

**Taking Responsibility for Border Security:  
Commercial Interests in the face of e-Borders**

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Acknowledgements

The authors would like to thank the Leverhulme Trust for funding the study reported in this paper. They would also like to thank the managers and staff in the organizations that participated in this study for sharing their expertise.

## ABSTRACT

Security is an important feature of the macro environment for tourism that affects the consumption of travel products. Following high-profile terrorist attacks, UK border security measures have been increased through the implementation of the *e-Borders* programme. This initiative requires passenger carriers to collect and electronically transmit travel document information and service information for any individual entering or leaving the UK. The commercial impact of *e-Borders* on travel firms is investigated by examining the relationships between the affected stakeholders, considering the power and decision making at play, and exploring the outcomes. The *e-Borders* programme is described, and a framework for the in-depth, qualitative study is presented. The findings show that passenger carriers and travel firms manage the negative consequences of compliance and restore their commercial interests by engaging in a process we describe as *recognizing, rationalizing* and *refashioning*. The implications for research and practice are explored.

*Keywords:*

Border security; e-Borders; stakeholder theory.

## 1. Introduction

Tourism research often focuses on individual case studies (e.g., Pearce, 2001), with the consequence that it may fail to consider how wider trends impact on the industry. Yet as a global activity, tourism is deeply affected by phenomena such as globalisation and the networked economy (Witlox, Vereecken & Derudder, 2004), while the discretionary nature of leisure travel means that demand is strongly impacted by context (Pearce, 2005). Therefore, research in tourism must take into consideration the macro setting in which tourism activity occurs (Ashworth & Page, 2011).

Security is a key feature of the macro environment. It affects the preferences and behaviours of individual tourists (Hall, Timothy, & Duval, 2004), the activities of businesses operating in the industry (Fuchs & Reichel, 2011) as well as wider perspectives, such as the promotion of regional peace or the control of infectious disease (see Isaac, 2010; Yu, 2012). Therefore, it is common to witness government intervention and policy change in the aftermath of events that threaten homeland security (Birkland, 2006). One important area of government intervention concerns the protection of national borders, specifically decisions concerning who is allowed to cross such borders (Timothy, 2001). Following high profile terrorist attacks in the US, UK and elsewhere, the scrutiny of cross-border passenger traffic is deemed essential for blocking the entry of problematic individuals (Salter, 2004) such as terrorists. In the UK, such concerns have led to the development of a wide-ranging counter-terrorism initiative known as e-Borders. Through this initiative, which involves monitoring the movement of people across national borders, the UK Borders Agency on behalf of the government, requires passenger carriers to collect customer identity and behaviour data on its behalf (Whitley & Rukanova, 2008).

From the carriers' viewpoint these requirements represent a major change in the macro setting and have the potential to affect the operational and commercial aspects of their business. When disruptions to the macro environment occur, organizations typically move to protect their commercial position (Smart & Vertinsky, 1984). For carriers, e-Borders has the potential to threaten these interests because of the operational costs involved in implementing the initiative and its potential to damage customer relationships. The industry is already being affected by other major changes in the macro environment, such as the effects of increased Airport Passenger Duty (APD) [ABTA, 2013]; the EU's Emission Trading System (ETS) [European Commission, 2013]; and the challenge from online retail and the breaking up of the travel supply chain. Additional disruption that threatens the status quo by making it more difficult for firms to keep operating costs low will be unwelcome. Furthermore, e-Borders implies a major change in the role of carriers, as well as in the relationship and balance of power between these businesses and the government. Potentially this initiative also has implications for the carriers' relationships with their customers and other stakeholders, including other travel organizations in the supply chain. An

understanding of the real cost of e-Borders and how that cost is implemented down the supply chain and spread among industry players is therefore essential.

Consequently, we investigate the following research question: *What is the impact of e-Borders on the carriers' relationships with their customers and other stakeholders?* In considering the impact of e-Borders, as advocated by Faulkner (2001) and Scott and Laws (2005), we look beyond the phenomena and explicitly consider the effects of the initiative on the system. We do this by examining the interactions between stakeholders at the micro level, in order to understand the impact on affected parties of this macro-level change in the regulatory environment. In line with other studies of stakeholder collaboration in tourism management research (see Arnaboldi & Spiller, 2011), we focus on three broad areas: i) the identification of key stakeholders and their interests; ii) the collaborative process; and iii) the long-term structure and outcomes of the multi-stakeholder process. We use the framework to reveal that carriers and travel organizations engage in a process of *recognizing, rationalizing* and *refashioning* in order to manage the negative consequences of compliance and restore their commercial interests. Although our study focuses on the UK, it is an example of a wider phenomenon of passenger data capture by airlines and so will be of interest to those operating in and researching other territories.

After describing the e-Borders programme and identifying emerging issues, we present the framework around which the study is based. The findings are presented and discussed and the implications for further research and practice are considered.

## **2. The e-Borders programme**

The e-Borders programme is a UK government initiative to monitor all movements of people across the national borders and, in this way, *'to support an intelligence-led approach to border control'* (UK BA, 2009). It is typical of EU-wide and US initiatives to prevent risky individuals from entering or leaving territories, which have grown apace since the 9/11 terrorist attacks (Surveillance Studies Network 2006; 2010).

The programme requires that all travel carriers collect and electronically transmit travel document information - also called advanced passenger information (API, the collection of which is referred to as APIS) - as well as service information, for all individuals travelling out of the EU. Data must be transferred to the UK Border Agency (UK BA), between 24 hours and 30 minutes before travel. The UK BA checks the details against watch lists of individuals judged to pose a risk to national security and analyses the data for unusual patterns of travel behaviour. Where concerns arise, alerts are generated for border staff, including police, immigration and customs officers. Although currently only air carriers are required to do so, by 2014 it is proposed that all air, sea and rail carriers must comply (Home Affairs Committee, 2009). As part of the e-Borders programme, carriers are also responsible for

collecting data from organizations that sell seats on their aircraft on their behalf. Specifically, travel agents, tour operators and seat brokers are all affected by e-Borders and have developed processes and implemented systems to collect and transfer the required information to the carriers. The e-Borders initiative has encountered a number of problems since its inception. The launch was moved from May to October 2009 after airlines cautioned that introducing the system during the peak holiday season would lead to chaos (Millward, 2009). In turn, the EU warned that freedom of movement within the EU meant that, '*citizens who refused to pass on their personal information could not be stopped from entering or leaving Britain*' (Whitehead, 2009, p.12). This situation has not been resolved. While the EU has suggested that European Citizens may opt out of providing data, the UK has challenged this advice and the two parties are still in dialogue. In July 2010, the government sacked the main IT contractor in the supplier consortium, Raytheon, due to significant delays in delivery (Kollewe, 2010; Ford, 2010). After Raytheon was sacked, new suppliers were brought in on temporary contracts. For example, IBM and Serco were employed to implement the system before and during the Olympic Games in London 2012. While the scheme continues to operate, those involved face changing requirements and considerable uncertainty, as noted by the Home Affairs Committee (2012), who '*remain concerned about progress on the programme*'.

