

# **An inspection of General Maritime**

October 2024 – February 2025

**John Tuckett** 

Independent Chief Inspector of Borders and Immigration



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Any enquiries regarding this publication should be sent to us at

Independent Chief Inspector of Borders and Immigration, 3rd Floor 28 Kirby Street Farringdon London EC1N 8TE United Kingdom

ISBN 978-1-5286-5842-3 E03390129 10/25

Printed on paper containing 40% recycled fibre content minimum.

Printed in the UK by HH Associates Ltd. on behalf of the Controller of His Majesty's Stationery Office.

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3rd Floor

28 Kirby Street

**Farringdon** 

London EC1N 8TE



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# **Foreword**

While the specifics may have changed over time, the underlying threats and challenges associated with general maritime (GM) are the same as they have been for centuries. The geography of the UK creates myriad opportunities for maritime smugglers, whether of goods or people, and patrolling the coast and intercepting vessels at sea is a resource and logistical conundrum for Border Force, as it was for all of its forerunners.

In reality, Border Force does not hold all the answers. An effective response to GM relies on substantial contributions from others, in particular the Ministry of Defence and UK policing. For Border Force, it also requires a major programme of investment in vessels and systems, and in staff training and development. These are not new insights. The need for a co-ordinated multi-agency strategy and the need to replace Border Force's obsolescent fleet of cutters and coastal patrol vessels have been recognised for some years, though progress has been slow.

Border Force Maritime Command (BFMC) has the only UK law enforcement maritime assets capable of operating beyond the UK's territorial waters. Despite this, the age of the fleet means that a programme of significant maintenance and life extension work is required to keep it sea-worthy, which impacts vessels' availability for operational activity. A Maritime Capability Replacement Programme (MCRP) began in 2021, but as at 2024-25 the fleet was not due to be replaced until 2029 at the earliest.

In 2023, the Border Force Board and the National Maritime Security Committee (Officials) jointly commissioned an independent strategic review of general maritime. This produced a large number of recommendations, some 'strategic', others 'fix now', which the Border Force Board endorsed at the end of 2024, with a view to creating a 'GM Transformation Programme' in 2025. A wider review of maritime security, intended to develop a whole-system response to threats across all government departments and agencies, was completed in August 2024. However, as of mid-2025, the National Maritime Security Committee, the sponsoring body for the review, had yet to meet to discuss its findings and recommendations, and inspectors were advised this was unlikely to happen until there was a clearer picture of the policy direction for maritime security, following government spending reviews later in 2025.

When I began this inspection, the Home Office did not know the outcome of the 2025 Spending Review, and at the time of writing this was still not finalised. However, Border Force had accepted that its funding would be cut. Consequently, there was the real possibility that whatever ambitions it may have had to invest in GM capabilities would need to be pared back. Against this backdrop, rather than repeat recommendations that relied on substantial investment and long-term programmes, I agreed with the Director General, Border Force to focus on what could be achieved in the short term (18 to 24 months) within existing resources, including through efficiencies, reorganisation, and reprioritisation.

In 2015, I reported that Border Force's coverage of GM was poor by comparison with its coverage of General Aviation (GA), and that it had not been efficient or effective enough within current limitations, in particular the absence of advance information about GM arrivals, or in improving its coverage in the longer term. The 2015 inspection report noted that Border Force had recently recognised the need to

address this. Ten years on, I was therefore disappointed to see that GM continued to feel like a 'poor relation'. The appointment of a Maritime Director in early 2025 is a step in the right direction, provided he is empowered and supported.

While the threats and risks associated with GM are understood in broad terms, knowledge of the detail remains poor. It is hard to see how Border Force and partner agencies can create an effective strategy and operational response to GM threats without a comprehensive picture of the locations around the UK where GM vessels can arrive, yet efforts to document this have been half-hearted to date. Similarly, there needs to be an overhaul of record keeping in relation to GM-related activity by Border Force staff and Field Intelligence Officers, and of the evaluation of operational deployments by BFMC, in order to create and maintain an informed picture of GM threats, trends, actions, and outcomes that is capable of supporting operational and strategic decision making regarding priorities, deployments, resourcing, and investments.

The maritime environment can be harsh and hazardous, especially at sea, and Border Force staff operating in this environment need to have the skills and experience to do so safely. This inspection again found that provision of training was not aligned with either individual or business needs, and that there was little if any evidence of succession planning. This was a particular problem for BFMC, where some roles are highly skilled and require professional qualifications that take years to acquire. Although a 'learning needs analysis' in relation to GM is planned for 2025, the Maritime Director should prioritise a more comprehensive 'stock-take' of Border Force's human capital in relation to its maritime responsibilities.

Recommendations typically involve taking positive action, and there are nine of these. Unusually in this case, I have also recommended that the Home Office should resist taking action in two areas – the mandating of GM activity and of the 'submit a Pleasure Craft Report' system – without further detailed consideration and resource planning. To do so now would not improve Border Force's overall efficiency and effectiveness and would be unlikely to impact the more serious threats posed by GM.

This report was sent to the Home Secretary on 11 June 2025.

The above represents the views of my predecessor as ICIBI, David Bolt, under whose leadership and direction this inspection was conducted.

John Tuckett
Independent Chief Inspector of Borders and Immigration

# 1. Scope and methodology

### Scope

1.1 This inspection examined Border Force's approach to protecting the border from threats in the General Maritime (GM) domain.

The inspection considered:

- levels of GM-related operational activity nationally and regionally
- Border Force resourcing of GM operational activity
- outcomes from operational activity
- stakeholder engagement
- the 'submit a Pleasure Craft Report' (sPCR) process
- a review of the previous Independent Chief Inspector of Borders and Immigration (ICIBI)
  recommendations from the re-inspection of Border Force's management of Project Kraken
  at small seaports, published in January 2023.
- 1.2 The focus was on what improvements are achievable in the short term (18 to 24 months) within existing resources, including through efficiencies, reorganisation and reprioritisation.

This inspection did not examine:

- the small boats operations in the English Channel
- intelligence collection and processing
- the 'Maritime Capabilities Replacement Programme'

## Methodology

- **1.3** Inspectors:
  - reviewed open-source material, including published reports
  - requested documentary evidence and data from the Home Office and analysed over 600 documents provided
  - on 9 August 2024, held a familiarisation call with Home Office staff
  - between 21 August and 3 September 2024, undertook familiarisation visits to Border Force National Operations, the National Command Centre, the General and Commercial Maritime Team and Home Office Intelligence in Croydon, the Joint Maritime Security Centre (JMSC) in Portsmouth, the Regional Command and Control Centre (RCCU) (North) and Border Force GM leads in Teesport, Border Force GM leads in Immingham, the Regional Command Centre (Central) and Border Force GM leads in Stansted Airport

- on 5 September 2024, held familiarisation calls with the Regional Command Centre (South) and Border Force GM leads for South and South East Regions
- on 3 October 2024, attended a meeting of the ICIBI's Refugee and Asylum Forum
- on 23 October 2024, published a call for evidence on the ICIBI website, and subsequently analysed the two responses received, and undertook a remote interview with one of the respondents
- undertook a survey of Border Force officers from 14 November to 14 December 2024, and subsequently analysed the 294 substantive responses
- undertook a survey of the members of the Royal Yachting Association from 22 November to 6 December 2024, and subsequently analysed the 88 responses
- between 18 November 2024 and 20 January 2025, held 121 in-person and remote interviews and focus groups with Home Office staff and stakeholders
- between 28 November 2024 and 20 January 2025, visited 14 ports around Scotland and England to observe Border Force operations and systems: Scotland (Aberdeen, Grangemouth and Glasgow), North East (Port of Tyne), East (Felixstowe and Harwich), London (Tilbury), South East (Dover and Folkestone), South (Portsmouth and Southampton), and South West (Plymouth); inspectors were unable to visit the South Wales coast (Pembroke) due to flooding, but spoke to staff and stakeholders based there
- on 4 February 2025, held a feedback session with Home Office senior management, sharing initial thoughts and indicative findings from onsite activity
- 1.4 This report was sent to the Home Office on 15 May 2025 for factual accuracy checking prior to submission to the Home Secretary for laying before Parliament.

# 2. Key findings

# Strategic approach to general maritime

- In 2023, the Border Force Board and the National Maritime Security Committee (Officials) (NMSC(O)) jointly commissioned a maritime consultancy firm to conduct an independent review of general maritime (GM). The review ran between September and December 2023. The 'GM Strategic Review' report was protectively marked and is not in the public domain. Along with its findings, it set out eight strategic recommendations. These were endorsed by the Border Force Board in February 2024. It also made 21 'fix now' recommendations, work on most of which was "underway" at the time of this inspection. Both sets of recommendations are at Annex D and E.
- 2.2 The Independent Chief Inspector of Borders and Immigration (ICIBI) did not set out to reexamine the findings and recommendations from the 'GM Strategic Review'; however, it found evidence that the Review's main findings remained valid and that progress in implementing its recommendations had been slow, not least because transforming Border Force's general maritime capabilities and response will require a long-term programme of major investments in people, equipment, and systems as well as alignment with a large number of other government departments and agencies. This inspection therefore focused on the improvements that Border Force could make in response to general maritime threats and challenges in the short term (12 to 18 months) within its existing resources.
- As is common to many areas of the Home Office's Migration and Borders (M&B) System, inspectors found that data collection and reporting in relation to GM was poorly managed. This meant that GM threats were not well enough understood and not readily quantifiable. This in turn affected the priority that was attached to Border Force's response, and, while inspectors found examples of localised risk testing and intensification exercises, some of which were aimed at addressing intelligence gaps identified in threat assessments, Border Force had no overall national plan for GM, and regions and ports had developed their own approaches, as the 'GM Strategic Review' had highlighted.
- 2.4 The Border Force Operating Mandate requirement that all persons arriving in the UK are subject to immigration control applies to GM arrivals.¹ However, where no prior notification of the arrival of a GM service is received, mandatory checks are not performed unless a team is present (for example, on a routine marina visit). But, while it is the case that GM is squeezed out by activities that are mandated, simply adding GM to the already burdensome list of what is mandated is not the answer, and is likely to prove counter-productive to Border Force's overall efficiency and effectiveness.
- 2.5 While it is clear that Border Force should be doing more overall in relation to GM, its first priority should be to make what is currently being done more joined-up and purposeful. This requires better internal communication, for example there was no clear plan of how to ensure

<sup>1</sup> The Operating Mandate was produced in 2015, and Border Force top management recognises that it needs updating.

Border Force staff were kept abreast of relevant policy or procedural changes. Moreover, it requires direction and, when this inspection began, there was no identified owner for GM within Border Force to provide it. At the end of 2024, Border Force created a new Senior Civil Servant (SCS) post of 'Maritime Director', which it stated would bring with it "the opportunity to reset many expectations around leadership, management, strategy, culture etc, and this extends to planning for training, people, career pathways and further pathways". An appointment was made in February 2025, and, though too late for this inspection to assess its impact, this was a significant step forward.

2.6 Since many of the resources and assets required to deal effectively with GM threats are the same as those required to respond to other maritime threats, the strategy for GM cannot be developed in isolation. A wider review of maritime security, intended to develop a whole-system response to maritime threats across all government departments and agencies, was completed in August 2024. However, as of May 2025, the NMSC(O) had yet to meet to discuss its findings and recommendations, and inspectors were advised this was unlikely to happen until there was a clearer picture of the policy direction for maritime security following government spending reviews later in 2025.

# Regional general maritime work

- 2.7 Inspectors found that Border Force's approach to collecting and using information about general maritime had not materially improved since ICIBI's 2016 'Inspection of General Aviation and General Maritime'. Basic data, such as the number of GM locations in the UK, how many people arrived in the UK by GM, and the volume and number of seizures made, was not readily available. The information that was provided to inspectors was often incomplete and heavily caveated as to its accuracy. In some cases, it was plainly wrong.
- 2.8 Border Force relied on ports to record GM arrivals. There was a lack of assurance of data entry processes. The Maritime Priority Assessment Tool (MPAT) used to record GM arrivals was discontinued in August 2024, after nearly ten years, due to inconsistencies in how it was being completed and to corruption of the data. It was replaced by the Leave to Enter (LTE) assurance tracker. From the evidence provided to inspectors, completion of the LTE assurance tracker was as inconsistent as before, and, unless this is gripped quickly, it will prove to be equally as unreliable as MPAT, which would be both a waste of effort and a missed opportunity.
- 2.9 The 'GM Strategic Review' referred to the limited scrutiny of GM activity. During onsite interviews, Border Force managers told inspectors they did little assurance checking of GM. One port described it as "non-existent". The Border Force Assurance Expectations did not give it sufficient focus or priority. Border Force estimated that, of the assurance checks of GA and GM completed between November 2023 and October 2024, 80% were for GA and only 20% were for GM.² However, it was unable to say what assurance activity it had completed. Recent changes to the Border Force Assurance Toolkit aimed to improve this, but Border Force will need to test whether this has worked.
- 2.10 Border Force officers were not required to record the amount of time they spent on GM work, which made it difficult for inspectors to determine the scale and type of work that was being done. The consensus among officers interviewed at ports was that GM activity levels were low, and the work was essentially reactive. In reality, it may even be lower than reported, as inspectors found that Border Force Officers (BFOs) at ports did not have a consistent

<sup>2</sup> In its factual accuracy response, Border Force noted: "Due to the way the assurance check is combined into GA and GM, it is not accurate to say that those not definitively linked to GM, are linked to GA."

- understanding of the term 'general maritime' and many included cruise ships and ferries in their definition.
- 2.11 ICIBI surveyed Border Force officers of all ranks who identified as having some involvement with GM. The survey received 294 responses. The responses from BFOs, the principal operational grade at ports, indicated that their GM-related work mainly involved risk assessing GM arrivals, completing the LTE assurance tracker, and sometimes deploying to meet a vessel. Where this involved making a record of any casework on Atlas (the Home Office's main caseworking system) this was not subsequently retrievable as GM-related as there was no Atlas 'tag' for GM.
- 2.12 The reporting system for pleasure craft arrivals in the UK, 'submit a Pleasure Craft Report' (sPCR) was introduced in July 2022. Where advance passenger information (API) is received in an sPCR, Border Force reviews this and either meets the vessel to conduct immigration checks or, more often, clears it remotely.
- 2.13 The scheme is voluntary. In its first full year of operation, Border Force received sPCRs for 6,496 vessel arrivals. In 2024, this rose to 7,349. While there is no way of knowing what the true numbers of pleasure craft arrivals were in 2023 and 2024, it is clear that only a fraction of them submitted a sPCR.
- 2.14 BFOs and managers were concerned that they were policing the compliant and that anyone intending to commit an offence would simply not submit an sPCR. Inspectors were told that the Home Office was considering whether the sPCR scheme should be made mandatory. However, Border Force senior managers raised concerns about the practicalities of meeting more vessels and of ensuring compliance with the scheme, as the unpredictable nature of maritime voyages could significantly impact arrival times and locations.
- 2.15 Some port-based BFOs were keen to do more GM work, particularly searching vessels for customs purposes. They felt training for pleasure craft search was crucial, but the numbers of BFOs who had received this was low and so, very few vessels were searched although for more in-depth searching, Border Force had a separate National Deep Rummage Team, which was recognised internationally for its skills and expertise.
- 2.16 Inspectors heard from managers and staff that training in general was not effectively prioritised to the areas and people that needed it the most, and securing a place on a training course was more a case of being in the right place at the right time. BFOs complained of receiving training they did not need for their role and would not get a chance to put into practice.
- 2.17 Local training records were not kept in a consistent and searchable format, meaning Border Force did not have an accurate record of who was trained in what, when, and when that training would need to be refreshed. While the impact of this went wider than GM, it was recognised as an issue in the 'GM Strategic Review', which recommended a comprehensive training needs assessment and gap analysis for GM. Border Force told inspectors it expected to complete a learning needs analysis in relation to GM by the end of June 2025, and to identify the appropriate learning products and delivery. However, based on what inspectors found, it may well struggle to find enough suitably qualified and experienced staff to deliver GM training at pace, and it will also need to fix the system for allocating training places and for maintaining training records, or else risk continuing to train the wrong people, in the wrong things, at the wrong time.

- 2.18 When BFOs did get the opportunity to conduct proactive GM work, it often mirrored the engagement and information collection functions of Field Intelligence Officers (FIOs), with BFOs visiting GM locations and speaking to whoever was there, including harbour masters, marina officials, vessel owners and captains, about what they knew or had seen in relation to GM activity. Inspectors were told by managers at some ports that it was a challenge to provide staff with meaningful GM work during the downtime between periods of mandated activity, and they preferred to use this time on other port-based work that was more likely to produce tangible results.
- 2.19 Some ports had dedicated maritime resources and assets which they were able to deploy proactively. Inspectors were told this was because their senior managers had pushed for 'on the water' assets, where others had not. Inspectors heard different opinions about the value of a regional 'on the water' capability. One Border Force senior manager considered that vessels acted as a deterrent to criminal activity, while another thought they made it possible to access GM sites that Border Force had not previously visited. However, another thought that the money spent on boats would have been put to better use replacing ageing vans, while another told inspectors a boat was "the last thing we need". As record keeping was incomplete and inconsistent, inspectors were unable to determine the outcomes from deployments of regionally managed vessels or make any 'return on investment' assessments.

# Resourcing general maritime work at ports

- 2.20 Some respondents to the ICIBI survey thought that Border Force should increase staffing levels to improve the operational response to GM threats. The Home Office's own analytical modelling indicated that the level of resourcing for GM work was "under where it should be for an 'adequate to good' service". Border Force managers told inspectors that meeting the requirements of the Border Force Operating Mandate was a challenge and there was little capacity for GM work. If something happened that required a response, they often relied on the goodwill of staff to change or extend their shifts.
- 2.21 Border Force expected to have to make headcount reductions in 2025-26, as part of wider Civil Service cost-cutting. While the precise scale and shape of this had yet to be agreed, it was unlikely that Border Force would be in a position to make a meaningful increase in GM resources unless it made corresponding reductions elsewhere. Meanwhile, Border Force managers were concerned that an overall reduction in staff, together with the removal of seasonal workers, would lead to even less priority being given to GM work. Regardless, it was obvious that whatever GM work could be accommodated needed to be smarter, reinforcing the importance of better data collection and reporting, and better analysis and assessment of threats, responses, and outcomes.
- 2.22 For some years, Border Force has recognised that it needs to be agile in its use of staff resources. Its answer to this challenge has been to make the majority of BFOs at port 'multifunctional', meaning they can perform a range of immigration and customs tasks. However, in onsite interviews, BFOs told inspectors that being trained to do most tasks made it difficult to build up the specialist knowledge and skills required for certain work, including GM. Moreover, Border Force managers and trade union representatives told inspectors that the Home Office recruitment and selection processes for new officers had been too generic and were not fit for purpose. It took too long to get somebody into the job, and, when they did, the role was not what some new staff were expecting and/or at times what they were physically capable of performing.

- 2.23 Initial BFO immigration and customs training did not prepare new staff for working in a GM environment. Despite repeated feedback about this, training was still predominantly focused on working in an airport. Instead, there was a reliance on more experienced officers to teach GM skills locally, and BFOs confirmed that they turned to colleagues to teach them about GM. However, both BFOs and managers told inspectors that 'skills fade' was an issue, particularly with the multi-functional teams, because officers have so many work streams to cover.<sup>3</sup>
- 2.24 Some BFOs at ports believed that dedicated GM teams were needed to perform GM work effectively. At the time of this inspection, only one region had adopted this model. This provided 24/7 coverage of GM within the region and operated two Rigid Hull Inflatable Boats to conduct activity 'on the water'.
- 2.25 At ports, the GM lead role was usually performed by a Border Force Higher Officer. Inspectors found Border Force did not have clear expectations of GM leads, there was no guidance or training to explain what the role entailed, and a lack of support for those given this responsibility. Some GM leads appeared passionate about GM, and ensured it had a high profile at their port. Others either did not seem to have the same level of interest or had been assigned other time-consuming responsibilities alongside GM, such as General Aviation (GA). There was no Border Force-wide network for GM leads. Some regions had tried creating their own, but these relied on personal interest and drive and did not survive when individuals moved on to different roles or teams.

#### **Border Force Maritime Command**

- 2.26 'On the water' activity in response to general maritime is primarily the responsibility of Border Force Maritime Command (BFMC). Like the 'GM Strategic Review', this inspection found that BFMC was under-staffed, which meant it was unable to crew all of the vessels in its fleet. This impacted Border Force's maritime capabilities in general, including GM work.
- 2.27 Border Force's ability to recruit new staff to the BFMC had been severely hampered by a long-running dispute about terms and conditions, which at the time of this inspection remained unresolved. Retaining staff had also proved problematic. Between 1 January 2022 and 30 April 2025, 100 staff had left (BFMC's funded staffing total was 339 full-time equivalents). And the BFMC workforce was ageing, with nearly half (47%) aged over 50 and more than 10% over 60, and with no clear succession plans in place to address this.
- within BFMC, in particular around the misuse of social media and of alcohol, and allegations of bullying and sexual harassment. Inspectors noted that, in the 2024 People Survey, almost a quarter of BFMC staff had said they had been discriminated against at work in the last 12 months (20% within their current team). This compared with a Home Office-wide 'score' of 11% (8% within their current team). Nearly a third (31%) of BFMC respondents to the People Survey said they had seen someone else bullied or treated unfairly in the last 12 months. At the time of writing, the Border Force Operational Assurance Directorate (BFOAD) had completed a 'deep dive' review of BFMC, covering "planning, infrastructure, operations, tools and people, health and safety, equipment, intelligence and operations, and treatment of people". The expectation

<sup>3</sup> At the factual accuracy stage, Border Force advised inspectors that "the national training serves as a product to give staff foundation knowledge, with skills that are built on with 'on the job' upskilling to prepare new staff working in a GM environment. As such, the national training product is not focused on GM itself. Border Force has Operational Training Officers (OTOs) within Operational teams whose responsibility it is to help newly trained staff build on their classroom learning, tell them about any local processes/procedures, and develop specialist skills 'on the job."

- was that this would identify areas for improvement seven years on from the previous BFOAD review.
- 2.29 The complex and potentially hazardous maritime environment and specialised nature of much of BFMC's work required specialist training. This was delivered in-house by Border Force. The training was Royal Yachting Association accredited. By delivering it in-house, Border Force estimated that it saved around £100,000 per year compared to sourcing the training from an external provider.
- 2.30 However, Border Force did not have an up-to-date maritime training strategy. BFMC offered a choice of two pathways to new recruits joining crews of its vessels, 'engineering' and 'deck'. Since 2020, only four new Maritime Enforcement Officers had chosen the engineering pathway, compared with over 40 who had chosen the deck pathway. Inspectors were told that, to keep the fleet appropriately crewed, 30% of officers needed to follow the engineering pathway. To try to remedy the imbalance, BFMC had begun encouraging new officers to consider the engineering pathway at the induction stage. It was unclear how successful this initiative had been, or what BFMC's 'Plan B' was.
- 2.31 BFMC's fleet was small, and some of the vessels were old and required an ongoing programme of maintenance and life extension work to keep them sea-worthy and functioning. This impacted the vessels' availability for operational activity. The 'GM Strategic Review' compared Border Force's capabilities with those of other nations and concluded that Border Force was "underpowered". A major programme was under way to procure new vessels, along with the capabilities required to bring them into service. However, the obsolescent vessels were not due to be replaced until 2029 at the earliest.

# **Border Force Maritime Command operations**

- 2.32 Border Force Maritime Command had the only UK law enforcement maritime assets capable of operating beyond the UK's territorial waters. As such, other law enforcement agencies relied heavily on it to carry out work on their behalf. BFMC frequently deployed its maritime assets in support of law enforcement partners and was willing and enthusiastic to do so. But its support of other agencies, along with Border Force's own planned operations and essential non-operational tasks, left less than half of the fleet's time at sea for proactive patrolling.
- 2.33 The 'GM Strategic Review' identified that Border Force needed to evaluate operational activity and seize the learning opportunities. Inspectors found that Border Force was not doing this. It was unable to provide evaluations for the majority of the Operations declared to inspectors. Some were led by other agencies, but Border Force had not evaluated the part it had played in these. In those few cases where an Operation had been evaluated, this had been done well, but the fact that BFMC was not routinely and consistently debriefing and evaluating its operational activity meant that the learning was limited, and there was no way of assessing how effectively its resources were being used.

# Stakeholder engagement

2.34 Border Force engages with a wide range of GM stakeholders, including other government departments and law enforcement agencies, various organisations representing those with a commercial or a leisure interest in GM, as well as the seagoing and general public. Inspectors found that most stakeholders who had engaged with Border Force spoke positively about their partnerships, working relationships, and interactions.

- 2.35 Border Force's relationships with certain sections of the GM community, such as pleasure craft owners and membership organisations, have not always been easy. Border Force had worked at improving these relationships, and the relevant stakeholders described them as now constructive and based on mutual trust. At an organisational level, the Home Office-chaired General Maritime Pleasure Craft Sector Group was valued by stakeholders as a cross-government forum where they were consulted on GM developments and kept up to date with changes in policy or procedures.
- 2.36 Unsurprisingly, Border Force's relationships with police were closest where the two were co-located at ports and therefore had regular contact. Here, Border Force's willingness to assist by sharing its equipment and skilled resources, for example maritime search teams, helped foster constructive and supportive operational relationships that worked mostly on an informal basis rather than through working groups and forums.
- 2.37 Given the size and breadth of the GM community, stakeholder engagement will always be a challenge for Border Force, and it is questionable whether it will ever be able to do enough of it. It had clearly enjoyed some success, especially at a local level, but inspectors did not find any evidence of an overarching strategy or approach, and aside from Project Kraken there was nothing that amounted to a UK-wide communications strategy. This could do with better co-ordination.
- 2.38 As identified in the 'GM Strategic Review', Border Force did not promote its successes to its own staff, stakeholders, or to the public. Inspectors were told that not seeing the results of their work publicised had a negative effect on staff morale in BFMC, especially those staff who undertook difficult and hazardous work at sea. It also denied BFMC the deterrent effect of its successes being more widely known and the potential to generate more intelligence as a result of greater public awareness of the work it did.
- 2.39 The 'GM Strategic Review' also identified some entrenched attitudes within Border Force towards sharing information with other agencies. Inspectors found evidence that this was still the case. Stakeholders reflected that, despite positive relationships at a local level, Border Force at an organisational level could appear untrusting and reluctant to share information.

