



A review of firearms licensing departments in England and Wales (2022)

Executive summary

This report highlights considerable differences in the effectiveness and efficiency of forces in their processing of certificates over the last 12 months. It identifies forces that have continued to provide a good service to the shooting community, despite the considerable challenges presented by Covid lockdowns and the introduction of the Home Office Statutory Guidance on Firearms Licensing. It also identifies forces that are failing the shooting community due to unacceptable delays. The report recommends that there is reform of the current system with a view to achieving more consistent, efficient and effective systems in all forces.

Introduction

Over the past four years, BASC has produced a series of league tables looking at the turnaround times achieved for firearms licensing departments (FLDs) in England and Wales. BASC is the only shooting organisation that has produced such information and has been compiling data on FLDs for more than 20 years. On taking up the post of the Chair of the Firearms and Explosives Licensing Working Group (FELWG), chief constable Debbie Tedds stated that she did not think that the league tables were helpful, particularly as there was no narrative to contextualise the findings. It was suggested that BASC consider a more constructive way of assessing the relative performance of FLDs, looking at both quantitative and qualitative measures.

Objective

Given the request outlined above, BASC's head of firearms has produced a more comparative dataset which can be shared with heads of FLDs, chief constables and PCCs, MPs and other opinion formers. This dataset identifies which forces achieve the best turnaround times and, where possible, looks at comparative costs and staff resourcing of the FLD; this should in turn identify the most efficient and effective FLDs, and which are failing. The intention of the review is not to criticise any individual force, but rather to identify best practice.

Methodology

A series of 14 questions were asked of each force under the Freedom of Information (FOI) Act (see Appendix B). This information was cross-referenced with data from the Home Office relating to the number of firearm and shotgun certificates in England and Wales in 2020-21 and the number of certificates that were processed by each FLD during 2021-22, including the turnaround times. The latter data was generated from the National Firearms Licensing Management System (NFLMS). In addition, the conclusions and recommendations have drawn on BASC's considerable experience in analysing firearms licensing practices in the UK and figures provided for firearms licensing from Police Scotland.

Results

Responses were received from 34 of the 42 forces contacted. The results are tabulated below in Appendix A. For each force where a response was received, there are recorded the number of firearm and shotgun certificates held in the force area, the number that were processed during 2021-22 and what percentage of the certificates that represents. Where available, the number of full-time equivalent staff and departmental budget are recorded. The cost of each certificate processed is calculated by dividing the overall number processed by the total departmental budget. Similarly, the number of certificates processed per staff member is calculated by dividing the overall number processed by the number of staff. Finally, the table includes the red, amber and green ratings from the previous two years, green representing the top quartile and red the bottom quartile for overall turnaround times.

The headline figures are as follows:

- There are 13 forces which, despite Covid, managed to turn around renewals and grants in between 38.5 and 70 days, the average being 54 days. These forces were Bedfordshire, Cambridgeshire, Hertfordshire (the three forces combine in a consortium), Cleveland, Cheshire, Essex, Gloucestershire, Gwent, Kent, Lincolnshire, Merseyside, Thames Valley Police (TVP) and Warwickshire.

- These 13 forces also managed to process applications and renewals from between 15.8% and 25.1% of their certificate holders, the average being circa 20%. This is the percentage one would expect to be processed given a five-year certificate. Worryingly, several forces with severe backlogs processed well below this figure, raising the question as to what plans are in place to eliminate that backlog. It is difficult to see how this will be achieved without such remedial action. Examples include Cumbria, Dorset and Northumbria who processed less than 11% of their applications and renewals.
- In those forces where the budget figures appeared realistic, the cost to process each certificate was between £87.24 and £521.99. The average cost was £181.12, but this is somewhat meaningless given the huge variation. Seven of the 13 forces with the best turnaround times managed to process certificates at a cost of between £118.71 and £194.87 with an average cost of £140.96.
- Analysis of TVP's budget, where comprehensive data was available, would suggest that the revenue from certificates covered roughly 50% of the cost of the FLD. This is significant, as the financial report for 2020/21 for TVP shows that some 56% of its overall budget is in the form of Home Office grants.
- The number of certificates processed per staff member varied from 76.3 to 583. Again, the variation is huge. If, however, one looks at the 13 forces with the best turnaround times, ten have an average number of certificates processed per staff member at 207.15.
- Police Scotland issued 99.35% of firearm and shotgun certificate renewals prior to their expiry dates.
- The most recent firearms licensing figures released by the Home Office in July 2022, show that since the year before the Covid pandemic there has been an 8% reduction in the total number of firearm and shotgun certificates held in England and Wales. This represents a loss of over 47,000 certificate holders. That 8% reduction must be, in part, due to the failure to process new grants in a timely manner.

