



# EXTENDING THE DURATION OF FIREARM AND SHOTGUN CERTIFICATES

## EXECUTIVE SUMMARY

- Police licensing departments experience peaks and troughs in their workloads due to ‘renewal years’ and ‘non-renewal years’ (**Section 2.1; Section 3.2**), causing problems for police staffing and loss of service via delays for certificate holders, even in non-renewal years.
- Evidence suggests that delays are due to a burden on police licensing departments rather than an increase in certificates on issue (**Section 3.2.2**).
- More seriously, peaks and troughs result in pressure on licensing departments and the loss of experienced staff within licensing departments, both of which could have adverse consequences for public safety (**Section 3.2.2**).
- Modern police intelligence gathering and sharing methods mean that the suitability of certificate holders is under constant review. Such improvements mean that renewals after five years serve no added benefit to enforcement, because the duration of certificates has become immaterial with advances in ‘real time’ monitoring (**Section 3.1**).
- The police have faced, and continue to face, heavy budget cuts under austerity. Any method to reduce costs for the police will help contribute to public safety, and around 80% of police budget is due to staff costs. Phasing in ten year certificates would smooth peaks and troughs of police workloads, reducing pressure, the need for staff and allowing the retention of experienced staff within licensing departments (**Section 3.2**).
- Ten year certificates meet the principles of better regulation (**Section 4.2**).
- Introducing ten year certificates would present the opportunity to maintain public safety while at the same time reducing burden and improving efficiency for the police, and improving service to certificate holders.

### Recommendations

- **Recognition by Government that renewals after five years serve no added benefit to enforcement**, as improvements in police information gathering and sharing have led to ‘real time’ monitoring, rendering the duration of certificates immaterial.
- **Recognition by Government that phased introduction of ten year certificates would significantly improve the enforcement of firearms law**, bringing benefits to public safety, the police service and to certificate holders by preventing the current peaks and troughs of the renewals process in firearms licensing departments.
- **That ten year shotgun and firearm certificates be introduced and phased in using the 50% method** within the UK. As an exemplar of better regulation, this would bring benefits to the public, the police and certificate holders.

# 1. INTRODUCTION

In 1995 the government, at the request of the police, extended the length of shotgun and firearms certificates from three to five years. Since that date police information and real time reporting systems have improved beyond all recognition.

However, despite these advances and recognition of the wealth of benefits shooting confers (Table 1; BASC 2015, 2015a, 2015b; PACEC 2014), firearm and shotgun certificates are still only valid for five years. This places a burden on shooters who must renew their certificates regularly and causes excessive demand and inefficiencies for police licensing departments.

**Table 1:** Summary of some of the key benefits of shooting in the UK

Economic	Environmental	Social
<ul style="list-style-type: none"> <li>Shooters spend around <b>£2.5 billion</b> annually on goods and services related to their shooting activity.</li> <li>Shooting providers generate <b>350,000</b> direct paid jobs annually. Most are seasonal and / or part time – their Full Time Equivalent (FTE) is <b>74,000</b>.</li> <li>Shooting is worth <b>£2 billion</b> Gross Value Added (GVA) to the UK economy per year.</li> </ul>	<ul style="list-style-type: none"> <li>Shooting providers spend nearly <b>£250 million</b> on conservation annually.</li> <li>Shooting influences the management of <b>two thirds</b> of the UK's rural land area and nearly <b>two million</b> hectares a year are actively managed for conservation as a result of shooting.</li> <li>Shooters spend <b>3.9 million</b> work days on conservation annually – the equivalent of 16,000 full time jobs.</li> </ul>	<ul style="list-style-type: none"> <li><b>95%</b> said shooting was important to their personal wellbeing.</li> <li><b>88%</b> said shooting gives them moderate to high intensity exercise.</li> <li><b>91%</b> would spend less time outdoors if they could not shoot.</li> <li><b>77%</b> said their social life would suffer without shooting and the average number of friends made through shooting was <b>20</b>.</li> </ul>
Source: PACEC (2014)	Source: PACEC (2014)	Source: BASC (2015b)

The current (and previous) Government(s) have been keen to reduce and amend regulation to make it fit for purpose<sup>1</sup>. The Principles of Good Regulation guidelines (Better Regulation Task Force 2003) state: 'Where regulation is poorly designed or overly complicated it can impose excessive costs and inhibit productivity' and 'Regulations should be systematically reviewed to test whether they are still necessary and effective. If not, they should be modified or eliminated.'

In this context, BASC believes it is again time to review the length of certificates to include the significant changes in real time reporting and monitoring systems, developments in medical checks and the increased workload for police firearms licensing teams. On this basis BASC recommends increasing the length of certificates from five to ten years.

<sup>1</sup> Prime Minister David Cameron speaking in 2014:  
<https://www.gov.uk/government/speeches/supporting-small-businesses-david-camerons-qa-at-the-federation-of-small-businesses>

## 2. UK LICENSING SYSTEM: BACKGROUND

The Firearms Act 1968 (as amended) regulates the possession of firearms and ammunition in England, Wales and Scotland. Anyone who wishes to acquire or possess firearms, shotguns or ammunition to which Sections 1 and 2 of the Act apply, must be authorised by an appropriate certificate. Sections 26 – 32 deal with the licensing system which is administered by the police service. There is no centralised licensing function and each chief officer is responsible for firearms licensing within his or her own force area. With increasing collaboration between forces, some chief officers have delegated their powers under the Firearms Act to officers in neighbouring forces. Police Scotland administers firearms licensing in Scotland as a single cohesive unit. Northern Ireland has its own legislation, the Firearms (Northern Ireland) Order 2004 and firearms licensing is administered by the Police Service of Northern Ireland.

*The UK has the second lowest national gun possession rate in Europe at 2% and the second lowest age-standardised firearms related fatality rate per 100,000 people.*