## Intelligence

- 2.40 Although intelligence collection and processing was not a focus of this inspection, the limited volume of available and actionable intelligence related to general maritime was apparent. This inspection found that such GM-related intelligence activity as there was produced poor returns. The number of GM intelligence referrals generated in the last three years was low, [redacted]. Only around 6.2% of [redacted] GM referrals were tasked for further development, and those converted to targets for action were in single figures each year. The failure of Home Office systems to track intelligence from referral source to ultimate outcome limited the ability of Home Office Intelligence (HOI) to obtain any useful insights from the intelligence received, or to evaluate intelligence coverage or to prioritise gaps.
- 2.41 Since most GM vessels were not legally required to report their planned voyages, and smaller pleasure craft were not required to transmit their location using the automatic identification system, the data available to inform the broader GM picture was thin. Inspectors were told that significant advances had been made in maritime surveillance capabilities and that these were being further developed. However, it was unclear how far these would directly benefit Border Force's GM work.

- 2.42 At the most basic level, Border Force did not know how many locations there were in the UK that could be used by GM vessels. It shared a spreadsheet with inspectors that contained details (not recorded uniformly) of 2,166 GM locations, only 675 (31.16%) of which had been visited in the three years to end December 2024. However, HOI estimated that there were between 7,000 to 9,000 GM locations.
- 2.43 Operation Tipson, begun in 2022, was, among other things, an attempt to map GM locations. The Operation did not seem to be progressing at sufficient pace. Meanwhile, inspectors found evidence of duplicated effort, with local visit records and mapping exercises not shared between HOI and the relevant Border Force region. The lack of co-ordination led some local stakeholders to complain about visits by different Home Office teams asking the same questions.<sup>4</sup>
- Operation [redacted] is a 12-month GA/GM risk-testing exercise resourced by the Small Boats Operational Command (SBOC). It began in July 2024. The relative inexperience in GM of the staff participating in the Operation, together with a lack of training and local knowledge, and the fact that teams were deployed only every six weeks meant that, at the time of this inspection, it had yet to demonstrate any real impact in terms of GM outcomes. However, it was claimed that it had helped to increase Border Force's profile and visibility in GM locations that were not often visited, and had supported the aims of Project Kraken.<sup>5</sup>
- 2.45 Inspectors found frustration among FIOs that their local knowledge was under-utilised. Potential sources of intelligence could be better leveraged, including ensuring frontline officers knew when and how to make an intelligence referral. Meanwhile, the lack of clarity and agreement about the roles and responsibilities of HOI and of the Joint Maritime Security Centre led to duplication and to disconnects.
- 2.46 In terms of the FIO 'network', it was not evident to inspectors how the regional distribution of FIOs had been determined. The numbers of FIOs per region were broadly equal, whereas the length of the coastline and travelling times to GM locations were clearly not. Since Border Force did not have a reliable picture of GM arrivals, inspectors assumed that this was not how the distribution had been decided. It would be helpful to all concerned for the rationale for FIO distribution to be explained and for Border Force's expectations of FIOs to be clearly set out.<sup>6</sup>

### **Project Kraken**

- inspection reports between 2016 and 2023. Most recently, in 2023, it recommended that the Home Office should "develop a mechanism to track the outcomes of intelligence generated through Project Kraken and use the information to assess the effectiveness of the project and promote 'good news' stories". This recommendation was accepted. A second recommendation related to dedicated funding, including for an ongoing communications campaign. This was 'partially accepted'. The current inspection found that limited progress had been made in relation to these two recommendations.
- **2.48** While Project Kraken referrals could be tracked to their outcomes using local data, there were issues with data quality, and inspectors received three different sets of figures. However,

<sup>4</sup> In its factual accuracy response, Border Force advised inspectors that "Operation Tipson is not led by the HOI directorate".

<sup>5</sup> Project Kraken is a multi-agency approach initiative, led by Border Force, to increase reporting of suspicious behaviour and criminality within the GM community, sector, coastline and at sea. Members of the public can report any concerns via the Coastal Crime Line powered by Crimestoppers.
6 In its factual accuracy response the Home Office advised inspectors that "the rationale for the FIO network is based on the principle that they are a taskable asset that is multi-mode, multi threat. They are expected to collect intelligence across all modes that cross the UK Border, not just GM."

- despite these inconsistencies, it was evident that the number of intelligence referrals generated by Project Kraken had increased since 2023 and continued on an upward trajectory.
- 2.49 Meanwhile, as at February 2025, there was still no dedicated budget for Project Kraken, although some funding had been obtained and used to procure metal signs promoting the Project in North Yorkshire. Border Force did not provide any evidence of a communications campaign.

# 3. Recommendations

#### The Home Office should:

- 1. Review Border Force's working definition of general maritime (GM), ensuring that all Border Force staff, Home Office colleagues, partner agencies and other stakeholders, understand what is included and what is not (in terms of vessels, locations, movements etc.).
- 2. Empower the Maritime Director to set the minimum standards required of Border Force regions and commands, and of Home Office Intelligence (HOI) (in conjunction with the Director HOI), when conducting GM-related work, including any horizon scanning, scenario planning, and risk-testing exercises.
- 3. To support the Maritime Director in promoting a consistent Home-Office-wide approach to GM, identify GM leads at regional/command and ports levels and establish a national network that links them.
- 4. Overhaul record keeping in relation to GM, focusing on data quality completeness and retrievability, in order to create and maintain an informed picture of GM threats, trends, actions, and outcomes that is capable of supporting operational and strategic decision making regarding priorities, deployments, resourcing, and investments.<sup>7</sup> As a minimum, this should include:
  - a. creating activity logs for Border Force staff and Field Intelligence Officers (FIOs) that capture the time spent on GM-related work (according to the definition of GM)
  - b. ensuring that the 'Leave to Enter assurance tracker' is being completed consistently and conducting a review of the current Border Force 'Assurance Expectations' to verify that the recordkeeping of entries within the 'Leave to Enter assurance tracker' is subject to effective and sufficient assurance measures
  - c. creating an Atlas8 'tag' and using this to ensure that GM-related casework is reportable
  - d. improving the functionality of the Collaborative Business Portal, so that is more user-friendly and less time-consuming for Border Force users
  - e. recording sufficient details about intelligence referrals (including source, assessment, action(s) taken, feedback provided) to enable them to be linked to outcomes
  - f. evaluating in a common format all operational deployments focused on GM, including those where Border Force Maritime Command (BFMC) and regions are supporting another agency, detailing the source of any actionable intelligence, the operational objectives, the immigration and customs outcome(s), and any lessons learned

<sup>7</sup> Data quality should be in line with government guidelines (Government Data Quality Hub, 'The Government Data Quality Framework' (published 3 December 2020). Available at <a href="https://www.gov.uk/government/publications/the-government-data-quality-framework/the-government-data-quality-framewor

<sup>8</sup> Atlas is the immigration caseworking system used by the Home Office.

- 5. Create and maintain a centralised record of what training every Border Force officer has completed and their training needs (including for refresher training), readily accessible to regions and commands, so that training provision and places on training courses can be allocated on the basis of business and individual need.
- 6. Update 'General Maritime' guidance in line with the revised definition of GM, roles and responsibilities, and record-keeping requirements, ensuring that it is subject to regular reviews to remain up to date.
- 7. Relaunch Operation Tipson, setting a date for completion of the initial mapping of all general maritime locations of no later than 31 December 2026, and tasking the FIO network to prioritise mapping GM locations, starting with those where there is a regular 'official' presence (a harbour master, marina manager, etc.) and capturing a standard set of data recorded in a standard format (including, as a minimum, name and type of location, geolocation data, local police contact, name(s) and contact details of responsible persons, and date(s) of visit). Where available, Border Force regional staff should be used in support, but with HOI taking responsibility for the operational plan and programme of work.
- 8. Produce a short-term (one to two years) succession plan for BFMC, identifying the risks, mitigations and contingencies involved with filling key posts, and setting out the work required (to incentivise staff to follow particular career pathways, for example) to ensure that the right staff with the right skills and professional qualifications will be in place in the medium to long term (three to ten years).
- Develop and implement a communications strategy to promote Border Force's GM work internally
  within the Home Office, and with external stakeholders and the public (incorporating Project Kraken
  and other initiatives).

# The Home Office should <u>not</u>:

- 10. Mandate general maritime activity, beyond what is currently included in the Border Force Operating Mandate, without a fundamental review of all Border Force activities to determine what should and should not be mandated or otherwise required and the process for amending what is included in each category.
- 11. Make the 'submit a Pleasure Craft Report' (sPCR) system mandatory without first developing a clear plan for how Border Force would respond to a significant increase in notifications and how it would police compliance.

# 4. Inspection findings: Strategic approach to general maritime

# The definition of 'general maritime'

4.1 The term 'general maritime' (GM) is used by Border Force to describe certain types of maritime vessels. In the 'General Maritime Guidance' (Version 6.0) (August 2022) for staff, the working definition of general maritime is:

"Unscheduled, uncanalised and non-commercial (with some exceptions) maritime traffic. <sup>9, 10</sup> This generally includes vessels such as yachts, rigid hulled inflatable boats (RHIB), motor cruisers and other small motorboats. It can also include small commercial vessels, where they have been converted for non-commercial use (for example, fishing vessel into a pleasure craft) or identified through intelligence as being used solely for smuggling purposes.

However, GM does include unscheduled commercial arrivals, which are engaged in commercial trade by transporting cargo and/or passengers and the crew on board the vessel. ... Any vessel carrying any goods for industrial or commercial purposes is a commercial vessel. This can include such vessels as tugs, fishing vessels and rig support vessels, all of which can be unscheduled or un-canalised."

**4.2** In the evidence submitted for this inspection, the Home Office provided a further definition:

"General maritime can be more clearly and concisely expressed as: all unscheduled uncanalised international maritime traffic, and scheduled uncanalised international non-passenger services, whether operated commercially or for pleasure and leisure. This includes vessels such as cargo ships, tankers and other bulk carriers, fishing boats, yachts including superyachts and sailing yachts, tugs, rigid hull inflatable boats (RHIBs), other inflatables. Motorboats, canoes kayaks and paddleboards. Schedule passenger services are not general maritime. Scheduled cargo/freight services are general maritime."

- **4.3** For the purposes of this inspection, GM was understood to include:
  - a. all non-scheduled (not on a regular route) international maritime traffic arriving at an uncanalised location (one with no customs or immigration controls or no port approval, for example small harbours, marinas, beaches)
  - b. scheduled uncanalised international non-passenger services, whether commercial or pleasure

and encompassing yachts, tugs, RHIBs, motorboats and small fishing vessels, as well as larger vessels where a. or b. above applies.

<sup>9 &#</sup>x27;Unscheduled' meaning not on a regular route, or a last-minute change of destination, or additional destination or destinations when on a regular route

<sup>10 &#</sup>x27;Uncanalised' meaning locations with no customs or immigration controls or no port approval for that location, for example beaches, marinas and small harbours.

# Legislation

- 4.4 For immigration purposes, paragraph 27 (1) of Schedule 2 of the Immigration Act 1971 requires the captain of any ship arriving in the UK not to allow passengers to disembark "unless either they have been examined by an immigration officer, or they disembark in accordance with arrangements approved by an immigration officer". This applies to all vessels, including general maritime vessels.
- 4.5 The Customs and Excise Management Act 1979 (CEMA), sections 35 and 64, outlines the customs clearance procedures for inward (to the UK) and outward movements of vessels. Section 35 outlines measures for the reporting of any goods brought into the UK via a ship which have not already been declared for customs purposes, while section 64 details the measures for seeking clearance for departure for any goods leaving the UK. Again, this applies to GM vessels.

# **2025 UK Border Strategy**

In December 2020, the then Conservative government published a '2025 UK Border Strategy', which set out its vision for the UK border over the next five years as "embracing innovation, simplifying processes for traders and travellers, and improving the security and biosecurity of the UK". Under the heading 'Making our presence at the border more resilient and efficient', it described Border Force as:

"the primary face of government at the border and ... critical to its operation. Border Force responds to different threats through the blended application of operational and organisational capabilities. These capabilities apply to the movement of both people and goods."

- 4.7 The strategy focuses on movements through key ports and airports. It was silent in relation to maritime threats along the UK coastline as a whole. However, it identified Border Force's strategic aims under three headings: "Protect, Facilitate and Adapt". Under Protect, Border Force aims to:
  - improve the UK's ability to identify potential threats before they reach the border to enable targeted and effective interventions through co-ordinated multi-agency operations
  - reduce vulnerabilities at the border to prevent illicit or dangerous goods and individuals from entering or leaving the country
  - strengthen the UK border to deter those who seek to do us harm and those who attempt to abuse or circumvent the UK's migration system
  - safeguard vulnerable individuals and reduce the risk to life to those attempting to cross the border illegally
- **4.8** Each of these aims is relevant to general maritime.

<sup>11</sup> Immigration and Asylum Act, 1971. <a href="https://www.legislation.gov.uk/ukpga/1971/77/schedule/2">https://www.legislation.gov.uk/ukpga/1971/77/schedule/2</a>

<sup>12</sup> Customs and Excise Management Act 1979. https://www.legislation.gov.uk/ukpga/1979/2/section/35

# General maritime reviews, assessments and strategy

4.9 Inspectors requested copies of all Home Office reviews, assessments and strategy documents relating to GM operations and threats.

#### 'General Maritime Strategic Review'

- 4.10 In 2023, the Border Force Board (BF Board) and the National Maritime Security Committee (Officials) (NMSC(O)) commissioned an independent strategic review of general maritime. The review was conducted by a maritime consultancy firm between September and December 2023. It sought to assess how Home Office Intelligence, Border Force Regions, the Joint Maritime Security Centre (JMSC) and Border Force Maritime Command (BFMC) worked together to protect the UK Border in the maritime domain. The findings of the review, along with its strategic recommendations, were endorsed by the BF Board on 28 February 2024.
- 4.11 The 'GM Strategic Review' was the first part of a wider review of UK maritime security. The second phase looked at the UK whole-system response to maritime security across all government agencies and departments ("a high-level Strategic Capability Assessment and Gap Analysis"). The 'Phase 2 Whole System Approach' report was completed in August 2024. As of May 2025, the NMSC(O) had not met to consider its findings and recommendations.<sup>13</sup>
- **4.12** Given these strategic and wider reviews and the likely timescales for the implementation of any whole-system changes, this inspection focused on what improvements the Home Office, specifically Border Force, could make in the short term (12 to 18 months) within existing resources, including through efficiencies, reorganisation, and reprioritisation.
- 4.13 The 'GM Strategic Review' was commissioned because Border Force and others recognised that systems and capabilities in the maritime space were deficient compared with other areas, including General Aviation (GA). This was not a new situation. In 2015, the Independent Chief Inspector of Borders and Immigration (ICIBI) reported that "levels of knowledge and understanding of the threats and risks [associated with General Maritime and General Aviation] remained generally poor" and that "coverage of GM was poor by comparison [with GA]".
- **4.14** The key findings of the 2023 'GM Strategic Review' included:
  - entrenched siloed working and inter-departmental boundaries
  - maritime operations delivered across two distinct Pay Band 1 pillars
  - resource planning is reactive, with limited investigation capabilities
  - small number of Field Intelligence Officers (FIOs) nationally and insufficient threat picture/ situational awareness
  - GM output done on "best endeavours and spare capacity"
  - operations are strong on "respond" but not co-ordinated within "understand" and "deter"
  - GM activity is not mandated, with no requirement to report breaches

<sup>13</sup> On 13 May 2025, the Home Office advised inspectors that the Department for Transport (DfT), the government department with primacy in the maritime domain, thought it unlikely that the NMSC(O) would be reconvened, and it was not clear what (if any) cross-government holistic maritime security co-ordination body will replace it; although a formal decision by the DfT has yet to be made. The National Strategy for Maritime Security is no longer government policy. It is unlikely that whole system review will be taken forward in a formal and systematic way (note: the review did not examine Border Force in any detail as it was intended to be read alongside the Border Force GM Review). There have been some discussions across government on how to take the co-ordination of maritime security forward, but these are unlikely to go forward until the Strategy Defence Review, Strategic Security Review, National Security Strategy and Spending Reviews are concluded/published.

- 4.15 It made a total of 75 recommendations, with eight described as "high-level priority strategic recommendations" (see Annex D). In November 2024, the Home Office advised inspectors that a plan for delivering the strategic recommendations had been drawn up and a Maritime Capability Management Group of Home Office officials tasked with monitoring progress. This included 21 'fix now' recommendations "with a lower resource requirement", to be delivered within 12 months.<sup>14</sup>
- 4.16 In light of the 'GM Strategic Review', the Border Force Board agreed to scope a 'GM Transformation Programme' to "wrap around" the Marine Capability Replacement Programme (MCRP), the development of spending review options, and to manage the expectations of ministers in relation to GM. In mid-February 2025, inspectors were told that the GM Transformation Programme was currently focused on resourcing a programme team and, once the new Maritime Directorate was in place, planning workshops would be held to "ensure the right direction is set in accordance with the outline Transformation Plan".<sup>15</sup>
- 4.17 Annex D sets out the Home Office's progress with implementation of the 'fix now' recommendations in the strategic review up to 20 March 2025.

#### **'Border Force Control Strategy 2023'**

- 4.18 The 'Border Force Control Strategy 2023', issued in May 2023, pulled together the Home Office's understanding of the threats to the border. It was developed in conjunction with partner agencies and used a risk scoring methodology (the Management of Risk in Law Enforcement (MoRiLE) 2020 framework) to determine the priority of individual threats according to 'modes' and 'themes'. 'Priority A' level themes are all relevant to the GM mode. 16
- **4.19** Many of the themes listed as Priority B, C or D are also relevant to GM.<sup>17</sup>

#### '2024-25 Border Force Business Plan'

**4.20** The '2024-25 Border Force business plan' does not refer specifically to GM. However, it does refer to the procurement of new cutters and coastal patrol vessels to support maritime capabilities.

#### 'General Maritime Strategic Threat Assessment'

- 4.21 The Home Office uses a range of intelligence products to assess the threat from GM. These include a 'General Maritime Strategic Threat Assessment', produced by the Home Office's Intelligence Analysis and Assessment team. This was issued in February 2024. Its aim and purpose are:
  - to produce a strategic threat assessment of the primary threats to the UK Border within the GM mode
  - to identify where the use of commercial maritime vessels facilitates these threats
  - to assess historic and enduring threats to the UK border within the GM mode

<sup>14 &#</sup>x27;Fix now' recommendations are defined by the Home Office as "urgent, deliverable within 12 months, lower resource requirement".

<sup>15</sup> As of 3 February 2025, Maritime Directorate's initial leadership team comprised a Senior Civil Servant (Pay Band 1) and three G6 posts".

<sup>16 [</sup>redacted]

<sup>17 [</sup>redacted]

- **4.22** The threat assessment identified challenges and vulnerabilities presented by GM, including:
  - no legislation governing the sale, registration or operation of GM vessels for private use
  - [redacted]

#### Types of GM threat – clandestine entry

- 4.23 There is evidence of vessels such as yachts and fishing boats being used by migrants to enter the UK clandestinely, crossing from the near Continent to points along the south and east coasts. Incidents of clandestine entry involving GM had been intercepted, mostly at ports rather than at sea. The 'GM Strategic Threat Assessment' considered the small number of GM clandestine entrant detections was not an accurate reflection of the scale of the threat.
- 4.24 Inspectors asked Border Force for the number of clandestine arrivals and stowaways detected at GM locations or on GM vessels. They were told that Border Force's data "is not categorised in a way to provide a return to these requests". Border Force explained that, while all instances of clandestine arrivals are recorded using PRONTO, a digital system used by Border Force officers for record keeping, the system does not differentiate between clandestine and stowaway. ISB1 data recorded in Atlas, the Home Office's main caseworking system, captures instances of persons who have been subject to further examination by Border Force. However, there may be multiple reasons for a person being detained (such as a stowaway claiming asylum on arrival) which may not all be reflected in the data. Atlas does not contain a GM 'tag' which would enable GM cases to be identified.
- 4.25 Despite these limitations, some data was provided for individuals classed as 'clandestine arrivals' or 'stowaways' who may have entered the UK by GM. This was heavily caveated as "best effort" data based on various assumptions (see figure 1).

Figure 1: Number of clandestine arrivals by GM mode between 1 January 2022 and 31 August 2024

Border Force region	2022	2023	2024	Total
Central	19	12	1	32
North	25	12	1	38
South	9	5	1	15
Non-Border Force location		4		4
Total	53	33	3	89

4.26 The Home Office was unable to provide inspectors with the number of deserters or absconders from GM vessels, stating "given deserters/absconders will not be present to be issued an IS81, Atlas does not hold data on this. We are therefore unable to provide any quantitative data on deserters or absconders from GM vessels."

#### Types of GM threat - modern slavery and human trafficking

**4.27** Examples of modern slavery and human trafficking have been identified on fishing vessels operating within UK territorial waters off the west and east coasts of Scotland and north east England. There is a risk that this occurs in other fishing fleets operating around the UK.

#### Types of GM threat – at-sea drop-offs of Class A drugs

4.28 Criminals are known to have used at-sea drop-offs (ASDO) as a way of importing large quantities of Class A drugs. <sup>19</sup> The 'General Maritime Strategic Threat Assessment' noted that there had been an increase in drug 'wash-ups', where drugs packages are found on beaches as a result of failed ASDO or 'coopering' events involving crews on commercial maritime vessels. <sup>20</sup> [redacted]

#### **'Border Risk Assessment'**

- 4.29 In 2020, Home Office Analysis and Insight (HOAI) produced a 'Border Risk Assessment'. This was refreshed in March 2023. The 'Border Risk Assessment (BRA) Refresh' was intended to complement the Border Control Strategy. It collated the available evidence, intelligence, and subject matter expert judgements and provided an assessment of the threat, vulnerability, and consequence associated with each thematic area and mode of entry. It highlighted the need for risk testing to develop understanding of the risks.
- 4.30 Inspectors were provided with details of local risk testing and intensification exercises, some of which made specific reference to addressing intelligence gaps in threat assessments. However, there was no overall national testing and exercise plan for GM. Border Force managers recognised the importance of risk-testing exercises given that intelligence in relation to GM was limited. Both managers and stakeholders commented that resources are typically focused on activities that are likely to produce a successful outcome, such as a drug seizure or recovery of unpaid duty, meaning that other threats were not routinely tested.

## General maritime versus mandated activities

- **4.31** Border Force officers and managers told inspectors they were concerned that increasing the priority given to GM without reviewing the existing mandated activities set out in the Border Force Operating Mandate would be counter-productive (see Annex C for summary).
- 4.32 Senior managers referred to the Home Office's response to previous inspection findings relating to GA and Cyclamen as examples of where risks were considered in isolation and added to the list of mandated activities.<sup>21</sup> In respect of Cyclamen, one said that it was "a completely inappropriate response by the Home Office. Yet we are still living with that mandated response now some of it is way over the top."
- 4.33 Similarly, Border Force officers considered that the way mandated targets for meeting GA flights were applied was disproportionate and could lead to perverse outcomes. For example, the same flights and sites were repeatedly tested because they were close and more accessible than other GA sites, rather than focusing on actual risks. One Border Force officer said: "We make it worse by prioritising the wrong things but it is not a port decision it is mandated."

<sup>19</sup> At-sea drop-offs involve an illicit commodity being thrown overboard from a 'mother vessel' and retrieved later by a 'daughter vessel'.

<sup>20 &#</sup>x27;Coopering' involves two vessels physically meeting at sea and passing goods from one to the other.

<sup>21</sup> As part of the government's counter-terrorism strategy CONTEST, Border Force uses Cyclamen for screening vehicles, goods, and people at the border to detect and deter the illegal importation of radiological and nuclear materials.

- A manager added: "GA is a mandated requirement, GM isn't. If you have to cover both, you'll do GA as it's mandated."
- 4.34 These additional mandated activities were not reflected in the extant version of the Border Force Operating Mandate, which was last updated in 2015. Border Force managers and staff told inspectors that there was a need for a more regular review of risks and priorities, including of the priority to be given to GM in light of all the other risks and resource pressures. As one senior manager put it: "GM needs to be taken seriously irrespective of the mandate. Border Force need a more mature understanding of what's happening, the vulnerability and the risk."
- 4.35 At ports, inspectors observed that proactive GM work was largely reliant on individual officers with an interest in, or knowledge or past experience of, the maritime domain. But inspectors were given examples of GM initiatives developed by regional staff and involving extensive planning to develop an operational order that did not go ahead because staff were not released from higher-priority or mandated work. A Border Force officer told inspectors: "The impression given by senior managers is 'don't look too hard as we won't have staff to deal with anything we find' but what is the point of being here if we don't do our job?"
- 4.36 Some managers spoke about the challenge of finding "meaningful GM activities" for staff during the downtime between mandated activities, such as processing ferry arrivals. Meanwhile, some officers expressed their frustration at the lack of drive or enthusiasm for GM from some teams and their managers. They felt this was possibly linked to a lack of skills, knowledge, or training.
- 4.37 Along with the lack of any clear expectations of staff to engage in GM activity, beyond responding to notifications of pleasure craft arrivals, inspectors found that little emphasis was placed on the value and importance of recording GM activity and there was no central reporting of data. Border Force managers told inspectors that this inspection had resulted in them being asked to provide data on outcomes from GM activities for the first time ever.

# Mitigation of operational risks

4.38 Inspectors requested details of all risk registers relating to GM. The Home Office provided a risk register for the General and Commercial Maritime Team (GCMT) and confirmed that there were no other risk registers covering GM, and that GM was not included in any wider risk register.<sup>22</sup> The GCMT's risk register, dated 10 September 2024, set out four risks relating to the work of the team. All four were 'Open'. (see figure 2).