Caveats

- Of the 42 forces contacted, 34 returned some or all the data requested. Responses are still due from Cheshire, Cumbria, Devon & Cornwall, Gloucestershire, GMP, Nottinghamshire, Surrey and Sussex. From those that did respond, some of the data is clearly incorrect, particularly relating to budgets. This often relates to the fact that FLDs are not stand-alone departments, or that certain functions, such as administration, are not included in the budget. In Lincolnshire the administration is carried out by G4S and therefore there is only budget information for the police-staffed element.
- The datasets from the Home Office, i.e. the total number of certificates and numbers of certificates processed on the National Firearms Licensing Management System (NFLMS), cover different years. Historically, however, the total number of licences in a force area do not change significantly.
- The data from NFLMS is automatically generated, but it is susceptible to intentional or unintentional manipulation, in that it is dependent on FLDs entering data onto the system when applications are received. It should be noted that NFLMS is a legacy system which contains numerous data errors and is scheduled to be replaced in the next five years.
- The data makes no allowance for individual force factors. Thus, some forces were affected much more by Covid restrictions than others due to a lack of office space. There is no account of the geographic differences between forces, and it might be expected that a large rural force may appear less efficient than a smaller urban force, as firearms enquiry officers have greater distances to travel. In addition, the four Welsh forces were required to cope with the greater Covid restrictions applied by the Welsh Government. It should be noted that these factors do not appear to have any noticeable effect.
- Some forces are highly digitalised, with online applications and use of Zoom and Teams to conduct low-risk assessments on renewal. It is estimated that about half of forces are still using paper-based systems. This is despite the assurance from the Home Office when fees were reviewed in 2014 that all forces would have moved to online applications. A move to full-cost recovery was conditional on this being achieved.

Conclusions and recommendations

1. The most obvious conclusion from the data, is that there is considerable inconsistency between the FLDs of the 42 forces. Costs, staffing levels per certificate holder and turnaround times vary on a scale that cannot be justified. It is often argued that the true measure of performance of an FLD is public safety. That is clearly true. It is, however, impossible to measure, partly because the Home Office does not collect statistics on deaths and injuries involving legally held firearms. This is because misuse of legally held firearms is exceptionally rare. All this indicates that forces are maintaining public safety. If that is accepted, it is difficult to see why FLDs operate so differently. Similarly, Scotland's unified system is running without delays, or any evidence of public safety being compromised.
2. Other serious inconsistencies have been identified by BASC's firearms officers when dealing with member enquiries. These relate to areas such as land assessments, blanket applications of territorial conditions, arbitrary decisions on suitability of cartridge types for quarry species, and excessively disproportionate security requirements. Consistency in forensic science provision across the forces of England and Wales is achieved by complying with written standards, and accreditation by an external independent body, the UK Accreditation Service (UKAS). The whole process is overseen by a forensic science regulator who has statutory powers. The time has surely come for legislators to consider similar oversight for force FLDs. An alternative may be to look at a national service, potentially provided by a body such as the Criminal Records Bureau (CRB), which has access to confidential police systems and the experience of providing such a service. Nevertheless, force-based firearms enquiry officers would still be required, but placing them under national control would contribute to consistency of training and decision making. Such reforms could possibly be driven by PCCs, particularly those representing rural forces that are most likely to have the largest numbers of shooters.
3. Despite the considerable problems presented by the pandemic, there were still 13 forces that managed to maintain a good level of service. Furthermore, seven of these – Bedfordshire, Cambridgeshire, Hertfordshire, Cleveland, Essex, Thames Valley and Warwickshire – all showed a remarkable consistency in terms of costs, staffing per certificate processed and turnaround times. It is also noteworthy that all seven use online processing, which almost certainly helps them achieve their efficient service. These would be the forces that the Home Office should use to benchmark the fees process, with consideration to also look at Lincolnshire, whose hybrid model would also appear very efficient, although there is limited detail on overall costs. Furthermore, chief constables and PCCs would do well to look at why these forces are achieving such good results, and put in place plans to emulate them. The Home Office should also look at how Police Scotland, over the same time period, succeeded in issuing over 99% of their renewal certificates prior to expiry.
4. In conclusion, FLDs in England and Wales have had a difficult two years. The total number of certificates held has dropped by over 47,000 in two years. Nevertheless, some departments have maintained an excellent service and demonstrated what is possible. The Home Office is currently reviewing fees, which have always been contentious. Simply increasing fees without any reform of the system, will anger a shooting population facing numerous inflationary pressures. Any increase in fees should be coupled to reform of the system. Shooters want to see an efficient, consistent and proportionate licensing system. It is paramount that it safeguards the public but should also allow lawful shooting to continue without being unnecessarily bureaucratic. The service currently offered is dilatory in its provision to the shooting community. There needs to be a debate as to how firearms licensing can be improved and what that will cost. Shooters and the shooting organisations need to be heavily involved. And the debate needs to take place now.

