

03 May 2023

Mr Ian Arrow
HM Senior Coroner for Plymouth
Torbay and South Devon
1 Derriford Park
Derriford Business Park
Plymouth, PL6 5QZ

[REDACTED]
Chief Constable
Force Executive Team
Warwickshire Police HQ
Leek Wootton
CV35 7QA

Dear Senior Coroner

Response of the Chief Constable of Warwickshire Police to your Report to Prevent Future Deaths (“PFD Report”) arising from the Inquests in to the Keyham shootings in August 2021

In providing this response to the above PFD Report, I am writing in both my capacity as Chief Constable of Warwickshire Police, responsible for the Force’s Firearms Licensing Unit and also as the National Police Chief Council’s national lead for Firearms and Explosives Licensing, in which role I coordinate activity across all 43 Home Office Police Forces in this critical area of policing.

In my national role, I have recently written to all Chief Constable colleagues, reinforcing the concerns you raised in your recent PFD report stating:

“I am concerned that the information from those 41 police forces who indicated that they had made no incorrect decisions to return a weapon/certificate may need to be further tested and explored.”

I am concerned that the figures provided to the Home Secretary in 2021 may not reflect the accurate position, and that if sufficiently stringent checks are performed these may reveal other cases where a firearm or shotgun certificate had been seized, refused, revoked or surrendered but was subsequently issued/returned in circumstances when the certificate should not have been approved. I am concerned that if there are other cases that were not subject to a proper or thorough review of the risk of returning the weapon then the person may continue to have a firearms/shotgun certificate and hold weapons in circumstances that place the public and the licence holder themselves at risk.

I am concerned that in the light of the lessons learned in the Keyham inquests of the attitude towards risk, a further review of all certificates seized, refused, revoked or surrendered and then subsequently approved over the past five years may be required to be assured of public safety.”

I have encouraged all Chief Constables to ensure that they take stock within their own Force and consider their position. Where Chief Constables remain confident of the information which their

Force provided to the Home Office in response to the then Home Secretary's request in August 2021 for forces to report on licence applications which had been refused or revoked but subsequently granted, then I have suggested that they respond to you in those terms, advising them:

You are not being asked to duplicate past reviews or audits for the sake of it. If you have already conducted such a review, or you are clear that your force's response to the Home Secretary in 2021 was accurate and that your current procedures are sound, then you could respond to the Coroner to that effect, ideally with evidence so as to reassure him and the public.

To date, the feedback we have received indicates that most forces will either undertake a full 5 year review as you have suggested or will adopt the very slightly adapted process which I have ordered within my own force (and which I have shared with all Chief Constable colleagues) which is:

To direct a review of firearms and shotgun licensing and prioritise the review in the following way which is intended to be practical and effective.

- **Prioritise for review cases where firearms have been seized or surrendered to police pending a review of suitability to have a licence, but then subsequently returned. This was one of the major concerns in the Keyham Shootings Inquests.**
- **Start by reviewing the most recent decisions first, as the most recently returned licences arguably pose the biggest risk. They will be closest to the events which justified seizure or surrender in the first place, and there will have been less reassurance in the passing of time without new incidents.**
- **Review in slower time cases where applications have been refused or licences revoked, but where subsequent applications or appeals by the same licence holder resulted in a grant.**
- **If the return or grant has been ordered by the Crown Court, consider with the Force Legal Services department what, if anything, can be done, recognising your PFD Report in respect of training for Crown Court Judges who hear and consider appeals against police refusals to grant licences.**
- **If it is not practical to review the last 5 years of decisions, then consider progressively reviewing the last 4 years. Licence holders in their 4th to 5th year can be managed through the normal 5-yearly renewal process against current standards. (I have advised colleagues whose forces may have significant backlogs for renewal applications, or many temporary licences, then a review of the last 4 years alone may not be sufficiently reassuring).**
- **Review all previous decision-making against the current (February 2023) Home Office Statutory Guidance, in light of the concerns referred to in your PFD Report, in order to promote public safety by today's standards.**


I have suggested to colleagues that adopting this unified approach to the reviews may also have the added benefit of consistency of response.

I have further proposed that we try to achieve such reviews in each force over the next six months (from the date of your report) so **by 2 October 2023**. It is my intention that national progress in undertaking this review is monitored and tracked through the national Firearms and Explosives Licensing Working Group, which is led by Temporary Superintendent [REDACTED], from whom you heard evidence during the recent Inquests.

I hope that this response offers some reassurance of the national approach which I have endorsed, which will be adopted within Warwickshire Police, to undertaking a timely and proactive review of decisions where following initial concerns about suitability, an applicant has eventually secured lawful possession of a firearm or shotgun. Such reviews will be assessed against the most recent Home Office guidance and, within Warwickshire Police, with your further recommendations around other areas of concern (the need to address legislative shortcomings and revision to guidance, training recommendations and so on) very much in mind.

Yours sincerely



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Dear Senior Coroner

Response of the Chief Constable of Warwickshire Police to your Report to Prevent Future Deaths (“PFD Report”) arising from the Inquests in to the Keyham shootings in August 2021: Nationally accredited training

In providing this response to the above PFD Report, I am writing in both my capacity as Chief Constable of Warwickshire Police, responsible for the Force’s Firearms Licensing Unit and also as the National Police Chief Council’s national lead for Firearms and Explosives Licensing, in which role I coordinate activity across all 43 Home Office Police Forces in this critical area of policing.

WARWICKSHIRE POLICE

I have carefully considered the recommendations you have made that Chief Constables should satisfy themselves that within their own forces there is adequate local training for Firearms Licensing Unit (FLU) staff and supervisors, and that we have only delegated our decision-making duties to those who we believe are appropriately trained.