The e-Borders programme is symptomatic of what has been seen as a blurring of surveillance processes across public-private boundaries (Surveillance Studies Network, 2006; 2010). Like other regulatory control initiatives, it relies on information gathering, standard setting and behaviour modification (Hood et al., 2001). The rationale for involving commercial organizations in a government's national security programme is that these firms have direct contact with their customers, enabling them to collect passenger identity and travel behaviour data. Benneer (2006) argues that non-state regulation works best: (i) when the organizational population is diverse so they can choose their response; (ii) where the information collection burden on the regulatory body would be very high if information collection was not decentralized; and (iii) where the risks associated with regulation are uncertain. If we follow Benneer (2006), from the government's point of view the design of the e-Borders programme, where air carriers have to collect data from other companies and their customers, seems an efficient choice.

However, Coglianesse and Nash (2006) assert that moving regulation to private sector companies has operational implications for these companies, and will '*penetrate and shape what goes on inside private sector firms*' (p.3). Furthermore, Porter (2011) cautions that whilst regulators can determine the objectives or targets of regulation, they should not mandate the approach to meeting the regulation, which he sees as '*blocking innovation and almost always inflicting cost on companies*' (p.74). Ultimately, the success of the initiative depends on the individual organizations' response to the regulation which is affected by within-firm priorities, the attitudes of management to the regulation and the firm's ability to respond (Kagan, 2006).

The disruption which e-Borders has caused is to the regulatory environment of travel firms, yet the aspects affecting the initiative's success are the same as those associated with any upheaval in the macro setting. Smart and Vertinsky (1984) suggest that if the external environment is perceived as very complex, turbulent and uncertain, then firms often respond by engaging in short term 'fire-fighting', adaptive responses and retrenchment. Managers who are trying to respond to the disruption and uncertainties caused by e-Borders are therefore unlikely to feel that they can control events, or that they have sufficient lead-time to make radical change or to be more entrepreneurial. Consequently, we would expect them to react in an adaptive way (Smart & Vertinsky, 1984). Initially this might involve making operational changes to meet the immediate regulatory needs; whereas later on, industry players might engage in responses designed to restore their commercial interests. Even so, the effects of disruption to the macro setting are unlikely to be evenly shared among industry players, so the response of different organizations is likely to vary. In their paper examining strategic responses to interest groups, Julian et al. (2008) suggest that larger, more visible organizations are better able to accommodate external pressure, particularly if they have the dynamic capabilities to do so, rather than core rigidities that make it hard to adapt. The presence of cognitive factors, such as a sense that the pressure is urgent and manageable, is also important. This variation in response – for instance between small and large organizations, or between those organizations that perceive the external pressures to be urgent and manageable and those that do not - reinforces the need to understand how the real cost of e-Borders is shared and implemented by different stakeholders.

In summary, the e-Borders programme represents a significant change in the macro-environment in which tourism organizations operate, and reflects a broader trend towards involving private organizations in initiatives to protect the national interest. Although e-Borders may have made regulatory sense, its impact on the organizations operationalizing it, and on existing business relationships (see Ball et al., 2010), is less clear. Against a decline in market share prompted by low cost airlines and online retailers, APD and ETS, the e-Borders requirement is another threat to tour operators and travel agents. Therefore, it is critical to understand the impacts of this regulatory initiative on the industry. In particular, there is a need to understand the operational implications of collecting and transferring customer data. Not only have firms had to change some of their internal processes, they have also had to ensure that customers provide data at the right time, in the right format and in the right place. The new process involved in ensuring national security therefore introduces a different tenor into customer relationships, with potentially significant implications.

Yet, little is known about how firms are coping with the requirements or of the adaptation process involved. Therefore, it is necessary to identify in what ways are these government surveillance processes affecting how carriers relate to their customers and other stakeholders. For instance, what impact does compliance have

operationally and on their ways of working? How do they share the requirements of e-Borders along the supply chain? What are the implications for how they manage their customer relationships? What knock-on effects are there on their commercial interests and their marketing activities?

Moreover, the implication of adhering to e-Borders' requirements is that collaboration of other players in the carriers' network – such as the travel agents or seat bookers – is required. Therefore, we adopt stakeholder collaboration as the basis for our analytical framework to examine how e-Borders has impacted the tourism industry, as described next.

### **3. Stakeholder research in tourism studies: Analytical framework**

Initiatives bringing together multiple organizations have been documented in various areas of tourism management such as sustainability (e.g. Erkus-Ozturk & Eraydin, 2010) and cultural districts (e.g. Arnaboldi & Spiller, 2011). Each case, as with e-Borders, is characterized by a complex problem that one organization alone cannot solve. A consequence of the conditions of interdependence and uncertainty that parties face is that they adopt collaborative strategies to optimize the payoffs in the domain (Jamal & Getz, 1995). As Arnaboldi and Spiller (2011) acknowledge, studies of stakeholder collaboration in tourism management research focus on three broad areas: i) the identification of key stakeholders and their interests (e.g. Jamal, 2004; Vernon, Essex, Pinder & Curry, 2005); ii) the collaborative process (e.g. Bramwell & Sharman, 1999; Vernon et al., 2005) and iii) the long-term structure and outcomes of the multi-stakeholder process (e.g. Jamal & Stronza, 2009).