Appendix A

Ratings from the previous two years

■ Top quartile
 ■ Middle quartile
 ■ Bottom quartile

Force	Staff	Budget	FA certs	SG certs	Certs processed 21/22	Turn-around time (renewal)	Turn-around time (grant)	Average turn-around time	Cost per cert	Cert per staff	Staff costs	2020	2019
A&S	18	464,400	6,400	21,173	5,323 (19.3%)	60 Days	144 Days	102 Days	£87.24	295.7	£25,800		
Bedfordshire			1,550	6,008	1,724 (22.8%)	37 Days	40 Days	38.5 Days					
Cambridgeshire			2,961	11,522	3,202 (22.1%)	40 Days	45 Days	42.5 Days					
Hertfordshire			2,310	9,655	2,849 (23.8%)	39 Days	40 Days	39.5 Days					
BCH Combined	27	923,000	6,821	27,185	7,775 (22.8%)	39 Days	42 Days	40.5 Days	£118.71	287.9	£34,185		
Cheshire			2,737	10,658	2,626 (19.6%)	53 Days	86 Days	70 Days					
Cleveland	3.1	107,700	1,188	2,868	883 (21.8%)	35 Days	48 Days	41.5 Days	£121.97	284.8	£34,741		
Cumbria			3,375	8,962	1,076 (8.7%)	179 Days	177 Days	178 Days					
Derbyshire	5.6		3,442	11,945	3,265 (21.2%)	69 Days	91 Days	80 Days		583			
Devon & Cornwall			11,063	29,319	5,006 (12.4%)	115 Days	89 Days	102 Days					
Dorset			3,426	10,202	963 (7.1%)	128 Days	110 Days	119 Days					
Durham	14	557,480	2,389	5,249	1,068 (14%)	88 Days	141 Days	115 Days	£521.99	76.3	£39,820		
Dyfed-Powys	22.2		4,475	14,140	3,584 (19.2%)	88 Days	97 Days	93 Days		159.8			
Essex	23.96	831,851	4,993	20,235	6,338 (25.1%)	58 Days	66 Days	62 Days	£131.24	264.5	£34,718		
Gloucestershire			2,785	11,114	2,922 (21%)	49 Days	51 Days	50 Days					
GMP			2,002	6,773	1,217 (13.9%)	93 Days	131 Days	112 Days					
Gwent	14	N/A	1,562	5,478	1,633 (23.2%)	51 Days	70 Days	61 Days		116.6			
Hampshire	N/A	601,800	5,399	21,721	4,285 (15.8%)	83 Days	85 Days	84 Days	£140.44				
Humberside	9.81	£111,510	3,202	9,743	2,642 (20.4%)	87 Days	88 Days	88 Days	£42.21	269.3	£11,367		
Kent	31	£821,361	5,778	21,037	4,215 (15.7%)	60 Days	59 Days	60 Days	£194.87	136	£26,495		
Lancashire	14.52	£260,918	3,089	11,607	3,182 (21.7%)	60 Days	114 Days	87 Days	£82	219.2	£17,970		
Leicestershire	12		2,421	11,203	2,924 (21.5%)	50 Days	93 Days	71.5 Days		243.7			
Lincolnshire	24	£380,000	4,042	13,251	3,786 (22%)	61 Days	61 Days	61 Days	£100.37	157.8	£15,833		
Merseyside	8	£232,724	981	3,222	775 (18.4%)	60 Days	74 Days	67 Days	£300.30	96.9	£29,091		
MPS			4,353	24,822	4,619 (15.8%)	96 Days	96 Days	96 Days					
Norfolk			5,249	20,772	4,637 (17.8%)	95 Days	86 Days	91 Days					
Suffolk			4,673	16,622	3,753 (17.6%)	83 Days	120 Days	102 Days					
Norfolk & Suffolk	34		9,922	37,394	8,392 (17.7%)	89 Days	103 Days	97 Days		246.8			
Northamptonshire	9.16	£260,564	2,504	9,600	2,541 (21%)	50 Days	103 Days	77 Days	£102.54	277.4	£28,446		

