



**Kent
Police**

Protecting and serving the people of Kent

[REDACTED]
Chief Constable

Mr Ian M Arrow
His Majesty's Senior Coroner
Plymouth, Torbay & South Devon

[REDACTED]
[REDACTED]

[REDACTED]
Date: 2nd May 2023

Dear Mr Arrow,

Re: Preventing Future Deaths Report

I write in relation to your prevention of future deaths report, made under Regulation 28 of the Coroners (Investigation) Regulations 2013, relating to the tragic deaths in Keyham on 12th August 2021. You have required all Chief Constables in England and Wales to respond in relation to two important firearms licensing issues: cases when firearms license certificates have been seized, refused, revoked or surrendered and then subsequently returned; and, in the absence of nationally accredited training, the provision of local training to a satisfactory standard for all staff involved in firearms licensing. This letter sets out the actions Kent Police has taken, or proposes to take, with regards to these two areas and the timetable for such action to be completed.

1. Review of all certificates seized, refused, revoked or surrendered and then subsequently approved over the past five years

In response to your concerns, and following consultation with the National Police Chiefs' Council (NPCC) lead for National Police Firearms Licensing, I have directed a review of firearms and shotgun licensing within Kent Police focussed on the above area of concern and prioritised in the following manner:

- We are prioritising review cases where firearms have been seized or surrendered to police pending a review of suitability to have a licence, but then subsequently returned. There are 102 license holders in Kent who have their certificates returned following suitability reviews between 2019 and 2023.
- These cases will be progressively reviewed, starting with the most recent cases which, arguably, pose the greater risk due to being closest to the events that justified seizure or surrender, and which have not had the benefit of the passage of time without further incident to provide reassurance.
- The review will also cover cases where the applications have been refused or licenses revoked but where subsequent applications or appeals by the same licence holder resulted in a grant. There are 32 license holders who have a current certificate having been granted at new application or on appeal at court.
- The decision-making in all 134 of these cases will be reviewed and assessed against the current (February 2023) Home Office Statutory Guidance.

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- Cases relating to 2018, the earliest of the five year review period, are subject to the normal five-yearly renewal process which is already progressing, again assessed on the current standards.

This is a substantial, detailed and important piece of work and I have set a deadline for completion of all aspects of the review of 2nd October 2023. My team is working closely with the National Firearms and Explosives Licensing Working Group (FELWG) to coordinate this activity.

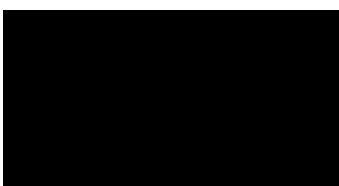
2. Steps I am taking to ensure that (i) adequate local training, of a satisfactory standard, has been universally delivered to all firearms licensing staff and supervisors in applying the Home Office Guidance on Firearms Licensing Law and the revised Statutory Guidance for Chief Officers of Police, and (ii) decision making authority is delegated only to persons who have undergone adequate training in firearms licensing and in applying that guidance.

I am sighted on the work being undertaken by the NPCC lead and College of Policing to develop a national training package and my team is engaged with its development. However, in the absence at this time of nationally accredited training for firearms licensing staff, Kent Police has taken steps to ensure that all staff and supervisors receive suitable training and continuous professional development. This has focussed on the development of a modular programme covering: the application of Statutory Guidance, APP and relevant legislation; managing risk and use of the national decision model; investigation techniques and interviewing; domestic abuse (including stalking and harassment), vulnerability and child protection; terrorism and extremism; and modern slavery and human trafficking. The programme, which also includes practical inputs on firearms dealerships, ranges and antiques, features delivery from academics, Kent Police Legal Services and subject matter experts including the force armourer. Detailed records are retained of completion of modules for all members of staff and supervisors, and new firearms licensing team members are provided bespoke training and required to complete a portfolio outlining occupational and operational competence. Work is ongoing to develop lesson plans for joint training with Essex Police, which whom Kent Police collaborates on Learning and Development, and to explore wider opportunities for peer review.

Therefore, I am satisfied that development and delivery of this training programme is underway and that all members of staff and supervisors to whom decision making authority is delegated have received, or are in the process of receiving, adequate local training.

To provide me with further assurance on the themes on which you have sought a response, and to give a further independent view of the effectiveness of the review and other measures I have put in place, I have commissioned my Force Inspectorate to review the systems in place within Kent Police to manage any risk to public safety associated with firearms licensing. I am also grateful for the support of the NPCC portfolio lead, Chief Constable Tedds, and the FELWG as I seek to ensure robust and rigorous firearms licensing processes are in place in Kent.

Yours sincerely



Chief Constable