


# PCC and CC Force Inspection response record

Version Dec 2024

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| <b>Force</b>   | Staffordshire  |
| <b>Police and Crime Commissioner</b>                 | Ben Adams  |
| <b>Chief Constable</b>                               | Chris Noble  |
| <b>Title of inspection</b>                           | <a href="#"><u>Inspection on Improving the Response to Organised Immigration Crime</u></a>   |
| <b>Published Date</b>                                | 16/05/2025   |
| <b>Inspectorate</b>                                  |  <p><b>HMICFRS</b><br/>Making communities safer</p>   |
| <b>Summary of inspection</b>                         | <p>During the inspection, HMICFRS examined:</p> <ul style="list-style-type: none"> <li>how the response of law enforcement agencies to OIC was led;</li> <li>the initial response to suspected immigration crime incidents;</li> <li>the management of information and intelligence;</li> <li>how OIC groups were targeted by law enforcement; and</li> <li>organisational learning and training for officers and staff.</li> </ul> <p>This report made ten recommendations. They are designed to improve how UK law enforcement agencies identify and tackle the organised crime groups responsible for immigration crime.</p>  |
| <b>Grade</b>   |  |
| <b>Recommendations relevant to PFCC &amp; Police</b> | <p><b>Recommendation 1</b><br/>By 31 December 2025, the National Crime Agency, in consultation with the Border Security Command and the Home Office, should review, revise and reissue its roles and responsibilities document, 'Organised Immigration Crime High Level Responsibilities'. The revised version should:</p> <ul style="list-style-type: none"> <li>• describe relevant responsibilities of the Border Security Command; and</li> <li>• where police forces retain substantial serious organised crime investigation capabilities, extend those responsibilities to include investigating organised immigration crime.</li> </ul> <p><b>Recommendation 2</b><br/>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.</p> <p><b>Recommendation 4</b><br/>By 31 December 2025, chief constables should make sure they have clear plans to collect, analyse and share information related to organised immigration crime.</p> <p><b>Recommendation 8</b></p> |

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|                              | <p>By 30 April 2026, chief constables, working with the Modern Slavery &amp; 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.</p> <p>Recommendation 9<br/>By 30 April 2026, chief constables, working with the Modern Slavery &amp; 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.</p> |
| <b>Areas for improvement</b> |   |

### Police, Fire and Crime Commissioner's initial response

Organised immigration crime (OIC) involves an organised crime group assisting a person to cross borders without legal permission or documentation. In most cases, victims of modern slavery and human trafficking are the individuals themselves. This is different to OIC cases, where the country receiving the individual is generally the victim.

The report identifies 10 recommendations to Chief Constables, the NCA and others which are set out below. No specific recommendations were made to Police and Crime Commissioners. During this inspection we heard that organised immigration crime (OIC) hasn't always been a priority for police forces in England and Wales, largely because they saw it as the responsibility of Home Office Immigration Enforcement. Several agencies share responsibilities for tackling OIC, which creates confusion and division of responsibility between police forces and ROCUs is more practical for some regions than others. Since the inspection fieldwork was completed, the Government created the Border Security Command, which is designed to improve co-ordination and leadership when it comes to tackling organised immigration crime.

I am keen that Staffordshire play its part in tackling this crime, supporting immigration enforcement officers and identifying those responsible for organised immigration crime and associated victims of modern slavery and human trafficking.

### Chief Constable's response

Staffordshire Police is committed to delivering a robust, intelligence-led, and partnership-focused response to Organised Immigration Crime (OIC). The strategic direction in line with the recommendations centres on strengthening investigative capability through a dedicated MSHT & OIC team, enhancing officer awareness and skills via targeted training and CPD, and embedding clear processes for intelligence collection and sharing. Collaboration at regional and national levels, supported by formal intelligence plans and governance structures, ensures alignment with wider policing priorities.

The overarching aim is to protect vulnerable individuals, disrupt organised criminal networks, and deliver a consistent, professional response to OIC across Staffordshire.

It is worth highlighting that Staffordshire hosts the regional MSHT/OIC (Modern Slavery and Human Trafficking / Officer in Charge) group for the West Midlands. This has been well attended and provides a valuable platform for networking, joint learning, and sharing of good practice across forces, further supporting our commitment to continuous improvement and protective measures.

The below provides an overview of the key progress made by Staffordshire Police in addressing Organised Immigration Crime (OIC) in line with the recommendations.

#### **Recommendation 1 – Dedicated OIC Team**

- Staffordshire Police have a dedicated Modern Slavery, Human Trafficking and Organised Immigration Crime Team (MSHT & OIC).
- The team is actively progressing a number of significant OIC investigations, reflecting a clear operational focus on this priority area.

#### **Recommendation 2 – Operational Guidance and CPD**

- The Vulnerability Toolkit includes a dedicated section for OIC, providing officers with guidance on engaging the National Crime Coordination Unit (NCCU).
- A process map is being updated to require submission of intelligence logs in OIC cases.
- A 60-second briefing is in development to ensure officers are aware of their responsibilities regarding OIC intelligence.
- The MSHT team will deliver online CPD events, with OIC and intelligence submission forming a significant part of this training offer.

#### **Recommendation 4 – Regional Intelligence Plan**

- A Regional OIC Intelligence Collection Plan has been drafted.
- This was submitted to the PPU Command Board for approval on 6th June 2025.
- The plan provides a framework for collaborative intelligence collection, analysis, and sharing across Staffordshire and regional partners.

#### **Recommendation 8 – Hydra Training**

- The first Hydra training courses for Staffordshire officers took place on 10th and 14th March 2025.
- 13 officers from key teams have completed the training.
- Staffordshire Police are working with Learning and Development to schedule further courses, noting capacity constraints due to reliance on West Midlands Police facilities.

#### **Recommendation 9 – OIC E-Learning**

- OIC e-learning is not yet mandatory.
- A paper recommending the e-learning package be made mandatory was submitted to the PPU Command Board on 6th June 2025.
- Once approved, officers will be required to complete the e-learning by 31st December 2025, ensuring full compliance by 30th April 2026.

#### **Next Steps**

- Finalise and communicate the updated process map and 60-second briefing.
- Secure sign-off for the Regional Intelligence Collection Plan and e-learning mandate.
- Expand CPD and Hydra training opportunities, exploring options to overcome capacity limitations.



- Police have made significant progress in strengthening their response to Organised Immigration Crime. Continued focus is required on embedding training, securing governance approvals, and delivering against the regional intelligence plan.

### Police, Fire and Crime Commissioner's overall comments

There are many agencies involved in addressing OIC and I value the recommendation in relation to clarifying each agency's roles and responsibilities to ensure that there is clarity in this area.

This update provides me with assurance that the Chief Constable is ensuring the recommendations are being acted upon and where they are not yet compliant they are taking steps to achieve conformity.

I will monitor progress on these actions to ensure that Staffordshire Police through my regular governance processes