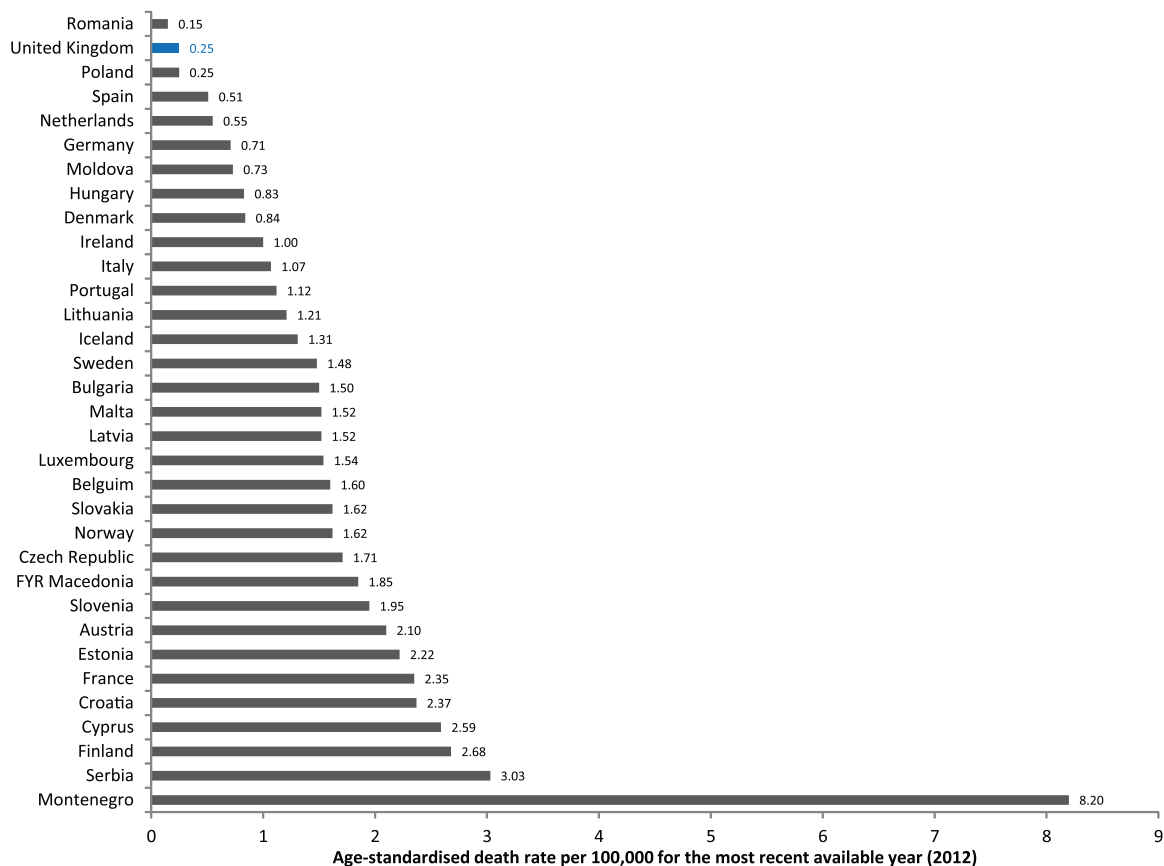
**Duquet & Van Astein (2015)**

There are over 600,000 certificate holders or people who shoot in the UK (Table 2; PACEC 2014). It is estimated that there are at least 25 million gun owners in the EU, with large differences in national gun possession rates, ranging from the highest share of the population owning a gun in Cyprus (18%) and Finland (13%) to the lowest share of the population owning a gun in the United Kingdom (2%) and the Netherlands (1%). Alongside Poland and Romania, the UK has the second lowest national gun possession rate in Europe at 2% (Duquet & Van Astein 2015). Furthermore alongside Poland, the UK has the second lowest age-standardised firearms related fatality rate per 100,000 people in 33 European countries at 0.25 (Figure 1).

**Table 2:** Shotgun and firearm certificate on statistics for the UK

	Shotgun certificates	Firearm certificates
<b>England and Wales</b> (Home Office 2014a)	<ul style="list-style-type: none"> <li>• <b>589,293</b> Shotgun Certificates on issue</li> <li>• Covering <b>1,329,376</b> individual shotguns Average holding of <b>2.3</b> shotguns per certificate holder</li> </ul>	<ul style="list-style-type: none"> <li>• <b>151,413</b> Firearm Certificates on issue</li> <li>• Covering <b>507,867</b> individual firearms</li> <li>• Average holding of <b>3.4</b> firearms per certificate holder</li> </ul>
<b>Scotland</b> (The Scottish Government 2014)	<ul style="list-style-type: none"> <li>• <b>49,165</b> Shotgun Certificates on issue</li> <li>• Covering <b>142,142</b> individual shotguns</li> <li>• Average holding of <b>2.9</b> shotguns per certificate holder</li> </ul>	<ul style="list-style-type: none"> <li>• <b>26,101</b> Firearm Certificates on issue</li> <li>• Covering <b>91,863</b> individual firearms</li> <li>• Average holding of <b>3.5</b> firearms per certificate holder</li> </ul>
<b>Northern Ireland</b> (Police Service Northern Ireland July 2015, pers. comm.)	<ul style="list-style-type: none"> <li>• <b>59,385</b> Firearm Certificates on issue</li> <li>• Covering <b>166,025</b> individual firearms</li> </ul>	

**Figure 1:** Firearms-related fatalities in 33 European countries, 2000-2012. Compiled using data from Duquet & Van Astein (2015), based on the European Detailed Morality Database (WHO).



Unless they are revoked or cancelled by a court, firearm and shotgun certificates are valid for five years.

## 2.1 The 1995 extension





The duration of certificates was fixed at three years by Section 26(3) of the Firearms Act 1968. The concept of the extension to the duration of certificates was first raised in 1982 when certificate fees were considered in a review by the Home Office (Home Office 1982). This review considered that a period in excess of three years without reassessment was too long for firearm certificates. However, it took the view that the duration of a shotgun certificate could be doubled to six years without impairing controls providing that there was a requirement upon the holder to notify a change in address. The difference in approach between the two certificates can be explained by the 'good reason' requirement for the firearms certificate whereas the shotgun certificate did not have this requirement.

Between 1991 and 1993, four studies (Association of Chief Police Officers (ACPO) 1991; Coopers & Lybrand DeLoitte and the Centre for Police and Criminal Justice studies 1991; Home Office 1992; Her Majesty's Inspectorate of Constabulary (HMIC) 1993) were conducted into the administration of the firearms control system. According to all four studies, an efficient and effective administration of the existing [firearms licensing] system' was not occurring within the police (Office of Legislative Affairs (OLA) 2000; also see Law Commission 2015).



In 1991 ACPO found a wide divergence in practice and costs which was mirrored by BASC's own study conducted by Coopers & Lybrand DeLoitte and the Centre for Police and Criminal Justice studies (1991). The 1991 ACPO report made the following recommendation: 'It is recommended subject to the considerations outlined above, that the period of validity of firearm and shotgun certificates be increased to five years.' The considerations referred to were proposed to ensure the extension was well-managed, yet not all of them have occurred as planned as licensing departments are still struggling with peaks and troughs in their workloads (Table 3).

**Table 3:** Outcomes of ACPO considerations regarding the move from three to five year certificates

Considerations	Outcome	
Amendment of the Firearms Act 1968 to allow for revocation of firearm certificates mid-term where "good reason" has ceased to exist		This has been achieved by Section 40 of the Firearms (Amendment) Act 1997
Amendment of the Firearms Act 1968 to allow for prosecution of summary offences discovered on renewal even though they were more than 6 months old		Current information systems notify licensing departments of allegations of summary offences in 'real time' (see <b>Section 3.1</b> )
Police National Computer (PNC) <sup>2</sup> options pursued as a matter of urgency		This was overtaken by the implementation of National Firearms Licensing Management System (NFLMS) <sup>3</sup> in 2007 (see <b>Section 3.1</b> )
Transitional arrangements are put in place on implementation on any extension to prevent peaks and troughs in licensing departments' workloads		This has not been addressed by government and is still occurring (see <b>Section 3.2</b> )

<sup>2</sup> The PNC is the national law enforcement database which gives the police service and other users 24 hour access to significant information on individuals at both local and national levels.