The characteristics of the e-Borders initiative, the multiple parties affected within the travel supply chain, and the nature of the collaborations occurring between them, mean that stakeholder analysis is an appropriate analytical framework to use. Specifically, we studied what Arnaboldi & Spiller (2011) call the 'micro-level dynamics' between stakeholders, a valuable yet under-utilised research perspective in tourism studies. Reviewing these interactions at the micro level, enables a teasing out of the impact of this macro-level change on the affected parties. Stakeholder analysis is appropriate for these purposes because it focuses on the power, interests, interconnectedness and hierarchical working of the individuals and groups which surround an organization (Eden & Ackermann, 1998; Mitchell et al., 1997). Focusing at the micro-level also provided detailed and subtle insights into how the response to e-Borders played out over time. We use this analytical framework to explore three aspects of the e-Borders initiative: key stakeholders and their interests, collaborative processes, and long-term structure and outcomes.

#### *3.1 Key stakeholders and their interests*

The identification of key stakeholders is considered pivotal in the early stages of initiatives involving partnership and is related to issues of legitimacy and power

(Jamal & Getz, 1995). In this context, legitimacy consists of having the right to be involved in the collaboration, as well as the capacity to do so (Gray, 1985). Concerning 'capacity', Jamal and Getz (1995) specifically state that stakeholders must have '*the resources and skills needed to participate*' (p.194). A consequence of this definition of legitimacy is that power will be unevenly distributed across participants, with less powerful members of the network facing difficulties in getting their interests heard (Tosun, 2000). Moreover, some members may seek coalitions with others who share their goals and resources, which may threaten the success of the initiative (Stoker, 2005).

The sets of ideas and material interests associated with stakeholder relationships may hinder and threaten some of those involved (Archer, 1995). Therefore, stakeholder analysis needs to consider negative or conflicting stakeholder relations (Friedman & Miles, 2002). In areas where there has been a transfer of non-commercial activities to commercial firms, as has happened for e-Borders, it may not be possible to balance the interests of all stakeholders since private sector organizations are obligated to carry out activities that fall outside of their commercial remits and interests (Surveillance Studies Network, 2006; Ball et al., 2010). This recognition of conflicting perspectives is consistent with the work of Huxham and Beech (2003) in the strategy implementation literature. These authors suggest that the identification of tensions is the first step in '*practitioners' ability to manage them in a considered way*' (p.71). e-Borders affects a variety of organizations over and above the government and the carrier. For instance, the travel agents, tour operators and seat brokers which sell tickets on behalf of carriers are also affected by the need for compliance. Each organization has its own set of interests - their needs, hopes, concerns and fears (Jamal, 2004) - which may conflict with those of other stakeholders. Although we do not specifically collect data from customers, their interests are also strongly implicated, as the findings will reveal.

### *3.2 Collaborative processes.*

The original stakeholder model presented by Freeman (1984) showed the focal organization as a hub, with the stakeholders viewed as spokes. Intuitive as this view may be, it fails to acknowledge that stakeholders also influence each other (Fassin, 2009) and a combination of stakeholders exert more influence on a focal firm than each separately (Mitchell et al., 1997; Friedman & Miles, 2002). Initiatives involving collaboration are deeply affected by the distribution of power within the stakeholder network (Arnaboldi & Spiller, 2011). Moreover, risk-management theory has also highlighted the collaborative nature of organizational regulatory compliance and its new role in policing private industries (see Hutter & Power, 2005; Power, 2007). The tourism literature identifies a number of factors impacting positively on collaborations or partnerships in the industry. Specifically, a collaborative project is more likely to achieve its objectives when there is consensus-based decision making, information is widely disseminated, there is heterogeneity within the network and the members'

roles evolve over time in line with the collaboration (Arnaboldi & Spiller, 2011; Gray, 1989; Jamal & Getz, 1995, Vernon et al., 2005).

Although for e-Borders, the responsibility for identifying suspicion and generating alerts lies with the UK BA, it is the carriers - which we consider as the focal firm – that are obligated to collect and submit the specific passenger data to UK BA. To fulfill these requirements, because of the nature of the travel supply chain, the carriers must ensure that other travel firms provide them with the required data. Thus while the ultimate power in the system rests with UK BA, responsibility for compliance is delegated to other stakeholders. Ongoing uncertainty surrounding the legality of e-Borders ultimately impacts on stakeholders occupying a customer-facing role.

### *3.3 Long-term structure and outcomes*

The long-term analysis of the initiative which is perhaps the most important issue in terms of understanding the success of partnerships or collaborations, has hitherto not received attention in the literature. The ambiguity and vagueness of the stakeholder concept (Mitchell et al., 1997), allied to globalization and technological evolution (Fassin, 2009), means that organizations have a broad range of stakeholders to consider. Moreover, specific stakeholders can become more or less salient over time as a result of the coalitions that are formed (Mitchell et al., 1997) or changes in the environment (Phillips, 2003). Arnaboldi and Spiller (2011) suggest that success of stakeholder initiatives in the long-term depends heavily on the structure of the collaboration, the involvement of local actors and the adoption of reasonable expectations (Arnaboldi & Spiller 2011). For example, the problems which e-Borders has encountered since its inception, including the delay of the launch, the dismissing of the main IT contractor, (Kollewe, 2010), and the EU legal challenges, have left those involved facing changing requirements and considerable uncertainty. The long-term impact of e-Borders on the relationships between stakeholders and on the commercial interests of carriers and other travel organizations therefore merits scrutiny. We therefore argue that there is a need to consider how the stakeholder relationships change over time (Friedman & Miles, 2002), commercial and other implications for these firms, and how their customer relationships are impacted.

## **4. Research method**

### *4.1 Data collection*

In line with other stakeholder studies and with the nascent, dynamic character of the field, an exploratory research methodology based on key informant interviews was adopted. Such interviews are a widely recognized and respected exploratory research method (Kumar et al., 1993) enabling access to the experiences of a diverse range of individuals and groups who can tell their own stories or ‘epilogues’ (Dibbern et al., 2008, p.343). Mindful of interview saturation we devised, alongside recommended qualitative guidelines, to gather over 30 hours of interviews (Weiss, 2008; Strauss &

Corbin, 1990; Silverman, 2009). Data gathering using this approach allows a progressive and iterative approach that is helpful when studying diverse stakeholders (Pouloudi & Whitley, 1997), and is able to generate a rich understanding of the phenomenon of interest.

