



Norfolk's Police and Crime Commissioner (PCC) response to inspections published by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)

Section 55 of the Police Act 1996 (as amended by section 37 of the Policing and Crime Act 2017) requires local policing bodies to respond and publish comments on all inspection reports pertaining to your force within 56 days of report publication.

Inspection Title:

Improving the response to organised immigration crime.

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Publication Types:

Serious and organised crime

Police Forces:

All local forces in England and Wales

Link to Report:

[Improving the response to organised immigration crime - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services](#)

Section 55 Response Deadline:

11 July 2025

Key Findings

Reducing illegal migration to the UK is a priority for the Government. In January 2024, the then Home Secretary commissioned a report into how effectively the police and National Crime Agency (NCA) tackle organised immigration crime (OIC) in England and Wales.

HMICFRS' inspection took place between February 2024 and June 2024. The inspectorate carried out fieldwork in the NCA, visiting its offices in London and Kent. HMICFRS also visited nine police forces (Norfolk Constabulary was not visited) and three Regional Organised Crime Units (ROCUs), in England and Wales.

The National Police Chiefs' Council established the Modern Slavery & Organised Immigration Crime Unit (MSOICU) in 2021. In February 2021, the unit introduced the National Response Plan (NRP) to improve the initial response to suspected immigration crime incidents.

HMICFRS were pleased to find that most police personnel interviewed knew what to do when dealing with an immigration crime incident.

There is an established process for receiving migrants who make it at least halfway across the English Channel (to the 'median line') in small boats. It has a well-established humanitarian and welfare approach. But opportunities to gather valuable intelligence relating to OIC are being lost. Irregular migrants who use small boats will almost certainly have paid members of organised crime groups (OCGs) to arrange transport to the UK. This means that they are potential witnesses and a valuable source of intelligence. The inspectorate also found that automated facial-recognition technology wasn't available for personnel to use upon arrival.

At the time of HMICFRS' inspection, the inspectorate was concerned to find that there was no effective legal power to seize and examine mobile telephones or other electronic devices from irregular migrants to search for evidence and intelligence. These devices may contain valuable information about the criminals organising the crossing, how they were paid, the modes of travel and the routes they used.

Not all police forces and regional organised crime units (ROCU) have satisfactory arrangements for collecting and analysing intelligence. Some have prioritised OIC and include it in their strategic governance arrangements. HMICFRS found some police forces didn't prioritise OIC. Some have no intelligence collection plans, lack dedicated analytical resources and have limited access to other relevant organisations' information. All the organisations responsible for tackling OIC have their own IT systems, which don't connect with each other.

UK law enforcement agencies face unique challenges when tackling the organised criminals who make possible illegal immigration. Most personnel spoken to told the inspectorate that it would be difficult to illegally enter the UK without some assistance from OCGs. HMICFRS heard that most of the criminals involved, particularly those at the head of OCGs, were based overseas. Additionally, many items used to support small boat crossings aren't usually illegal, such as boats, engines and flotation aids.

Simply enforcing the existing law won't stop immigration crime. Law enforcement agencies must work together and proactively use a full range of tactics to disrupt and reduce opportunities for criminals. This includes working with overseas governments and law enforcement bodies.

HMICFRS heard several examples of excellent investigations, both at home and overseas, targeting those responsible for OIC. The inspectorate also found that generally there was an established process to decide which agency should manage individual investigations.

HMICFRS are concerned that they found few examples of police forces or ROCUs proactively targeting OCGs involved in OIC. This may be for several reasons, including police forces not collecting intelligence and too many known OCGs not being prioritised. This needs to improve.

Since 2022, the MSOICU has been reviewing the response of police forces in England and Wales to OIC. These peer reviews identified several areas for improvement. This included a

lack of awareness of OIC among some frontline personnel. And not all police forces were using the NRP in their control rooms. Generally, the inspectorate found that the understanding and implementation of the NRP was good. This was especially true with police control room personnel and incident managers. During visits to police forces, HMICFRS found that some had included guidance about OIC in their initial training courses. This is an effective way of improving frontline personnel's understanding of OIC and how they should respond to incidents. Police forces' intranet systems should include information covering what to do when responding to suspected immigration crime incidents.

The MSOICU has developed an immersive training package primarily aimed at managers and investigators. The scenario allows attendees to deal with a fictional incident where a lorry drops irregular refugees in a clandestine location. The MSOICU has started to train police force personnel to manage training in their own forces.

At the time of the inspection, the College of Policing hadn't provided any OIC-specific training. However, it is using its online learning resource College Learn to host an e-learning course aimed at raising awareness of OIC for police officers.