<sup>22</sup> The General and Commercial Maritime Team is the key point of contact for Home Office policy colleagues, cross-government departments, frontline operations, and ministers on all things maritime. Its current work includes further development of the 'submit a Pleasure Craft Report' and National Maritime Single Window system, Operation Tipson, General Maritime Guidance, and Stowaways Policy.

Figure 2: General and Commercial Maritime Risk Register – open risks as at 10 September 2024

Risk	Mitigation – latest update	Current risk rating
Stowaway guidance	Currently on hold due to other priorities.	Impact: Low/ moderate Likelihood: Medium/ possible (8)
General Maritime (GM) arrival data: Insufficiency of data and a reporting mechanism to accurately convey GM risks	Work is ongoing with policy analysts to develop a submission for ministers on mandating Advance Passenger Information (API) in GM. <sup>23</sup>	Impact: Low/ moderate Likelihood: Medium/ possible (8)
Reporting issues, lack of arrival awareness:  Border Force being unable to locate or confirm the geographical location of any vessel reporting that does not carry any Automatic Identification System (AIS) or locator equipment <sup>24</sup>	The Operation [redacted] Team will be testing the Royal Navy's vessel tracking programme (Telesto).	Impact: Low/ moderate Likelihood: Medium/ possible (8)
Insufficient staff resource for the General and Commercial Maritime Team (GCMT)	Announcement of restructure which will see the GC&M team moved to another section of Border Force. Awaiting further details.	Impact: Low/ moderate Likelihood: High/ likely (9)
Border Force officers not being aware of their responsibilities for processing GM arrivals as part of the 'submit a Pleasure Craft Report' (sPCR) process.	The team had held upskilling events for regional GM leads and regional Command and Control Units and shared information to improve awareness of requirements.	Impact: Low/ moderate Likelihood: High/ likely (9)

4.39 In 2023, the 'GM Strategic Review' had highlighted that there was "no active GM risk reporting from the frontline to [Border Force] Board level" and no "single source of truth on risk".

Inspectors found that this was still the case.

# Leadership for general maritime

4.40 When this inspection began in October 2024, there was no senior individual within Border Force with overall responsibility for GM. Border Force staff based at ports told inspectors that not having anyone in a senior leadership role who had responsibility for GM was an issue. One manager said: "Senior management are focused on the big priorities – 99% of what they do will

<sup>23</sup> API is the biographic identity and nationality data for each international passenger, enabling accurate demand-modelling, watch-listing checks for known threats, and the targeting of potential threats at the border.

<sup>24</sup> AIS is a vessel tracking/locator system, currently only mandated on commercial vessels and vessels over 300 gross tonnes.

be ensuring coverage of the PCPs [Primary Control Points] at the border". Another commented that "GM has not had sufficient senior level attention until the GM Strategic Review".

4.41 In February 2025, the Home Office appointed a Director of Maritime (Senior Civil Servant Pay band 1), initially on a temporary basis.<sup>25</sup> This strategic leadership role was given responsibility for GM as a theme across all Home Office border functions, as well as having direct responsibility for BFMC. The appointment was welcomed by Border Force managers, who said they saw it as an opportunity for better co-ordination and oversight of GM activity.

# 5. Inspection findings: Resourcing for general maritime

# **Border Force teams responsible for general maritime**

- **5.1** Border Force is responsible for carrying out immigration and customs checks on people and goods that enter the UK. To do this, it is structured into six operational regions: Central, North, South, South East, Heathrow and Europe.<sup>26</sup>
- **5.2** With the exception of Heathrow, which does not include any general maritime (GM) locations, each Border Force region has staff based at airports and seaports who have responsibility for designated GM locations in their region.
- 5.3 Inspectors asked the Home Office for the number of staff involved in GM, broken down by region and by other business areas (see figure 3).

Figure 3: Staffing attributed to GM activity by Border Force area at September 2024

Business Area	Total headcount	Full-time equivalent (FTE)	FTE attributed to GM <sup>27</sup>
Border Force Maritime Command	339	279	279
General and Commercial Maritime Team (GCMT) <sup>28</sup>	4	4	4
Central region	594	556.39	307
North region	1,238	1,361.75	736.63
South East region <sup>29</sup>	270	260.18	260.18
South region	1,202	1,118.19	1,118.19

<sup>26</sup> South East was formerly known as South East and Europe before Border Force Europe became a separate region.

<sup>27</sup> Inspectors asked the Home Office for the number of full-time equivalent (FTE) staff currently in post, and the number of vacancies, for Border Force Officers and Field Intelligence Officers who do or could undertake GM work. The Home Office stated that the FTE staffing figure attributed to GM for the regions and for Home Office Intelligence includes all those who "may" support GM deployments. It said that grades Assistant Officer (BFAO) to Higher Officer (BFHO) support GM deployments in all regions except South region and these are the figures provided. South region's figures include grades Administrative Assistant to Senior Civil Servant (SCS), as that region considered all grades 'could' undertake GM work. In its factual accuracy response, the Home Office stated that "Central, North and South regions explained due to their regional set ups, activity and the multifunctional nature of many of their staff, the number of FTEs who 'could' undertake GM work was not easily retrievable and each region took a different approach to attempting this calculation." South (Headcount 1202, FTE 1118.19) responded stating, in theory, all their FTE could undertake GM duties, subject to the relevant skills and training. While North and Central made estimates, there was no consistent approach to their calculations". "Border Force made inspectors aware that the data requested was not held centrally and was therefore collated largely drawing on locally held management information. As such this data was not assured, would be subject to change and did not always align to central data given the different parameters applied in collation. The original evidence submitted by the Home Office for Central region (Headcount 594, FTE 556.39) only included staff in East Anglia and Thames Commands, who are the GM commands. It advised that, to ensure the data is in line with other regions, the figures for Central region as a whole should be included (Headcount 1505, FTE 1369).

<sup>28</sup> The General and Commercial Maritime Team (GCMT) is a key point of contact on anything within the maritime environment for Home Office policy, cross government departments, frontline operations, and ministers.

<sup>29</sup> The South East Inland Coastal team provides the resource for GM in South East region.

The data provided indicated that there were no vacancies in any of the regions or in the GCMT. Meanwhile, Border Force Maritime Command (BFMC) showed 60 vacancies, for which funding had been allocated. However, as at the end of March 2025, recruitment was on hold due to an unresolved dispute over the terms and conditions of existing staff.

#### **GM** staffing levels at ports

- 5.5 Border Force managers at ports told inspectors that staffing levels were one of their biggest frustrations. One told inspectors that staffing was "beyond the worst that I have seen it, we are at a level that is so critical it's ridiculous".
- The priority was mandated work as set out in the Operating Mandate. It required significant planning and flexibility in how staff were used in order to cover this. Managers claimed that the shortfall in capacity was often bridged by the goodwill of the staff. Managers were reasonably confident that they could deploy staff to a GM incident by relying on willing staff who were prepared to change or extend shifts at short notice. One senior manager told inspectors: "If I lose that goodwill I will be in trouble."
- 5.7 In November/December 2024, inspectors invited Border Force Officers (BFOs) to complete a survey. This asked what they felt could be done to improve Border Force's operational response to GM. The most common answer was "increase staffing levels".
- 5.8 In previous years, managers have been able to call on a seasonal workforce (SWF) to supplement staffing levels at times of high demand, typically in the summer months. However, inspectors were told by the Home Office that use of the SWF would cease from January 2025, reducing the total Border Force full-time equivalent (FTE) by an estimated 194. Instead, Border Force intended recruiting permanent staff on flexible working contracts that were tailored to the individual's circumstances. Inspectors were told by managers that recruitment would be based on one new member of staff per location. One Border Force manager told inspectors that they had requested ten FTE staff to replace the SWF they had previously relied upon, but they had been given just one officer. Several other managers told inspectors loss of the SWF would impact the resourcing of GM work.

#### **Border Force headcount reduction**

- Inspectors requested a copy of the Border Force 'Strategic Workforce Plan'. The Home Office provided a document that set out Border Force's headcount reduction targets to be achieved by March 2025, in line with government announcements about reducing the size of the Civil Service. As at 1 April 2024, the total Border Force FTE was 11,415. The target for 31 March 2025 was 10,879 FTE. Border Force sought to adjust the target to c.11,900 FTE, due to c. 1,020 FTE being added to Border Force workforce figures from workstreams which had not been included in the original forecast, primarily the Illegal Migration Intake Unit. Inspectors noted that the Joint Maritime Security Centre (JMSC) and Border Force Maritime Command (BFMC) were not subject to the current Civil Service headcount reductions.
- 5.10 The Border Force regional business plans for 2024-25 detailed their headcount targets for the end of the business year (see figure 4).

Figure 4: Border Force regions' headcount targets for 31 March 2025

Region <sup>30</sup>	Staff in post at 31 March 2024 (FTE)	Head count target for 31 March 2025 (FTE)	Difference (+/-)
Central	1,365	1,392	+27
North	1,423	1,322	-38
South East	1,138	1,039	-101
South	1,139	1,114	-25

5.11 In November 2024, inspectors were told that the Home Office's own "analytical modelling" indicated that the current level of resourcing for GM work was "under where it should be for an 'adequate to good' service". While the headcount reductions in the regions (except Central, where there is a small increase) were not specific to GM, managers were concerned that they could result in GM being pushed even further down the list of priorities.

#### Regional general maritime teams

- 5.12 Border Force regions employ a multi-functional operating model which enables staff to be moved between activities as required.<sup>31</sup> Border Force managers told inspectors that, while this flexibility was important, it meant that newer staff had not gained the experience and specialist knowledge they would have previously acquired from working in a particular area on a regular basis.
- **5.13** BFOs at several ports told inspectors that their region would benefit from having a dedicated GM team. This view was repeated in responses to the Independent Chief Inspector of Borders and Immigration (ICIBI) staff survey.
- As of February 2025, only South East region had frontline officers who focused on GM work as a part of their normal day-to-day responsibilities. Previously, there were more dedicated GM teams, and Border Force officers told inspectors that this had ensured that some GM work was done. They felt that the loss of dedicated teams meant that knowledge of GM had been diluted, as staff experienced in GM were either merged into local teams or left Border Force because it was no longer the job they wanted to do. As a result, relationships that those officers had built up with stakeholders in the local GM community had also been lost. Outside South East region, there were still some BFOs with extensive knowledge of GM, and inspectors were told that less experienced colleagues were very appreciative of their input and support.
- 5.15 In South East region, GM operational activity was covered by the South East Inland and Coastal Team (SEICT). SEICT had over 250 BFOs split across 24 teams, each led by a BFHO. The teams provided 24-hour coverage across three shifts, rotating through various core areas of work every six weeks, including General Aviation (GA), GM, Customs, and Civil Penalty.
- **5.16** This arrangement means there are always four teams on rotation available to undertake GM work, including local operations.
- **5.17** BFOs in SEICT told inspectors: "Maritime was left for years and now there is a massive focus on it, which is great." They described how they are able to focus on marinas (where there can be

<sup>30</sup> Heathrow region, Europe region and Small Boats Operational Command headcount reduction figures are not included, as they do not conduct GM activity.

<sup>31</sup> Multi-functional BFOs cover immigration and customs functions.

one thousand vessels a month coming in), meeting pleasure crafts that have notified of their arrival, checking the visitor berths for any vessels flying a Q flag, identifying suspect fishing vessels, and speaking to owners about anything unusual they may have observed.<sup>32</sup> A team member also has access to Telesto, a Ministry-of-Defence-owned vessel-monitoring system that enables monitoring of the movement of vessels fitted with tracking devices.<sup>33</sup>

5.18 Managers in SEICT said that a lot of the work was intelligence gathering, working closely with Field Intelligence Officers, rather than making seizures, which made it difficult to demonstrate impact. However, there had been some recent successes, such as a seizure of 400 kilos of cocaine from a fishing vessel off the south coast, as a result of a Border Force investigation.

#### **Port GM Leads**

- 5.19 Most of the ports visited by inspectors had designated a BFHO to lead on general maritime. In some cases, they were also the designated lead for GA. GM leads told inspectors there was no training for the role, and inspectors found no evidence of operational guidance, or a clear set of role-related expectations. Levels of GM experience varied considerably.
- 5.20 While certain BFHOs had been designated as port GM leads, there was little evidence of any co-ordination of their work at regional or national level. Inspectors were told of a proposal to the regional leadership team in one region that it should create a regional maritime forum for Border Force Senior Officers to mirror the arrangement for GA. This was agreed in early 2024, and quarterly meetings were planned with GM leads to discuss best practice, operations, and assurance. The first meeting took place in May 2024. However, the officer who had made this proposal was redeployed as part of a restructure and no-one took over the work, so the meetings stopped.

#### **Command and Control**

- 5.21 The Border Force National Command Centre (NCC) performs the national command and control function for Border Force, including management of critical incidents and reporting to ministers. It covers all Border Force activity, including GM.
- **5.22** Each Border Force region has its Regional Command and Control Unit (RCCU). RCCUs command and control functions include advising ports on GM-related enquiries. RCCUs report and escalate operational matters to the NCC as necessary.
- 5.23 Three RCCUs (Central, South, and North) have mobile response teams of frontline officers that can be deployed to ports, and in principle could be used for GM work. Each week the RCCUs receive bids for staff in mobile teams from ports, and they are allocated via the national tasking mechanism and deployment model.

<sup>32</sup> The RYA website explains: "If you are arriving from abroad on board a boat under its own propulsion, unless you are certain that you do not need to, e.g. you do not need permission to enter a country or the country has stated otherwise, you should fly the Q flag on first entering territorial waters. The crew should normally remain on board the vessel until the skipper has completed the necessary customs and immigration formalities, when the Q flag may be taken down."

<sup>33</sup> The Royal Navy's Maritime Domain Awareness (RN MDA) provides the UK maritime Common Operating Picture through a platform called Telesto. Civilian (non-military) users access Telesto via the Joint Maritime Security Centre that sponsors all non-Defence users of the system. In addition to Telesto, RN MDA provides a comprehensive rules-based MDA analytics platform, CAMTES. This uses similar, but not identical, datasets to Telesto and provides rules-based reporting, alerting, and analysis.

# **Border Force Maritime Command staffing**

#### **Overview**

- **5.24** BFMC provides a national maritime law enforcement capability, combining the law enforcement and maritime skills, experience, and expertise required to operate effectively and safely at sea.
- As at October 2024, the seagoing workforce was 186 FTEs, 42 below its full complement of 232 FTEs. Inspectors were told that the staffing plan included eight maritime enforcement cutter crews with 17 posts in each, six coastal patrol vessel crews of six officers per crew, and 24 officers working across two teams in the mobile rigid hull inflatable boat (RHIB) team.
- 5.26 In 2023, the 'GM Strategic Review' highlighted that BFMC's seagoing workforce was significantly short of its agreed complement. It found there was an urgent need to strengthen recruitment and training and recommended that "strategic workforce planning should focus on BFMC and overall GM activity in relation to staffing levels, succession planning, skills, experience and qualification gaps to ensure it is managing and forecasting its current and future requirements to remain an effective national capability". Inspectors therefore looked for evidence of progress in relation to these issues.

#### **Ageing workforce**

5.27 Concerns over the loss of GM experience and knowledge in BFMC are exacerbated by the age profile of the workforce. (See figure 5, which includes the percentage of staff in age ranges for the National Deep Rummage Team (NDRT), for the seagoing fleet and operations (Fleet & Ops), and for BFMC overall).<sup>34</sup> Of 100 leavers from BFMC between 1 January 2022 and 16 April 2025, 18 were retirements, eight of which were from maritime crews. A further 34 members of staff will reach their normal retirement age (60 years) by 2028.

Figure 5: Breakdown of Border Force Maritime Command workforce by age range as at 31 December 2024

Age band	Percent of headcount			
	NDRT	Fleet & Ops	Overall BFMC	
16-29	16.28%	7.00%	8.39%	
30-39	23.26%	19.75%	20.28%	
40-49	20.93%	25.10%	24.48%	
50-59	34.88%	36.21%	36.01%	
60+	4.65%	11.93%	10.84%	

#### **Staff retention**

5.28 Border Force found it challenging to recruit and retain staff in specialist areas. Border Force managers told inspectors that many staff had left to work in the private sector because their skills meant they could earn more elsewhere. Of the 100 staff who had left BFMC between 1 January 2022 and 16 April 2025, 33 were recorded as having left the Civil Service. Roughly three quarters (77) of those who left were BFOs.

<sup>34</sup> The National Deep Rummage Team has specialist rummage-trained officers who can search the most hazardous areas of vessels.

5.29 A "key priority for improvement" identified in the 'GM Strategic Review' was as follows: "Those staff holding specialist qualifications where the organisation has invested heavily should be recognised in terms of retention in role through appropriate incentive mechanisms (as a return on investment) with appropriate succession planning from those roles that require extensive lead in times." These things were not in place by the time of this inspection.

#### Terms and conditions dispute

- 5.30 BFMC staff are employed on different terms and conditions (T&Cs) from other Border Force staff. This impacts pay, allowances, and leave. For example, the leave allocation for BFMC staff is built into their shift patterns. Within BFMC, T&Cs have been revised over the years, so staff are on different T&Cs depending on when they joined BFMC. These different sets of T&Cs have affected recruitment, retention, and morale.
- 5.31 The Home Office had been in a prolonged dispute with staff and the unions over the T&Cs for BFMC staff. Failure to agree on new T&Cs had meant that it had not been able to recruit to the 60 vacant posts for which there was approved funding.
- 5.32 The Home Office told inspectors in March 2025 that it had shared proposed new T&Cs for BFMC staff with the Trade Unions and hoped the dispute would be ended soon. The proposed changes reflected the specialist nature of maritime roles and recognised the unique attendance patterns and flexibility that the roles required. They included annualised hours working, a new maritime skills allowance for specific roles to align with qualifications, and pay protection for roles with reduced benefits.

#### **Maritime allowances**

- 5.33 In autumn 2024, Border Force Operational Assurance Directorate (BFOAD) began a review of BFMC. This examined whether staff were being managed properly and supported in accordance with Border Force and Home Office values. The review identified that the allowances system was not clear to staff and recommended that BFMC and Home Office HR should produce a definitive guide to allowances.
- 5.34 The BFOAD review also found that some officers had been receiving reward and recognition awards from Border Force managers every month to compensate them for the loss of Temporary Cover Allowance. These officers had come to expect the payments as part of their basic pay, regardless of whether they had excelled or achieved any goals. This was not in line with Home Office policy.

#### Culture

- Border Force senior managers told inspectors that there were "difficult cultural issues within BFMC" that needed to be tackled. Concerns had been reported around social media use and alcohol consumption, and there had been allegations of bullying and sexual harassment. At the time of this inspection, BFOAD was still investigating these reports.
- 5.36 A Trade Union representative told inspectors that the alleged bullying extended up to senior management level and described BFMC as an "old boys' club", observing: "There is a massive problem with sickness, bullying and nepotism on the boats. It's not a very nice place to work." The representative said that the few women who worked on the crews found it especially difficult. Inspectors interviewed four different crews and encountered only one female officer.

- Crew members told inspectors that some colleagues were "set in their ways" and "resistant to change" and that "lots of issues arise as a result".
- 5.37 A wellbeing officer post in BFMC had been vacant since July 2024 and was being covered by two senior managers on an interim basis. However, the BFOAD review found that staff were unaware of the existence of the wellbeing officer role.
- 5.38 The BFOAD review highlighted a serious incident on board one vessel which was not independently investigated. This led to a recommendation that "all serious allegations are dealt with effectively, involving the Home Office Professional Standards Unit (HOPSU) and OAD, as appropriate".
- 5.39 Inspectors noted that in the 2024 Home Office People Survey almost one quarter of BFMC staff said they had been discriminated against at work in the last 12 months (20% said that this had occurred within their current team). This compared with the Home Office-wide figure of 11% (8% within their current team). Meanwhile, 31% of BFMC respondents to the People Survey said they had seen someone else bullied or treated unfairly in the last 12 months. This compared with 21% in the Home Office as a whole.

# **Border Force recruitment and training**

#### Recruiting the right people

- Border Force managers told inspectors that the recruitment and selection process for new Border Force officers was too generic and not fit for purpose. One said: "It is not transparent and fails to recruit people with the right skills, temperament, or fitness level." Some successful candidates were unaware of the physical aspects of the role, and managers cited examples of new starters unable to perform tasks such as climbing up the side of boats and crawling under lorries.
- A Trade Union representative suggested that issues with the suitability of candidates were linked to the Home Office's drive "to get as many through the door as possible". BFOs and external stakeholders suggested to inspectors that local recruitment exercises with Border Force Senior Officers and Higher Officers on selection panels would be more likely to result in the appointment of good-quality candidates and would also help candidates gain a better understanding of the role and the team.
- As well as the quality of the recruitment and selection process, several Border Force managers told inspectors that it took too long from applying to starting in the role. In some cases, the process took over 18 months. As a result, by the time a job was offered, some candidates had already accepted one elsewhere.

## A maritime training strategy

5.43 At the time of this inspection, Border Force did not have an up-to-date strategy for maritime training. The 'GM Strategic Review' recognised this in 2023 and recommended a comprehensive training needs assessment and gap analysis for GM. Border Force told inspectors it expected to complete a learning needs analysis by the end of June 2025, following the completion of "analysis work on GM risk, capabilities and operational effectiveness, and agreement of a new GM approach and structure".

- 5.44 BFOs told inspectors that Border Force did not prioritise training effectively and that the system for applying for training was flawed. As an example, a BFO with less than a year's service could be allocated a place on a training course before a BFO who had been waiting much longer, simply because they happened to be present in the office on the day the places for the courses were released and were therefore able to reply quickly to the email.
- 5.45 Inspectors requested details of training undertaken by BFOs. The Home Office responded that training records were not held in a consistent manner and some ports had multiple spreadsheets. This meant that Border Force did not have a comprehensive record of who had received the training required for their role or when it needed to be refreshed. Similarly, in autumn 2024, the BFOAD review found the training matrix used by BFMC was not completed consistently, with apparent gaps in training and officers not updating their own records accurately.
- 5.46 Inspectors were told by Border Force managers that staff were sometimes placed on training courses when they did not have a need for the training. In response to the survey issued by inspectors, one BFO said that they and several of their colleagues had completed a RHIB training course despite their region not having any such vessels. Meanwhile, a Border Force manager told inspectors: "there is a huge waiting list for the pleasure craft searching course but that is because it is not prioritised properly to ensure only those who will search a vessel receive the training".

#### **Border Force Maritime Command training**

- 5.47 Due to the complex maritime environment in which its staff operate, BFMC provides a lot of specialist training. The BFMC induction course runs over nine weeks and includes a broad range of maritime training, such as a boarding a vessel course, personal safety training, firearms and explosives, and the rummage foundation course.<sup>35</sup> This induction course leads into a 12-month structured pathway focusing on maritime content.
- 5.48 BFMC training is accredited by the Royal Yachting Association. Inspectors were told that, by delivering courses in-house rather than using an external provider, BFMC saves an estimated £100,000 per year. For example, the cost of a yacht master course from an external provider is £10,000. However, Border Force managers told inspectors there was a lack of trainers, both in-house and external, for some specialist training, such as the coastal theory element of the advanced mariners' course. Several courses had been cancelled due to the lack of trainers.
- BFMC maritime crews have two training pathways: the 'deck route' and the 'engineering route'. Between 2020 and 2024, only four Maritime Enforcement Officers chose the engineering route, compared with over 40 who chose the deck route. Inspectors were told that BFMC needed 30% of new recruits to choose engineering in order to keep the fleet appropriately crewed. To address this, during induction, BFMC is encouraging new recruits to consider the engineering pathway.
- 5.50 Qualification for key seagoing roles is a lengthy process. The 34 seagoing staff who will reach normal retirement age by 2028 include seven of a total of 12 chief engineers. This is a particular concern, as the fastest route to qualifying as a chief engineer takes around seven years. Meanwhile, the Maritime and Coastguard Agency 'Master 3000 G7 qualification', which enables a person to skipper a vessel, takes around 11 years to complete.

- 5.51 To mitigate the risk that it will be unable to fill such positions, BFMC had reached an agreement with the Maritime and Coastguard Agency to amend its published training pathways to make them shorter. However, the qualifications achieved through these shorter pathways will cover working on government vessels only, and the person would need to have completed the standard pathway before they could work on other vessels.
- 5.52 Inspectors were told by maritime crew that attending maritime training had financial implications for them. Officers would lose some allowances if they were not at sea, meaning that they would be financially worse off if they attended a training course.

#### **Border Force Officer port training**

5.53 The Home Office provided data for trained staff, broken down by Border Force Command (including regions and BFMC). The data covered 4,412 staff, including those based at airports as well as seaports. (see figure 6).

Figure 6: Number and percentage of Border Force officers trained by course type as at 26 November 2024

Training course	Total trained	Percent trained
Customs	3,340	75.70%
Deep Rummage (Vessel Rummage Advanced)	46	1.04%
Dock and Shipboard Awareness	2,483	56.28%
Foundation Rummage (Vessel Rummage Foundation)	283	6.41%
Immigration Pre IS81	2,917	66.12%
Immigration Post IS81	2,351	53.29%
Maritime Induction	100	2.27%
Search of Pleasure Craft	514	11.65%

- 5.54 BFOs who work at a port are normally expected to complete either customs foundation training, or immigration foundation training, or both. This is dependent on their location and role. The feedback from officers who had completed this training was that it did not provide them with the skills and knowledge required to undertake GM work because it is focused on airport operations. A Border Force manager and national trainer agreed that the immigration course prepared BFOs for working at an airport but not at a seaport. The manager confirmed this had been fed back "many, many times" but the "Home Office focus is on airports and always has been".
- 5.55 New starters were expected to be taught maritime skills locally by more experienced colleagues. This was done on an ad-hoc basis, without any formal structure or sign-off process to confirm that they were competent. Managers told inspectors of their concerns about relying on existing staff to provide 'on the job' maritime training when those providing the training often had little experience themselves.
- 5.56 In light of the 'GM Strategic Review', in December 2024 the Border Force Board approved a 'GM transformation programme', which included a workstream to create a GM training module for the BFOs. The Home Office subsequently advised inspectors that it expected to complete a learning needs analysis by the end of June 2025 and this would inform future training provision.

