

Our ref: [REDACTED]



[REDACTED]
Chief Constable

9th October 2024

Dear Mr Travers,

I write in response to your Regulation 28 report dated 8th August 2024, relating to the inquests touching the deaths of Emma, Ellette and George Pattison.

I share your concern that any certificate holder or applicant can, it would appear, hide certain medical treatment by using an online facility. The national application form asks, "Are there any periods in the past 10 years when you have not been registered with a UK GP or have consulted medical practitioners other than at your GP practice?" In this case, Mr Pattison answered "no" in both his 2016 and 2022 renewals. Surrey Police acknowledge that, although the force re-asks all other questions on the medical form during the Firearms Enquiry Officer (FEO) visit, Surrey Police did not ask about the use of other medical services in this visit. Surrey Police has, because of this case, revised our practice, and FEOs now do cover this in their visits to try and elicit the information from an applicant. Surrey Police acknowledges that an applicant could still withhold this information, and there is currently no method for the police to find out if it is being so withheld.

The College of Policing and the NPCC have made recommendations that this national set of questions is re-written to be more explicit. Whilst most applicants understand what is being asked, there is still room for non-disclosure or deception. Additionally, the request for disclosure is limited to information from the previous 10 years only. Surrey Police would also like to relocate the question to a more prominent position within the medical section to ensure its importance and relevance is clear and noted.

I recognise that the wider regulation of online GPs is being explored as part of your recommendations and would welcome change to make this a more robust process.

Surrey Police licensing officers take a negative view of applicants who fail to disclose relevant information. However, there seems to be little within legislation to require a holder to disclose a change in personal circumstances during each 5-year period. Therefore, I am consulting with the College of Policing and the NPCC lead on the potential to add a condition to holder certificates, reminding them of their obligations to inform the police of any changes in domestic and health situation. I believe this would allow more robust oversight between renewals.

Controlling and coercive behaviour became an offence in 2016. Since then, there has been a continued learning programme designed to equip responders to recognise this behaviour. Surrey Police has a dedicated Domestic Abuse Team and continue to work with our partners in the identification and support of victims of domestic abuse. Officers asked Mrs Pattison about her relationship. However, she did not make any disclosures of abuse. Mrs Pattison was also spoken with independently by the FEO when conducting the suitability review. No risk factors were identified at that stage and Mrs Pattison stated that she had no concerns regarding the firearms possession.

Surrey Police is aware of the Project Titanium trial being conducted by Gwent Police to explore domestic abuse concerns further and are supportive of the aim and objective of this project. We look forward to understanding the finding of this project post review. In the meantime, Surrey Police processes ensure that current partners are independently engaged with and, on a case-by-case basis, previous partners or family members can be spoken to.

As a licensing authority Surrey Police thoroughly reviews the investigative paperwork completed by police officers. This includes body worn video and Domestic Abuse, Stalking and Harassment & Honour Based Violence risk assessment forms in order to make licensing decisions based on all the information available to us.

This work is being progressed nationally by Chief Constable Debbie Tedds, the NPCC lead for firearms licensing. She is supported by her staff officer Chief Superintendent Adrian Davies who is also the College of Policing contact for this area of work. Both proposed changes above must be agreed at a national level and there cannot be local differences to the form or process. This work is already underway and the proposed changes will be presented at the National Firearms, Explosive working group by Adrian and, once ratified, will be implemented. I expect this to take 6 – 12 months.

For assurance, I have asked our Assistant Chief Constable with responsibility for Firearms Licensing to report formally to me on progress against your recommendations in 3 months.

Yours sincerely



Chief Constable