



Lancashire  
Constabulary

[REDACTED]  
Chief Constable

Lancashire Constabulary Headquarters PO Box 77 Hutton Preston Lancashire PR4 5SB  
[REDACTED]

Mr Ian M Arrow  
His Majesty's Senior Coroner for Plymouth, Torbay and South Devon  
1 Derriford Business Park  
Derriford Park  
Plymouth  
PL6 5QZ

25<sup>th</sup> April 2023

Dear Mr Arrow,

**Regulation 28 Prevention of Future Deaths following the tragic shootings in Keyham on 12<sup>th</sup> August 2021**

On behalf of Lancashire Constabulary, I send our sincere condolences to the families of Maxine Betty Davison, Lee Raymond John Martyn, Sophie Iris Martyn, Stephen John Godfrey Washington and Kate Jane Shepherd.

Lancashire Constabulary supports the recommendations you have made, and updates as follows:

**Report to all Chief Constables in England and Wales regarding the return of weapons after review of suitability.**

A programme to review all certificates refused, revoked, seized or surrendered and then subsequently approved over the past 5 years has commenced. This is being undertaken against the March 2023 Home Office Statutory Guidance. We expected to complete this work by the end of October 2023.

Several process and scrutiny changes have been introduced in relation to refused, revoked, seized and surrendered licenses as well as initial and renewal applications. The reviews will be carried out in line with these processes and additional scrutiny. The following changes have been introduced:

*Governance:*

- A dedicated Chief Inspector responsible for Firearms Licensing who reviews all decisions at a senior level in line with 3.50 Home Office Statutory Guidance.
  - During the 12-month period April 22 – March 23, a total of 313 decisions were reviewed, each having a documented assessment of all the evidence available and reasons for the decision. These included cases where a relevant medical condition had been identified. 10% of these reviews resulted in refusal or revocation of a certificate.

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- A dedicated Superintendent who reviews any decision to return a certificate following a voluntary surrender, or request/review to allow storage of weapons back to the certificate holders home address.
- An Assistant Chief Constable with responsibility for Firearms Licensing meets with the Chief Inspector every 6 months to scrutinise a random selection of high-risk decisions to ensure consistency and effective decision making.
- Governance is recorded through quarterly Firearms Policy Management Group meetings.

*Process:*

- No application or renewal is processed without receiving a GP report. In some cases, we seek further specialist advice if there are specific ongoing conditions that could impact on a person's suitability e.g., Liver Function tests or Carbohydrate-deficient transferrin.
- An automated system alerts the Licensing team when an incident is reported at a certificate holders address. This instigates a review of the license. This reduces the risk of relevant information being missed and not acted on.
- PNC Markers on licensed certificate holders creates an automated alert to the department and Force Incident Commander if any holder is arrested.
- In collaboration with the Force Intelligence Bureau, a process is being introduced identifying any new intelligence submitted by officers and staff that is connected to a licensed certificate holder and/or their address to be automatically highlighted to the team for a review.
- Colleagues from Counter Terrorism policing review any new piece of intelligence quickly if it relates to either a certificate holder, their address or a telephone number associated with them and inform the licensing team, resulting in a joint review.
- The number of PND checks undertaken have increased and checks are now carried out on initial application, first renewal and at any reviews following an adverse incident. PND checks will be carried out on all renewals prior to the end of 2023.
- Nationally we are monitoring two pilots:
  - PND being used to automatically update NFLMS.
  - Automated social media checks.
- A process where Body Worn Video is now viewed when available as part of reviews where certificate holders have interacted with police but resulted in no formal action being taken. This has led to further revocations.

Lancashire Constabulary fully accepts the recommendation to review the previous 5 years cases, and the identified a risk-based approach to prioritise the review. The above processes that have been implemented ensure increased scrutiny, consistency of decision making and a risk-based approach to all decisions for return, initial application, and renewal.

Report on training of Firearms Licensing Decision makers.

In the absence of any current formal training from the College of Policing, Lancashire has introduced the following:

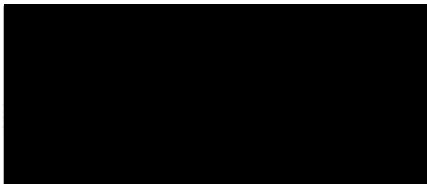
- In November 2021 staff from the Firearms Licensing Department received a 3-day training package, referred to in your report as the South Yorkshire Training Package, this included the Chief Inspector.
- A programme of CPD which has included topics such as Domestic Violence awareness and Intelligence grading. Further training for this year includes, Neurodiversity, National Decision Model and Statement writing.
- Our scheme of delegation allows for a Force Incident Commander (a Chief Inspector role) to revoke either a Firearm or Shotgun Certificate. They have received inhouse training into this procedure.
- This year further training delivered through Mowbray Partners has been agreed. This online package is updated to reflect changes in the Statutory Guidance.



Lancashire Constabulary fully support the recommendation for additional training and CPD for firearms licensing decision makers. We welcome the nationally accredited training being developed by the College of Policing which we will prioritise for all our staff. Our internal processes ensure staff with delegated authority will only make decisions consistent with their level of training.

We are not complacent and recognise the need for all staff within the Firearms Licensing Department to have adequate training of a satisfactory standard in applying both the Home Office Guidance on Firearms Licensing Law (November 2022) and the Statutory Guidance for Chief Officer of Police (February 2023). We will continue to embed training, CPD and ensure training records are updated to ensure we keep our staff up to date with any legislative changes and do all we can to keep the public safe.

Yours sincerely,

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**Chief Constable**

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