24 in-depth interviews were carried out in 10 organizations (see Table 1) between June 2009 and November 2010, allowing changes in the stakeholder interactions and context to be monitored. At the start of this data gathering period the implementation of e-Borders was at an early stage and staging the interviews over this time period allowed the researcher to witness the changing situation and its implications for stakeholder relationships. A cross-sectional quantitative study would have been less able to capture the issues arising from these emergent relationships. This method of data gathering also enabled us to question the tensions highlighted by the travel industry to the Home Affairs Committee (2009), where discrepancies between e-Borders directives and industry capabilities had been raised. Gaining some perspective on the tasks that the industry had now to perform and what was actually happening in reality and ‘on the ground’, we reasoned would be better served by examining this issue through a semi-structured interview instrument.

Undertaking this number of interviews enabled data to be gathered from a wide range of stakeholders and from individuals in different organizational roles (e.g. management and front-line staff), which allowed different perspectives to be considered and increased the internal validity of the study. In common with most research of this nature, we relied on the generosity of organizations to gain access, so sample sizes for each stakeholder do vary. However, while representatives from all of the stakeholders involved have not been interviewed in each organization, consistent patterns in the data were apparent, suggesting data saturation (Bryman, 2004).

**Table 1:** Interviews Undertaken

<b>Interviewee Type</b>	<b>Number of Interviewees</b>	<b>Number of Organizations</b>
Travel agents	7	3
Tour operators	7	1
Airlines	4	3
Government bodies	3	1
Industry bodies	2	1
Airport operators	1	1
<i>TOTAL</i>	<i>24</i>	<i>10</i>

A semi-structured interview schedule was applied to guide the data collection. The following issues were probed: knowledge of e-Borders, the impact of e-Borders on the focal firms, the groups and individuals influenced by or influencing the focal firms, and the nature of the interconnections between stakeholders. The roles and processes, as well as the context for the programme, its changes and impacts were also explored. Documentary evidence complemented the interview data, including

supplier maps, briefing papers and internal reports, and external documents such as government reports, white papers and media reports (Denzin & Lincoln, 1998). This evidence ensured that a broad and detailed view of the stakeholders was achieved.

#### *4.2 Data Analysis*

Interviews were recorded unless permission for recording was refused, in which cases contemporaneous notes were taken. Typically at least two interviewers were present, so that notes could be compared, ensuring consistent understanding and completeness. The three dimensions from the stakeholder framework described in the previous section helped guide the initial coding process. That is data relating to the identification of key stakeholders and their interests; the power distribution and decision making mechanisms; and the long term outcomes and structure of the multi-stakeholder process. An iterative approach as described by Strauss and Corbin (1990), reflecting on each interview as it was undertaken was followed. Nvivo software was used to code and analyse the data (Dey, 1993; Miles & Huberman, 1994), so that themes and patterns could emerge. Following the refinement of codes, they were discussed by the full research team. Three main codes were central to the findings: (i) cross-fertilization – whether information, data or practices implemented for e-Borders has been used in other formats, such as marketing; (ii) de-stabilization – where the standardized means of operation has been disrupted by the e-Borders initiative; and (iii) impacts – considering how travel companies have changed the operational practices and systems used in conducting their business.

To address bias, coding was undertaken by one researcher and independently assessed by other members of the research team. A rich contextual picture was achieved by combining data from multiple interviewees with differing roles and augmenting it with documentary evidence. Including key informants from a range of organizations increased the external validity and generalizability of the findings.

### **5. Findings**

The findings are presented according to the three areas previously identified.

#### *5.1 Key stakeholders and their interests*

The UK BA has implemented the e-Borders programme to pursue its interests in UK border security. While airlines, tour operators and travel agents share the Agency's concerns about the security of travel, they must also protect their commercial interests by keeping their costs down, and by ensuring smooth and efficient travel experiences for their customers. Because UK BA is delegating the collection of customer data to the carriers, it is bringing its interests into conflict with those of a number of these stakeholders. Table 2 describes these stakeholders and their interests in more detail.

**Table 2: Stakeholders and their Interests**

<b>Stakeholder</b>	<b>Stake/Interest</b>
Airline – legacy	Airlines are responsible for transmitting advanced passenger information (APIS) to UK BA before travel. Information must be gathered at booking, separately after booking or at check-in; adopting technical standards imposed by UK BA. Some carriers can use their loyalty scheme to record APIS data of customers.
Airline – charter/budget	Like legacy carriers, charter and budget airlines must transmit APIS data to UK BA. Charter flight bookings are often made in groups without data on individuals being provided.
Airport operators	Those providing check-in services for airlines must ensure APIS data is collected and transmitted on behalf of the relevant airline.
Tour operators	Not ultimately responsible for passing APIS data to UK BA, but operators worry about reputational damage if customers cannot travel. Where possible, they collect data at booking, with some providing websites for customers to provide APIS data online.
Travel agents	Not ultimately responsible for passing data to UK BA, but agents also worry about reputational damage if customers cannot travel. Originally encouraged customers to provide APIS data to tour operators or airlines, but increasingly concerned about losing the customer relationship.
Industry bodies e.g. ABTA	Represent the views of industry groups, and have made representations about the legality of e-Borders in Europe. Also about technical aspects of data format and transfer, to ensure the use of existing industry standards and to minimise additional costs.
IT suppliers (Trusted Borders)	UK BA formed a consortium of IT hardware and software suppliers to develop the data transfer, storage and analysis system. In July 2010, the programme’s main IT contractor was sacked (Millward, 2009; Ford, 2010), but was replaced in April 2011.
Global Distribution System Operators	Enable their users (airlines, travel agents and tour operators) to input APIS data quickly and efficiently. Successfully lobbied by ABTA to add lines of script which dealt with APIS input.
UK Border Agency	Agency is responsible for visas, managing immigration and border security, and for developing/operating e-Borders. Responsible for examining the supplied data to identify and investigate suspicious activity and individuals, including monitoring against watch lists.
UK Government	e-Borders was introduced by the Labour government in 2003, originally as a means for immigration control. After the London 2005 bombings, security and counter-terrorism became additional rationales. The current Conservative government continues to support the programme.
European Commission	Several stakeholder groups, including the airlines and industry groups made representations to the EC about the programme’s legality under EU laws on free movement. EU citizens were judged to have the right to withhold data when travelling within Europe.
Customers	Customers must provide their APIS data prior to travel. At present, awareness and understanding of the scheme are low, with many unaware that information is needed or that it is being recorded, analysed and stored by UK BA. Even fewer customers are aware of their right to opt-out of the scheme for intra-EU flights.