- 5.57 Multi-functional staff require training in a range of skills in order to be able to operate as a flexible and mobile resource. Inspectors were told that this can result in a considerable amount of a new starter's first year being taken up with training. Managers told inspectors that, even if courses and trainers were available, it could be a struggle to release officers to attend training courses due to the impact on staffing levels available to cover mandated work.
- 5.58 In the ICIBI survey, some BFOs responded that they did not want to attend training courses. The main reason was that the training courses meant spending long periods away from home, which was off-putting in terms of work-life balance.

#### 'Skills fade'

- 5.59 Border Force officers and managers told inspectors that 'skills fade' was an issue, particularly with the multi-functional teams, as officers have so many work streams to cover. BFOs who did not perform GM work every day may lose their skills and inspectors were told "[some] BFOs are not comfortable doing GM work as they don't know what they're doing".
- 5.60 Inspectors were also told that staff returned to work having completed a training course and did not get the opportunity to put their newly acquired skills and knowledge into practice, so they forgot what they have been taught. One BF officer told inspectors in December 2024: "I did a container search course last September and have not searched one since. I did a forklift course three years ago and haven't driven one since. I did a power tool course and have never used them since. The courses themselves were decent but if you don't use it, you lose it. It's a tick box exercise so they can say someone is trained or it's just filling spaces on the courses, it's not worthwhile."

## Line manager development

5.61 Inspectors identified some positive moves aimed at addressing Border Force staff concerns highlighted in the 2023 People Survey. For example, in response to a perceived lack of support for new line managers, North region had introduced a leadership development programme in Manchester for Higher Officers and Senior Officers. By February 2025, 162 managers out of a possible 211 had attended the five-day course, which had been rolled out to managers across the region.

# 6. Inspection findings: Regional general maritime work

## **Overview**

General maritime (GM) work in the Border Force regions is predominantly land-based. Some ports have their own Border Force vessels, which can be used to patrol the surrounding waters, interdict other vessels at sea, or access GM locations from the water. But in most cases, officers travel overland from the port where they are based to attend uncanalised GM locations (those with no permanent Border Force presence).

#### **Border Force Operating Mandate**

- 6.2 Activities such as participating in a GM operation, either run locally or part of a national effort, or engaging with stakeholders in the GM community, are not mandated, but some work in relation to GM is. This includes carrying out mandatory checks where:
  - a pleasure craft or commercial GM vessel owner notifies Border Force of their arrival from outside of the UK, in which case the vessel is either met or remotely cleared
  - a vessel is selected as a target and officers are deployed to conduct searches for customs or immigrations purposes
- 6.3 However, the Border Force Operating Mandate states that "where no prior notification of the arrival of a GM service is received, mandatory checks are not performed". In practice, this means that unless a 'submit a Pleasure Craft Report' (sPCR), C1331 form, or a National Maritime Single Window (NMSW) entry is completed for the person(s) entering the UK, Border Force will not carry out any checks, unless there is actionable information from another source about an arrival.
- 6.4 ICIBI's 2016 'Inspection of General Aviation and General Maritime' highlighted the lack of advance passenger information (API) for general maritime arrivals as a particular vulnerability:
  - "The absence of API for GM arrivals, of the type and extent available for General Aviation, was arguably the most significant gap in terms of Border Force's ability to manage the risk from GM arrivals efficiently and effectively."
- 6.5 Border Force officers told inspectors that, because API was not a legal requirement, it was not known who was entering the UK via GM. When Border Force does receive API, either through the NMSW or an sPCR, checks will be performed under Checks Model 3 (Arrival Met) or Checks Model 4 (Remote), depending on the declared nationality of the passengers and purpose of visit. However, officers described this as "policing the compliant" and pointed out that criminals were unlikely to declare their voyage.

The contrast in level of control between canalised locations and in GM work was highlighted in the 'GM Strategic Review', which noted:

"In canalised ports, any breaches [of the mandated checks] are required to be reported to ministers, but in GM, the same controls are not mandated and [there is] no requirement to report breaches, which therefore limits activity, accountability and scrutiny."

# The 'submit a Pleasure Craft Report' (sPCR) process

#### **Background**

**6.7** The Home Office told inspectors that for pleasure craft owners:

"The responsible person ... may report the voyage and persons onboard using the 'submit a Pleasure Craft Report' (sPCR) service in compliance with the Pleasure Craft Directions (December 2021). Reporting may also be made by completing a C1331 form which can be submitted electronically or posted on arrival."<sup>36</sup>

6.8 The sPCR process for captains to provide notification online (via GOV.UK) of all voyages arriving or departing the UK was introduced on 25 July 2022. This had generally replaced the submission of a His Majesty's Revenue and Customs (HMRC) paper-based form C1331. In 2017, ICIBI had recommended that the Home Office "discuss and agree with Her Majesty's Revenue and Customs either the discontinuance of Form C1331 (the required customs declarations by pleasure craft) or an effective way of ensuring a meaningful level of compliance with the current requirement to complete and file it."<sup>37</sup> This recommendation was accepted, and the Home Office responded:

"Form C1331 under current arrangements is of limited use to Border Force. Border Force and HMRC will jointly review the information requirements and systems for General Maritime by the end of June 2017."

- 6.9 At the time of the current inspection, the C1331 could still be used. Also, a Microsoft Excelbased report could be submitted by email as a fallback option if the online system was down.
- 6.10 Since April 2024, sPCR has incorporated the Universal Permission to Travel (UPT) scheme and electronic travel authorisation (ETA). Due to the phased approach to the roll-out of UPT, and the nationalities that had been included to date, the scheme had little impact on the sPCR process as of June 2024.<sup>38,39</sup>
- 6.11 As at 7 February 2025, the sPCR process remained voluntary. However, the Home Office told inspectors it was preparing advice for ministers on proposals to make it mandatory. The Home Office was intending to seek ministers' agreement to:

"Consult publicly on a proposal to introduce new regulations. These regulations would be made in accordance with paragraph 27BA of Schedule 2 to the Immigration Act 1971 and would require captains and persons responsible for international General Maritime voyages

<sup>36</sup> C1331 is a form for reporting the departure and arrival of pleasure craft on non-UK voyages.

<sup>37</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection of Border Force operations at east coast seaports (July – November 2016)' (published 12 July 2017).

<sup>38</sup> Universal Permission to Travel (UPT) is a scheme introduced through the Nationality and Borders Act 2022 that requires all travellers without an advance visa or confirmed immigration status to have valid travel permission in advance. This is done through an electronic travel authorisation (ETA), a digital record linked to a person's passport.

<sup>39</sup> From 5 March 2025 European Economic Area nationals can apply for an ETA.

(including to and from the UK from within the Common Travel Area) to submit information about the voyage and persons on board online (using sPCR or NMSW) in advance of departure to or from the UK. The intention is the regulations would be underpinned by a civil penalty regime with a maximum penalty of £10,000 for non-compliance with their requirements."

6.12 Border Force senior managers raised two main concerns about the practicalities of enforcing such a scheme. Firstly, there was the difficulty of deploying staff from ports to meet vessels when arrival times and locations could easily change and it was not possible to track vessels without automatic identification system (AIS) transponders.<sup>40</sup> Secondly, there was the question of whether current staffing levels could cope with an increased workload of mandated activity.

#### Link to vessel movement

- 6.13 A Border Force senior manager told inspectors that one of the fundamental problems with sPCR was that it was not linked to the movement of the vessel. A skipper could complete the sPCR indicating when they were likely to arrive but be unavoidably delayed due to the unpredictable nature of maritime journeys. Guidance on sPCR states that skippers should notify of changes to the voyage plan, although the logistics of this are difficult mid-voyage.
- 6.14 Border Force can monitor the movements of vessels fitted with AIS transponders, which includes the vast majority of commercial vessels. However, there is no requirement for pleasure craft (under 300 gross tonnage) to fit AIS transponders.

### 'Q' flag

6.15 HMRC guidance on GOV.UK outlines the procedures for pleasure craft owners on flying a 'Q' flag upon entering the UK's territorial waters. The guidance states:

"For journeys that you must report, you must fly the yellow 'Q' flag as soon as you enter UK waters (the 12-mile limit). Make sure the flag can easily be seen and do not take it down until you've finished reporting to customs authorities. If you do not comply you will be liable to a penalty."

6.16 ICIBI's 2016 'Inspection of General Aviation and General Maritime' found that compliance with the scheme was low and "none of the authorities at the marinas and harbours [inspectors] visited recalled seeing 'Q' flags being flown".<sup>42</sup> The Independent Chief Inspector of Borders and Immigration (ICIBI) recommended that the Home Office should:

"Develop and implement a strategy to improve the flows of information about General Maritime (GM). This should cover, both nationally and locally: ways to encourage better compliance with existing reporting requirements, including customs declarations and the 'Q' flag system".

6.17 This recommendation was 'accepted'. The Home Office responded that Border Force would "co-ordinate the development of a cross-agency strategy to improve the flow of information about GM. This will be in place by summer 2016." Along with this, it was developing a network of Field Intelligence Officers (FIOs), would make more systematic use of information from the

<sup>40</sup> AIS is a system that uses a transponder and satellite technology to geographically locate vessels.

<sup>41</sup> HM Revenue & Customs, 'Sailing a pleasure craft that is arriving in the UK' (last updated 20 November 2023). <a href="https://www.gov.uk/guidance/sailing-a-pleasure-craft-that-is-arriving-in-the-uk">https://www.gov.uk/guidance/sailing-a-pleasure-craft-that-is-arriving-in-the-uk</a>

<sup>42</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection of General Aviation and General Maritime (February – July 2015)' (published 14 January 2016). https://www.gov.uk/government/publications/inspection-report-of-general-aviation-and-general-maritime-january-2016

- public about movements at the coast, and attend more remote locations more frequently, either by land or sea. The response did not mention 'Q' flags.
- **6.18** For the current inspection, inspectors asked the Home Office for data on 'Q' flag arrivals including the overall number, how many arriving vessels did not comply, and any action taken in respect of non-compliance. The Home Office could not provide this data. It stated that there was "no practical way to capture this information".
- As in 2016, when inspectors spoke to BFOs they did not mention that checking compliance with the 'Q' flag process was part of their GM work. The only mention of 'Q' flags during the current inspection was by a stakeholder, who expressed concerns about the practicalities and health and safety risks of raising the flag in bad weather. Inspectors did not receive any evidence from any source to indicate that the Home Office had done anything to seek to improve compliance with the 'Q' flag scheme.

#### Response times to sPCR notifications

- 6.20 The Home Office does not have any published service level agreements or target timescales for responding to sPCR notifications. As at 20 February 2025, Border Force did not record the time taken to grant leave to enter (LTE) from the point of the notification. It was therefore impossible for Border Force to assess how well the current process was working from a service user's perspective or how mandating the sPCR would impact service levels.
- 6.21 In response to the ICIBI's 'call for evidence', the Royal Yachting Association (RYA) told inspectors that their members reported having to wait several hours for LTE and that sometimes they had no contact at all from Border Force and had to call the National Yachtline for clearance. Inspectors also conducted a survey of RYA members in which they reported similar issues. One RYA member told inspectors: "the app failed and eventually (after I had sailed the Channel) [I was] emailed with a [system] error. I cleared with Yachtline instead."

#### **Collaborative Business Portal**

- 6.22 The General Aviation Information Tool (GAIT) is described by the Home Office as a case working system used for GA. By matching a live flight plan feed against any submitted General Aviation Report (GAR), a Border Borce Officer (BFO) can see immediately which flights have not had a GAR submitted. The tool also records a risk assessment of the flight and indicates whether it needs to be met by Border Force officers. No maritime equivalent of GAIT exists for GM.
- BFOs told inspectors they preferred the GAIT interface compared with the Collaborative Business Portal (CBP) system used to access crew and passenger data for GM arrivals, both commercial and pleasure craft. GAIT was described as "user friendly" and the information easier to access and follow. A Border Force manager described the fact that the same style of tool was not available for GM as "baffling", adding that GAIT had helped change Border Force's approach to GA "significantly".
- Inspectors heard mixed views about CBP from BFOs. Some described it as "clunky" and "user-unfriendly", while others thought it was "straightforward" to use. A BFO at one port told inspectors that the system was allocating arrivals at sites that were not within their port's remit due to it being set up incorrectly. Several BFOs mentioned that they had to do a manual search

<sup>43</sup> The National Yachtline is a 24/7 telephone service, operated by HMRC, to enable sailors arriving from outside of the UK to report their arrival and departure.

of the "destinations unknown" data on CBP to check for arrivals that fell within their remit but had not been allocated to a port. This was raised repeatedly by BFOs as an issue, as arrivals could be missed if the "destinations unknown" data was not checked.

#### Recording and assessing arrivals at port

- Inspectors asked the Home Office for data on the number of GM arrivals since January 2022, including the number of vessels, the number of passengers/crew, and if they were physically met by a Border Force officer. The Home Office responded that it was unable to provide any data as the data it had collected from the Maritime Priority Assessment Tool (MPAT) could not be used due to "inconsistent" use by the ports completing MPAT.
- 6.26 MPAT was designed to help Border Force officers at ports record arrival information and assess the risk of individual GM movements where API had been provided. MPAT was first piloted in 2013 and rolled out across Border Force following a recommendation from ICIBI in 'An inspection of General Aviation and General Maritime (February July 2015)', which the Home Office accepted.
- 6.27 Inspectors were told by the Home Office that MPAT was discontinued in January 2024, after a second review had found that the system was "temperamental, and corrupted multiple times".
- **6.28** In August 2024, MPAT was replaced with a 'Leave to Enter assurance tracker' (LTE tracker).
- 6.29 Between 15 August 2024 and 31 December 2024, a total of 47,994 individuals were recorded on the LTE tracker, 40,345 (84%) of whom were non-British/Irish nationals. The LTE tracker recorded that four people had been refused leave to enter and 36,194 had been granted it. From the information provided by the Home Office, it was not possible to say what had happened with the remaining 4,147 non-GBR/Irish individuals.<sup>44</sup>
- The LTE tracker has a column for how LTE was issued ("If not met, how was clearance given?"). The dropdown options include: 'email', 'Phone', 'text', and 'N/A'. 45,46 There was no option for 'not cleared', so, where the column was left blank, it was not possible to know whether a region had failed to clear the vessel or simply failed to record how they had cleared the vessel.
- 6.31 Data exported from the LTE tracker for the period 15 August to 31 December 2024 showed that, for just over 40%, it was not known if the vessel was cleared or how, because the column was left blank (figure 7). Also, the 'assurance' column was often not completed, and, where it was, it was not possible to know who had completed an assurance check as they could not input their name or initials.

<sup>44</sup> In its factual accuracy response, the Home Office stated: "This included figures relating to a cohort of non-GBR/Irish individuals who had been incorrectly included. These individuals, such as those arriving on cruise liners, had been correctly processed as per checks model 3 and 4 (modernised cruise procedures) and the National Maritime Single Window (NMSW). Any of these individuals who were refused LTE would have been recorded on other Home Office systems. It was therefore not possible to say what happened to these individuals from the LTE tracker alone. ...The new process is still being implemented in operational teams to ensure consistency across ports. Entries are inputted by frontline officers. There is yet to be a review of entries to improve completion and accuracy for reporting."

<sup>45</sup> Inspectors received LTE data in two forms (for two different time periods): the full LTE spreadsheets for each region, followed by a summary of this data provided by the Performance Reporting and Analysis Unit (PRAU). Analysis of the individual spreadsheets showed that 'text' had been used 16 times. It was not included in the data returned by PRAU.

<sup>46</sup> Inspectors understood that 'N/A' (not applicable) was intended to apply to those cases where the vessel had been met or where the occupants did not require clearance, such as British nationals. However, in the absence of clear instructions about what to record under 'N/A', it was not possible to say what might or might not have been included.

Figure 7: Data exported from the LTE tracker from 15 August to 31 December 2024, showing how Border Force clears and responds to GM arrivals

	Border Force response to vessel arrival							
		Met	Not met	Unknown	Total	%		
	Email	12	257	0	269	9.69%		
Vessel	Phone	4	234	0	238	8.58%		
clearance	N/A	96	989	24	1,109	39.96%		
method	Unknown <sup>47</sup>	22	91	1,046	1,159	41.77%		
	Total	134	1,571	1,070	2,775	100.00%		
	%	4.83%	56.61%	38.56%	100.00%			

- **6.32** BFOs told inspectors that the LTE tracker did not have anywhere to record the 'reason for visit', which meant all arrivals were counted simply as 'visitors'.<sup>48</sup>
- 6.33 It was not evident to inspectors who had responsibility for ensuring that the LTE tracker was completed correctly. No-one appeared to have oversight of this.
- 6.34 A Border Force manager in one port told inspectors they were not currently using the LTE tracker at all due to "some confusion" over what was required. Another Border Force manager told inspectors the LTE tracker was introduced without any guidance for staff: "There was just an Interim Operating Instruction (IOI), it literally happened, and we didn't know about it." When inspectors asked a Border Force senior manager about this, they said an IOI had to be issued while the GM guidance was being reviewed. This guidance had yet to be re-issued at the time of the inspection.

#### **Border Force 'Assurance Expectations'**

- 6.35 The Border Force 'Assurance Expectations' set out the minimum standards that Border Force should be achieving, or putting plans and action in place to achieve, in every office, port, and Border Force location. Assurance expectations are grouped into 16 themes, with GM sitting under 'Expectation 8: Immigration arrivals, indicator 8.16'. 'Indicator 8.16' states that "all General Aviation (GA), General Maritime (GM), crew, and cruise ship arrivals are checked in advance wherever applicable and the Border Force response is in line with guidance."
- **6.36** Inspectors requested copies of local assurance logs for GM arrivals. Border Force told inspectors:

"Within the period between 12 November 2023 and 29 October 2024, a total of 155 assurance checks have been reported against indicator 8.16. Of these checks:

- 121 resulted in a Green (adequate and effective) rating.
- one resulted in an Amber (significant weakness) rating.
- none resulted in a Yellow (some improvement required) rating.
- six resulted in a Red (fundamental weakness) rating.
- 27 resulted in a Grey (no activity to assure) rating ."

<sup>47</sup> The term 'unknown' is taken from the PRAU data return.

<sup>48</sup> In its factual accuracy response the Home Office pointed out that the LTE tracker contained a 'notes' column, which could be used to record the reason for travel.

6.37 'Indicator 8.16' is the only assurance measure that refers specifically to GM. However, because it groups GA with other modes of arrival, Border Force was unable to say definitively how many of the checks related to GM. It estimated that "approximately 31" of the 155 assurances checks related to GM, stating that:

"the vast majority of the 155 assurance checks within indicator 8.16 apply to GA activity and not GM activity. It is estimated that c.20% of these checks apply to GM assurance activity".

6.38 Border Force managers told inspectors that they do not assure GM activity very often. Any assurance undertaken is recorded on the Border Force 'Assurance Toolkit', a digital assurance tool introduced across the regions between November 2023 and February 2024. Prior to this, managers (normally BF Higher Officers) would record their assurance checks on locally held Excel spreadsheets. The Home Office told inspectors that:

"Border Force has recently amended the Toolkit to make it easier to identify which area of activity the assurance check relates to although, whilst this will improve data collection moving forward, it is not possible to apply this to historical data".

#### **General maritime data**

- 6.39 A key finding from ICIBI's 'An inspection of General Aviation and General Maritime (February July 2015)' was that there was "no systematic collection of information about any aspect of GM". The report acknowledged that it was not within Border Force's immediate control to fix this as it neither owned nor managed existing reporting regimes, such as C1331 customs declarations by pleasure crafts. However, it pointed out that Border Force was missing opportunities to build and exploit knowledge of GM from the information it did receive from others and from its own actions.<sup>49</sup> The current inspection showed that opportunities were still being missed.
- by the Home Office to be "unreliable". Meanwhile, the replacement LTE tracker was not being consistently completed, making it equally unreliable. Therefore, inspectors could not be confident that the breakdown of GM arrivals by region recorded in the LTE tracker was an accurate reflection of either the volumes or distribution of GM arrivals. The regional totals recorded for the period 15 August to 31 December 2024 are shown in figure 8.

Figure 8: General maritime vessel arrivals recorded on the LTE tracker by Border Force region from 15 August to 31 December 2024

	North	South	Central	South East <sup>50</sup>	Total
Total	1,123	1,076	163	412	2,774
% by region	40.48%	38.79%	5.88%	14.85%	100.00%

6.41 The Home Office provided pleasure craft arrivals data from the 'submit a Pleasure Craft Report' (sPCR) system from 25 July 2022, when it was introduced, to December 2024 (see figure 9).

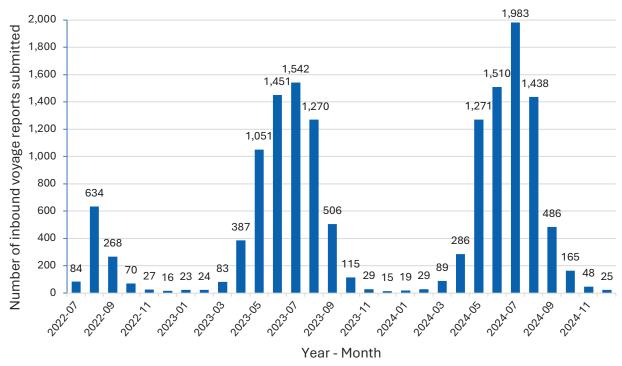
<sup>49</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection of General Aviation and General Maritmime (February – July 2015)' (published 14 January 2016). <a href="https://www.gov.uk/government/publications/inspection-report-of-general-aviation-and-general-maritime-january-2016">https://www.gov.uk/government/publications/inspection-report-of-general-aviation-and-general-maritime-january-2016</a>
50 In South East region, the South East Inland and Coastal Team has responsibility for dealing with GM arrivals.

Figure 9: Data from sPCR showing the number of vessels and individuals reported as arriving to the UK by pleasure craft between 25 July 2022 and 31 December 2024

Year	Arrival voyage reports submitted	British/Irish individuals reported	Non-British/ Irish individuals reported	Total individuals reported
2022	1,099	5	0	5
2023	6,496	32	64	96
2024	7,349	10,731	13,048	23,779
Total	14,944	10,768	13,112	23,880

**6.42** The seasonal nature of sPCR is evident from the monthly arrivals (see figure 10).

Figure 10: sPCR data, broken down by month, showing the number of vessels reported as arriving to the UK by pleasure craft between 25 July 2022 and 31 December 2024



Inspectors were unable to reconcile the sPCR data with the LTE tracker data. However, even allowing for the seasonal variations, the sPCR totals for 2024 suggested that the LTE tracker data substantially under-stated the number of known GM arrivals. Meanwhile, though increasing year-on-year, still only a fraction of pleasure craft arrivals submitted a sPCR. 51

#### **Number of general maritime locations**

6.44 Inspectors asked the Home Office for a list of all GM locations in the UK. The information provided was taken from the CBP system, the Border Force interface for the sPCR and NMSW

<sup>51</sup> In its factual accuracy response, the Home Office pointed out that there is no way of knowing the true numbers of pleasure craft arrivals.

- systems.<sup>52</sup> The list contained 2,055 GM locations. 'Approved ports' accounted for 81 of the 2,055.<sup>53</sup>
- 6.45 Inspectors identified issues with the accuracy and completeness of the data. Only 233 of the entries on the list include a postcode for the location, while 1,337 entries contained a UN LOCODE.<sup>54</sup> Many entries did not contain any location details, other than a generic descriptor of a town or area, for example one entry was "Southampton".
- 6.46 The Home Office told inspectors that the data "was taken from the CBP portal and contained GM and GA (General Aviation) locations", meaning it was not specific to GM locations but also contained airports and airfields.<sup>55</sup>
- 6.47 In mid-February 2025, the Home Office provided a further list of GM locations taken this time from Operation Tipson. <sup>56</sup> This identified 2,276 locations. Excluding those listed as purely 'Commercial maritime', there were 2,166 locations that may have been used for GM. <sup>57</sup> The Home Office caveated the list, saying that this was a "work in progress and not complete."

#### **GM** locations by region

6.48 The regional distribution of the 2,166 Operation Tipson locations is uneven (see figure 11).58

Figure 11: Number of Border Force ports and GM locations per region as of 31 December 2024

Border Force Region	Number of Border Force ports	Number of GM locations
Central	3	257
North	15	1,232
South	9	424
South East	2	209
Other <sup>59</sup>	3	43
Total	32	2,166

## Regional general maritime seizures

6.49 Inspectors asked the Home Office for the number, volume, and type of seizures made from GM vessels, broken down by Border Force region, the types of vessels encountered, and the frequency of detections. The Home Office was able to provide the information only for Border Force Maritime Command (BFMC) and not for any of the Border Force regions.

<sup>52</sup> The Collaborative Business Portal (CBP) is used to submit declarations/crew details prior to arrival in the UK. The NMSW and SPCR reports filter through to this.

<sup>53</sup> An approved port is one with customs approval, which is predominantly an operational control document designed to limit and control potential customs risks at the Border. The National Frontier Approvals Unit is a national team responsible for the issue and maintenance of legally required approvals for custom points of entry.

<sup>54</sup> LOCODE stands for the United Nations Code for Trade and Transport Locations. It is a system developed by the United Nations Economic Commission for Europe (UNECE) to standardise location identification worldwide.

<sup>55</sup> Any aircraft not operating to a specific and published schedule and not making a military flight.

<sup>56</sup> Operation Tipson was rolled out to Field Intelligence Officers (FIOs) in 2022. It involves a mapping exercise, with FIOs required to complete a proforma after each port visit.

<sup>57 2,166</sup> is the figure excluding locations indicated to be purely commercial

<sup>58</sup> In its factual accuracy response, the Home Office stated that the Operation Tipson data supplied was an extract of a live, working document. As the mapping exercise is incomplete, the data is also incomplete.

<sup>59 &#</sup>x27;Other' includes the Channel Islands and the Isle of Man.