Recommendations

Ten recommendations are made within the report, four of which are directed at Chief Constables nationally:

Recommendation 2:

By 30 April 2026, chief constables should make sure that every time a member of their force reports a case to Immigration Enforcement's National Command and Control Unit, the reporting officer completes and submits the required intelligence document.

Recommendation 4:

By 31 December 2025, chief constables should make sure they have clear plans to collect, analyse and share information related to organised immigration crime.

Recommendation 8:

By 30 April 2026, chief constables, working with the Modern Slavery & Organised Immigration Crime Unit, should make sure that relevant personnel in all Home Office police forces complete the Hydra training package on organised immigration crime.

Recommendation 9:

By 30 April 2026, chief constables, working with the Modern Slavery & Organised Immigration Crime Unit and the College of Policing, should make sure that relevant personnel in all Home Office police forces complete the four modules of the organised immigration crime e-learning package.

Areas For Improvement

There were no areas for improvement.

Chief Constable response to report and any Recommendations/Areas For Improvement

This report entitled *“Improving the response to organised immigration crime”* summarises the findings of a thematic inspection conducted by His Majesty’s Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS).

The inspection highlights the significant challenges that organised immigration crime poses and the critical importance of local, regional, and national collaboration between the police and other agencies to address the complex and evolving nature of the threat.

The report has resulted in ten recommendations, four of which were directed to all police forces and Chief Constables across England and Wales.

I note this report and its findings and accept all the recommendations that have been made.

In collaboration with Suffolk Constabulary, we have formed a working group of representatives from the departments that will collectively deliver the activity needed for us to achieve the standards outlined by HMICFRS within the timeframes that have been specified.

Our initial response to each recommendation is outlined below.

Recommendation 2

By 30 April 2026, chief constables should make sure that every time a member of their force reports a case to Immigration Enforcement’s National Command and Control Unit, the reporting officer completes and submits the required intelligence document.

Within the existing structure of our Joint Force Intelligence Unit (JFIU) we do not currently have a dedicated Intelligence Officer post for organised immigration crime. Given the benefits this would bring, a joint-force business case has been submitted to create this post, which is expected to be in place by Autumn 2025.

We recognise that there is a lack of understanding across the Constabulary around making referrals to the National Command and Control Unit (NCCU). Once the dedicated organised immigration crime Intelligence Officer is in post it will be their responsibility to deliver activity, including training and communications, to achieve compliance with this recommendation. Audits will be undertaken to ensure conformity.

Other internal programmes are also being reviewed to identify where NCCU processes can be incorporated.

Recommendation 4

By 31 December 2025, chief constables should make sure they have clear plans to collect, analyse and share information related to organised immigration crime.

The new organised immigration crime Intelligence Officer, under the governance of the Joint Force Intelligence Unit Detective Inspector, will have a key role in ensuring that we

achieve this recommendation. It will be their responsibility to oversee and manage intelligence collection plans relevant to organised immigration crime.

Additionally, an Analyst within our Joint Strategic Business & Operational Services department is being tasked to review current intelligence and tasking packages that are created for organised immigration crime to ensure that our analytical products are in line with this recommendation.

Recommendation 8

By 30 April 2026, chief constables, working with the Modern Slavery & Organised Immigration Crime Unit, should make sure that relevant personnel in all Home Office police forces complete the Hydra training package on organised immigration crime.

A review will be undertaken of the current training and Continuous Professional Development (CPD) that has been completed by officers and staff in relevant roles. Training will be arranged for relevant personnel who are identified through this review not having completed the organised immigration crime Hydra training package.

The working group that has been formed will oversee the delivery of this recommendation, which will include a review of options for local delivery of the Hydra training package.

Recommendation 9

By 30 April 2026, chief constables, working with the Modern Slavery & Organised Immigration Crime Unit and the College of Policing, should make sure that relevant personnel in all Home Office police forces complete the four modules of the organised immigration crime e-learning package

The four modules of the organised immigration crime e-learning package are being added to the Constabulary's online Learning Management System so that it can be accessed by officers and staff in relevant roles. Communications regarding the mandatory completion of this e-learning have been agreed ready for roll-out. Completion rates will be monitored over the next 12-months by the Joint Learning & Development department to ensure this recommendation is met.

PCC response to report and any Recommendations/Areas For Improvement

I note HMICFRS' recommendations contained within their report titled 'Improving the response to organised immigration crime' and my Chief Constable's positive response to them.

For Office Use Only:

- Response forwarded to the Chief Constable.
- Response forwarded to the Norfolk Police and Crime Panel.
- Response submitted to the HMICFRS monitoring portal.
- Response published on the OPCCN website.