Compliance with e-Borders was seen as conflicting with the commercial interests of travel firms due to the costs and other resources involved, disruption caused to established operations and ways of working, and negative effects on customers and on service quality. For these interviewees the quality of the customer service interaction is seen as paramount, being widely regarded as the basis for sustaining customer relationships and thus is central to commercial interests.

Interviewees reported tensions between the legal requirements and their commercial obligations. Agents and partners handling customers for different airlines find the process for providing data through varied corporate interfaces to be cumbersome. The collection of data required by e-Borders is also time-consuming, adding '*at least 15 minutes to the customer service encounter, no matter what medium*'. (T12, Airline).

Some staff felt that the legal requirements conflicted with the nature of their jobs. Even though many firms had invested heavily in designed websites to meet e-Borders requirements, customers were often slow or reluctant to understand their responsibilities, with many contacting the travel organizations for help in putting their API data. As one interviewee explained,

*I have had some customers that refuse: they don't want to bring us their passports at all, in which case I then put the onus back onto them, and it is their responsibility. And if they haven't done it, then they can't come back to us. We've advised them what needs to be done, and we give them the information of what they need to do.* (T22, Tour Operator)

Respondents also reported tensions with competitors, largely due to the differential impact on incumbent firms of the costs of complying with e-Borders. While major legacy carriers already collect the information required, other operators are still finding ways to do so.

*When you're a small independent ski tour operator that buy ten seats of [name of airline] a week, and that's the entire size of your operation, your business is run out of your back bedroom, the IT changes to make all this happen are just, the costs just don't stack up.* (T4, Airline)

Other tensions also emerged, with retail travel agencies being reluctant for their customers to visit the carrier's website to provide their data, in case they lost ownership of that customer relationship. Instead they reported passing on just enough data to legally fulfill their obligations.

*If you're a cynical travel agent like we are, you might say, well, hang on a moment; if they fill in all that information ... what's to stop you using that data for other marketing activities.* (T21, Tour Operator)

The lack of clarity surrounding regulations and their implementation was also a source of tension. This was particularly so in relation to the EU ruling about the legality of the programme, which brought significant uncertainty and changes to the implementation work already undertaken.

## 5.2 Collaborative processes

As already explained, UK BA has set the standard for the type of passenger data to be collected and the timing of its transmission. Establishing a consortium of suppliers to build the data transfer, storage and analysis system was part of this process.

Considerable discussion about the system's interface was needed, in some cases requiring substantial investments from firms using formats which differed from the industry standard. Discussions involving pan-industry bodies on behalf of airlines and other travel firms also took place. Although these processes were established to encourage collaboration between different stakeholders, they also provided insights into some of the tensions. These stresses included the uncertainty following the severing of ties with the main IT contractors in 2010, which resulted in delays and increased expense across the majority of stakeholder groups. In general, there was a feeling among respondents that the government had not taken into account how the industry already worked. One airline executive mentioned "*They don't seem to understand what we tell them*", another complained that when challenged during the Regulatory Impact Assessment the government "*...dismissed our comments*" (T6, Airline); while a third explained the problems that result.

*We do commercial business together and our systems have to talk to each other. Whatever we do in terms of development has to be done harmoniously so that our systems talk (...) They failed to recognise that aspect (...) They were having conversations with system suppliers rather than carriers. The obligation falls on the carrier but the system supplier had to do the development work. (T12, Airline)*

Competing travel firms worked together through pan-industry trade bodies to influence the development of e-Borders. Despite this collaboration, interviewees saw significant disparity between the type of air carriers – legacy, leisure or budget carrier – and their respective legacy systems' ability to adapt to e-Borders requirements. This discrepancy resulted in a perceived power imbalance, with legacy carriers seen as having a greater say in the development of e-Borders. Smaller firms found it difficult to fund the necessary investments in systems, staff and training. They also expressed frustration with the decentralized aspects of e-Borders, whereby UK BA make air carriers responsible for collecting and transferring data, rather than having a unified central government portal for e-Borders information.

After the implementation of e-Borders, the relationships between businesses in the travel supply chain and between those businesses and government were destabilised. Although carriers have become the focal point in the emerging structure, they rely heavily on tour operators and travel agents to collect data from customers; and on the government to define the requirements. As one airline executive explained "*The onus is on the airline to provide the information, but they pass the request down the line so that the buck stops with the agent*" (T1, Airline). Acknowledging the difficulties that

could arise, some carriers referred to the need to encourage and support agents through the process.

*In terms of our agents, we talk to them about the need for them to help us with the collection of data... We can't force them to do it because what will happen is they'll just put anything in there. ... if you force them against their will they'll just put something there that's meaningless and that means that we've got to do it again at the airport. (T6, Airline)*

Carriers also have relationships with other partners, such as tour operators that book seats on their aircraft; while airlines outsource many airport services to a third party ground handling company. Such agents and partners provide an interface with the customer. Competitors can also both influence and be influenced by the focal firm. Table 3 captures some of the tensions that arise as a result of the collaborations between stakeholders, and which are reflected by one interviewee.

*Collectively, the airlines have actually made e-Borders work. I think you'll find that the ferries certainly, and possibly Eurostar, are doing very little, although they represent a big chunk of what comes through the border. So, there's an impact and competitive situation there that annoys us a bit. (T15, Trade Body)*

