.
- 3.4 Although many internal stakeholders also highlighted the positive aspects of the proposal, others questioned the impact on border processes or asked questions about the practical aspects of withdrawal.

Collection and Dissemination of Statistics

- 3.5 In general, responses related to the collection and dissemination of statistics were positive about the change. There was enthusiasm for potential new uses of data from digital systems and confirmation that there is a need for a replacement to be developed.
- 3.6 However, some concerns were expressed over the loss of data until new digital systems are rolled out and a number of responses indicated a preference not to have a gap in data collection or made detailed technical points. When this consultation was launched, the Government noted that the data from new systems would not be directly comparable to the current arrivals data and that there may exist a gap. However, it identified a range of alternative data sources which give useful information on flow of visitors that would mitigate the temporary loss of other data. In particular, the International Passenger Survey collected by the Office for National Statistics (ONS) which provides estimates of numbers of persons travelling to the UK.
- 3.7 Conversely, a range of responses highlighted the reduced collection burdens on data suppliers (millions of individual passengers) and the benefit of more efficient data collection. Withdrawal of the landing card data collection and replacement with electronic collection is very much in line with Code of Practice for Official Statistics (*Principle 6*) "the cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics".
- 3.8 It is noted that landing cards are not used to produce the net migration statistics and ONS has welcomed the development of new electronic data collection, describing it

as “a positive factor in [its] ambitions to create relevant, timely, high quality migration statistics and to complement and quality assure the data from the International Passenger Survey”.

- 3.9 Given the range of views expressed, the Government plans to keep its stakeholders in the statistical community and the UK Statistics Authority informed on the progress of plans to develop and publish replacement data.

Border Processes

- 3.10 Most of the responses to the consultation related to the impact of withdrawing landing cards on border processes. The majority of these responses (from carriers in particular) were positive about the Government's proposals and pointed to a number of benefits including enhanced security as part of the move to digital systems, improved passenger experience at the border leading to benefit to industry and the wider UK economy, and efficiency savings. A number also questioned the ongoing operational benefit provided by paper landing cards and pointed to the environmental benefits of ending paper based processes in favour of digital ones.
- 3.11 A range of views were expressed by operational staff. A number were positive about the withdrawal of landing cards with the view that it would lead to better interactions with passengers at the primary control point. They were also sceptical about the extent to which the landing cards serve as a security measure.
- 3.12 Other operational staff expressed concerns about withdrawal of landing cards which tended to relate to:
- the retention of a small number of landing cards for future reference as an intelligence or evidential source once the statistical data has been collected;
 - the withdrawal of landing cards not making border processes more efficient; and
 - the practical implications of the withdrawal of landing cards.
- 3.13 In considering its proposal on the withdrawal of landing cards, the Home Office looked at the use of landing cards by its own operational commands and partner agencies. It was told by these organisations that whilst there has in the past been occasional use of the cards, they were satisfied that other means can now be used to secure the information they require. The Government remains reassured by this direct engagement with expert stakeholders that the impact of withdrawing landing cards is manageable.
- 3.14 Concerns about the Government's proposal not contributing to efficiencies are not supported by its own analysis of passenger interactions at the PCP. With these issues in mind, the Home Office has worked with representatives of its operational workforce to develop a comprehensive package of communications and guidance to ensure staff understand the practical impact of the withdrawal of landing cards on their day-to-day duties.

Suggestions

- 3.15 The consultation process also received a number of positive suggestions related to the withdrawal of Landing cards or other border process initiatives. These included suggestions about other practices that the Government could consider reviewing and making further use of the digital systems already available.
- 3.16 The Government is grateful for these suggestions and is continually working on programmes which enhance security, produce greater efficiencies and contribute to driving UK prosperity. For example, it has recently announced extended access to ePassport Gates to nationals of Australia, Canada, Japan, New Zealand, Singapore, South Korea, and the United States.

4. Government's Response

- 4.1 The Government welcomes the comments and suggestions made during this consultation. It is noted that many respondents welcomed the changes and that the majority of external stakeholders were supportive of the removal of landing cards. The ending of landing cards will reduce costs for airlines and remove a bureaucratic burden imposed on non-EEA passengers. The Government also notes there were some concerns raised by some about the impact of the withdrawal of landing cards on border processes. However, having consulted with the operational partners, it remains content that the operational impact of withdrawal would be manageable
- 4.2 While it is acknowledged that some respondents were concerned that the removal of landing cards would impact on security, the Government remains reassured on the basis of direct expert engagement, that this will not be the case. The Home Office's own operational commands and partner security agencies have said they are satisfied that other means can now be used to secure the information they require.
- 4.3 The Government has considered whether to delay the withdrawal of landing cards until new digital systems are rolled out in order to address the concern of some statistics users regarding any gap in the Home Office data on arrivals. However, as set out above, the Government remains content that there are adequate alternative sources published by the Office for National Statistics that will continue to provide a comprehensive picture of visitor arrivals to the UK, and that there are ways in which the impact of any data loss in the Home Office statistics can be mitigated while the new replacement data sources are being developed and tested. In light of the potential savings to the public and the requirement not to place an excessive burden on data suppliers, the Government does not therefore believe there is a strong enough case for delay.
- 4.4 The Government has therefore decided that now is the right time to withdraw paper based landing cards and Border Force will no longer require non-EEA passengers to present them on arrival into the UK.

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5. Consultation principles

- 5.5. The principles that government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the consultation principles: <https://www.gov.uk/government/publications/consultation-principles-guidance>.

Annex - List of respondents

In addition to responses from internal stakeholders (including other public bodies), and individuals (including academics and members of the public), responses were received from the following external stakeholders:

Airlines for America
Airlines UK
Airport Operations Association
All Nippon Airways
American Airlines
BAR UK (Board of Airline Representatives in the UK)
British destinations
Church and Society Officer, Presbyterian Church of Wales
Delta Air Lines
easyJet Airline Company Ltd
Gatwick Airport Ltd
Global Print Management
Head of Terminal Operations, Birmingham Operations
Heathrow Airport Ltd
International Airlines Group
ISU
Jet2.com
London First
Manchester Airports Group
National Records of Scotland
NielsonSmith
Ryanair
Thomson Airways
Tourism Alliance
UK Chamber of Shipping
Virgin Atlantic Airways Ltd



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