<sup>3</sup> The National Firearms Licensing Management System is a database which records the details of certificate holders, their firearms and those who have applied for certificates in the past and had them either refused or revoked. NFLMS was put in place to allow firearms licensing departments to share information. Personal and certificate data on NFLMS is transferred onto the PNC by virtue of dynamic interface. Its main function is to prevent an unsuitable person from making a new application in another police area when he or she had been refused a certificate in another.

ACPO (1991) went on to acknowledge that: ‘Such a change [certificate extension] has considerable advantages for both the shooting community and the police, providing that some action can be taken to minimise the worst effects of the difficulties perceived.’

Coopers & Lybrand DeLoitte and the Centre for Police and Criminal Justice studies (1991) also recommended that:

- Consideration should be given to extending the period between renewals for certificate holders with a history of good management, for example from three to at least ten years, in order to reduce costs and the use of police time.

On 13th October 1994, certificate duration was extended to five years by the Firearms (Period of Certificate) Order 1994 (SI 2614/1994). This came into force in 1995, but led to unintended consequences in relation to firearms licensing department workloads (**see Section 3.2**).



### 3. THE BENEFITS OF TEN YEAR CERTIFICATES

In the current economic climate it is certain that further savings will be required within police budgets. Balancing risk management with efficiency is therefore a theme which will become increasingly important. The introduction of phased ten year certificates would help police forces in both these areas.

#### 3.1 Risk management

The police are the licensing authority for firearm and shotgun certificates and firearms dealers. The authority rests with local police forces rather than a central licensing authority because of the local information that police will use to inform their judgement (Home Office 2015). The licensing of firearms is predicated on public safety. Firearm and shotgun certificates are granted and renewed on the basis that individual applicants have been deemed suitable to possess firearms and shotguns without danger to public safety or the peace. Historically, risk would be influenced by time since certificate grant (Figure 3). This is simply because the longer an individual held a certificate, the higher the likelihood that their circumstances may change, rendering them unsuitable to possess firearms without further risk assessment. However, during the past decade there have been significant improvements in the way police manage risk and deliver firearms licensing.

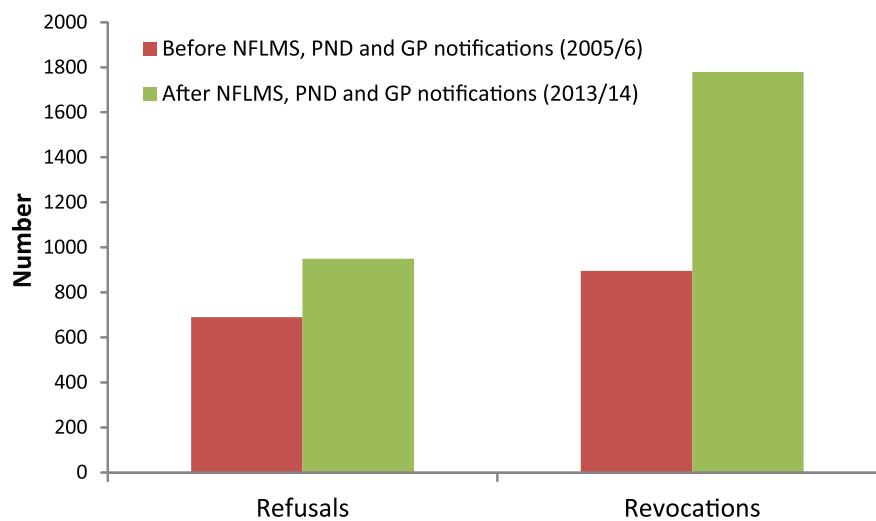
These changes have delivered a multi-agency type approach to managing risk and a change in handling and managing data in the digital age, both of which minimise risk. For example, the National Firearms Licensing System (NFLMS) was introduced in 2007 and 24/7/365 monitoring and reviewing is now possible via an interface with the Police National Computer (PNC). Daily activity reports are forwarded automatically to the licensing department for action. Other command and control systems are capable of interface with firearms licensing departments. The Police National Database (PND) was developed in 2010, following the Bichard enquiry (Bichard 2004; Bichard 2005), to allow the police service to share local information and intelligence on a national basis (College of Policing, *no date*).

*During the past decade there have been significant improvements in the way police manage risk and firearms licensing, delivering a multi-agency approach.*

Furthermore, since 2012 the police have been writing to GPs, signposting which patients have access to firearms. This has led to disclosure of information by GPs allowing police to make fully informed decisions and take action where necessary, resulting in revocations and reviews which would not otherwise have occurred. In fact between 2005/6 and 2013/14 (before and after NFLMS, PND and GP notifications were introduced) refusals increased by 38% and revocations by 99% in England and Wales (Home Office, 2014b; Figure 2). All of these measures have focused on public safety by allowing police to act on real time reports. It is important to note however, that fewer than 1% of firearm certificates and 1.3% of shotgun certificates applied for (new and renewals) were refused in 2013/14 and revocations were equivalent to 0.5% of total certificates on issue in 2013/14 (England and Wales; Home Office 2014b) which demonstrates that as a body, certificate holders are responsible and law-abiding.



**Figure 2:** Certificate refusals and revocations before and after NFLMS, PND and GP notifications. Data from Home Office (2014b)



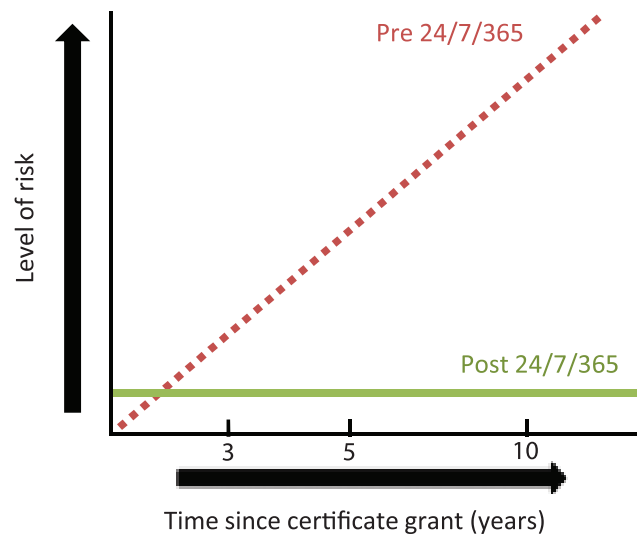
Firearms licensing managers receive intelligence reports about any certificate holder who comes to the notice of the police from a wide variety of sources including PNC, PND, Special Branch, Crime Stoppers, Command & Control and particularly domestic violence units. This information is available on what amounts to a real time basis. The likelihood of any certificate holder reported for any adverse behaviour evading these real time intelligence reporting systems is slight and decreasing.

