



Hertfordshire Constabulary
Stanborough Road
Welwyn Garden City
Herts
AL8 6XF



02nd May 2023

To: Mr I M Arrow, Senior Coroner, Plymouth, Torbay, and South Devon

Via e-mail - Private and Confidential

Dear Mr Arrow,

Re: Response to all Chief Constables to prevent further deaths

I write in response to your report to all Chief Constables to prevent future deaths; made under Regulation 28 of the Coroners (investigative) Regulations 2013 dated 8th March 2023.

On behalf of Bedfordshire, Cambridgeshire, and Hertfordshire Police I write to confirm that through our collaborated Firearms and Explosive Licencing Unit as Chief Constables we have instructed the following reviews:

- A review of all firearms seized and returned over the last five years, sequenced with those returned soonest reviewed first.
- A review of all certificate holders refused or revoked, but subsequently successful with a new application over the last 5 years.
- A review of all holders subject to a police intelligence report over the last five years, prioritised in order of risk identified through initial triage.

In each case our reviews will ensure that processes and outcomes align to the most recent guidance and standards, and where required we will revoke certificates to be assured of public safety. This work undertaken by us will deliver retrospective application of the standards currently applied to Grants, Renewals, and Revocations to these past cases and incidents. To achieve this work, we are providing additional investigative resource uplift to our Firearms and Explosive Licencing Unit dedicated to these reviews, and it is estimated that the work will take six months to complete in full.



We have worked hard to deliver improvements to strengthen our processes and decision making within the Firearms and Explosive Licensing Unit, and following the publication of the Statutory Guidance in November 2021 we reviewed our policy and procedures to ensure that they aligned with the new guidance, and recently the revised version. This work included escalating the authority level to Assistant Chief Constable (November 2021) to authorise the return of a firearm or shotgun following seizure, and the alignment of force policy and processes to the Home Office Statutory Guidance. The BCH firearms and Explosive Licensing Unit has been subject to several changes to strengthen processes and outcomes, and we have already seen a step-change in outcomes as a result of this work which has sought to reposition the Unit from an administrative led function to one with an investigative mindset and professional curiosity. Having reviewed the data for the 2022/23 policing year (April – March) 49 Grant applications were refused, 15 Renewals refused, and 58 certificates revoked, and a review of the quality of decision making has provided assurance that our policy and procedures are being complied with by our staff.

The retrospective review work that we are undertaking around past decision making will ensure that we apply these standards and processes to those legacy cases, and where risk or incorrect decision making is identified we will take immediate steps to rectify that. During 2023 to date we have revoked 7 certificate holders who were previously refused/revoked and subsequently successful in an application, and a further 3 certificate holders following a review of their circumstances.

The work that we are undertaking has identified areas for improvement beyond our force areas which we have escalated to the NPCC lead and Home Office. These emerging issues includes concerns around the disparity between the shotgun and firearm application process, namely there being no minimum age limit for shotgun applications. We have an appeal currently progressing through Crown Court relating to a child that applied for a shotgun certificate aged 8 years old, and unlike firearms there is nothing definitive in legislation or guidance to prevent young children making such application and appealing police refusal decisions. We have raised further concerns regarding the Crown Court appeal process whereby those appealing decisions based upon domestic abuse factors can cross examine vulnerable DA victims in such hearings which may present significant safeguarding and vulnerability issues for such victims, we have one such case also progressing through Crown Court. Finally, we have identified a potential intelligence gap/risk in relation to cases that are progressing through family court and civil courts which involve persons or members of the family who are licenced firearms holders. At present there is no requirement to disclose the presence of firearms within such cases, and a good preventative step could be a change in the



law or, if a change in law is not deemed proportionate then some other form of positive action such as OP ENCOMPASS which is in place across schools and Police around DA disclosure information sharing, but between courts and Police so that a risk assessment can be undertaken around the presence of such firearms within family settings with high level civil disputes.

Acknowledging a lack of nationally accredited training for Firearms Explosives Licencing Units, a review of our training has been conducted, with new role specific training currently being undertaken by all Firearms Explosives Licencing Unit staff. Continued professional development will be achieved through a planned annual training schedule, and we have purchased an external training package for all FELU staff dedicated to firearms licencing roles whilst a nationally accredited package is developed. Delegated decision maker authority is only given to those who have undertaken adequate training. Finally in January 2023 a full Change Team review of our Firearms and Explosive Licencing Unit commenced and is due to report in May. This review is undertaking a root and branch review of the firearms and explosive licencing reviews, updated guidance, future demand, and requirements, and seeking areas of national best practise in place across other forces. This work will ensure that we are able to deliver a service aligned to requirements, public expectations, and embedded the required staffing levels and skills to deliver this service to meet future demand and standards.

Yours sincerely


Bedfordshire Police


Cambridgeshire Police


Hertfordshire Police