**Table 3** Collaborations and Tensions between Stakeholders

<b>Between Air Carriers (focal firms) and...</b>	<b>Description</b>	<b>Illustrative Quotes</b>
<b>Government/UKBA &amp; System Suppliers</b>	<p>Firms feel Government has not listened to them and has placed all responsibility for compliance on them.</p> <p>Government has given significant influence to system suppliers – e.g. allowing more expensive, non-standard data interchange protocols.</p>	<p><i>They can only put the legislation on the carrier. They're the legal entities carrying passengers across the borders. The tour operator, frankly the government don't care that [company name] sell on their 300 seats on the aeroplane to six different tour operators. They don't care about that. (T4, Airline)</i></p> <p><i>Well, there are certain airports where it costs me money to send the data in because the systems are set up in such a way that they are using the SITA telex network which is expensive [as it is non-standard]. (T4, Airline)</i></p>
<b>Supply Chain Partners</b>	<p>Small tour operators and travel agents very concerned about damage to customer relationship.</p> <p>Inconsistent approach especially to system interfaces – causes additional work for supply chain partners.</p> <p>Concern about margins preventing smaller partners developing IT solutions.</p>	<p><i>The cruise company would collate the customers contact information directly and therefore have a way of dealing with the customer directly. They may convert the customer and it would cost [us]. (T11, Tour Operator)</i></p> <p><i>If it was just a standardised one system for all of them it would be fantastic. It's the same for the chartered aircraft they're giving you a bit of information to say that this [APIS data capture] is compulsory for this destination but for these destinations it isn't compulsory. (T16, Tour Operator)</i></p> <p><i>The difficulty with investing in a full CRM/frequent flyer system is that travel agents margins are so small they do not have the money to invest in these systems. (T8, Tour Operator)</i></p>
<b>Competitors</b>	<p>Variations across competitors in how carriers implement e-Borders – some with more care (and hence cost) than others.</p> <p>Variations in how obligations under e-Borders are passed on to supply chain partners.</p>	<p><i>I know that certain carriers....will choose to do a shoddy job ... The [Airline Name] ... for example, all the stuff they collect online, they can send fairly easily. But anything where the passengers don't complete the web check-in process ... they have to collect manually at the airport. . So they might go, this manual bit's a bit difficult; I won't bother. (T4, Airline)</i></p> <p><i>We are having to write that into contracts [with tour operators] ...But we don't want to do that because if another airline doesn't write that into their contract, [operator] could find that they've got better terms going somewhere else... (T4, Airline)</i></p>

<p><b>Customers</b></p>	<p>Additional time and cost of service encounter.</p> <p>Some airlines and airports opted to pass costs on to customer.</p> <p>Little public information – some customers aware of need to provide API data others, particularly infrequent flyers are not.</p>	<p><i>I was really concerned with us having to say to our customers, you're about to go on this holiday but you've got to speak to the airline to make sure that you give them your data; because, actually, we should do that. But my challenge is that, in doing it, I've incurred a lot of extra cost; and of course the travel business is a low-margin industry, and I can't necessarily afford that extra cost so I'm caught in this dilemma. (T21, Travel Agent)</i></p> <p><i>So SITA have been out selling to all of the airports saying you need our new all-singing, all-dancing check-in systems that are compliant with UK APIS. And some airports have gone from having no check-in fees to fees of \$2.50 a passenger. All the different airports are now charging a dollar a passenger just to use the check-in system (T4, Airline)</i></p> <p><i>If you got the passenger that just comes in off the street to do an airline booking I would say that the public are unaware. There'd be very few people that would be walking in and thinking I must take my passport with me down here so they have to come back again with that. (T18, Travel Agent)</i></p>
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### 5.3 Long term structure and outcomes

Following the initial roll out of e-Borders, carriers and other travel organizations engaged in a process of developing and embedding their responses to the requirements. Alongside the required operational changes, they moved to protect the customer interface and to minimise negative effects on service quality. This movement involved two aspects: firstly, securing the customer relationship and secondly, exploring commercial opportunities that might arise from e-Borders. Nevertheless, there remained a strong tension between the travel industry and e-Borders requirements, centring on the difficulty in balancing the demands of regulatory compliance with those of managing customer relationships. As the following interviewee attests,

*...it's trying to get the balance between getting your customers and bringing the booking in and then the responsibility that you have there, and then collecting this data. What happens if they don't give you the data? Do you come down on the customer quite heavy-handed? Do you withhold tickets? Do you... I don't know. And that's a really difficult thing (T4, Airline).*

These sentiments reflect widely expressed concerns that the customer relationship may be burdened unduly by the process of collecting APIS data. While the industry is required to comply with e-Borders, firms are unwilling to use this obligation as a 'big stick' (as one interviewee described it) to gather the required data. Doing so was seen as conflicting with the desire to provide a high quality service. Frontline workers apparently are ever mindful that the "*challenge is [to] keep up customer services levels*" and report doing what they can to advise customers on what they must do in order to travel. There is an attentiveness to "*not ruining someone's holiday*" (T23, Tour operator), and a worry that "*if you don't get the right details in and you've got a digit wrong, what the effect could be on your customer who's at the airport and it's your fault*" (T19, Travel agent); not least because of the desire to encourage repeat custom. In the current climate of economic uncertainty, this need to foster customer loyalty is particularly keenly felt.

In the early days of e-Borders, the industry pushed the APIS requirements onto the customer and had little concern about the successful inputting of the data. More recently, that thinking has changed, with firms much keener to take ownership of this activity. Asking customers to input their own data online raises a number of issues. Not all customers have computers or are familiar with using the Internet, so asking them to input their own data may be impracticable. Although placing this burden on the customer reduces costs, it could in the future lead to customers sourcing their own travel products. One industry representative stated there is a feeling that we are exposing "our secrets". As a customer manager explains,

*It was, push it on the customer and we're not worried. And it was like we've made the booking, our job is done. We need it to be low cost; we don't want to speak to that customer again if we don't have to ... Then you grow and you realise that you need to retain customers, we need to nurture relationships, we need to lower the acquisition costs of getting these customers. So every opportunity to contact them was a good opportunity. (T28, Operations Director)*

Interviewees acknowledged that data collected for e-Borders cannot be used for marketing purposes, with some expressing doubt about the extent to which it ever would be commercially beneficial. There was even a sense of being back-footed by the changes, with many speaking of an industry that has not developed some of the more aggressive marketing strategies currently in practice in other industries. However, the fact that APIS has increased the level of customer interaction is an unexpected benefit that is seen as bringing opportunity for securing the customer relationship. This opportunity is, however, accompanied by concerns about 'ownership' of that relationship. We found evidence that APIS requirements are leading to turf wars as travel organizations grapple with whether "*they tell the customer to go somewhere else to input the data or do they collect it there and then?*" (T11, Tour Operator). Some carriers have dealt with such data concerns by developing microsites to ensure that the information is held securely, while others spoke of their procedures for deleting data after passengers have travelled. A large travel agent captured the general nervousness around this issue, summarising the situation from their viewpoint in relation to tour operators.