The Home Office is looking to further involvement by medical professionals (especially GPs) in the licensing process. Currently certificate holders are required to allow the police to ask for factual information about their medical conditions from GPs. Stakeholders are currently supporting the feasibility of placing an 'encoded reminder' on medical records which prompts the GP to notify the police when a certificate holding patient presents with any condition that might adversely affect his or her suitability to have access to firearms. When this scheme is finalised there will be a dynamic medical component added to existing police monitoring systems.

The fact that there is a maximum certificate length (five years) suggests there is a belief held by some that the longer an individual holds a certificate, the greater their risk to public and personal safety; if risk was not perceived to change through time there would be no maximum certificate duration. However, no evidence can be found to support the assumption of increasing risk. Nor is there any evidence to suggest that the routine process of reviewing certificate holders every five years adds anything to public safety. In fact, Home Office Guidance states that chief officers can conduct risk assessed telephone renewals (Home Office 2015) rather than make costly home visits to certificate holders. Indeed many forces now accept that there is no justification in visiting applicants on each and every occasion and, following risk assessment, renew certificates subject to telephone interview.

*Given the modern system of police intelligence gathering and sharing, the duration of a certificate becomes immaterial as the suitability of its holder is under constant review.*

In fact, given the modern system of police intelligence gathering and sharing, the duration of a certificate becomes immaterial as the suitability of its holder is under constant review, so risk remains continually low (Figure 3).

**Figure 3:** Differences in risk between historic and modern systems of risk management

## 3.2 Reducing burden and improving efficiency for the police

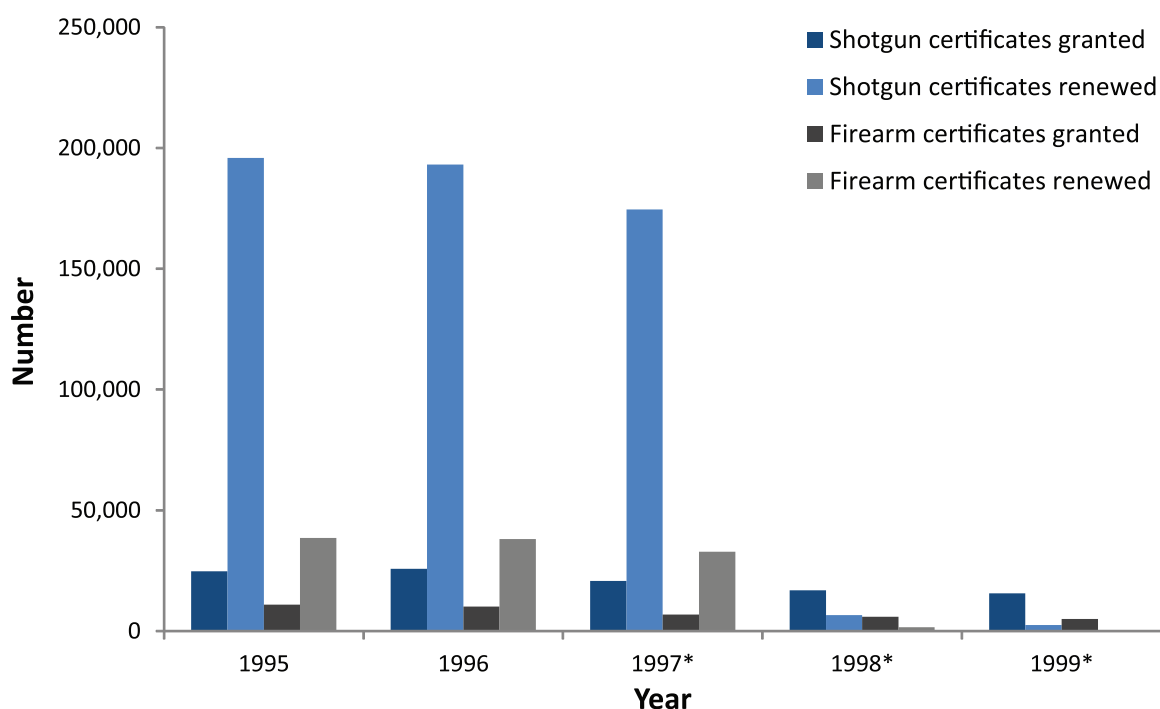
### 3.2.1 Reducing peaks and troughs in police licensing department workloads

The Firearms (Period of Certificate) Order 1994 (SI 2614/1994) came into force on 1st January 1995. The introduction of five year certificates was phased in as follows:

- **In 1995** all certificates due for renewal were renewed for a period of five years meaning that they would expire in 2000 rather than 1998.
- **In 1996** all certificates due for renewal were renewed for a period of five years meaning that they would expire in 2001 rather than 1999.
- **In 1997** all certificates due for renewal were renewed for a period of five years meaning that they would expire in 2002 rather than 2000.
- **In 1998** no certificates fell due for renewal. However a small number of renewal applications were processed. These related to certificates that expired in 1997 and enquiries had extended beyond 31st December or, in the case of shotgun certificates, renewals dealt with as a result of certificate holders surrendering certificates early to bring them into line with a firearm certificate grant (a coterminous application).
- **In 1999** no certificates fell due for renewal. Nonetheless some applications were processed. Most of these related to certificates that expired in early 2000 and certificate holders had made application early in order to facilitate timely renewal. However, in the case of shotgun certificates, some were a result of certificate holders surrendering certificates early to bring them into line with a firearm certificate grant (a coterminous application).

These phase-in methods resulted in a recurring cycle for firearms licensing departments of three years 'normal' workload in renewal years ('peaks'), and two years 'reduced' workload in non-renewal years ('troughs'). In England and Wales, this resulted in an initial overall average workload decrease<sup>4</sup> of 98% in renewals and 34% in grants between renewal years and non-renewal years (Home Office 2014b; Figure 4).

**Figure 4:** The resulting renewal cycle after 5 year certificates were phased in from 1995



\*Work relating to the grant of certificates was affected in 1997, 1998 and 1999 due to a drop in demand for new certificates following the unfortunate events in Dunblane and in the case of firearms, the prohibition of handguns brought about by the Firearms (Amendment) Act 1997.

The driver for the extension of certificate duration was the police service itself which recognised that such an extension would bring universal benefit to both licensing departments and certificate holders alike (see **Section 2.1**). Police concerns relating to the change from three to five year certificates in 1995 (Coopers & Lybrand DeLoitte and the Centre for Police and Criminal Justice studies 1991) have been addressed with the exception of a mechanism to mitigate the licensing department workload peaks and troughs caused by the extension (see Table 3, **Section 2.1**).

The extension of certificate duration would require amendment to the Firearms Act via various enabling Orders (see **Section 5**). Introducing ten year certificates presents an opportunity to better manage the peaks and troughs of demand that are currently experienced by many police forces – an opportunity which was regrettably not seized when certificate duration was extended from three to five years. Phasing in ten year certificates would smooth out the peaks and troughs for licensing departments and continuously reduce overall workloads (Box 1, Figure 5 and **Section 3.2.2**).