6.50 In 2015, as part of its inspection of GA and GM, ICIBI had asked for data for seizures (and for criminal, revenue, or immigration offences) recorded against GA and GM. Border Force was unable to provide this data, or to provide data in relation to seizures and offences at air- and seaports regularly handling GA or GM traffic, as enforcement results were recorded against the location where the staff involved were based, rather than the location of the event. At the time, it accepted ICIBI's recommendation that it should:

"Record evidence of illegal activity related to General Aviation and General Maritime traffic in sufficient detail, including as a minimum port of entry, to inform threat and risk assessments at both the strategic and operational levels."

**6.51** In March 2023, the Border Force 'Risk Assessment Refresh' stated:

"Office seizure data recording and processing needs to improve. Data collection is now more convoluted, so data cannot be easily broken down by mode. This is partly due to new collection and dissemination tools, capturing/sharing data ineffectively. It is also crucial that further risk testing is conducted across modes to increase our understanding of vulnerability and how it changes over time."

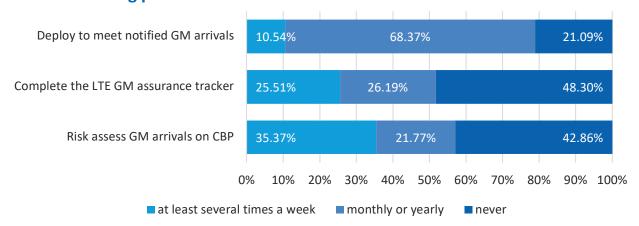
In the course of the current inspection, inspectors did not find any evidence of progress in improving the way seizure information was stored and analysed. During onsite visits, inspectors were told about individual ports keeping their own seizure records, but this information was not shared with ICIBI.

## **General maritime work**

## **Recording activity**

- 6.53 Inspectors found there was no requirement for the regions to record the amount of time officers spent on GM work. Without this information, Border Force was unable to say how much time was spent on particular GM activities or on GM overall.
- There was a consensus among the BFOs to whom inspectors spoke that GM was limited to "reactive work", such as dealing with sPCR notifications of arrivals, often remotely. A number said that, when time permitted, they visited harbours and marinas to talk to people who used them or worked there.
- 6.55 Inspectors surveyed BFOs and asked about how often they had carried out certain GM-related activities in their "day-to-day work over the last 12 months". The survey received 294 replies from grades from Border Force Assistant Officer to Assistant Director (Grade 7). According to the responses, the most frequent GM-related activity was risk assessing of GM arrivals (35.37% of respondents reported that they did this "at least several times a week during their busiest season"). This was followed by completion of the LTE tracker, which just over a quarter (25.51%) of respondents reported they did "at least several times a week during their busiest season". Meanwhile, 10.54% reported that they deployed to meet notified GM arrivals "at least several times a week during their busiest season" (see figure 12).

Figure 12: Frequency at which BF officers reported conducting the following GM activities during peak season



#### Senior manager priorities

- 6.56 Senior managers at ports told inspectors that the main reason for low levels of GM activity was that staff were fully occupied with Operating Mandate tasks. One manager described the challenge of risk testing GM with their current resources as "impossible".
- 6.57 Another manager thought GM was important work, but it did not provide "great returns" for the resources it required. Therefore, when ports did have some spare capacity, this was directed to searching goods and people coming through the port. A senior manager told inspectors: "What does the taxpayer want us to do with the money we're given? Drive up the coastline or get a big seizure here at port?"
- 6.58 Border Force staff described an increased focus on risk testing general aviation (GA) since April 2024, with ports having to meet 30% of GA flights assessed as low risk. 60 Staff felt this additional work had further limited the capacity for GM work. A manager commented that "[previously] GA and GM were equal [in terms of priority], GA has now rocketed again. ... It's a shame for GM. It's at the bottom of the pile."

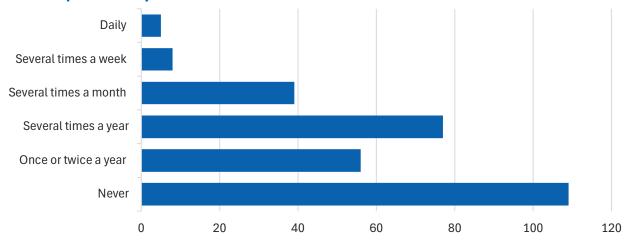
## The geographical challenge

- 6.59 BFOs told inspectors that the length of the coastline was one of the biggest challenges, particularly with the time needed and difficulty of getting to some GM locations. Inspectors were told that some locations involved a six-hour round trip, while others were difficult to reach by car. Staff at one port told inspectors they had to book their Border Force vehicle onto a passenger ferry to access GM island locations, which proved problematic in the summer months when the ferry was often fully booked in advance.
- 6.60 In situations where a vessel must be met in person and staff cannot get there in time, a request would be made to another Border Force command or to the police to attend. BFMC cutters or coastal patrol vessels may be tasked if they are in the area. BFOs told inspectors that they could "ask the police's maritime team to come down in an emergency, but often this will be the next day or the day after".

<sup>60</sup> ICIBI's 'A spot check inspection of Border Force's operational response to general aviation flights at London City Airport (January to February 2024)' was published on 26 March 2024. One of the key findings was that London City Airport was not meeting the minimum level of flights assessed as low risk. Available at <a href="https://www.gov.uk/government/publications/a-spot-check-inspection-of-border-forces-operational-response-to-general-aviation-flights-at-london-city-airport-january-to-february-2024">https://www.gov.uk/government/publications/a-spot-check-inspection-of-border-forces-operational-response-to-general-aviation-flights-at-london-city-airport-january-to-february-2024</a>

6.61 Despite the geographical challenges, 52 of the 294 (17.69%) respondents to ICIBI's survey of Border Force officers reported that they did land-based patrols at least several times a month during their busiest season (see figure 13).

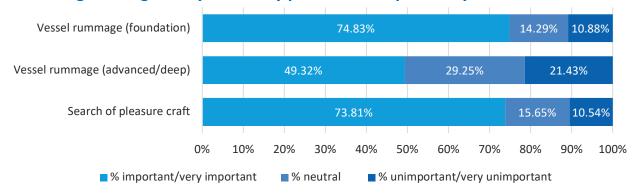
Figure 13: BF officer survey response to "How often do you conduct land-based coastal patrols in your busiest season"



#### **Searching of vessels**

- In order to carry out a customs examination of a commercial GM vessel, BFOs are required to have completed the 'Rummage Foundation Skills' course. <sup>61</sup> The equivalent training for pleasure crafts is the 'Search of Pleasure Craft' course. More advanced rummaging of a commercial vessel or pleasure craft is conducted by the National Deep Rummage Team (NDRT), due to the hazardous nature of the work and stringent safety requirements.
- 6.63 Almost three-quarters of the 294 respondents to the Border Force survey indicated that both the 'Rummage Foundation Skills' and the 'Search of Pleasure Craft' courses were important for them to be able to perform all aspects of their role fully. Separately, BFOs told inspectors that they were frustrated at not being able to access these courses due to the scarcity of training places (see figure 14).

Figure 14: BF officer survey response to "How important do you consider the following training is for you to fully perform all aspects of your role?"



The 'Search of Pleasure Craft' course aims to enhance an officer's skills in practical search techniques, while also covering areas such as how ports and marinas work, concealment

<sup>61 &#</sup>x27;Rummage' is a historical nautical reference to describe the searching of a vessel for smuggled goods.

trends, use of intelligence, risk analysis, profiling and targeting, crew questioning, and documentation. However, a Border Force manager told inspectors that the course in its current format did not have enough focus on physical examination and needed to be reviewed. They said: "the course is very heavy on PowerPoints but only spends one day on a vessel. It is more of a Field Intelligence Officer course."

6.65 The Home Office provided data on the number of Border Force staff who had received 'Search of Pleasure Craft' training (see figure 15).<sup>62</sup>

Figure 15: Number of Border Force staff trained in search of pleasure craft by Border Force region as of 26 November 2024

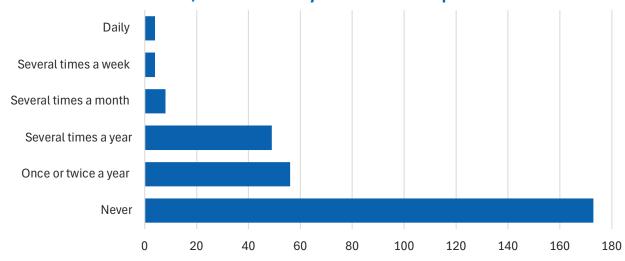
Border Force region	Number of staff pleasure craft trained	Staff headcount	% trained
Central	111	1,133	9.80%
North	28	1,238	2.26%
South	121	981	12.33%
South East	138	621	22.22%
NOHQ – Maritime Command	97	241	40.25%
NOHQ – Readiness Task Force (RTF) <sup>63</sup>	19	198	9.60%
Total	514	4,412	11.65%

6.66 BFOs told inspectors that when they were able to visit GM locations it was mainly to talk with the skipper/captain or engage with a port stakeholder. None of the BFOs with whom inspectors spoke mentioned a visit resulting in the physical examination of the vessel. Most of the officers inspectors met at ports said they could not remember the last time they searched a GM vessel. This was borne out in the responses to the ICIBI survey (see figure 16).

<sup>62</sup> Data provided is for Administrative Officer and Higher Officer grade only. Border Force made inspectors aware that the data requested was not held centrally and was therefore largely collated drawing on locally held management information. As such, this data was not assured, would be subject to change, and did not always align to central data given the different parameters applied in collation.

<sup>63</sup> The RTF was created in 2018 to give Border Force additional resilience and flexibility ahead of EU Exit. The RTF sits within National Operational Headquarters (NOHQ)

Figure 16: BF officer survey response to "Thinking about your day-to-day work over the last 12 months, how often do you search a GM pleasure craft?"



- 6.67 The 'Foundation Rummage Skills' is a four-day training course which aims to provide staff with the knowledge and skills to search a vessel's accommodation, open decks, forepeak, and steering gear, safely.<sup>64</sup>
- 6.68 Figure 17 shows the number of Border Force staff in each region who had completed the 'Rummage Foundation Skills' training as of 26 November 2024.

Figure 17: Number of Border Force staff trained in 'Rummage Foundation Skills' by Border Force region as of 26 November 2024

Border Force Region	Number of staff foundation rummage trained	Staff headcount	% trained
Central	80	1,133	7.06%
North	61	1,238	4.93%
South	39	981	3.98%
South East	48	621	7.73%
NOHQ – Maritime Command	55	241	22.82%
NOHQ – Readiness Task Force	0	198	0.00%
Total	283	4,412	6.41%

A Border Force senior manager told inspectors: "Historically, every port had a rummage team. We've moved away from that." Now, rosters could be altered to pull together a search team to rummage a target vessel if the required number of staff were not already on shift. However, another Border Force senior manager told inspectors that the regional approach to rummaging was ineffective:

"There is not a lot of valuable work done ... If people were honest ... A lot of resource goes into it in some regions, but the results are negligible."

<sup>64 &#</sup>x27;Forepeak' is the part of a ship's hold that is closest to the bow, used for storing cargo or adjusting the ship's balance.

- 6.70 NDRT, part of BFMC, told inspectors that the lack of referrals coming from the regions for advanced rummages of vessels was a concern. A team member told inspectors that they did not expect regional teams would necessarily find concealments when rummaging a vessel at 'Rummage Foundation Skills' level, but rummages by regional teams should generate more referrals to the NDRT for an advanced rummage when the vessel next arrives in the UK. However, they had "never had a referral from [one particular] region".
- 6.71 If the NDRT was unable to meet a vessel selected for examination by the Maritime Intelligence Bureau, this would be forwarded to the local port to action via the relevant Regional Command and Control Unit (RCCU). The latter told inspectors that the shortage of trained officers at ports was problematic. It meant that on occasions the selected vessels were not searched. A senior manager in one RCCU said: "when a vessel needs rummaging [at more than 'Rummage Foundation Skills' level], we don't have anyone with those skills to call on. If we get a target and NDRT are not available, we can't do it even if it's a category A alert."

#### Regional maritime capability

- 6.72 Central and South East regions have their own maritime capability. North and South regions do not. Inspectors heard that the reason for this disparity was that some regional senior managers had a greater interest in 'on-the-water' activity than others and had been able to obtain the funds to procure vessels. It was not because of any greater need or risk.
- 6.73 Central region had purchased two Targa 31 Mk II boats from the Metropolitan Police Service in March 2023 and had a maintenance contract for these vessels with them. While the assets and crew did not fall under its operational command, BFMC carried out an annual assurance check covering the Health and Safety requirements of operating these vessels.
- 6.74 Central region began deploying one of the Targa 31 Mk IIs ('Viper') operationally from April 2024. 'Viper' was based with Thames Command. Thames Command also had a rigid hull inflatable boat (RHIB) ('Guardian')<sup>65</sup>. East Anglia Command had the other Targa 31 Mk II ('Rattlesnake'). As of the end of 2024, this was not yet operational.
- 6.75 Figure 18 details the deployments of 'Viper' (since 2022) and 'Guardian' (in 2024) and their recorded purpose. The Home Office told inspectors that "the majority of deployments will have multiple reasons for deploying. For example, a patrol may also include periods where training is included such as 'man overboard' drills."

Figure 18: Number and type of deployment of regional assets between 1 January 2022 and 31 December 2024

		'Viper'			
Purpose	2022	2023	2024	Total	2024
Assurance	1	0	0	1	0
Collaborating	2	5	5	12	7
Engagement	0	0	0	0	2
Intel gathering	7	1	7	15	32
Operations	0	6	10	16	9
Patrols	9	20	15	44	71
Refuel	5	13	10	28	15
Training	3	14	6	23	14
Total deployments	16	31	25	72	87

- 6.76 Inspectors asked the Home Office for the outcome of each deployment, but this was not provided.
- 6.77 South East region deployed two RHIBs ('Athena' and 'Artemis'), which were operated by the South East Inland Coastal Team. Since 2022, these vessels have been used predominantly in the Channel in support of small boats operations and to check other vessels, including whether they have submitted a notification of arrival in the UK.
- 6.78 Inspectors requested data on the deployment of the South East region's assets since January 2022 (see figure 19).

Figure 19: South East region RHIB deployments between 1 January 2022 and 31 December 2024

	Number of deployments						
Year	2022 2023 2024 Tota						
RHIB 'Artemis'	25	13	68	106			
RHIB 'Athena'	55	11	84	150			
Total	80	24	152	256			

6.79 The Home Office evidence return for South East region included the purpose and outcome of each deployment. Inspectors noted that one deployment in April 2022 had led to the rescue of a person from the water and subsequent administering of first aid. On another occasion, in July 2024, four people were recovered from the water during a deployment. There were also a number of at sea interdictions of vessels, both for safety and customs purposes.

## **General maritime guidance**

- 6.80 BFOs told inspectors that Home Office 'General Maritime' guidance, published on 8 August 2022, was out of date. A three-page section focused on the now defunct MPAT tool. The section on reporting GM statistics also related to arrivals categorised under the MPAT tool. The guidance made no mention of the LTE tracker.<sup>66</sup>
- Respondents to ICIBI's survey of Border Force said that the GM guidance was unclear and confusing. Inspectors were told that a number of Border Force ports had created their own local guidance due to the inconsistency and lack of clarity of the 'General Maritime' guidance. A manager told inspectors that they first realised how vague 'General Maritime' guidance was when they were trying to upskill staff after a merger. They ended up creating process maps to show the staff what to do. Other ports had created their own desk instructions for BFOs to follow.
- **6.82** RCCUs told inspectors that they had also created their own process maps and guidance solely for RCCU staff.
- 6.83 Seagoing BFOs told inspectors that they were unable to access 'General Maritime' guidance because it was not available on Ocelot, which was their only means of accessing guidance when they were at sea.<sup>67</sup>
- 6.84 A Border Force senior manager told inspectors that the General and Commercial Maritime (G&CM) team had recently conducted a "loose audit" of activity across regions. One area where processes differed between ports was the handling of stowaway arrivals, in particular whether the stowaway should remain on the vessel or be taken ashore and detained pending removal.<sup>68</sup> The senior manager said that the section in 'General Maritime' guidance on stowaways was "limited".
- 6.85 In February 2025, the G&CM team informed inspectors that it had reviewed and re-written 'General Maritime' guidance. Between November 2024 and April 2025, the draft was sent to the Home Office Policy Team, frontline officers, and other key stakeholders for peer review. The new version was published on 22 May 2025.

## **Operation [redacted]**

## Background

- 6.86 In July 2024, the Home Office began a 12-month operation focused on GA and GM. Operation [blanked out]'s objectives are to:
  - "Identify, understand, and report on the scale and vulnerability of the illegal migration threat in General Aviation and General Maritime modes.

<sup>66</sup> In its factual accuracy response, Border Force stated that it had identified that the GM guidance was out of date before this inspection and that work had begun in May 2024 to re-write it. The new version, including the removal of the MPAT references and up-to-date information regarding the LTE tracker, was published in May 2025.

<sup>67</sup> Ocelot is a Border Force guidance platform which can be accessed either via a web browser or a smartphone application. It gives quick and accurate answers using process maps for customs and immigration queries to help Border Force officers with their decision making.

<sup>68</sup> As defined by the Convention on Facilitation of International Maritime Traffic, 1965, as amended, (available at <a href="https://www.imo.org/en/OurWork/Facilitation/Pages/FALConvention-Default.aspx">https://www.imo.org/en/OurWork/Facilitation/Pages/FALConvention-Default.aspx</a>), a stowaway is "a person who is secreted on a ship, or in cargo which is subsequently loaded on the ship, without the consent of the shipowner or the Master or any other responsible person and who is detected on board the ship after it has departed from a port, or in the cargo while unloading it in the port of arrival, and is reported as a stowaway by the master to the appropriate authorities".

- Test intelligence and inform its development, enabling BF to become more intel and threat led in General Aviation and General Maritime.
- To provide a deterrent effect to Organised Crime Groups looking to exploit vulnerabilities in General Aviation and General Maritime for the purposes of OIC."
- 6.87 BFOs and Higher Officers (BFHOs) from the Small Boats Operations Command (SBOC) spend one week in seven away from processing small boats arrivals working in a region on Operation [blanked out]. One of the officers involved told inspectors that it would be better if a team were doing this full-time as doing so once every seven weeks meant "you lose the knowledge".

#### **Approach**

- 6.88 The plan was for Operation [blanked out] teams to deploy to GA and GM sites to hand out leaflets and interact with arriving flights and vessels for customs and immigration purposes. GM vessels that are met on arrival are subjected to immigration controls according to Checks Model 3 of the Border Force Operating Mandate, checking against the API data submitted via the NMSW or sPCR.
- 6.89 Operation [blanked out] teams will also board the vessel (if it is safe to do so) for visual confirmation of those on board. If immigration clearance to enter the UK is required, this can be done after liaising with the relevant RCCU. If further checks are required due to inaccurate or incomplete API, these can be facilitated through the RCCU or National Command Centre (NCC).
- 6.90 Team deployments were typically four days in length, with a further day allocated for travelling. Visits would normally include a mixture of GA and GM locations. Inspectors were told that there had been a heavy focus on GA visits over the summer months of 2024, but there had been an increased focus on GM over the winter.

#### **Successes and challenges**

- 6.91 Operation [blanked out] was supporting the objectives of Project Kraken. Operation [blanked out] teams hand out Project Kraken leaflets and engage with the general public and stakeholders to reinforce the key messages from Project Kraken.
- 6.92 Inspectors were told that the Operation had changed how teams were used. Each team was now assigned to the same region every seven weeks, whereas before they could be deployed to a different region each time. Staff had felt that the previous approach had not enabled them to build up local knowledge, although they were positive about the support and local knowledge that regional Border Force staff provided, particularly regarding accessing certain GM locations.
- 6.93 Meanwhile, a senior manager was sceptical about what Operation [blanked out] would achieve, saying: "it's people unfamiliar with the area, with no relationships, they don't know what to target. It's a good paper exercise." They added that the Operation was unlikely to have any "substantial operational effect" and felt that employing more FIOs would be a more effective way of enhancing the GM risk picture.

#### Reporting

6.94 Inspectors were provided with a report produced by the Operation [blanked out] team, detailing deployments from July to September 2024. Over this three-month period, 32 GM locations were visited but only one vessel was met. No immigration or customs offences were reported. The report offered some explanation why so few vessels had been met:

"Vessel boarding numbers [are] low due to [an] absence of [a] GAIT style mandatory notification system and RAG rating of GM sites.<sup>69</sup> If [there are] no arrivals [,] officers will talk to harbour staff/vessels owners (promoting Project Kraken) to gather information and report back into the system."

6.95 In February 2025, inspectors requested an updated report covering October to December 2024. The Home Office responded that no such report existed. Instead, it said that reports would be produced by a BFHO following each specific deployment. The Home Office provided copies of the new weekly deployment reports, which contain a summary of each day's activities, including photographs of the locations visited and any forward actions. The change of format to a more narrative description of activity meant that it was not immediately apparent exactly how many sites had been visited, vessels met, checks conducted, and offences recorded.

# 7. Inspection findings: Border Force Maritime Command operations

#### **Border Force Maritime Command**

- 7.1 Border Force Maritime Command (BFMC) provides the national 'at sea capability' for Border Force. BFMC manages a fleet of vessels, including offshore patrol vessels (cutters), coastal patrol vessels (CPVs) and smaller craft, including rigid-hull inflatable boat units (RHIBs) and tactical watercraft (TWC).<sup>70</sup> Border Force's maritime assets are the UK's only law enforcement assets that have the capability to operate beyond the UK's territorial waters.
- As of October 2024, the Border Force fleet comprised five cutters (although one, HMC Protector, was due to be scrapped), six CPVs, four mobile RHIBs and six TWCs. Inspectors were told that the cutters were "between 20 and 25 years old". Due to their age, they require significant maintenance, break down frequently, and are undergoing a 'life extension programme' one vessel at a time. The required work reduces the amount of time the cutters are available for operational activity. In 2021, Border Force started a Maritime Capabilities Replacement Programme (MCRP) to procure a new fleet and to build the capabilities to support it. The Programme is projected to run until 2029. The MCRP was not in scope for this inspection.
- 7.3 As of October 2024, BFMC had 279 staff against an authorised full-time equivalent (FTE) of 339. Of the 339, 232 are 'Seagoing Enforcement Officer' posts, the staff that crew the fleet. At the time of the inspection, there were 186 Seagoing Enforcement Officers in post, with 46 vacancies.
- 7.4 BFMC's Maritime Operating Directive separates the activity it conducts into seven 'tasks', divided into two categories: 'Force Driving' and 'Contingent'. 'Force Driving' tasks are deemed essential to Border Force delivering its strategic objectives, whereas 'Contingent' tasks have "an element of choice as to whether they are undertaken or not". There are three 'Force Driving' tasks:
  - patrols and operations around the UK's territorial waters and Exclusive Economic Zone<sup>71</sup>
  - inshore patrols, intelligence gathering, and public engagement
  - specific intelligence-led law enforcement operations
- **7.5** The four 'Contingent' tasks are:
  - supporting counter terrorism and general maritime policing
  - supporting government partners such as the Marine Management Organisation and the devolved governments 72
  - international engagement and 'upstream disruption'
  - responding to national crises

<sup>70</sup> A tactical watercraft is also known as a jet ski.

<sup>71</sup> United Nations defined maritime boundary extending from land to 200 nautical miles into the ocean except where those boundaries overlap with another country.

<sup>72</sup> The Marine Management Organisation is a government agency whose purpose is to protect and enhance the UK's marine environment and to support UK economic growth by enabling sustainable marine activities.

**7.6** Border Force uses these task categorisations to determine if and how it should respond, and the number and type of vessels required to deliver the task.

#### **Maritime Command Centre**

7.7 BFMC operates a Maritime Command Centre (MCC) 24/7. It is the single point of contact for the fleet. The MCC provides the authority to launch a vessel and processes all requests for information checks by the BFMC fleet, and also conducts intelligence checks on vessels of interest. The MCC records all fleet deployments and interactions the fleet has with vessels of interest.

# **National Deep Rummage Team**

- 7.8 The National Deep Rummage team (NDRT) sits within the BFMC. As at October 2024, the team was carrying four vacancies in its funded complement of 47 FTE posts. The four NDRT teams were based in Liverpool, Southampton, Immingham, and Felixstowe and worked one week on, one week off, with two teams always on duty to respond to taskings. Deep rummage trained officers can search the most hazardous areas of vessels, such as the engine room, for prohibited and restricted goods.
- 7.9 In addition to the fleet, MCC and NDRT, BFMC has central teams with responsibilities for operational planning, training, logistics and maritime safety.

# **BFMC** activity

7.10 BFMC separates fleet activity into 'Planned Taskings or Deployments' (operations or exercises that are planned in advance) and 'Business as Usual or proactive patrolling' (routine patrols and reacting to spontaneous events). There are also days when fleet vessels are not available for operational activity, for example because of crew changes or planned maintenance. Figure 20 shows the breakdown of activity for the BFMC fleet for 2024.

Figure 20: Breakdown of BFMC fleet days by activity between 1 January and 31 December 2024<sup>73</sup>

Vessel	Days crewed	Non- operational	Planned taskings	Proactive patrols
Vigilant	365	57 (16%)	102 (28%)	206 (56%)
Valiant	365	60 (18%)	134 (37%)	171 (45%)
Seeker	365	71 (19%)	146 (40%)	148 (41%)
Searcher	246	122 (50%)	50 (20%)	74 (30%)
Hunter	365	0 <sup>74</sup>	254 (70%)	111 (30%
Speedwell	365	80 (22%)	80 (22%)	205 (56%)
Alert	69	37 (54%)	0	32 (46%)
Total	2,140	427 (20%)	766 (36%)	947 (44%)

7.11 Border Force also provided inspectors with a 'BFMC Deployment Log 2022 – 2025' which showed that most fleet and NDRT deployments were to vessels BFMC classed as "commercial". The spreadsheet did not show which of these were commercial GM vessels, but identified that only three out of a total of 777 deployments in 2024 were to vessels classed as GM.