*so our problem, immediately, with someone like Thomas Cook, was, we don't really want our customers going onto your main website, putting all of their data into your website, just to meet the obligations; because in filling in that e-form on your website, actually they are getting one step closer to becoming direct customers of you, as opposed to our customer ... It's the retail travel agent's paranoia but it's a valid paranoia. (T21, Travel Agent)*

It is responses such as these that are driving the industry's longer term response to e-Borders. Firstly, there are concerns about 'ownership' of the customer relationship and secondly, a desire to explore any commercial opportunities arising from the additional customer contact. Despite, as mentioned before, APIS collection being "*a good excuse to get in touch with your customers again*" (Airline T4), not all call centre staff are making the most of this opportunity. One frontline team leader expressed frustration at the situation,

*But more I think it's a sales opportunity for them, and I try and tell them in their call coaching sessions to sell... Try and sell them something. A call is a call at the end of the day... (T13, Tour Operator)*

Even though using APIS calls as a selling opportunity is considered important, carriers are not yet using APIS data directly for marketing purposes. Instead the emphasis is on selling ‘extras’, such as the choice of seat or meal on flights. Rather than retaining information for future marketing, the industry is concentrating on the immediate sales or on improving existing bookings. As the following interviewee acknowledges,

*Regarding APIS, it has had very little impact on the marketing function. It does not feature anywhere in marketing data. Branches were alerted to it in a communication and some online training (which branch managers requested) from the marketing dept. (T24, Tour Operator)*

Cross-selling or selling ‘add-ons’ is already common practice in the industry, so it is not surprising that the selling opportunities which the APIS contact creates has been noticed. As one informant explains,

*Historically, you go into travel agents and you would buy a ticket, the tickets would turn up in the post two weeks before you travel. You would never speak to a travel agent, never speak to your tour operator and never speak to your airline until you get to the check-in desk. And that was it. But now passengers who book direct, can you give us your APIS details, and while you’re doing it, do you fancy buying a leg-room seat? Do you fancy buying car hire? Do you want to buy some insurance? Great cross sale opportunity, absolutely fantastic cross sale opportunity. (T4, Airline)*

There is a growing realisation that APIS requirements are accompanied by opportunities to develop customer relationships and expand sales. Initially, there was little evidence of firms using the APIS process to benefit commercially. More recently, attention has shifted to using e-Borders calls to sell ‘add-ons’ to existing customers. Although the full marketing potential of the initiative has yet to be realized, the industry is now exploring a number of marketing benefits. For example, one organization is working on a ‘known traveller’ approach, where certain benefits are extended to customers who are prepared to share particular personal data. In addition, links with ‘known’ smartphones are being explored: in this instance, the details stored by the phone will replicate the details held on a passport (T27, CEO Industry subsidiary). Thus we are seeing a resurfacing of the commercial interests of carriers and travel operators in how they are implementing their e-Borders response.

## **6. Discussion and Conclusions**

Tourism is an important economic activity, though policy makers often prioritize other issues (Ashworth & Page, 2011). This study describes a change in the legal macro setting for tourism, which results from a complex problem of national security that cannot be solved by the government alone. Due to their proximity to the end

user, carriers have been enlisted to develop, implement and finance traveller monitoring systems, effectively delegating and internalizing some of the costs of providing effective ‘national security’. The problem of reconciling public vs. private costs and benefits is familiar in tourism (Ashworth & Page, 2011), and understandably creates resentment among industry players. However, safety is a key variable in destination choice, regardless of the tourist’s demographic characteristics (Smith & Carmichael, 2005). While all stakeholders would insist upon safety as a high priority, a clearer understanding of the real costs – including the intangible costs – to stakeholders of these changes is of significance to both practitioners and researchers.

Our study has explored the impact of e-Borders in the firm’s interactions with a network of other stakeholders in order to address our research question: *What is the impact of e-Borders on the carriers’ relationships with their customers and other stakeholders?* By examining the different interests and collaborative process among stakeholders we are able to explain the medium-term outcomes and structures arising from e-Borders. Using a stakeholder framework to study these effects and by conducting our data collection throughout the early stages of e-Borders implementation, we have been able to follow and reflect the changes arising from compliance. Gathering data over a three-year period coinciding with this bedding-in phase, has also yielded insights into what has taken place in process terms. We argue that the carriers, and to some extent the other travel organizations, have engaged in response to the e-Borders initiative in a process we describe as *recognizing*, *rationalizing* and *refashioning*. This process has been motivated by the desire of firms to manage the negative consequences arising from the e-Borders initiative, return their commercial interests (and those of their customers) to the fore, and to restore equilibrium to the disrupted system. While there is a sequential character to the process that we describe, there is also evidence that some stages are overlapping.

### *6.1 Recognizing*

We refer to the first stage of the process as *recognizing*, at which point the rules of engagement are established and the foundations are laid for the power and decision making between stakeholders. It is now that the different stakeholders learn about the expectations and possible implications of compliance requirements. Practical discussions ensue between stakeholders concerning how the initiative could be managed and what implications there might be for operational processes and ways of working. Importantly, our study has identified that a range of intangible costs impact upon service delivery. Chief among these are the additional transaction time, the complex process involved, customer confusion and the possibility of mistakes. These factors impact negatively on the customer interaction, which is of considerable concern in a sector that increasingly emphasizes service quality and the customer experience (Shaw, Bailey, & Williams, 2011).

## 6.2 Rationalizing

The process of *rationalizing* follows, although aspects of this phase may run alongside the recognizing stage. Rationalizing involves aligning the e-Borders requirements with operational factors, with the consequence that stakeholders ensure compliance by modifying existing processes, technology and ways of working. We find this process to be difficult and costly, that customer service is implicated, and that commercial interests are threatened. In the process of meeting the e-Borders requirements there is a destabilization of the overall system as the power relationships between stakeholders play out. The collaboration process is therefore also characterized by a series of tensions. The relationships with the government and IT supplier consortium are particularly strained as is common in circumstances where power brokers have a disproportionate influence (Jamal & Getz, 1995). This strain impacts negatively on the interaction with customers, through the changes and uncertainty it brings. The relationship between the focal firm and their agents and partners becomes critical, as the co-operation of organizations in direct contact with customers can significantly smooth API data collection. Moreover, these parties also face technology, personnel and recruitment costs from e-Borders. Therefore, developing a strong relationship with these organizations is likely to benefit both the passenger carriers and their customers. The benefits of such collaborative networks between competitors have been documented in other instances of public tourism goods, such as sustainable tourism development (Erkus-Ozturk & Eraydin, 2010). If carrier and competitors come together they have more power to influence the government and the emerging technical solution, which is beneficial for all involved. Even so, imbalances in power may remain, with some smaller operators benefitting less than their larger counterparts.