<sup>4</sup> Workload measured as average grants and renewals for renewal (1995, 1996, 1997) and non-renewal years (1998, 1999). Average grants 33,100 in renewal years and 21,700 in non-renewal years; average renewals 224,300 in renewal years and 5,475 in non-renewal years.

**Box 1: Options for introducing ten year certificates****Option 1: Phase-in 50% at a time.** **Recommended.**

The peaks and troughs in licensing department workloads could be significantly smoothed out by giving half of renewals five year certificates and the other half ten year certificates, continuing until a point (after one full five year cycle) at which all renewals could be granted ten year certificates. This would halve the quantity of work required in peak years to a level similar to current trough years, and although there will still be peaks and troughs the annual fluctuations will be much smaller. This model would reduce the difference in workloads between peak and trough years by 82% and halve workload in renewal years (Figure 5). This sort of 'smoothing the cycle' process has been achieved in Cheshire, West Yorkshire and North Wales Police Services. These forces offered selected certificate holders the opportunity to move their renewal date. This has enabled these forces to move to finite staffing levels as their demand is constant and not subject to the extreme variations seen in many other forces. This negates the requirement to increase staffing levels within firearms licensing departments or alternatively to push firearms licensing enquiries into other areas of front line policing and for these three forces, has broken the cycle of recruitment, training, mentoring then redeploying staff at the end of the renewal cycle. Using this phase-in method, it would only take three renewal years to smooth peaks and troughs in firearms licensing department workloads.

**Option 2: Phase-in 10% at a time.** **Not recommended.**

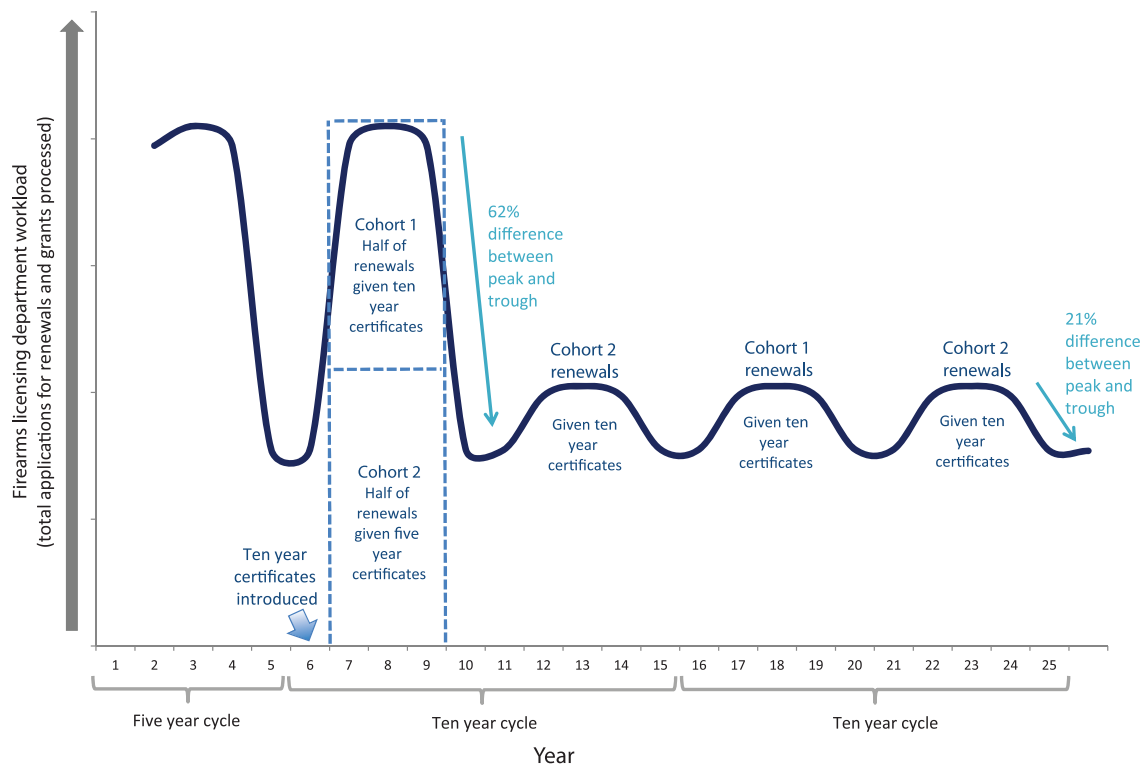
Other options for phase-in include moving towards roughly 10% of all renewals being processed as ten year certificates in each year of a ten year certificate cycle. However, given the existing position of peak and trough years, this would be very difficult to achieve in a single ten year cycle without a complicated phase-in system including different length certificates being issued. Phasing in ten year certificates 10% per year at a time would mean that the total time elapsed before all certificate holders had ten year certificates and peaks and troughs were smoothed would be much longer than for Option 1.

**Option 3: No phase-in method: delayed peaks.** **Not recommended.**

There is also an option to delay peaks via the introduction of 10 year certificates. If 10 year certificates were introduced with no phase-in, there would be three peak years ('renewal years') followed by 7 trough years (with no renewals). The 7 year lull would allow police to take out resources from firearms licensing departments to contribute to austerity savings that forces need to continue to make. This is not a recommended measure as it a) removes experienced staff from licensing departments (see **Section 3.2.2**), and b) does not solve the problem of peaks and troughs for licensing departments – it simply postpones the problem. It does however, have the benefit of better equipping the police to deal with peaks when the public sector emerges from austerity measures.



**Figure 5:** Recommended phase-in option for the introduction of ten year certificates. Home Office (2014b) data sheet used to create average workload over the past five renewal periods for which data available (2005-2013), and over the past five non-renewal periods (2003-2014). Workload data created by totalling all applications for grants and renewals (whether granted or refused).



### 3.2.2 Improved efficiency

Currently, the higher workload of renewal periods puts undue pressure on licensing departments and their staff. As discussed in **Section 3.2.1**, the phased introduction of ten year certificates would smooth licensing department workloads and reduce them to levels similar to those of current 'trough' years. This would substantially reduce the overall amount of staff time required to continue the work of licensing departments.

*Phasing in 10 year certificates could eliminate extreme peaks and troughs in licensing department workloads, and reduce their workload to a level similar to current trough years.*

Furthermore, due to the cyclical nature of current peaks and troughs in workload, renewal years require more licensing department staff than non-renewal years. This causes great difficulties and licensing departments tend to redeploy or terminate the contracts of experienced staff reduce during the two year trough and recruit and train new staff before or during the three year peak (Figure 6). Recurring high levels of recruitment and training carry with them a significant financial burden for the police.