Force	Staff	Budget	FA certs	SG certs	Certs processed 21/22	Turn-around time (renewal)	Turn-around time (grant)	Average turn-around time	Cost per cert	Cert per staff	Staff costs	2020	2019
Northumbria			3,642	8,718	1,262 (10.2%)	158 Days	148 Days	153 Days					
North Wales	14	£468,000	2,940	10,654	2,733 (20.1%)	66 Days	85 Days	76 Days	£171.24	195.2	£33,428		
North Yorkshire			6,863	18,267	5,548 (22.1%)	59 Days	128 Days	94 Days					
Nottinghamshire			1,961	7,977	1,816 (18.3%)	85 Days	96 Days	91 Days					
South Wales	16.5	N/A	2,267	6,540	1,794 (20.4%)	59 Days	119 Days	89 Days		108.7			
South Yorkshire	12.36	£130,816	2,310	8,373	1,983 (18.6%)	80 Days	116 Days	98 Days	£65.97	160.4	£10,583		
Staffordshire			3,165	13,163	2,458 (15.1%)	136 Days	101 Days	119 Days					
WMP			1,853	7,820	1,495 (17.2%)	149 Days	114 Days	131 Days					
Staffs & WMP comb	17	£666,269	5,018	20,983	3,953 (15.2%)	142 Days	108 Days	125 Days	£168.55	232.5	£39,192		
Surrey			3,083	12,153	2,909 (19.1%)	63 Days	93 Days	78 Days					
Sussex			6,679	12,153	5,209 (27.7%)	63 Days	88 Days	76 Days					
Thames Valley	26.35	£887,076	6,161	25,604	6,427 (20%)	57 Days	61 Days	59 Days	£138.02	243.9	£33,665		
Warwickshire	10	£208,725	2,451	9,033	2,266 (19.7%)	62 Days	69 Days	66 Days	£92.11	226.6	£20,873		
West Mercia	28	£812,000	7,582	27,584	4,899 (13.9%)	74 Days	123 Days	99 Days	£165.75	175	£29,000		
West Yorkshire	12	£355,328	3,149	10,544	2,689 (19.6%)	75 Days	85 Days	80 Days	£132.14	224.1	£29,611		
Wiltshire	11	£167,847	3,573	13,190	2,980 (17.8%)	62 Days	149 Days	106 Days	£56.32	270.9	£15,259		

Appendix B

Questions for force firearms licensing departments (FLDs) Freedom of Information request

Unless stated otherwise, all questions relate to the current position as of 1 March 2022

1. How many staff work in the force's FLD (full-time equivalent)?
2. How many of these are police officers?
3. Are any other staff involved in work for the department (e.g. PCSOs doing enquiries or PNC staff doing background checks)?
If so, how many and what are their roles?
4. What training is provided to FEOs and by whom?
5. Who holds the delegated authority of the chief officer under Section 55 Firearms Act 1968 to grant/renew/refuse/revoke?
How many staff have this delegated authority?
6. What is the budget for the department?
7. Is the budget 'ringfenced'?
8. Is the FLD a stand-alone department, or part of another business area?
9. How many certificates have been extended under Section 28B in the last 12 months?
10. How many Section 7 permits have been issued in the last 12 months due to expired certificates?
11. Is the force currently accepting grant applications?
12. What is the turnaround time for a grant (currently and a year ago)?
13. When is an application first recorded on NFLMS? As soon as received? Once all enquiries have been completed?
At some other stage in the process (please specify)?
14. Are certificates ever 'issued' on NFLMS prior to conducting statutory enquiries?

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18 July 2022



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