## **Planned operations**

- 7.12 As well as routine patrols and reactive deployments, BFMC undertakes intelligence-led law enforcement operations, often in support of the National Crime Agency and UK police forces. The operations are pre-planned, have an operational order and operation name.<sup>75</sup>
- 7.13 In the evidence provided for this inspection, Border Force referred to 62 operations involving activity in the maritime domain that took place between 2021 and 2025, with some described as "ongoing".
- 7.14 Inspectors reviewed the 62 operations. From the evidence provided, the main purpose of 13 of them was to intercept and prevent the illegal importation of drugs, while the main purpose of 11 of them was to tackle immigration crime, such as modern slavery and people smuggling. In 13 of the 62 operations, Border Force was not the lead agency.

<sup>73</sup> The data provided by Border Force did not cover all BFMC's vessels.

<sup>74</sup> Data provided to inspectors by Border Force showed that Hunter had no non-operational days in 2024, but elsewhere in the evidence provided it had at least nine days dedicated to crew changes.

<sup>75</sup> An operation order is a document that links information regarding an event or incident with the structure of the law enforcement response and resources required to conduct the response.

#### **Operational outcomes**

- 7.15 The evidence provided to inspectors did not include details of the outcomes of all of the planned operations, not least as some were ongoing at the time of the inspection.
- 7.16 Where outcomes were recorded, they mostly involved significant seizures of Class A drugs, such as cocaine and ketamine, and the arrests of those suspected of their importation.

  Other commonly listed outcomes were the generation of intelligence for further action, the identification of foreign nationals who did not hold the required visa for entry to the UK, and the development of partnership working with other agencies and local stakeholders.
- 7.17 The data provided to inspectors by BFMC regarding seizures of commodities did not specify which seizures had been made as part of a planned operation. Figure 21 shows all seizures made directly by BFMC, including by the NDRT, from all of its activities in UK waters. It does not include seizures made by other law enforcement agencies or by Border Force regions where BFMC provided support. Border Force told inspectors that "a significant amount of time is applied supporting partner agency operations or other Border Force regions to make their own successful detections".

Figure 21: Commodities seized by BFMC between 1 January 2022 and 31 December 2024

Vessel type	Commodity	2022	2023	2024
Commercial	Cannabis (kgs)	182		
Commercial	Cocaine (kgs)	2,610	2,980	907
Fishing vessel	Cocaine (kgs)		350	1,300
Fishing vessel	Ketamine (kgs)			200
RHIB	Cocaine (kgs)			1,178
Wash up <sup>76</sup>	Cocaine (kgs)		2,503	
Yacht	Clandestines (individuals)		21	
Taciit	Firearms and ammunition			240

# **Evaluations of operations and lessons learned**77

- 7.18 The 2023 'GM Strategic Review' identified that Border Force should "consider how it can be a more effective learning organisation" by collecting information from "operational incidents (positive and negative) to inform and improve future organisational processes". As of February 2025, inspectors found that there was no central record of evaluations or consistent reporting of learning from operational activity to inform future planning and resourcing.
- 7.19 Inspectors requested evaluations for 26 of the 62 planned operations, all of which involved the deployment of Border Force staff and most of which involved the use of Border Force vessels. Border Force was unable to provide evaluations for 21 of the 26 operations. It explained that some of the operations were "ongoing", so no evaluation had yet been done, and in some cases

<sup>76</sup> A 'wash up' is an incident when prohibited items, usually illegal drugs, wash up on the shoreline predominantly after a failed at-sea drop-off.

<sup>77</sup> Border Force uses the terms 'evaluation' and 'debrief' when describing the process of reviewing an operation and identifying any lessons learned.

- it was not the lead agency. Where it did not provide an evaluation, Border Force did provide operational orders, summaries, or event reports.
- 7.20 The evaluations that were provided had been completed by different Border Force teams.

  They were not in a consistent format and used a variety of proforma-type documents. The evaluations themselves were generally detailed and comprehensive, and set out what had gone well during the operation and areas for improvement.
- 7.21 Two of the five evaluations that were provided had been completed by BFMC. These followed the same format. They covered the pre-deployment and deployment phases of the operation. The pre-deployment sections included the operation's 'intent', 'initial method' and 'risk assessment'. The deployment section included the 'tactical plan', 'communications', 'risk assessment', and 'legal considerations'.
- 7.22 The BFMC evaluations concluded with recommendations and action points. Each action point had an identified owner. Examples of recommendations and action points included recommended changes to the body-worn camera policy, exploring the possibility of installing GoPro style cameras to RHIBs, and making improvements in how BFMC works in conjunction with the Small Boats Operational Command (SBOC) aircraft.
- 7.23 The recommendations and action points were specific to each operation. Given this and the limited number they saw, inspectors were unable to identify any emerging themes. Border Force did not provide any evidence of how or if lessons learned from operational evaluations were shared across BFMC or Border Force more widely.

# 8. Inspection findings: Stakeholder engagement

### **General maritime stakeholders**

- 8.1 Border Force engages with a wide range of other parties ('stakeholders') when pursuing its general maritime (GM) activities. These include other government departments, such as the Ministry of Defence (MoD) and the Department for Transport (DfT), and agencies such as the Maritime and Coastguard Agency (MCA), who have a shared interest in maritime security. They also include other law enforcement agencies, such as the National Crime Agency (NCA) and local police forces.
- 8.2 In addition, Border Force engages with port authorities, harbour masters, and private industry, such as marina owners and operators, as well as membership associations and charities working in the general maritime sector. Border Force also tries to reach out to the public, both seafarers and those living in coastal areas, to encourage them to report any suspicious activities they witness.

# Strategic engagement

- 8.3 At a strategic level, the Border Force-chaired Maritime Sub-Threat Group, which reports to the NCA-chaired Borders Coordination Board, is designed to bring together key stakeholders from across the Home Office and external agencies, including the police, MCA, MoD and others. The Sub-Threat group had "not sat regularly over recent years" until a meeting was held in September 2024. At the time of this inspection, the future of the Sub-Threat group was under review by Border Force and the NCA.
- 8.4 The Joint Maritime Threat Steering Group, of which Border Force is a member, is chaired by the Joint Maritime Security Centre (JMSC) and brings together all UK maritime security intelligence stakeholders. Its aim is to "consolidate UK and global maritime threat understanding, in support of strategic decision-making and policy drafting". No minutes are taken at these meetings, but the Home Office told inspectors that "the threat assessment output is agreed as a formal record of the discussion".
- 8.5 Inspectors found that the relationship between Border Force and stakeholders at a strategic level was generally positive. A law enforcement stakeholder told inspectors that Border Force Maritime Command (BFMC) was an active attendee at the meetings it convened, which was not true of all agencies. Another characterised the relationship with Border Force as "very good" and said that there was regular strategic level engagement.
- 8.6 Stakeholders told inspectors that Border Force has been proactive in developing constructive partnerships with non-governmental organisations operating in the GM sector. One organisation, the Royal Yachting Association (RYA), recounted that the relationship it had with Border Force had not always been positive, but Border Force had made clear efforts to improve engagement and a collaborative relationship had now been established. The National

Coastwatch Institution, which monitors a large amount of the coastline, explained that its relationship with Border Force had previously been "at arm's length" but they now had a "constructive and positive" relationship that has culminated in a recently signed memorandum of understanding between the two organisations.

# **Local engagement**

- 8.7 Inspectors spoke to numerous stakeholders who engage with Border Force at different locations around the UK. Most told inspectors that the relationships they had were positive and were built on mutual trust and understanding of each other's goals and challenges.
- 8.8 At the local and operational levels, Border Force's engagement with stakeholders was led primarily by frontline officers in BFMC and Border Force's regional commands, and by Field Intelligence Officers (FIOs). Much of it was conducted face-to-face at the ports where staff were based, when Border Force officers visited harbours and marinas as part of their duties, or as part of a programme of engagement or intelligence gathering. In some cases, Border Force officers were co-located with key stakeholders, such as the MCA, police and JMSC.
- 8.9 Inspectors also noted effective joint working between Border Force and Counter Terrorism Policing at a local level. In one port visited by inspectors, a Counter Terrorism Police Officer had been embedded with Border Force. Both Border Force and police spoke of the significant benefits of this close working relationship. However, when police priorities changed, the officer moved on.
- 8.10 Overall, inspectors found there were effective working relationships, especially where Border Force officers and stakeholders worked closely together on a daily basis. Engagement tended to be informal and operationally based rather than managed through formal meetings. Speaking about the positive relationship they had with Border Force, a police officer said: "We don't need a forum, their officers are just downstairs."
- 8.11 Stakeholders also told inspectors that Border Force was supportive at a local level, for example, allowing use of equipment such as scanners and providing staff with search skills to assist them. A police officer described Border Force as "very enthusiastic to help". Another said: "We rely on their expertise. It would be difficult to carry out this function without their support." Another reflected that "operational engagement is outstanding".
- While relationships between Border Force and local stakeholders were generally positive, where there was regular contact and joint working with individual officers or teams, some stakeholders were less positive about Border Force more widely. A port operator told inspectors that, unless they spoke to their named contact in Border Force, "you won't get on with anything". Another told inspectors that, despite a noticeable recent increase in engagement from Border Force, there was not a close relationship. A police officer explained that they had an excellent working relationship with FIOs as they work with them regularly, but there was a "them and us" culture more generally with Border Force. Another said that their force and Border Force "work alongside each other but don't necessarily communicate their interests to each other".

# Sharing information at a tactical level<sup>78</sup>

- 8.13 Stakeholders told inspectors that, while they had an effective relationship with Border Force at a local level, there had been issues with information. This was recognised in the 'GM Strategic Review', which noted that: "multi-agency working and joining up with agencies has entrenched issues impacting on data/information sharing".
- 8.14 A police officer said that Border Force "fear sharing information with us in case we somehow want to take over". They reflected that it was not an issue with individual Border Force staff, but a "corporate culture". Another police officer told inspectors that Border Force were "overly secretive about information when they don't need to be". A third said that Border Force does not inform police of its operations even though police have to "pick up the pieces with any land-based fallout".
- 8.15 Inspectors were also told by police that poor information sharing had led to Border Force officers and police officers dealing with or investigating the same issue or individual at the same time. One officer told inspectors that police and Border Force had been "watching for the same person at the same time and we didn't know it". Another police officer described an incident when a harbour master had called them to say that three law enforcement officers had asked him the same question. Neither example had any known negative operational impact, and it was unclear to inspectors which agency should have informed the other of their planned activity.

## **Engagement with the wider GM sector**

- **8.16** Border Force engages with organisations and individuals who are active in the GM sector in a number of ways. This engagement involves a variety of Border Force staff from central teams, such as the General and Commercial Maritime Team (GCMT) team, and frontline officers.
- 8.17 The General Maritime Pleasure Craft Sector Group meets on a monthly basis. The meeting is chaired by the Home Office's Passenger Policy and Border Transformation team and is attended by staff from the G&CM team, Home Office Policy, and the Future Borders and Immigration Systems (FBIS) team. The DfT and His Majesty's Revenue and Customs (HMRC) also attend, alongside representatives of membership organisations from the GM sector, such as the RYA. Inspectors saw from the meeting agendas and minutes provided that updates were given on the 'submit a Pleasure Craft Report' (sPCR) process, HMRC processes and the FBIS programme, and agenda items were discussed at length and the views of the membership organisations sought.
- 8.18 A membership organisation told inspectors that this forum had helped to generate a collaborative and positive working relationship with the Home Office and Border Force. They said that "Border Force welcomes feedback and seeks to rectify any issues we raise". They also told inspectors that through this forum they were able to help shape the design and implementation of the sPCR process. A Border Force manager told inspectors that the meeting "gives these organisations a voice with government" and that, in their opinion, the progress that has been made in relationships with the GM sector would have been difficult without it.
- **8.19** Border Force staff also attend public events like the annual Southampton Boat Show, and visit local stakeholders such as harbourmasters, yacht clubs, and marina operators. The

<sup>78 &#</sup>x27;Tactical level' is used here to describe a middle management level that implements the strategies set by senior managers and involves the co-ordination of frontline operational activity to achieve organisational goals

Southampton Boat Show is the largest boat show of its type in the UK. The event is run by British Marine, a trade association for the UK leisure, superyacht, and small commercial marine industry. The show takes place over ten days, and Border Force has a stand at the event. Border Force's GCMT team takes the lead and arranges for Border Force staff and publicity material to be available throughout the ten days. Border Force staff told inspectors that attendance at the show provided them with the opportunity to engage with the GM sector and users of the sPCR process, and to obtain helpful feedback on how it was working in practice. In addition, inspectors were told that Border Force had taken out a one-page advert in the annual Cruise Association yearbook publicising the sPCR process.

- **8.20** The Southampton Boat Show was also an opportunity to promote Project Kraken. A stakeholder told inspectors that publicising Project Kraken at the show had "helped to spread the word about what and how to report" information to Border Force.
- 8.21 Inspectors spoke to a wide range of people working in the GM sector, including harbourmasters, local police, charity workers, and staff from other government departments. They were generally positive about their engagement with Border Force, and people spoke of good working relationships at both the strategic and operational levels. However, one stakeholder told inspectors that they felt improvements could be made in how Border Force shared information with them. They stated that:

"what may make sharing information easier is if we have a simple diagram of how information is shared at the different levels, if we had one version of the truth that wouldn't be a bad thing".

8.22 Inspectors carried out a survey of RYA members. This asked about Border Force visibility and about how the RYA's members viewed the conduct and professionalism of Border Force officers. Over half (59%) of respondents had seen a Border Force vessel when on the water, but 78% had rarely or never interacted with Border Force officers. For those who had interacted with Border Force officers, half felt that they were professional, a third thought they were knowledgeable, but only 10% felt they were approachable.

# **Strategic communications**

- 8.23 The 2023 'GM Strategic Review' identified the lack of an effective strategic communications strategy. It commented that Border Force was not promoting its involvement in successful law enforcement operations at sea, such as large drug seizures, and that "the promotion of these successes was not being used to the full deterrence effects in the media and press". The review also noted that the NCA does report its successes in this area but that Border Force's role in its operations is "often underplayed".
- 8.24 Border Force managers told inspectors that there had been a deliberate policy to focus communications and publicity on the small boats issue. Border Force managers said that the decision had been a political one, but inspectors were told in February 2025 that it was now under review. A Border Force manager told inspectors that "communications around interdictions [at sea] had been deliberately excluded as the public perception had to be that Border Force only do small boats".

- **8.25** A senior manager told inspectors that "it was never overtly stated that the Minister didn't want to [publicise GM activity] but it went to the Press Office and to Special Advisors and nothing happened".
- 8.26 Border Force staff told inspectors that the lack of publicity about their activities and successes was disheartening and demoralising. A Border Force senior manager told inspectors that it was especially important to publicise the work of the sea-based crews, given the dangerous nature of the work they do and the fact that they are the only law enforcement officers in the UK capable of doing it. They said that the NCA, as the lead agency, often claims the credit for successful operations involving Border Force.
- 8.27 In March 2025, print and TV media were invited by the new Maritime Directorate to visit crews and watch them in action. A news story was published on the BBC News website on 21 March 2025 promoting the work of the crews and highlighting the issue of at-sea drop-offs and the work Maritime Directorate is doing to tackle the threat. Border Force told inspectors that this was part of a new campaign to promote the work of the Maritime Directorate.

## Internal communications

- 8.28 The General and Commercial Maritime Steering Group meets monthly and is chaired by Border Force's G&CM team. The team's role is to provide a national overview of Border Force's GM work, to provide guidance and advice to both frontline staff and senior managers, and to co-ordinate engagement with the GM sector. The Steering Group's purpose is to provide an overview of Border Force GM activity, both nationally and regionally. GCMT considers the Steering Group to be the main forum through which it is able to communicate national issues to the regions and through which the regions feed into national GM discussions. The agendas for Steering Group meetings showed that meetings included an update on GM activity, intelligence trends, and other matters arising connected to GM, such as Project Kraken and Operation Tipson.
- 8.29 Regional GM leads, Home Office Intelligence, Home Office Policy, and BFMC, including the National Deep Rummage Team, have a standing invitation to attend Steering Group meetings. The agendas provided to inspectors did not set out a full list of attendees. No minutes were taken, or action points recorded. Border Force explained:

"This is to maintain the momentum and stream of the discussion within the forum while balancing the effective use of limited administrative resources. The group is one channel of ongoing/business as usual dialogue with our partners, so minutes are not deemed essential to progress workstreams."

- 8.30 Inspectors were told by a Border Force manager that it was the responsibility of the manager attending the meeting on behalf of their Command to communicate the outcome of the meeting to their staff by email. It was not clear how those Commands who did not have anyone attending would find out what had been discussed and any actions arising.
- 8.31 Inspectors found that frontline managers and staff had little awareness of the Steering Group, and no evidence was provided of any of its outputs being communicated to the frontline.

  This, together with the lack of documented attendees, minutes, and action points meant that inspectors were unable to assess its value.

8.32 The 2023 'GM Strategic Review' stated that GM activity had a "low level of visibility" inside Border Force. Inspectors asked Border Force to provide details of how GM activity, updates, and news were communicated internally within Border Force, including copies of newsletters, bulletins, or updates issued since January 2022. In its response, Border Force provided three copies of 'Maritime Matters', a newsletter compiled by the G&CM team. These were dated January, April, and July 2022. In an explanatory note provided with the newsletters, Border Force stated that they "have not been a feature in recent years". No other evidence of internal communications was provided.

# 9. Inspection findings: Intelligence

# 'General Maritime Strategic Review'

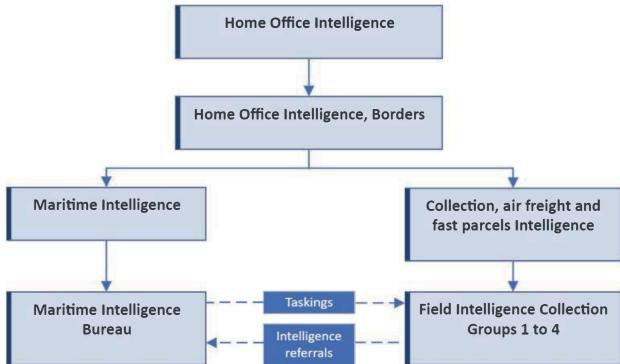
- 9.1 The 2023 'GM Strategic Review' found that there were significant "gaps" in the General Maritime (GM) intelligence picture and that, although threats were "broadly acknowledged", they were "not consistently, robustly, or widely understood". It also identified issues with routine sharing of low-level intelligence between the Maritime Intelligence Bureau (MIB) and the National Maritime Information Centre (NMIC), a department of the Joint Maritime Security Centre (JMSC).
- **9.2** The 'GM Strategic Review' recommended as a 'Priority Strategic Recommendation' that:
  - "The [Border Force (BF)] Board should consider how to develop a stronger threat-based approach to the maritime domain. The intelligence organisation(s) should enhance current efforts of collection, analysis and reporting, harnessing BF assets, sharing with others and developing an actionable threat picture for the BF Board. A detailed review of intelligence processes, including IT system enablers, and boundary/cultural issues to enable effective information sharing and to allow the MIB/JMSC to reach its potential as a Multi-Agency Intelligence Hub should be conducted."
- 9.3 In March 2025, in its evidence for this inspection, the Home Office provided an update on its progress against a number of the 21 'fix now' recommendations made in the 'GM Strategic Review' (see Annex D). However, it did not provide updates for the eight 'Priority Strategic Recommendations' including the one above (see Annex E).

# **Home Office Intelligence**

- Inspectors heard mixed views from stakeholders about the quality and quantity of intelligence they received from the Home Office. One law enforcement agency was positive, describing the relationship as "very collaborative", with frequent intelligence sharing that "works effectively". However, most stakeholders were critical, with one describing their organisation as a "net exporter of intel to Border Force". Others echoed this, saying that, while they fed into Home Office Intelligence (HOI), they received little back. One law enforcement agency described the Home Office as "overly secretive", and another gave examples of situations where the Home Office would not disclose information which had already been shared with them by other agencies. On occasion, information that was shared by the Home Office was unusable by other law enforcement agencies as it was not in the required format.
- 9.5 The HOI directorate is responsible for border-and immigration-related intelligence. The Home Office told inspectors that "umbrella MoUs" were in place between HOI and established partners, such as the police and the National Crime Agency (NCA), to enable information sharing for business purposes.<sup>80</sup>

- 9.6 Within HOI, two sections have specific responsibilities for GM-related intelligence: Maritime Intelligence, and Collection, air freight and fast parcels Intelligence (see figure 22). Both sit within HOI Borders.
- 9.7 Maritime Intelligence has responsibility for the development and dissemination of intelligence relating to any international maritime traffic. Within Maritime Intelligence, the Maritime Intelligence Bureau (MIB) handles intelligence relating specifically to commercial and GM vessels, excluding RoRo and small boats taking migrants across the English Channel.<sup>81</sup>
- **9.8** Within Collection, air freight and fast parcels intelligence, Field Intelligence Officers (FIOs) have the primary responsibility for "intelligence collection from public, trade and external sources".

Figure 22: Extract of HOI organogram showing relationship between MIB and FIOs



## Intelligence collection

- 9.9 The national intelligence collection capability is divided into four zonal collection groups: IG1, IG2, IG3, and IG4, representing the South and Wales, Central and East, North and Scotland, and South East and Juxtaposed controls. These areas do not fully align with the Border Force regional Commands. For example, officers told inspectors that Border Force South East regional Command intersects with both IG2 and IG4. There are a total of 91.59 officers (Administrative Officer to Senior Executive Officer grade) and FIOs across four regional areas of the UK (IG1 South and Wales, IG2 Central and East, IG3 North and Scotland, and IG4 South East and Juxtaposed).
- 9.10 As at the end of 2024, across the collection groups, there were 81 FIOs in post (75.96 full-time equivalents (FTEs)) spread more or less equally between regions, despite their geographical spreads (see figure 23).

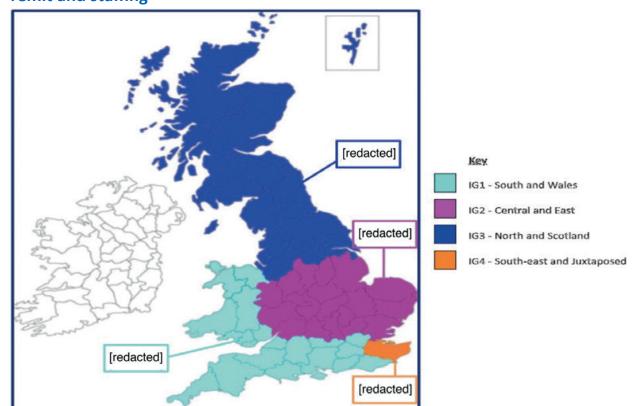


Figure 23: Map of the United Kingdom showing FIO zonal collection teams' remit and staffing

- 9.11 The four intelligence collection zones are divided into smaller areas, each with dedicated FIOs. For example, FIOs told inspectors that [redacted] were responsible for North Wales and [redacted] for the remainder of Wales, while [redacted] were responsible for all of Devon and Cornwall. FIOs reported that their areas were difficult to cover when it could take them three hours to reach their furthest point. Managers told inspectors that the number and distribution of FIOs was a challenge, though there was a hope that the reorganisation of Border Force responsibilities in late 2024 and increased focus on GM might address this.
- **9.12** The 'GM Strategic Review' contained a recommendation that the Home Office:

"Consider the requirement of additional FIO's [sic] in high-risk areas to improve intelligence collection and understanding of the local threat picture in the general maritime space".

- 9.13 In March 2025, the Home Office told inspectors that, faced with a 18% staffing reduction in 2025, it had submitted a bid to maintain the 79 FIOs and increase this to 83.82 The outcome of this bid was not known at the time of writing.
- 9.14 The Home Office reported that FIOs were "multi-modal", though some FIOs told inspectors that they only covered GM and air domains. Most FIOs spoken to said that approximately 5% of their work was tasked and the remainder was self-generated. They described the Central Operations Platform (COP), the system on which intelligence was submitted, as a "black hole". There was a perception among some FIOs that the intelligence they submitted was not developed and was sometimes marked by development officers as 'no further action' when it was clear to them that it had value. These FIOs considered this was partly due to the fact that

<sup>82</sup> The figure of 79 FTEs does not reconcile with either the staff in post headcount or FTEs quoted in the evidence provided to inspectors.

<sup>83</sup> Covering different aspects of maritime and air domains.

- the intelligence development hubs lacked local knowledge. They were also frustrated that their local knowledge was under-utilised and under-valued.
- **9.15** Frontline Border Force officers gave mixed accounts of their relationship with the FIOs in their regions. Some reported very good relationships, particularly where they shared buildings, met frequently, and received weekly briefings from FIOs. Others said they might receive a briefing once or twice a year.
- 9.16 Frontline officers can also report items of intelligence using COP, but some FIOs felt frontline officers were not confident to do this. Some frontline officers confirmed that they were unsure when or what to submit in intelligence reports on COP, telling inspectors that they had received no guidance. Others told inspectors that intelligence gathering was left to the FIOs. At some ports, frontline officers gave the FIOs notice of any intelligence they were submitting on COP, while others said they were told by managers not to contact FIOs at all.

### **Operation Tipson**

- 9.17 Operation Tipson was rolled out across Border Force FIOs in 2022 as an initiative to map the "known and unknown" GM locations along the UK coastline. It was led by the General and Commercial Maritime team. An 'Op Tipson December 2022 Presentation' indicated it would have a "lead time" of approximately three years, based on "80 staff tasked with visiting over 4,000+ sites".
- 9.18 In December 2024, the Home Office told inspectors that Operation Tipson remained an FIO priority, but that progress was "difficult to quantify". Initial reviews had been conducted in its first few months to "sense check" FIOs' understanding, but no formal review had been conducted, although there was an intention to conduct one in the future. Inspectors found there was a lack of focus or clarity about the Operation among FIOs, who said they would update the Operation Tipson spreadsheet if something changed, such as a "pin code" to access a marina, but it was "not a priority" or something they did "regularly". In December 2024, one FIO told inspectors that Operation Tipson was "finished now and sits with NMIC [the National Maritime Information Centre]".
- 9.19 Regional Border Force officers told inspectors about similar local spreadsheets that they maintained, recording their visits to GM locations, including deployments to meet vessels. In some regions, frontline officers had also conducted and recorded their own GM location mapping exercise. In one region, FIOs had access to the regional Border Force officers' SharePoint, where their visit records were stored; however, this access was not reciprocated and did not seem to be repeated in the other regions.

