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CHIEF CONSTABLE

Force Executive Team
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[REDACTED]

Date: 3 May 2023

Mr Ian Arrow
HM Coroner
1 Derriford Business Park
Plymouth
PL6 5QZ

Dear Mr Arrow

I would firstly wish to offer my deepest condolences to the families of Maxine Davison, Lee Martyn, his daughter Sophie, Stephen Washington and Kathryn Shepherd on behalf of West Midlands Police.

I hereby attach the Staffordshire Police and West Midlands Police response to the two Preventing Future Death Reports arising from the inquests that were directed to all Chief Constables.

As explained in the attached report, the Firearms and Explosives Licensing Unit provides a collaborated service to both forces.

The response relating to the review of all certificates seized, refused, revoked or surrendered and then subsequently approved over the last 5 years provides details of the action taken and proposed to be taken as requested. The second response details the level of training undertaken by staff in the Firearms and Explosives Licensing Unit and the proposed training to be undertaken as other details in response to the matters of concern raised in the report.

It is understood that the responses may be published.

Yours sincerely,

[REDACTED]
[REDACTED]
Chief Constable

Report to prevent future deaths: made under Regulation 28 of the Coroners (Investigations) Regulations 2013

This response is made on behalf of the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire as the Staffordshire and West Midlands Police have a collaborated firearms and explosives licensing service.

After consideration of the Regulation 28 Report which raises matters of concern particularly in relation to training we issue the following response.

The Staffordshire and West Midlands Firearms Licensing Unit was restructured following the shootings in Keyham in 2021. The following changes and actions were put in place further to the direction of the Staffordshire and West Midlands Collaboration Governance Board as follows:

1. **Resourcing**, a new staffing structure was approved in December 2021 with growth from 17 police staff employees to 27 at an additional cost of £220,702.
2. **Decision Making**, the introduction of a new Deputy Manager to hold delegated responsibilities (under section 55(2) of the Firearms Act 1968). The post holder is currently undertaking training and is being mentored.
3. **Policy**, a new policy document was published on 16/02/2023 aligning operational delivery to the Home Office Statutory Guidance for Chief Officers of Police (2023).
4. **Review of certificate holders coming to police notice**, the introduction of Intelligence Officers that have core responsibilities for; completing enhanced police background checks, systems monitoring for certificate holders coming to police notice, collating suitability enquiries, collating information for court appeals, triage of medical certificates (on initial receipt), response to FOI requests and assisting police enquiries in criminal matters that relate to certificate holders and/or firearms licensing matters. In addition, there has been internal communications across Staffordshire and West Midlands re-confirming the need for officers to consider seizing certificates and firearms when they attend incidents involving certificate holders.
5. **Historically firearms licensing training has largely been based on local delivery and mentoring. Following the tragic shooting in Keyham significant changes have been made to deliver an extensive training package, which includes:**
 - a. National Triage Firearms Classification Course – Durham Police (enquiry officer)
 - b. Firearms Safety handling training – Staffordshire Police (enquiry officer)
 - c. Police National Decision Model training – CoP accredited trainers delivered (all staff)
 - d. Awareness training – Safeguarding and Domestic Abuse (all staff)
 - e. Awareness training – Neuro-Diversion (all staff)
 - f. Range assessment training – Clay Pigeon Shooting Association (CPSA) (enquiry officers)
 - g. Open Source – social media training (Intelligence Officers)
 - h. FEO, Decision Making and Administration Courses – Durham Police/Mowbray Associates (all staff)

In the absence of accredited training, the training has been planned following a benchmarking exercise with police services nationally to explore best practice. All decision makers with delegated authorities have undergone Police National Decision Model training and are undertaking the Mowbray Associates Firearms Licensing Decision Making Course.

6. **Governance**, there is continued oversight by two separate Executive Officer chaired, governance structures. Firstly, the Staffordshire and West Midlands Strategic Partnership Meeting. This addresses operational matters, including performance, training, change and external pressures. The meeting is quarterly and is chaired by an Assistant Chief Constable. Secondly, there is the Staffordshire and West Midlands Collaboration Governance Board, this Board focuses on strategic governance understanding national matters, addressing reputational risk and creating a consultative forum for the Chief Constables' and Commissioner's offices. The meeting is bi-annual and chaired by the Deputy Chief Constable (it is also attended by the Commissioner's Chief Executive Officers).

RESPONSE ON BEHALF OF STAFFORDSHIRE POLICE AND WEST MIDLANDS POLICE-REVIEW OF CERTIFICATES

Report to prevent future deaths: made under Regulation 28 of the Coroners (Investigations) Regulation 2013

This is a joint response prepared on behalf of the Chief Constable of Staffordshire and the Chief Constable for West Midlands Police as Staffordshire and West Midlands Police have a collaborated firearms and explosives licensing service.

This document is providing in response to the Coroner’s report which raises concern that a further review of all certificates seized, refused, revoked or surrendered and then subsequently approved over the last 5 years should be subject to a further review to provide assurance of public safety.

A review of all certificates seized and returned between August 2020 and March 2023 has been commissioned the details are reproduced in Table 1 below. Certificates granted prior to this period will also be subject to review but the outcome will not be available in time to include in this response. The 5-year information relating to revocation and refusal has been completed and is included within this response at Table 2 and Table 3

Table 1: Certificates seized and returned (August 2020 – March 2023):

	Seized and Returned	To be Re-visited following review
Staffordshire	48	2*
West Midlands	16	0

**These are scheduled reviews that have been brought forward*

Table 2 Certificates revoked and then re-issued following application (March 2018 – March 2023):

	Revoked	Re-granted (following re-application)	Re-granted (following a successful Court Appeal)	To be Re-visited following review
Staffordshire	116	5	1	0
West Midlands	102	4	2	0

Table 3 Certificates refused and then later granted following application (March 2018 – March 2023):

	Refused	Granted (following re-application)	Granted (following a successful Court Appeal)	To be Re-visited following review
Staffordshire	80	3	1	1**
West Midlands	103	5	5	1***

*** Re-visited to insure satisfactory circumstances (certificate was granted following a Court appeal)*

****Re-visited to insure satisfactory circumstances (no concern with the decision-making review)*

To provide further assurance as to the quality and consistency of decision-making there has been a series of scheduled quality assurance programmes in relation to internal and external audits over decision making which are listed below:

- Plymouth Coroner’s Regulations 28 (PFD) Response – certificates seized, refused, revoked or surrendered and then subsequently approved the outcome of which is included in this report.
- External RSM UK – review on certificate applications for initial grant, renewal and suitability reviews (currently ongoing).

RESPONSE ON BEHALF OF STAFFORDSHIRE POLICE AND WEST MIDLANDS POLICE-REVIEW OF CERTIFICATES

- Home Office review of temporary permits (August 2023).
- Information assurance review (currently ongoing).
- ROCU review and scrutiny of prescribed certificate types (May 2023).

Findings from all the above audits will be used to professionally develop the decision makers and improve the service.