My FLU is headed up by Temporary Superintendent ██████████ from whom you heard during the recent inquests. I am satisfied that T/Supt ██████████ has appropriate knowledge and awareness to ensure that he is making decisions based on proper assessment of an applicant’s suitability in line with the legislative regime and all Home Office Guidance. As you are aware, T/Supt ██████████ also heads up the Firearms and Explosives Licensing Working Group (FEWLG) and is therefore uniquely sighted on national issues and practices, which further place him in a position where he can consider various processes and practices with a view to informing improvements and best practice both nationally and within my own force area.

As such, I am further satisfied that all members of T/Supt ██████████ FLU are aware of legislative requirements and guidance which they need to bear in mind when making their own enquiries and undertaking their decision-making responsibilities. T/Supt ██████████ shares his learning and experience from his national role with his wider team with a view to ensuring consistency of decision making and proper consideration of suitability in every case.

NPCC LEAD ROLE

It is accepted that the roll out of nationally accredited training for all Firearms and Explosives Licensing staff across all police forces has been the subject of comment and recommendation through a number of reports and previous inquests and, to date, it has not been delivered. Since I took up the role of national lead in this area on behalf of my Chief Constable colleagues nationally, I have worked hard to identify the areas requiring attention and to progress work to achieve improvement, and training has been a priority within that work.

We have already scoped out the roles where accredited training should be a requirement (all Firearms Enquiry Officers (FEOs) and all caseworkers and decision makers) and work is now well developed in putting together the modules that will be required for staff to be deemed Competent including by way of example: National Decision Model (NDM), identification of risk and risk assessment.

The success of this accredited national training is linked to the current review of firearms licensing fees, which is aimed at increasing the fees paid by applicants to a level where firearms licensing units within police forces are funded by application fees – and not significantly subsidised by general policing budgets which is currently the case - such that it provides the necessary finances to enable the College of Policing to develop and deliver central coordination of a national accredited training programme for firearms licensing teams.

Current Firearms Licensing Training

The 2015 HMIC Report “Targeting the Risk” identified accredited training as an issue and in 2016, the NPCC Firearms and Explosives Licensing Working Group (FELWG) approached the College of Policing to look at incorporating two “in-house” training courses provided by two forces (South Yorkshire and Dorset) into a national package. This was declined at the time by the College Coordination and Delivery Group due to competing demands. However, further dialogue continued and led to the development of national standards for key roles (FEOs and those with delegated authority for decision making) which were published in August 2018.

The College were unable to assist with supporting further work by FELWG to develop a Quality Assurance template and process which would enable them to assess uptake and alignment of forces against the published standards (again due to competing national priorities as explained during my evidence to you at the recent Inquests) however through the FELWG work, an online training package was offered to all Forces from March 2021. This was produced by a company called Mowbray working in partnership with FELWG and assesses individuals against the nationally agreed standards for the key roles. As you heard during the recent inquests, the uptake for this package has not been universal – although it has remained available for forces to adopt and mandate for their teams.

New training provision.

A draft Learning Curriculum/Outcomes and Standards was developed in December 2022, in line with the new draft Approved Professional Practice for Firearms Licensing which was out for consultation until March 2023 and received in excess of 350 responses, which are currently being worked through.

With agreed College of Policing Learning Outcomes now in place for the training, we are also developing an accompanying Quality Assurance framework to assess and ensure operational competency is demonstrated at the conclusion of the training package.

The College is committed to implementing this training during the 2023/24 business year, and through recent negotiations, as NPCC lead, I was able to secure £500,000 from the Policing Minister to support with the assisted implementation of National Firearms Licensing Training.

We are currently working with the College to identify the best delivery option and how this will be aligned with quality assurance and mandatory continuing professional development aspect of the training. This will include the validation of licensing departments for reassurance and pending future HMIC inspection.

A number of options are currently being discussed on how to deliver training but the preferred proposal at present (considering the most cost effective and consistent delivery) is that the College of Policing designs the learning products and then licences others to deliver the programme. This would need to be supported by a quality assurance framework to ensure consistent delivery and the products would be centrally reviewed and updated appropriately.

Fees Review

The review of Firearms licence application fees, mentioned above, is also being worked through nationally to develop a funding stream, in part, to fund the training product development and sustainable Quality Assurance, along with a national coordination facility. Whilst the funding review is led by the Home Office, the NPCC has provided data from 31 forces to inform the review and will continue to work closely with the Home Office to bring the fees review to fruition, as this will support ongoing work with the College to maintain up to date training materials and oversight.

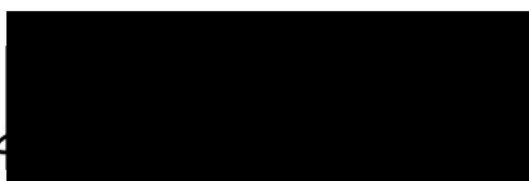
CPD Event

Finally, we are also holding a two day Continuing Professional Development event for Firearms Licensing Managers and Supervisors on 18th & 19th May 2023 at the College of Policing, Ryton, Warwickshire. I will be attending, together with senior leads from the College of Policing and the Home Office Firearms Policy Unit to discuss with those attending our future development and aspiration within this area of policing.

We are also extremely grateful that you have agreed to attend to provide valuable insight to attendees following the Keyham inquests, which we are certain will be impactful and invaluable in ensuring the commitment from all involved to continue to implement improvements and sustainable training programmes to ensure that the current momentum around promoting higher and more consistent standards of decision making through accredited training, is maintained.

If you require any further information or updates on this matter, please do not hesitate to contact me.

Yours sincerely

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Chief Constable 