### **Operation Tipson data**

9.20 The Operation Tipson spreadsheet provided by the Home Office identified 2,276 potential landing points. Excluding those purely indicated to be commercial maritime sites, there were 2,166. In comparison, HOI considers there are between 7,000 and 9,000 "ports" along the UK coastline. 84,85

<sup>84</sup> Including small ports, marinas, and wharves which could be used by GM vessels.

<sup>85</sup> In its factual accuracy response, the Home Office clarified that the 7,000 to 9,000 figure reported by the GM Strategic Threat Assessment was an estimate, and that work on Operation Tipson continues with a view to mapping the remaining sites.

9.21 The Operation Tipson spreadsheet showed that 675 (31.16%) of the 2,166 GM locations had had a visit by an FIO within the three years up to 31 December 2024. For 1,463 of the locations there was no date recorded for the last FIO visit. 86 By region, the GM sites in the Central region recorded the highest proportion of visits, with FIOs attending 191 of the 254 sites in the last three years. The highest number of visits were in the North region, where 290 GM locations were visited in the three years; however, this accounted for only 23.48% of the sites in the region (see figure 24).

Figure 24: Year GM locations were last visited by an FIO in each region South South East <2022 <2022 2022 1% 1% 11% 2022 20% 2023 7% 2024 5% BLANK 54% 2023 20% BLANK 76% 2024 5% Central North <2022 <2022 2022 0% 8% BLANK 6% 17% 2022 2023 10% 16% 2024 6% 2024 2%

2023 59% BLANK 76%

<sup>86</sup> In evidence, the Home Office said: "Border Force currently have 780 entries with dates of 'last visit' indicating a visit has taken place. However, there are also other files that indicate a visit has taken place, but the detail is either still required or awaiting upload." These are denoted by BLANK in the figure above.

## **Maritime Intelligence Bureau**

- 9.22 The Maritime Intelligence Bureau (MIB) sits in the National Maritime Information Centre (NMIC), a department of the Joint Maritime Security Centre (JMSC). It is responsible for intelligence development and targeting of commercial and GM vessels, and its work is prioritised according to the Border Force Control Strategy.
- 9.23 The MIB engages with international partners. It is a member of the North Sea and Channel Maritime Information Group and the North Atlantic Coastguard Forum. It also has two officers embedded in 'Project Latitude' (a 'joint cell' with the NCA targeting class A threats).
- 9.24 As at the end of 2024, the MIB had 28.12 FTE staff. It was carrying four vacancies. Like the Border Force Maritime Command, the MIB has an ageing workforce, with over half (58.62%) aged 55 and over (see figure 25), which posed a potential risk to business continuity. A manager told inspectors they had had four requests for partial retirement.

Figure 25: Age profile of staff in the Maritime Intelligence Bureau as at 31 December 2024

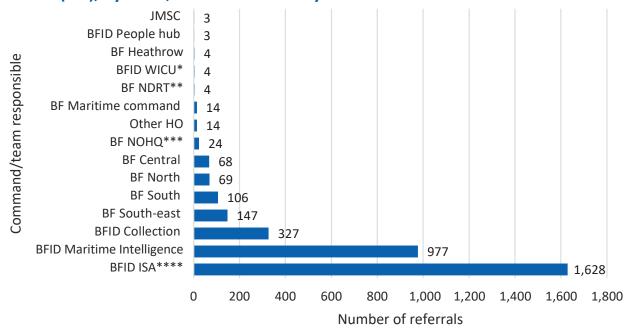
Age band	Percent of headcount
16-44	17.24%
45-54	24.14%
55-59	41.38%
60+	17.24%
Total	100.00%

- 9.25 Regional Border Force officers told inspectors that it was "very rare" for them to receive intelligence targets relating to GM activity. Some suspected that such targets "probably went to more specialist teams". Few of them received intelligence about GM vessels other than a weekly 'vessels of interest' list, which they described as "vague".
- 9.26 The Home Office provided inspectors with a sample of the 'vessels of interest' list for each month of 2024. On 14 January 2024, there were 29 vessels listed, with the dates they were added ranging from 4 January 2020 to 28 December 2023. On 15 December 2024, these 29 vessels remained on the list, and a further eight had been added during the year. The listed vessels were almost exclusively GM, and included yachts, sailing boats, rigid hulled inflatable boats, catamarans, and pleasure crafts.
- 9.27 Many Border Force officers and Border Force managers considered better intelligence was key to improving the response to GM. However, inspectors were told that MIB spent more time reacting to "inbox requests" than proactively developing intelligence. They felt that more resources were required to address this (just over half of the MIB's 28.12 FTEs were intelligence development officers). But intelligence development was difficult in any event because GM vessels were not legally required to report voyages or to have automatic identification systems, and there was typically no "starting point". A senior manager told inspectors that the MIB had recently recruited an open-source practitioner to help generate more information about GM.

## **Central Operation Platform intelligence referrals**

9.28 Between 1 January 2022 and 31 December 2024, 92,738 cases were created in the Central Operation Platform (COP), signifying intelligence referrals relating to the maritime mode. Of those, 3,380 (3.64%) related specifically to GM. Data on intelligence referrals made within the Home Office for the same period, broken down by team, showed that Border Force Intelligence Directorate (BFID) made 2,939 (almost 87%) referrals (see figure 26). Regional Border Force teams made a combined total of 390 referrals. Within BFID, BFID Collection, which includes the FIOs, made only 327.

Figure 26: Number of GM intelligence referrals generated within the Home Office (HO), by team, between 1 January 2022 and 31 December 2024



<sup>\*</sup>BFID WICU is Border Force Intelligence Directorate Warnings Index Control Unit.

9.29 The Home Office provided separate data which included intelligence referrals received from external sources. This showed that 79.67% of all intelligence referrals were generated within the Home Office (see figure 27).88

<sup>\*\*</sup>NDRT is the National Deep Rummage Team.

<sup>\*\*\*</sup>BF NO HQ is Border Force National Operations Headquarters

<sup>\*\*\*\*</sup>BFID Intelligence Strategy and Analysis (ISA) includes the National Intelligence Hub and Command and Control Unit.<sup>87</sup>

<sup>87</sup> BFID ISA and BFID Collection were the names of the sections before structural changes to Home Office Intelligence Directorate.
88 The Home Office recognised inconsistencies in the number of Home Office intelligence referrals across the two datasets and said this may be dependent on accuracy of user input at initial entry.

Figure 27: Source of intelligence referrals received by Border Force relating to GM between 1 January 2022 and 31 December 2024

Source	No. of referrals	Percent of referrals
Home Office	2,693	79.67%
Police	263	7.78%
Crimestoppers	148	4.38%
Other law enforcement	81	2.40%
Other government department	80	2.37%
Embassy/attaché	40	1.18%
Human intelligence source	36	1.07%
Other international	31	0.92%
Local government	4	0.12%
Military	2	0.06%
Other	2	0.06%
Total	3,380	100.00%

- **9.30** The Home Office was unable to link intelligence sources and outcomes of intelligence reports, stating: "This data cannot be pulled from COP in a single report. To establish outcomes, it would need someone to check each individual record."
- **9.31** The Home Office told inspectors that not all referrals to Border Force relating to GM will have been recorded on COP. Despite inspectors asking for data on all referrals relating to GM, the Home Office provided only the data extracted from COP.

### MIB GM 'taskings'

- **9.32** Where further information is required to enhance the intelligence already received, the MIB can issue a 'tasking' form requesting further intelligence to be collected. Taskings can also be issued by the MIB on behalf of other law enforcement agencies.
- 9.33 Between 1 January 2022 and 30 December 2024, the MIB issued 210 taskings related to GM (see figure 28). Of these, 93 (44.29%) were in relation to intelligence that had originated from a partner agency.

Figure 28: Source of GM intelligence leading to taskings issued by the MIB between 1 January 2022 and 31 December 2024

Source of intelligence	Number of taskings	Percent of taskings
Home Office Intelligence	77	36.67%
NCA	49	23.33%
Border Force Frontline	26	12.38%
Police	16	7.62%
Border Force National Intelligence Hub	14	6.67%
Public	13	6.19%
Overseas	10	4.76%
MCGA – Coastguard	4	1.90%
Marine Management Organisation	1	0.48%
Total	210	100%

9.34 Most MIB taskings were issued to Intelligence Groups, over half (55.71%) to IG1 (South of England and Wales) (see figure 29).

Figure 29: Recipients of GM intelligence taskings issued by the MIB between 1 January 2022 and 31 December 2024

Team tasked	Number of taskings	%
FIO IG1 (South of England and Wales)	117	55.71%
FIO IG2 (Central, Felixstowe and Harwich)	32	15.24%
FIO IG4 (South-east and Near Europe)	32	15.24%
FIO IG3 (North of England and Scotland)	23	10.95%
Accompanied RoRo Modal Hub	1	0.48%
Specialist Intelligence	2	0.95%
HO International	1	0.48%
All IG Teams	2	0.95%
Total	210	100%

- 9.35 Due to the format of the data provided, it was not possible to align the intelligence source for each piece of intelligence with the team tasked and the outcome. However, the data did divide the outcomes of the taskings into categories. This indicated that, in most cases, an FIO responded to the tasking, and when they did they were able to answer the query in the majority of cases:
  - FIO attended and query answered (83)
  - FIO attended and no further action (44)
  - no further action possible (12)
  - intel report completed (37)

- ongoing taskings or ongoing interest cases (26)
- tasking cancelled/actioned by other party (5)
- **9.36** Three taskings resulted in 'targets' being raised, which led to:<sup>89</sup>
  - one vessel target nil result
  - the arrest of two facilitators and identification of 15 migrants (adopted by the NCA following tasking of FIOs)
  - one 'vessel of interest' identified and a 'safety of life at sea' event reported

### MIB targets<sup>90</sup>

- 9.37 Between January 2022 and December 2024, the MIB issued 13 GM targets for action: five in 2022, five in 2023 and three in 2024. The Home Office suggested that the low numbers were due to an increase in 'at-sea drop-offs' (ASDOs) and told inspectors that, during deconfliction of intelligence with other agencies, "these become NCA investigations at an early stage".
- 9.38 The Home Office identified eight instances between 1 January 2022 and December 2024 where intelligence had been adopted by the NCA or the police for investigation when shared by the MIB for deconfliction.
- 9.39 Of the small number of actionable targets, a third were fishing vessels, the remainder were yachts and catamarans. Most were category A and B targets. In half of the cases, Border Force Maritime Command was the lead agency, otherwise it was a Border Force region, the NCA, Police or the French authorities. All targets were responded to, and some resulted in positive outcomes, including the seizure of almost 1,000kg of cocaine.

### **Joint Maritime Security Centre**

**9.40** The Joint Maritime Security Centre (JMSC) was established in 2019. Its most recent business plan states:

"As the UK's only maritime security focussed organisation, JMSC facilitates the coordination of the UK's maritime expertise, capabilities, and at-sea assets to enable a whole system response to threats to security, law and order, trade and commerce, and the integrity of the maritime domain."

- 9.41 The JMSC is a joint civil—military, multi-agency organisation based in Portsmouth, staffed by the Home Office, Policing, and the Royal Navy. At 31 March 2024, it had 27 FTE staff in post but an FTE target of 50, uplifted to 56 for the financial year 2024-25. It is funded by the Department for Transport (60%) and the Home Office (40%), with significant non-financial contributions from the Ministry of Defence, and additional specific funding from other government departments (notably the Foreign, Commonwealth and Development Office).
- 9.42 The JMSC is responsible for providing maritime domain awareness and understanding, operational co-ordination and coherence, strategic assessments, support to UK sanctions regimes, and international engagement. Most of the JMSC's operational support to frontline

<sup>89 &#</sup>x27;Targets' are issued to enable operational responses, such as interdictions, to take place.

<sup>90</sup> Targets are 'categorised' to reflect the credibility of the underlying intelligence and indicate the likelihood of obtaining a positive operational outcome, such as a seizure. These range from Category A (specific intelligence from a credible source) to Category C (target matches against known smuggling trend and/or other risk indicators).

- partners is delivered through JMSC Operations, which includes a platform for multi-agency collaboration.
- 9.43 JMSC Operations provides, through the NMIC, a platform and framework for government agencies to share information and develop an understanding of maritime threats, while JMSC Operations identifies and monitors emerging situations and co-ordinates the response by the police, military, or other government agencies. Whereas HOI prioritises its work according to the Border Force Control Strategy, the JMSC is "threat agnostic and impartial", according to its senior management.
- 9.44 The JMSC takes an "ask not task" approach to the co-ordination of agencies and assets, relying on an appropriate lead agency to take command of a situation. A key law enforcement stakeholder told inspectors that it valued its collaborative relationship with the JMSC and the work the JMSC did co-ordinating operational responses.
- 9.45 The MIB is located within the JMSC but remains within the HOI organisational structure. The MIB has its own intelligence analysts. Managers told inspectors that information was shared on request between the MIB and the JMSC, but they did not have access to all the same systems and, although MIB officers all had developed vetting clearance, there was still some information they could not access. <sup>91</sup> Inspectors asked the Home Office for copies of any memoranda of understanding (MoUs) or protocols which governed the sharing of information between the JMSC and the MIB, but none was provided.
- 9.46 Managers from both told inspectors there were "cultural barriers" and a disconnect between the MIB and the JMSC. This had on occasion resulted in duplication, with the JMSC and the MIB developing the same intelligence and communicating to operational teams on the same matters.
- 9.47 The 'GM Strategic Review' had recommended that Border Force "bring clarity on roles and responsibilities, processes and flows in the maritime intelligence arena in order to understand gaps, duplication of effort and areas for improvement". In March 2025, the Home Office told inspectors that roles and structures in relation to GM intelligence still needed to be fully defined to ensure no duplication of intelligence activity between HOI and the JMSC, and others, and that this formed part of a review being led by Home Office Border Security Command.
- 9.48 Senior managers recognised that the role of the JMSC required refinement, but that there was also an aspiration for Border Force to be a better "customer" of the JMSC, engaging more and making better use of the products and services the JMSC could provide. However, many Border Force officers seemed unclear about the respective roles and responsibilities of the JMSC, the NMIC and the MIB, using the terms interchangeably, and in some cases copying emails to multiple teams to make sure they reached the right one.

### **Detection of GM vessels**

**9.49** One of the JMSC's six core mandated activities is "Maritime Domain Awareness and Understanding". This sets out JMSC's responsibilities for "gathering, analysing, assessing, and sharing information pertinent to maritime situational awareness and understanding of threat".

<sup>91</sup> The highest level of government security clearance, allowing for "long-term, frequent and unsupervised access to Top Secret materials or information".

- **9.50** A senior manager told inspectors that the UK's ability to detect maritime movements had improved significantly since 2022, both in territorial waters and the UK marine area (territorial waters and the exclusive economic area). In each case, this was from a low base.
- 9.51 Further work to increase the data feeds and maritime surveillance capability was ongoing, in line with recommendations in the 'GM Strategic Review'. Evidence provided to inspectors by the Home Office showed that the number of air missions was on an upward trend and an MoU for increased air surveillance capability was being negotiated. Inspectors were also told about negotiations to integrate additional existing radar data streams into the maritime 'Common Operating Picture'.
- 9.52 The JMSC is responsible for managing access to 'Telesto', a web-based application providing access to the UK's maritime Common Operating Picture produced by fusing positional data streams. Border Force officers described Telesto as a "real bonus" and valued it as a tool for monitoring GM movements and informing their response locally. However, some officers wanted more training in its use, and there was a perception that there was a limit on licences which restricted its access.
- 9.53 Border Force advised inspectors at the factual accuracy stage that the Common Operating Picture is "constrained by the inherent limitations of different sensors linked to the curvature of the earth, range of the sensor from the target vessel and resolution (electro-optical) or power output (radar) of the sensor".

# 10. Inspection findings: Project Kraken

## Project Kraken - background

- 10.1 Project Kraken was established in 2008 as a joint initiative between Border Force, the National Crime Agency (NCA) and local police forces "which aims to counter the threats from serious and organised crime, including smuggling, immigration crime and terrorism, around the UK's coastline" by encouraging "members of the public in coastal communities, pleasure craft users and those in and around small ports, marinas and harbours" to report "suspicious or unusual behaviour on the coastline or at sea". 92,93,94
- 10.2 Border Force took over from the NCA as project lead in 2016. In 2020, responsibility for Project Kraken within Border Force passed from Border Force Maritime Command (BFMC) to the General and Commercial Maritime (GCMT) team within Border Force National Operations Headquarters. Project Kraken is promoted via GOV.UK and with posters encouraging and explaining how to report, but it also relies on Border Force's network of Field Intelligence Officers (FIOs) to promote it with their contacts in maritime communities around the UK.

### **Update on previous ICIBI recommendations**

- 10.3 The Independent Chief Inspector of Borders and Immigration's (ICIBI's) 'Inspection of General Aviation and General Maritime', published in January 2016, noted that, to that point, Border Force had found that Project Kraken was "of limited value". It had received just 14 pieces of information via Kraken between January and June 2015, though it was unclear whether some reports were not being passed on to Border Force from the other agencies. At the time of the inspection, Border Force was considering running a pilot in conjunction with the National Coastwatch Institution (NCI) to encourage its members to provide information to assist it in developing its maritime intelligence capability.
- 10.4 ICIBI's 'Inspection of Border Force operations at south coast seaports', published in November 2018, noted: "Despite efforts to breathe new life into Project Kraken, reporting had been modest and of little operational value, not helped by reporting arrangements that were cumbersome and unencouraging." It recommended that the Home Office should "look again at Project Kraken, in particular at the reporting arrangements, and identify if it could be made more effective". This recommendation was 'accepted'.
- 10.5 In 2019, ICIBI's 'Inspection of the Home Office's response to in-country clandestine arrivals ("lorry drops") and to irregular migrants arriving via "small boats" recommended that the Home Office should:

<sup>92</sup> Home Office, 'Response to the inspection into the effectiveness of Border Force's role in Project Kraken at small seaports' (published 27 January 2022). <a href="https://www.gov.uk/government/publications/response-to-an-inspection-of-border-forces-role-in-project-kraken/response-to-the-inspection-into-the-effectiveness-of-border-forces-role-in-project-kraken-at-small-seaports-accessible-version">https://www.gov.uk/government/publications/response-to-an-inspection-of-border-forces-role-in-project-kraken/response-to-the-inspection-into-the-effectiveness-of-border-forces-role-in-project-kraken-at-small-seaports-accessible-version</a>

<sup>94</sup> Border Force and Home Office, 'Report suspicious behaviour on the coast or at sea: Project Kraken' (guidance, last updated 1 April 2025). <a href="https://www.gov.uk/government/publications/report-suspicious-behaviour-at-sea-project-kraken">https://www.gov.uk/government/publications/report-suspicious-behaviour-at-sea-project-kraken</a>

"Work with the National Police Chiefs Council to create joint plans for the monitoring and 'policing' of the whole of the UK coastline (including ports and harbours) for the smuggling of people and goods and related criminal activities, integrating Border Force/Immigration Enforcement priorities, resources and functions, including intelligence collection, with those of coastal police forces."

- 10.6 The Home Office 'partially accepted' this recommendation, referencing a relaunch of Project Kraken in its response. The relaunch would "improve the communications approach with the general public and review information flows into law enforcement agencies".
- In October 2021, ICIBI inspected 'the effectiveness of Border Force's role in Project Kraken at small seaports'. The report was published in January 2022. It found that little progress had been made since the previous inspections. However, inspectors were told that a full review of Project Kraken had begun in March 2021 and that it was in the process of being redesigned and relaunched, with a projected completion date of spring 2022. The redesign would "increase public awareness of Project Kraken", "increase public reporting of unusual or suspicious behaviour in and around coastal and maritime environments", and "strengthen industry's response and security surrounding general maritime to reduce the impact of the threat from terrorism and serious and organised crime".
- **10.8** ICIBI made one recommendation, which was 'fully accepted':

"As part of the Project Kraken relaunch, due in Spring 2022, critically evaluate, and where necessary implement:

- the resources required (including staffing, strategic communications and promotional materials)
- any new intelligence reporting mechanisms, including changes to improve their efficiency and effectiveness where appropriate
- mechanisms to continuously measure the effectiveness of the Project."
- 10.9 Most recently, in January and February 2023, ICIBI conducted a 're-inspection of Border Force's management of Project Kraken at small seaports'. The report was published in June 2023. 96 Although badged as a re-inspection, the report provided a detailed account of the governance and resourcing of Project Kraken, its communications, branding, and community engagement, and the information flows. Much of this remains valid.
- **10.10** The 2023 re-inspection report noted that the relaunch of Project Kraken in July 2022 had resulted in an increase in reporting. [redacted] The effects of the pandemic notwithstanding, this showed a marked improvement, though from a very low base.
- 10.11 The report also noted that the Border Force staff who managed the relaunch and who oversee the project were enthusiastic and hard-working, and that partner agencies recognised that Border Force was the right agency to lead Project Kraken. However, more needed to be done to publicise the project and to track the outcomes of intelligence generated through it, and measure its effectiveness.

<sup>95</sup> Independent Chief Inspector of Borders and Immigration, 'An inspection into the effectiveness of Border Force's role in Project Kraken at small seaports – October 2021' (published 27 January 2022). <a href="https://www.gov.uk/government/publications/an-inspection-into-the-effectiveness-of-border-forces-role-in-project-kraken-at-small-seaports">https://www.gov.uk/government/publications/an-inspection-into-the-effectiveness-of-border-forces-role-in-project-kraken-at-small-seaports</a>

<sup>96</sup> Independent Chief Inspector of Borders and Immigration, 'A re-inspection of Border Force's management of Project KRAKEN at small seaports (January – February 2023)' (published June 2023). <a href="https://www.gov.uk/government/publications/a-re-inspection-of-border-forces-management-of-project-kraken-at-small-seaports-january-february-2023">https://www.gov.uk/government/publications/a-re-inspection-of-border-forces-management-of-project-kraken-at-small-seaports-january-february-2023</a>

10.12 The report contained four recommendations, one of which was 'fully accepted', one 'partially accepted', and two 'not accepted'. In October 2024, inspectors asked the Home Office for an update on implementation of the first two, and any observations on the two that were 'not accepted'.

### **Recommendation 1**

**10.13** ICIBI recommended that:

"The Home Office should develop a mechanism to track the outcomes of intelligence generated through Project KRAKEN and use the information to assess the effectiveness of the project and promote 'good news' stories".

- **10.14** The Home Office responded that work was "under way to further develop tracking mechanisms in place to enable us to measure the end-to-end effectiveness of the project". Its "expected implementation date" was September 2023.<sup>97</sup>
- **10.15** In October 2023, the Home Office provided an update on its progress:

"The coastal crime line reports are sent directly to Border Force National Intelligence Hub (BFNIH) along with national Counter Terrorism Police from Crimestoppers. The BFNIH then forward onto the Maritime Intelligence Bureau (MIB) who record and action each report. MIB keep a log of each Kraken report, either via the Coastal Crime Line or internally, or even directly from partners. This log includes an outcome for each report, it is at this stage that we will be able to provide and source 'good news' stories."

- **10.16** In February 2025, Border Force told inspectors it was "conducting insights research into Kraken and other reporting campaigns". It said that the outcome of this research will "inform the strategy for increasing the effectiveness of Kraken".
- 10.17 Inspectors pointed the Home Office to its October 2023 update and asked for data on Project Kraken referrals and outcomes. Inspectors were told: "The way MIB records data has changed since the Kraken inspection and in response to an increased focus on processing referrals data via COP, rather than the use of local spreadsheets". However, a Border Force manager told inspectors that tracking the outcome of intelligence could still be done using a spreadsheet log, which was easily searchable, "unlike COP", and this data was relied on for weekly returns.
- 10.18 The Home Office provided inspectors with a 'dashboard' used by the G&CM team which detailed the number of referrals received from Project Kraken, how and where they were received, and the outcome (by category rather than in detail). The dashboard recorded [redacted] reports submitted between 2022 and [redacted], indicating year-on-year progress.
- 10.19 Local MIB records were also provided to inspectors. These showed 253 referrals generated through Project Kraken between 1 January 2022 and 31 December 2024. Meanwhile, the overall intelligence referral figures provided identified that 148 reports were received via Crimestoppers in the same period. The Home Office explained that these different figures were due to "differences in the way the information is recorded and changes in definitions/the way referrals are categorised over time".

<sup>97</sup> Home Office and Border Force, 'Response to the re-inspection of Project Kraken at small seaports' (published 15 June 2023). <a href="https://www.gov.uk/government/publications/response-to-the-re-inspection-of-project-kraken-at-small-seaports">https://www.gov.uk/gov

<sup>98</sup> Maritime Intelligence Bureau.

<sup>99</sup> Central Operations Platform (COP), the system on which intelligence is submitted by frontline officers.

- 10.20 In evidence, the Home Office told inspectors that some referrals were shared with multiple teams and, therefore, there were more recorded outcomes than referrals. According to local MIB records, the recorded outcomes for the referrals received through Project Kraken were mostly shared with Home Office Intelligence Collection and/or Maritime Command. Otherwise, the referrals were deconflicted and passed to the NCA, the police, or both, or (for approximately 20%) marked as 'no further action' due to quality.<sup>100</sup>
- **10.21** The MIB was aware of four 'events' resulting from Project Kraken intelligence referrals:
  - in July 2023, Police, Border Force Maritime Command and FIOs deployed to a fishing vessel to identify possible visa abuse (Operation Hebwich) and drug offences; two non-visa nationals were "intercepted" and a £40,000 penalty levied
  - in November 2023, Police intercepted a fishing vessel; a holdall from the vessel was found to contain approximately 15kgs of cannabis and 98 vapes, each containing 1 gram of tetrahydrocannabinol (THC)
  - in August 2024, Police intercepted a rigid hull inflatable boat (RHIB) and seized approximately 500kgs of cocaine
  - in November 2024, FIOs, regional Border Force officers and HM Coastguard boarded a fishing vessel; modern slavery concerns were raised, and four Ghanaian crew members were referred into the National Referral Mechanism for their safety<sup>101</sup>
- 10.22 In February 2025, Border Force told inspectors that "successes are also being effectively tracked internally" and pointed to a news article relating to the August 2024 RHIB interception. However, inspectors found no evidence that these successes were being promoted as 'good news' stories within the Home Office.