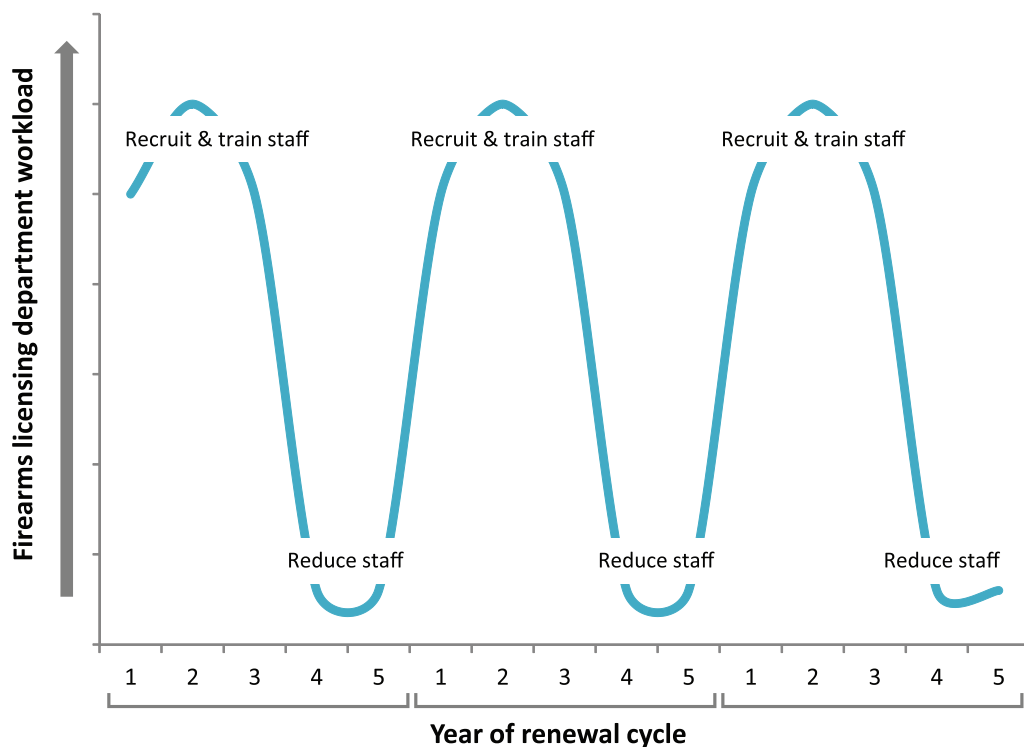


BASC is the only UK shooting organisation with a dedicated firearms team. The team handle thousands of contacts each year from members. Contacts related to delays in the licensing process spike in renewal years – but even in non-renewal years, there is an increasing incidence of delays. For example, records of the types of queries the BASC Firearms Team receive reveal that 177 contacts were related to delays in 1999, and 460 in 2014. This represents an increase of 160% in contacts related to delays in the licensing process during non-renewal years between 1999 and 2014 (Figure 7). When this increase is viewed in the context of a 3% decrease in firearm and shotgun certificates on issue in England and Wales between 1999 and 2014 (Home Office 2014b), it becomes increasingly apparent that these delays are due to a burden on police licensing departments rather than an increase in certificates on issue.

Last time there was a peak period was 2010 to 2012. During the first renewal year of that period (2010), BASC received 228 incoming contacts related to delays. The first year of the next peak period is 2015. From 1st January to 31st August 2015 the BASC Firearms Team has received 634 contacts related to delays, and if this current trend continues BASC expects to receive 951 by the end of 2015. To date, this equates to a 178% increase in contacts related to delays in comparison to the equivalent year of the last peak period. If this trend continues it will represent a 317% increase.

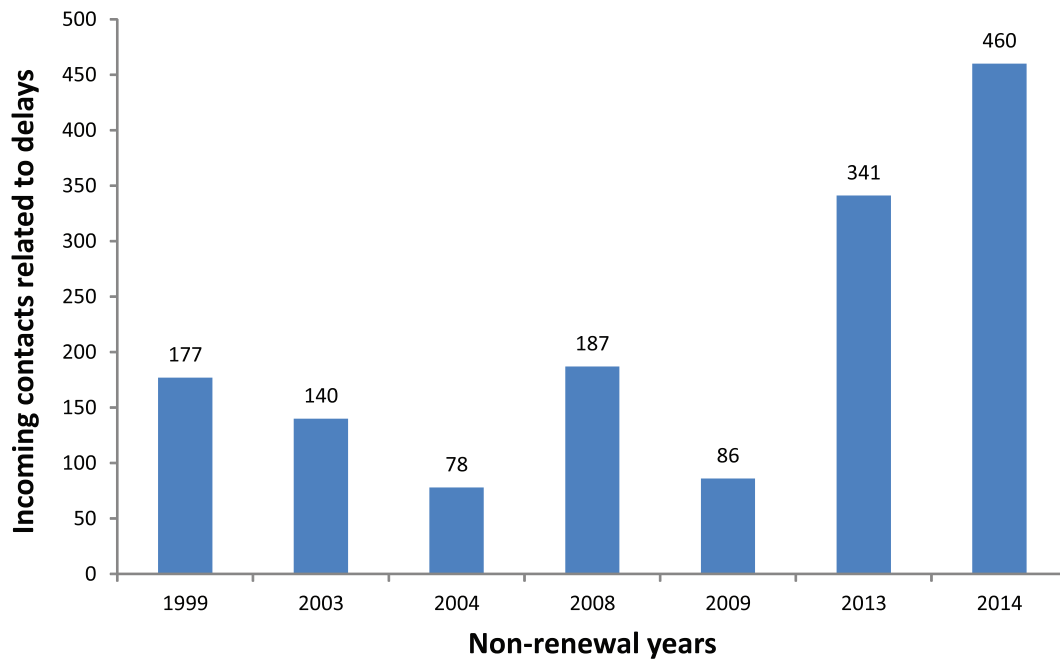
*Delays are due to a burden on police licensing departments rather than an increase in certificates on issue.*

Delays at renewal periods have been mainly attributed to the need for improved human resources management and training by HMIC (1993). Many licensing departments do not recruit or train new staff in time for the busy renewal cycle. This leads to delays in renewing certificates on time and many certificate holders are left in unlawful possession of their firearms as their certificates expire before they are renewed. Whilst temporary permits may be issued, this in itself presents a problem if staff are unavailable to issue them. Even when issued, legislation prevents items such as expanding ammunition from being possessed by the holder. As such, this seriously impinges upon all firearms users who manage wildlife. As a consequence of all of the above, the administration of firearms licensing has become regarded as dysfunctional within some sections of the shooting community.

**Figure 6:** An example of how the peaks and troughs in firearms licensing departments affect staffing

A more serious consequence of the current renewal cycle is that the reduction of staff in 'trough' years may also result in loss of expertise and trained staff within licensing departments. This has consequences for public safety, as noted by the Home Office (1992): 'Police firearms departments may be hampered in their attempts to build up expertise as police officers [police staff] are subject to postings to other departments. An officer [staff member] who has developed a valuable degree of skill and experience may have to be moved (on account of force priorities or personal career needs) thereby depriving the firearms licensing department of the knowledge and experience vital for making informed public safety assessments' (Home Office 1992). The training of staff has been highlighted as a potential problem within forces over a significant period.