## 6.3 Refashioning

We find that carriers and other travel organizations respond to the challenges of e-Borders by *refashioning* their ways of working. Although much of this refashioning takes place after the operational implementation associated with rationalizing, some of these activities run alongside the earlier phase. During refashioning, firms seek solutions to the serious, costly, destabilizing outcomes of compliance; exploring how high levels of customer service can be delivered within the regulatory constraints, and pursuing new avenues to develop commercial opportunity. Two principle motivators drive this refashioning phase. The first is that customers must be nurtured, that their interaction with the organization should be carefully managed and should not be jeopardized by compliance. Although carriers initially tried to shun APIS costs by passing them on to travellers, the mood quickly changed amidst angsts about customer retention, to easing the burden of compliance for customers. The second motivator is the desire to explore whether e-Borders can generate commercial opportunity for carriers and travel organizations. Although technically the answer is 'no' (as evidenced by UK BA's views on this matter), what is happening in practice is rather different. We found little evidence e-Borders being used to generate

commercial opportunity during our initial data gathering, yet in the later interviews when e-Borders had become more embedded, firms were using the customer contact created by compliance to cross sell. We suggest that such activity is increasing and that it will become more routinized and strategic over time.

In this regard, just as firms must respond to other changes in the macro environment, they are finding ways to adjust to the disruptions caused by e-Borders. When such changes occur, they may be regarded as either (or both) a potential threat or potential opportunity. What is distinctive about e-Borders, however, is that compliance is compulsory and enforced, that it must take place within the UK BA timeframe, and according to the mechanics laid down in the rules. Furthermore, all carriers operating into and out of the UK are facing the same regulatory changes. Consequently, there is little flexibility for some of these operators to benefit at the cost of the others. Even so, as Smart and Vertinsky (1984) would expect, firms have initially responded to the disruption by engaging in short-term ‘fire-fighting’, but are now adapting to restore their commercial interests and to reinstate the status quo over time. For example, some firms are now considering offering ‘pay for fast track’ services so that customers are not inconvenienced by security requirements. The variation in response (as Julian et al., 2008, suggest), may be due to a range of factors including the size or visibility of the organization, its resources and capabilities, and the perceived urgency and manageability of the situation.

## **7. Conclusion, implications and further research**

In conclusion, our study has explored how the implementation of the UK e-Borders programme has impacted passenger carriers’ relationships with other stakeholders. By reflecting upon the stakeholder interests, the power and decision-making at play, and on the medium-term outcomes arising from the process, our findings have brought into sharp focus a range of emerging tensions. A greater understanding of these tensions and their causes, along with possible paths to their resolution, are of considerable significance to managers in the tourism sector who are tasked with balancing compliance needs with commercial interest.

Our findings have a number of implications for travel firms. Firstly, while the immediate pressure to achieve regulatory compliance may make it beneficial to work in partnership with other carriers and travel organizations, these benefits are likely to be short term. Such partnerships are motivated by a desire to ‘protect’ the industry as a whole, with those involved sharing interests in minimizing disruption and the costs of compliance. However, once the initial implementation phase has passed, firms are likely to move quickly to restore their individual commercial interests. Vigilance is needed during this period, as firms ensure that they make the necessary operational changes, while protecting their customer relationships from opportunistic competitor activity. Secondly, the impact of the e-Borders initiative is unlikely to be evenly shared. As we have seen, although the responsibility for compliance rests with the

carriers, all parts of the supply chain are implicated. Smaller firms, those with fewer resources and with less-developed customer management systems are likely to find it more difficult to adapt and may have less influence over the changes. Travel agents, for example, must ensure that customers provide their data by complying with a variety of different systems set up by the carriers. In a situation where they have limited control over proceedings, they must also do what they can to protect their customer base. Finally, firms which move quickly to ensure that call centres are appropriately resourced and staff are suitably trained to deal with e-Borders queries, are also more likely to benefit from commercial opportunities, such as cross selling.

While this study did not directly examine the views of consumers, future research could examine the changing behaviour of travellers in relation to the shifting regulatory environment, considering whether the way travel products are bought or their relationships with travel firms have been affected. A quantitative research design could yield interesting insights into these behavior patterns across different customer groups.

There is also scope for further longitudinal research examining the e-Borders stakeholders featured in this study. Gathering data that captures these multiple perspectives over a three-year period has revealed how the responses of different stakeholders change over time to restore equilibrium to the system. Extending the period of data gathering would enable further stakeholder reactions, such as in relation to the evolving situation regarding the legality of e-Borders, to be captured. Researchers examining other situations where private organizations are mandated to implement government policy might for similar reasons, consider using a comparable longitudinal research design.

Finally, our research has focused on the implementation of a particularly regulatory change affecting the UK and those travelling or supplying travel services to and from it. Although we make no claims about the generalizability of our findings to other contexts, tourism is a global phenomenon and we believe that travel firms in other situations where regulatory disruption is taking place, may respond in similar ways. We are also aware that while our study has primarily focused on UK stakeholders, the changes in the UK will also have impacted other players elsewhere. Therefore there is potential both to carry out other stakeholder studies in other countries experiencing similar change and also to consider the impact of e-Borders beyond the UK.

The longer term impacts of e-Borders are unclear. The scheme is technically illegal within the boundaries of the European Union and unless carriers implement the stipulation that EU citizens may opt out of providing APIS data in advance, it will remain so. Carriers and their supply chains are facing huge additional systems adaptation costs, which they will have to absorb, if they are forced to implement the opt out. Ferries and rail operators are still reluctant to invest in compliant systems due to these legal uncertainties. The UK BA has suffered in the current round of

budgetary cuts and is under continual scrutiny from the Home Affairs Select Committee in relation to the development of the system. Given the demise of other government sponsored databases, such as the National Identity Register, which was similarly at odds with European human rights principles, an eerie quiet has descended around the issue as if to stifle public discussion while the travel industry 'just gets on with it'. It is therefore difficult to gauge the impact of eBorders, but a total information collection approach to border security which is at odds with European human rights principles may yet prove controversial for potential UK visitors (Pearce 2005).

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