### **Recommendation 2**

**10.23** The Home Office 'partially accepted' the recommendation that it should:

"allocate an annual budget for Project KRAKEN work, including an ongoing communications campaign, to enable planning for future years and demonstrate its long-term commitment to managing the project".

**10.24** The Home Office responded:<sup>103</sup>

"Project Kraken forms one part of the broader general maritime (GM) work undertaken by the Home Office. We review all Border Force activity on an annual basis and allocate funding against priorities and so Project Kraken will naturally form part of the GM settlement.

Furthermore, as Project Kraken is a multi-agency campaign, Border Force will continue to work closely with all our partner agencies to review and evaluate budgetary options as well as strands of activity, which will include communications, for the long-term success

<sup>100</sup> The Home Office stated that "some referrals were shared with multiple teams so the figures showing who information was shared with add up to more than the initial number of incoming referrals".

<sup>101</sup> Home Office and UK Visas and Immigration, 'National referral mechanism guidance: adult (England and Wales) (updated 20 October 2024). <a href="https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales</a>

<sup>102</sup> The Argus, 'Half a tonne of drugs found in rubber dinghy at Sussex beach' (published 25 August 2024). <a href="https://www.theargus.co.uk/news/24541007.half-tonne-drugs-found-rubber-dinghy-sussex-beach/">https://www.theargus.co.uk/news/24541007.half-tonne-drugs-found-rubber-dinghy-sussex-beach/</a>

<sup>103</sup> Home Office and Border Force, 'Response to the re-inspection of Project Kraken at small seaports'.

of the project. An evaluation/review paper will be produced to feed into established budgetary processes

Home Office expected implementation date: April 2024"

10.25 Inspectors were told by the G&CM team that there was no dedicated budget for Project Kraken. They were not provided with the 'evaluation/review paper' referred to in the Home Office's original response to this recommendation. However, in February 2025, in response to the request for an update, Border Force stated that "significant funding has been received from key law enforcement [stakeholders]". The response highlighted that "new stakeholders" had started to provide funding for Project Kraken, including the Modern Slavery Organised Crime Unit and the Joint Maritime Security Centre (JMSC). According to Border Force, the new funding had allowed it to place metal signs promoting Project Kraken across the North Yorkshire coastline, and the funding provided by the JMSC "ensures that the campaign has the necessary resources to continue its outreach and educational efforts across the UK's coastline".

#### **Recommendation 3**

**10.26** In June 2023, the Home Office did not accept the recommendation that it should:

"develop an engagement strategy that encompasses Border Force, stakeholder and law enforcement agency activities to raise awareness of Project KRAKEN and identify opportunities for smarter working around planned engagement events".

**10.27** It responded: 104

"The Home Office accepts that engagement plays an important role in raising awareness of Project Kraken.

Project Kraken is already supported through existing forums, notably the Kraken Tactical Delivery Group, which maintains strategic oversight of the work.

This oversight already includes a multi-faceted communications plan and so we don't believe an additional layer of governance would add benefit. Our engagement activity on all projects, including Kraken, will however continue to be subject to ongoing review."

- **10.28** In its update of February 2025, Border Force shared details of work it had undertaken in conjunction with the Home Office Policy and Innovation Lab (CoLab).
- 10.29 In October 2024, as part of the initial phase of the review, CoLab ran a workshop with the G&CM team to establish the "desired outcomes" for Project Kraken, to map the end-to-end process and relevant stakeholders, and to record what is working well and what could be improved. CoLab also facilitated a workshop with 15 stakeholders, including Home Office Intelligence, the police and the NCA.
- 10.30 'Project Kraken workshop write-up' set out the purpose of a "holistic review" initiated by Border Force Maritime Command as "to understand the value of Project Kraken and develop a clear strategy for the campaign". The document proposed next steps but stated that these would need to be reviewed, and agreement reached on which to take forward. It did not state who would conduct the review or whose agreement was needed. Inspectors were not provided with an update on which of the next steps were being taken forward.

10.31 In February 2025, Border Force also provided inspectors with examples of where "success and recognition are now being proactively shared". These included an example of a BBC broadcast that featured Project Kraken, scheduled for March 2025, and examples of partnerships with stakeholders that it states help to promote Project Kraken. The partnerships are with the National Coastwatch Institution, British Marine, and the Royal Yachting Association (RYA).

#### **Recommendation 4**

**10.32** In June 2023, the Home Office did not accept the recommendation that it should:

"develop and finance its own social media campaign to continually raise awareness of Project Kraken".

#### **10.33** It responded:

"The Home Office considers the previous Crimestoppers social media campaign to have been a strong positive step in our communication campaign relating to Project Kraken. The Home Office will work with partners to continue exploring future communication routes. Social media campaigns may feature as part of the overall communications strategy."

- 10.34 In December 2024, inspectors were told that responsibility for social media around Project Kraken had been moved from the G&CM team to another department within Border Force. No evidence was provided of any current social media campaign or communications strategy for Project Kraken. In February 2025, Border Force indicated that it was building on the work with CoLab to "inform the strategy for increasing the effectiveness and join up for Kraken ... with a cross-government reach".
- 10.35 In the course of this inspection, several Border Force managers told inspectors that Project Kraken had improved and still had further potential. There was recognition that it was "an important mechanism". However, some suggested that it needed to evolve, and would benefit from greater publicity and incorporating modern online reporting channels.
- 10.36 Meanwhile, the current inspection found that awareness of Project Kraken was patchy. RYA members are key target audience, but in ICIBI's survey, over 50% (46 of 88) of RYA members who responded said they were unaware of the scheme, despite most (45 of the 46) having been engaged in sailing activities for more than ten years.
- 10.37 One FIO told inspectors that they had recently been asked "if Kraken still exists", while others reported there were too many different campaigns which confused the public. Examples of similar schemes included the nationwide 'PortSafe' scheme, and local schemes such as Kent Police's 'Don't ignore it, share it' campaign. FIOs said they encouraged people to report information to them directly, as reports via the Project Kraken report line could take time to reach them and they did not receive any feedback on the intelligence collected or any patterns in it.

# Annex A: Role and remit of the Independent Chief Inspector

The role of the Independent Chief Inspector of Borders and Immigration (until 2012, the Chief Inspector of the UK Border Agency) was established by the UK Borders Act 2007. Sections 48-56 of the UK Borders Act 2007 (as amended) provide the legislative framework for the inspection of the efficiency and effectiveness of the performance of functions relating to immigration, asylum, nationality and customs by the Home Secretary and by any person exercising such functions on their behalf. The legislation empowers the Independent Chief Inspector to monitor, report on and make recommendations about all such functions and in particular:

- consistency of approach
- the practice and performance of listed persons compared to other persons doing similar activities
- the procedure in making decisions
- the treatment of claimants and applicants
- certification under section 94 of the Nationality, Immigration and Asylum Act 2002 (c. 41) (unfounded claim)
- the law about discrimination in the exercise of functions, including reliance on paragraph 17 of Schedule 3 to the Equality Act 2010 (exception for immigration functions)
- the procedure in relation to the exercise of enforcement powers (including powers of arrest, entry, search and seizure)
- practice and procedure in relation to the prevention, detection and investigation of offences
- the procedure in relation to the conduct of criminal proceedings
- whether customs functions have been appropriately exercised by the Secretary of State and the Director of Border Revenue
- the provision of information
- the handling of complaints; and
- the content of information about conditions in countries outside the United Kingdom, which the Secretary of State compiles and makes available, for purposes connected with immigration and asylum, to immigration officers and other officials.

In addition, the legislation enables the Secretary of State to request the Independent Chief Inspector to report to them in writing in relation to specified matters.

The legislation requires the Independent Chief Inspector to report in writing to the Secretary of State. The Secretary of State lays all reports before Parliament, which they have committed to do within eight weeks of receipt, subject to both Houses of Parliament being in session.

Reports are published in full except for any material that the Secretary of State determines it is undesirable to publish for reasons of national security or where publication might jeopardise an individual's safety, in which case the legislation permits the Secretary of State to omit the relevant passages from the published report.

As soon as a report has been laid in Parliament, it is published on the Inspectorate's website, together with the Home Office's response to the report and recommendations.

# **Annex B: ICIBI 'expectations'**

Background and explanatory documents are easy to understand and use (e.g. statements of intent (both ministerial and managerial), impact assessments, legislation, policies, guidance, instructions, strategies, business plans, intranet and GOV.UK pages, posters, leaflets etc.)

- They are written in plain, unambiguous English (with foreign language versions available, where appropriate)
- They are kept up to date
- They are readily accessible to anyone who needs to rely on them (with online signposting and links, wherever possible)

## Processes are simple to follow and transparent

- They are IT-enabled and include input formatting to prevent users from making data entry errors
- Mandatory requirements, including the nature and extent of evidence required to support applications and claims, are clearly defined
- The potential for blockages and delays is designed out, wherever possible
- They are resourced to meet time and quality standards (including legal requirements, Service Level Agreements, published targets)

# Anyone exercising an immigration, asylum, nationality or customs function on behalf of the Home Secretary is fully competent

- Individuals understand their role, responsibilities, accountabilities and powers
- Everyone receives the training they need for their current role and for their professional development, plus regular feedback on their performance
- Individuals and teams have the tools, support and leadership they need to perform efficiently, effectively and lawfully
- Everyone is making full use of their powers and capabilities, including to prevent, detect, investigate and, where appropriate, prosecute offences
- The workplace culture ensures that individuals feel able to raise concerns and issues without fear of the consequences

# Decisions and actions are 'right first time'

- They are demonstrably evidence-based or, where appropriate, intelligence-led
- They are made in accordance with relevant legislation and guidance
- They are reasonable (in light of the available evidence) and consistent
- They are recorded and communicated accurately, in the required format and detail, and can be readily retrieved (with due regard to data protection requirements)

## Errors are identified, acknowledged and promptly 'put right'

- Safeguards, management oversight, and quality assurance measures are in place, are tested and are seen to be effective
- Complaints are handled efficiently, effectively and consistently
- Lessons are learned and shared, including from administrative reviews and litigation
- There is a commitment to continuous improvement, including by the prompt implementation of recommendations from reviews, inspections and audits

# Each immigration, asylum, nationality or customs function has a Home Office 'owner'

The Home Office 'owner' is accountable for:

- implementation of relevant policies and processes
- performance (informed by routine collection and analysis of management information (MI) and data, and monitoring of agreed targets/deliverables/budgets)
- resourcing (including workforce planning and capability development, including knowledge and information management)
- managing risks (including maintaining a risk register)
- communications, collaborations and deconfliction within the Home Office, with other government departments and agencies, and other affected bodies
- effective monitoring and management of relevant contracted out services
- stakeholder engagement (including customers, applicants, claimants and their representatives)

# **Annex C: Border Force Operating Mandate**

The Border Force Operating Mandate defines the full border security checks to be conducted by Border Force officers, or through automated processes, on people and accompanied goods, freight, and post arriving in and – where appropriate – departing from the UK; it also defines the actions to be taken in response to the outcome of those checks.

The Operating Mandate establishes a consistent standard of scrutiny to detect threats across the broad spectrum of immigration, criminality, and terrorism.

Where relevant, it describes known circumstances of variance where mandatory checks cannot be conducted and sets out the alternative processes that apply in these circumstances. The main border security checks required are detailed below.

### Border security checks - people

Border Force officers must carry out full checks on all individuals entering the UK. Full checks means the appropriate combination of checks for individuals or specific cohorts of individuals, and covers:

- a defined set of mandatory checks to be applied to all individuals seeking entry to the UK
- a defined set of mandatory checks to be applied to specific cohorts of individuals seeking entry to the UK

Any further checks which a Border Force officer deems necessary and appropriate to be applied on a case-by-case basis to satisfy themselves of the appropriate course of action to be taken.

### **Mandatory checks models**

There are four mandatory checks models:

- fully networked Primary Control Point (PCP)
- non-networked PCP
- attended clearance at non-PCP locations
- remote clearance at non-PCP locations

### **Further checks**

In many cases, a Border Force officer may be satisfied on the basis of the mandatory checks alone that an individual may enter the UK or be permitted to cross the border. However, where they are not satisfied on this basis, Border Force officers should conduct whatever further checks they consider necessary and appropriate to reach a decision on what, if any, further action is required, including whether to grant or refuse entry, whether a person should be examined for customs purposes, or whether a case should be handed on to another authority for further action.

### The suspension of mandatory checks

In an emergency situation, local managers have the authority to suspend checks where there is a real and immediate risk of serious harm to members of the public or staff.

## Border security checks - goods

Border Force designated customs officials' checks cover five broad areas:

- 1. intelligence-led risk-based checks to detect illegal goods and revenue fraud at the border
- 2. regulatory international trade controls on goods entering or leaving the EU via the UK to ensure compliance with international, EU, and domestic regulatory requirements
- 3. revenue collection in relation to goods liable to charge in individuals' baggage and in parcel post
- 4. business and passenger service functions for the checking and endorsement of VAT refund claims, and for the checking and endorsement of all international trade documentation requiring a customs stamp at the border to evidence import and export movements and compliance with any relevant customs clearance legal requirements
- 5. national security and counter-terrorism checks to check freight that poses a risk to national security

### **Border security checks – Cyclamen**

As part of the government's counter terrorism strategy CONTEST, Border Force use Cyclamen for screening vehicles, goods, and people at the border to detect and deter the illegal importation of radiological and nuclear materials. Border Force must deploy resources, conduct screening, investigate alarms, and escalate cases in accordance with the Cyclamen Screening Protocol.

# Annex D: 'GM Strategic Review' 'fix now' recommendations with Home Office update and status as at March 2025

People (staffing levels, size, and recruitment)		
Recommendation	Update	Status
(2) Strategic workforce planning needs particular focus on BF Maritime Command and overall GM activity in relation to its staffing levels, succession planning, skills, experience and qualification gaps to	At the time of writing on 14 March 2025, there is an in-confidence negotiation with TUs, with a view to resolving the T&Cs dispute as soon as possible (see R6). This will allow onward recruitment into the newly established Maritime Directorate.	Underway
ensure it is managing and forecasting its current and future requirements to remain an effective national capability	The creation of a new Senior Management Team for the Maritime Director brings with it the opportunity to reset many expectations around leadership, management, strategy, culture etc and this extends to planning for training, people, career pathways and further opportunities.	
(3) Strategic investment in a continued pipeline of staff to maintain suitable staffing levels and technical expertise	As (2) above	Underway
(5) Scope the deep rummage capacity within Border Force against operational need	Spending Review Bid submitted for 24/25 to increase the size of the National Deep Rummage Team (NDRT).	Underway
	The creation of a new Senior Management Team for the Maritime Director brings with it the opportunity to reset many expectations around leadership, management, strategy, culture etc and this extends to planning for training, people, career pathways and further opportunities.	
(6) Staff are on different terms and conditions across the organisation in terms of pay and maritime allowances (i.e. 1998 v 2014 allowances) impacting morale, fairness, recruitment and retention	Significant work has been carried out to propose a new set of T&Cs and, at the time of writing on 14 March 2025, there is an in-confidence negotiation with TUs, with a view to resolving the dispute as soon as possible.	Underway

(7) Use of Small Boats Operational Command (SBOC) spare capacity in periods of low demand should be utilised in support of BF national general maritime priorities	All SBOC maritime and ISR capacity now sits within one new Maritime Directorate (MARDIR), with organisational structures now better supporting the co-ordination of resource. Weekly planning meetings are now held between small boats operations leads and operational leads for national GM priorities, which allow the deployment of fixed wing surveillance and other ISR capabilities during quiet periods. MARDIR ISR assets usually deployed to small boats have already supported the seizure of over two and a half tonnes of class A drugs as a result.	Underway
	Op [blanked out] deployments considered as part of the Port Analysis Project. Recommendations for future deployments will form part of the wider Sector 2 planning and Transformation programme.	
People (people, skills, training, and competency)		
Recommendation	Update	Status
(8) Border Force to undertake a comprehensive training needs assessment/gap analysis in the general maritime work area in order to understand current risk and vulnerabilities and determine whether the case-by-case basis on which training is managed meet the needs	Border Force are currently conducting an in-depth national analysis of GM risk, capabilities and operational effectiveness, which is due to conclude by the end of March 2025. The results of that analysis will support a rationalisation of the current GM approach and structure. As soon as that analysis is concluded and the future approach and structure for GM is agreed, the Border Force Learning & Development (L&D) team will conduct a comprehensive learning needs analysis (LNA), which will include holding a series of design workshops with the BF Maritime team that will help identify the appropriate learning products and delivery for GM. We are currently anticipating to have completed that LNA by the end of June 2025.	Underway
Policy and powers (legislative arrangements, and doc	trine)	
Recommendation	Update	Status
(26a) Explore legislative changes for all vessels in UK territorial waters in order to create an improved data picture, specifically Registration of vessels (similar to DVLA with motor vehicles).	Policy (26a and 26e linked together).	Underway

(26b) Explore legislative changes for all vessels in	Policy (26b and 26d linked together).	Underway
UK territorial waters in order to create an improved data picture, specifically Submit a pleasure craft report' which is currently voluntary (should become mandatory)	Advice is being prepared for Home Office Ministers seeking their agreement to consult publicly on a proposal to introduce new regulations. These regulations would be made in accordance with paragraph 27BA of Schedule 2 to the Immigration Act 1971 and would require captains and persons responsible for international General Maritime voyages (including to and from the UK from within the Common Travel Area) to submit information about the voyage and persons on board online (using s-PCR or NMSW) in advance of departure to or from the UK. The intention is the regulations would be underpinned by a civil penalty regime for non-compliance with requirements.	,
(26d) Explore legislative changes for all vessels in UK territorial waters in order to create an improved data picture, specifically Advance Passenger Information (API) as it is not mandatory on private yachts, smaller vessels	Policy (26b and 26d linked together).	Underway
(26e) Explore legislative changes for all vessels in UK territorial waters in order to create an improved data picture, specifically wider application of Automatic identification systems (AIS) which would help track vessels in UK waters	Policy (26a and 26e linked together).	Underway
(26f) Explore legislative changes for all vessels in UK territorial waters in order to create an improved data picture, specifically Inshore Vessel Monitoring System (IVMS) – expected to come into force in April 2024, this will be important particularly for monitoring some fishing vessel activity	Capability Planning to monitor pending legislative changes laid by Defra to the Marine Maritime Organisation (MMO). "On 22 May, the Prime Minster called a general election for Thursday 4 July. As a result, legislation relating to the use of inshore vessel monitoring system devices for under-12m vessels will be delayed and will be a decision for the new government. Over 85% of under-12m English vessels now have an I-VMS device installed. Despite this delay in the legislation, MMO will build on this significant progress and continue with preparation activities as planned. This will ensure industry is in a good position to legally fish once the legislation dates are set"	Completed

(26g) Cruise ships should be tackled on a threat basis and where possible become self-governing in relation to managing their own flow of passenger and staff	Changes to cruise liner clearance models would require a change to the clearance procedures in the Operating Mandate. There is not enough evidence in the Spending Review research to suggest that this is an operational issue at present.	Completed
Information and data (maritime intelligence)		
Recommendation	Update	Status
(33) BFMC need to consider how they better quantify their outputs and contribution to the maritime domain awareness/intelligence picture	BFMC are constrained by criminal investigation reporting processes, but working with DDaT to review patrol stats and Dashboard development. 107	Underway
(39) Consider mechanism for recording seizures at sea where they occur to provide a best intelligence picture	COP solution sent to BFMC on 20 May 2024. <sup>108</sup>	Completed
Technology (enterprise IT architecture systems)		
Recommendation	Update	Status
(45) Assess and scope current IT infrastructure and prioritise organisational needs to improve integration and data capture/analytical capability (including CoP).	COP Project Underway/Transformation Programme	Underway
(46) [redacted]	[redacted]	Underway
Infrastructure (physical maritime infrastructure – buil	dings, facilities, and land)	
Recommendation	Update	Status
(53) Develop Measures of Effectiveness/KPI's and Board Level dashboard for GM/maritime security	Transformation Programme (Sector Re-organisation)	Underway
(57) Scope whether any supporting infrastructure should be considered in the GM space in line with	Port Analysis Project Underway	Underway

<sup>107</sup> Digital Data and Technology.108 Collaborative Operating Platform.

(58) Dedicated secure storage and suitable transport arrangements need to be reviewed to ensure they are fit for purpose	Project Underway	Underway	
Equipment and Support (equipment and support arra	angements)		
Recommendation	Update	Status	
(67) Consider increasing the limit for contract approval from £1000-£5000 to provide greater	Home Office Commercial Department (HOCD) confirmed that this was not possible at the moment, although BFMC require this to support ongoing work.	Underway	
flexibility to Cutter crews	This has been raised again by the new Maritime Director. A possible alternative is to compete a general service contract for Maritime, which is being explored.		
(68) Develop a single source of truth maritime "asset register" with appropriate data fields that will assist in planning of maintenance/fleet reliability optimisation and support capability assurance at the front line	Engagement with [contractor] has ceased due to non-compliance and concerns over data handling. BFMC to commence engagement with DDaT to explore what options are available on HO systems.	Underway	

# Annex E: 'GM Strategic Review' - Priority Strategic Recommendations

#### **Recommendations**

- In light of current and likely future threat activity, the Board should define an appropriate level
  response to the protection of UK's borders in GM, including defining a minimum requirement in
  terms of resource and operational output. This will require, as a minimum; greater operational
  focus, improved cross-BF coherence and the urgent development of better understanding.
  In time, BF should grow the capability to persistently deter, disrupt, detain and prosecute
  malign actors.
- 2. Strategic workforce planning needs particular focus on BF Maritime Command and overall GM activity in relation to its recruitment, current and projected staffing levels, succession planning, skills, experience and qualification gaps to ensure it is managing and forecasting its current and future requirements to remain an effective national capability. Use of Regional and SBOC spare capacity in periods of low demand should be better utilised in support of BF national general maritime priorities.
- 3. The Board should support and encourage the development of effective cross-departmental governance in order to generate a mature and truly multi-agency response. A Strategic to Operational framework that brings coherence to the various maritime frameworks/ mandates/ directives through an overarching, internal BF policy and a longer term BF strategic plan/strategy aligned to objectives which would also help to enhance awareness and joined up planning in this context across the organisation. Consider a single GM definition across departments and agencies and a refreshed cross GM and Maritime Security Operating Mandate to include SBOC, BFMC and Regions.
- 4. The Board should consider how to develop a stronger threat-based approach to the maritime domain. The intelligence organisation(s) should enhance current efforts of collection, analysis and reporting, harnessing BF assets, sharing with others and developing an actionable threat picture for the BF Board. A detailed review of intelligence processes, including IT system enablers, and boundary/cultural issues to enable effective information sharing and to allow the MIB/JMSC to reach its potential as a Multi-Agency Intelligence Hub should be conducted.
- 5. The Board should consider how to assure an appropriate level of visibility of GM activity. The priority should be to understand operational risk, but in time should develop to bring increased focus and coherence of GM activity with wider BF outputs. There is more that can be done in the short term to create an improved GM focus with the existing workforce, but we recommend that the Board consider, in time, nominating a new GM leadership role with a seat alongside the Regions in the BF Senior Leadership Team (SLT). This GM role would have direct authority for BFMC outputs, but also have functional coordination responsibility for regional GM activity and lead the BF cross-government maritime security relationships.

#### Recommendations

- 6. A Concept of Operations (CONOPS) should be developed for GM. It should describe options to deliver cross-GM, combined, multi-agency operations that are optimised for deterrence, whilst maintaining the ability to respond quickly to threat queuing. Coordination by JMSC should be strengthened, operations should be enabled by an appropriate regulatory framework, enhanced by targeted commitment of additional resource and framed by a clear definition by the Board of the expected level of GM effort.
- 7. In support of the deterrence framework, it is recommended that a communications strategy and core narrative are developed. This will ensure the maximum impact is made from BF GM activity, while ensuring that messaging is coordinated and consistent with wider Government intent. Develop a communications protocol to clarify roles and responsibilities and create a marketing platform to promote branding, corporate identity, and the organisation's mission.
- 8. In addition to resolving current workforce challenges and building for the future through the MCRP and reflecting the needs of this complex multi-organisation "system of systems" approach, the Board should consider targeted investment opportunities in three key capability areas: (1) Improved access to Aerial Surveillance support and UAV capability (2) improved data management systems to enhance Maritime Domain Awareness (MDA); and (3) Additional Field Intelligence Officers.

# **Annex F: Border Force Maritime Command vessels**

Border Force Maritime Command operates the following vessels:

• four cutters (Damen 4207 Class) – HMC Vigilant, HMC Valiant, HMC Seeker, and HMC Searcher

Figure 30: HMC Valiant



• six coastal patrol vessels (CPVs) – Nimrod, Eagle, Active, Alert, Hunter, and Speedwell

Figure 31: Active



two road-mobile rigid hull inflatable boats (RHIBs) – Lynx and Leopard

Figure 32: Lynx



• ten tactical watercraft (TWCs) – (six road-mobile and four cutter-mounted)

Figure 33: Tactical watercraft



# **Acknowledgements**

The inspection team is grateful to the Home Office for its co-operation and assistance during this inspection and for the contributions from the staff who participated.

# **Inspection team members**

Lead Inspector: Philip Insuli

Project Manager: Julie Dugdale

Inspector: Peter Brown

Inspector: Victoria Campbell

Inspector: Chris Evans