*A more serious consequence of the current renewal cycle is that the reduction of staff in 'trough' years may also result in loss of expertise within licensing departments – something which was recognised by the Home Office as 'depriving the firearms licensing department of the knowledge and experience vital for making informed public safety assessments.'*

**Figure 7:** Incoming contacts to the BASC Firearms Team related to delays in non-renewal years

The Air Weapons and Licensing (Scotland) Act introduces a new certification regime to all airgun owners imposing further pressure on overstretched police staff. Increasing the licensing requirement to cover hundreds of thousands of people in Scotland plus visitors will place existing Scottish police licensing staff under massive administrative burden when the police are subject to pressure on both budgets and staffing.

*Any method to reduce costs for the police will help contribute to public safety, and any measure reducing the need for police staff time could help to dramatically decrease police budgets.*

The 2010 Spending Review laid out plans to reduce Home Office spending on police funding by 20% in real terms, by

2014/15 (HM Treasury 2010a). A report of Her Majesty's Inspectorate of Constabulary (HMIC 2014) noted that: 'Police forces in England and Wales continue to balance their books and attempt to minimise the effect of cost reductions on the services that the public receives.' In 2014 the Minister for State and Policing, Criminal Justice and Victims, announced that in 2015/16 each police force area in England and Wales would face a cash reduction of 5.1% compared to 2014/15 (Penning 2014). However, concerns have been raised that further cuts could see the risk to citizens rise 'exponentially' (Boffey 2015). Any method to reduce costs for the police will therefore help contribute to public safety. Furthermore, around 80% of police budget is due to staff costs (HMIC 2014), so any measure which reduces the need for staff time could help to dramatically decrease police budgets.







Treasury guidelines (HM Treasury 2015a) state that police can recover costs for administrative processes directly associated with the grant and renewal of certificates – but they cannot recoup costs of enforcement or capital equipment or costs associated with enforcement where a certificate holder comes to notice. This is further discussed in the HM Treasury Classification paper as follows: ‘Enforcing licence conditions is similar to enforcing a requirement for non-licence holders to obtain licences. It is thus a form of general policing and hence a government activity’ (HM Treasury 2010b). The work (and therefore cost) of granting and renewing certificates will remain the same regardless of certificate duration. **If ten year certificates were phased in however, the cost burden (of staff time and training) to the police of renewing certificates would be significantly reduced over time.**

*The latest Spending Review states that one of the measures the Government will take is ‘Supporting the police to innovate and exploit opportunities for greater efficiency and value for money.’ Ten year certificates represent one such opportunity for greater efficiency.*

The latest Spending Review (HM Treasury 2015b) states that one of the measures the Government will take to build on progress made over the last Parliament, will be: ‘Supporting the police to innovate and exploit opportunities for greater efficiency and value for money.’ Ten year certificates represent one such opportunity for greater efficiency. The principle of cost effective licensing is well established and in 2014 the DVLA recently reduced the fees for many of their licences as a result of increased efficiency in their process; for example the fee for a provisional driving licence was reduced from £50 to £34 (see **Section 4.1**).

### 3.3 Summary of benefits

The smoothing of licensing department workloads due to the phased introduction of ten year certificates would have significant benefits for the police, certificate holders and the public (Table 4). Firstly, it would reduce pressure on licensing department staff during the current busy renewal cycle, and create a more stable job environment for licensing department staff. Police licensing departments would experience constant staffing levels rather than recurring recruitment and redeployment. In addition they would have more time in which to plan and organise their processes and recruitment more effectively.

Secondly, phased in ten year certificates would improve public safety by allowing the retention of experienced staff within licensing departments and allowing them to focus on enforcement rather than administration related to the routine application process. In fact, removing unnecessary reporting and recording requirements is recognised by Her Majesty's Treasury as a way of allowing police to spend more time on the 'front line' (HM Treasury 2010a). Reducing the unnecessary burden of the current renewal 'rush' would allow licensing staff to focus their attention more effectively and efficiently on intelligence-led enforcement and ensuring public safety.

Thirdly, the phasing in of ten year certificates would improve service and minimise delays for certificate holders. This sort of 'smoothing the cycle' process has been achieved in Cheshire, North Wales and West Yorkshire force areas by offering selected certificate holders opportunity to move their renewal date (see Box 1, **Section 3.2.1**). The resulting improvements to service would enhance the reputation of police licensing authorities among the shooting community as per comments made by The Hon. Lord Cullen in 1996: 'The way in which [firearms licensing] enquiries are carried out has a significant influence on perceptions as to professionalism and efficiency of the police force' (Cullen 1996).

**Table 4:** The benefits of phased in ten year certificates

Benefit for	Description
<b>Police</b>	<ul style="list-style-type: none"> <li>Reducing overall workload and pressure on licensing department staff during the current busy renewal cycle</li> <li>Creating a more stable job environment for licensing department staff</li> <li>Negating the need for a constant cycle of recruitment and training, thereby improving efficiency</li> <li>Improving reputation among the shooting community</li> </ul>
<b>Public safety</b>	<ul style="list-style-type: none"> <li>Allowing the retention of experienced staff within licensing departments</li> <li>Reducing pressure on licensing staff, allowing them to focus more efficiently and effectively on intelligence led enforcement and ensuring public safety</li> <li>Allowing police to spend more time 'on the front line' rather than on administrative processes</li> </ul>
<b>Certificate holders</b>	<ul style="list-style-type: none"> <li>Reducing delays, improving service</li> <li>Reducing the burden of regular renewals</li> </ul>

## 4. TEN YEAR CERTIFICATES: BETTER REGULATION IN ACTION

By regulating in one area, problems may be unintentionally created elsewhere, for example requirements to recycle fridges in the UK created a 'fridge mountain' which the country was ill-prepared to process (Better Regulation Task Force 2003). Similarly, the 1995 extension to certificates led to unintended consequences in relation to the renewals process (**Section 3.2**).

Sir Philip Hampton's 2005 review, 'Reducing Administrative Burdens: Effective Inspection and Enforcement' (Hampton 2005) considered how to reduce unnecessary administration for businesses, without compromising the UK's regulatory regime. The so-called Hampton Principles are particularly applicable to firearms licensing, especially the overarching principle: 'The regulatory system as a whole, should use comprehensive risk assessment to concentrate resources on the areas that need them most.'

The Principles of Good Regulation (Better Regulation Task Force 2003) set out a policymaker's checklist relating to the five principles of good regulation. This includes:

- All governments should ensure that regulations are necessary, fair, effective, affordable and enjoy a broad degree of public confidence. To achieve this, any policy intervention and its enforcement should meet the five principles of good regulation.
- Regulations should be systematically reviewed to test whether they are still necessary and effective. If not, they should be modified or eliminated.

### 4.1 Other examples of certificate extensions as better regulation

The Driver and Vehicle Licensing Agency (DVLA) recently reviewed the maximum duration for driving licences restricted on medical grounds (DVLA 2014). In 2011/12 it reviewed 675,000 cases with a total cost of £20 million. In this example the DVLA could grant restricted licences for one, two or three years based on the severity of the medical condition and sought to extend the maximum grant to ten years. Roughly 61,000 cases would be eligible for the maximum licence duration, leading to a saving of £1.8 million per year, and reducing the annual DVLA workload by 10%.

Reasons for accepting the extended maximum duration included:

- Regular health checks by doctors meaning that changes in health (and therefore fitness to drive) are likely to be picked up and reported to the DVLA quickly.
- Over three quarters of drivers applying for a new three year licence are issued with another licence valid for three years.

These reasons are directly comparable to the case for ten year certificates:

- Improved police surveillance and intelligence gathering and sharing, and dynamic medical monitoring systems mean that any changes in health (and therefore fitness to hold a firearm or shotgun) are likely to be picked up and reported to the police quickly.
- Over 99.7% of firearm and shotgun certificate holders applying for a renewed five year certificate in England and Wales in 2013/14 were issued with another certificate valid for five years.

The DVLA proposal was put out to public consultation and was received positively by over 80% of respondents. The DVLA is now in the process of changing the law to allow for the granting of longer duration licences (DVLA 2014). It has been reported in The Times newspaper (31st August 2015) that draft proposals have been leaked and that driver will soon only have to renew their licence when they reach 75 rather than 70, under Department of Transport proposals designed to ease the burden on a “creaking DVLA”<sup>5</sup>.

A recent government consultation sought views on the review of the fishing licensing scheme in England. Amongst suggestions were options to extend the validity of fishing licences from five years to ten years, or indefinitely. The Department for Environment, Food and Rural Affairs (Defra) summary of responses showed that the government response, backed by 61% of respondents, was to increase the licence duration indefinitely in order to reduce the administrative burden on users and the licensing body. The government response chose to extend licences indefinitely rather than extend certificates from five to ten years because: ‘We believe it would be un-necessarily burdensome to the industry and the Marine Management Organisation’ (Defra 2015).



## ***4.2 How ten year certificates meet the principles of better regulation***

Treasury Guidelines (HM Treasury 2015a) encourage proportionate administration and enforcement mechanisms, without unnecessary complexity. Five year certificates are no longer proportionate and are overly restrictive in the current system of police intelligence sharing and data gathering. Five year certificates are no longer effective and the current situation of renewal peaks and troughs for licensing departments is inefficient.

The OLA (2000) noted: ‘Since its introduction in 1920, the legislation which established firearms control in the UK has been amended 12 times: on no occasion, however, have changes followed upon an assessment of what was already in place, nor have they been driven by research. Rather have the most drastic extensions of the control system been undertaken in haste following unusual and dramatic incidents. This has prompted criticism from workers in the field in the UK [and] concern within the Home Affairs Committee.’ It is crucially important that legislation be evidence led, and good regulation is proportionate, accountable, consistent, transparent, and targeted. The extension of certificate lives to ten years represents all of these aspects (Table 5).

<sup>5</sup> <http://www.thetimes.co.uk/tto/life/motoring/article4542658.ece>



**Table 5:** The current situation vs. ten year certificates in relation to the Principles of Good Regulation

Principles of Good Regulation	The current situation (with five year certificates)	With ten year certificates
<b>Proportionality</b> Regulators should only intervene when necessary. Remedies should be appropriate to the risk posed, and costs identified and minimised.	✗ Certificate duration and associated processes over-prescriptive and uneconomical for current levels of risk (see <b>Section 3.1</b> ).	✓ Proportionate to modern low risk. As a body, certificate holders are responsible and law abiding (see <b>Section 2</b> ).
<b>Accountability</b> Regulators must be able to justify decisions, and be subject to public scrutiny.	✗ Arbitrary decision which was not evidence-led.	✓ Decision based on more effective real time management of risk, low risk levels and the need for improved efficiency.
<b>Consistency</b> Government rules and standards must be joined up and implemented fairly.	✗ Current regulations inconsistently applied and certificate holders get varying degrees of service.	✓ Will allow regulations to be applied consistently and ensure continuity of service for certificate holders.
<b>Transparency</b> Regulators should be open, and keep regulations simple and user-friendly.	✗ High level of bureaucratic burden for police licensing authorities and certificate holders.	✓ Unnecessary bureaucracy reduced.
<b>Targeting</b> Regulation should be focused on the problem, and minimise side-effects.	✗ Short certificate duration unnecessary because suitability of the holder is under constant review.	✓ Reduces unnecessary focus on renewals and 'historic' risk levels.



## 5. LEGISLATIVE ASPECTS

In order to effect the change from five to ten year certificates in the UK, a new Firearms (Period of Certificate) Order and equivalent legislation in Scotland and Northern Ireland would need to be passed. These are relatively short Instruments to draft and would require little Parliamentary time. The following sets out how the Orders might be drafted:

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### STATUTORY INSTRUMENTS

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#### 20XX NO.

#### ARMS AND AMMUNITION

#### THE FIREARMS (PERIOD OF CERTIFICATE) ORDER 20XX

MADE	-	-	-	-	X
LAID BEFORE PARLIAMENT					X
COMING INTO FORCE	-	-			X

In exercise of the powers conferred on me by Section 28A(3) of the Firearms Act 1968(a), I hereby make the following Order:

#### Citation, commencement and extent

1. (1) This Order may be cited as the Firearms (Period of Certificate) Order 20XX and shall come into force on XX XX 20XX.

2. The Firearms (Period of Certificate) Order 1994 is revoked.

3. Section 28A(1) shall have effect subject to the following amendments —

- (a) After the words “A certificate shall” insert “subject to subsection 1A and”.
- (b) Subject to subsection (4) below; Section 28A(1) of the Firearms Act 1968 (period for which a firearm or shotgun certificate is to continue in force) shall have effect as if the references to five years were references to ten years.
- (c) After sub paragraph (1) insert:

*“(1A) For a period of ten years, from commencement of The Firearms (Period of Certificate) Order 20XX, the transitory provisions contained within subsection (4) of the Order, will have effect.”*

#### Transitory Arrangements

4. — Certificates shall be renewed by Chief Officers, upon commencement of this Order subject to;

- (a) During the proceeding three years from the commencement of this Order; Chief Officers shall issue 50% of renewal applicants with a five year certificate in each of those years, and;
- (b) Shall issue ten year certificates to the remaining 50% of renewal applicants in each of those years, and;
- (c) The holders of five year certificates shall, upon their next renewal application, be granted ten year certificates.
- (d) Chief Officers may not alter the period of a certificate on issue for any other purpose than to ensure proper transition from five to ten year certificates.
- (e) The renewal of certificates shall only be completed where the requirements of the Firearms Act 1968 (as amended) are satisfied.

Home Office

Date

Minister of State

(a)1968 c.27. Section 28A was inserted by Schedule 2 of the Firearms (Amendment) Act 1997 c.5

## 6. DISCUSSION

Shooting confers a wealth of benefits to the UK's economy, environment and people (**Section 1**), and the UK is one of the safest places in the world in terms of firearms-related public safety (**Section 2**). Ten year certificates were recommended in 1991 to reduce costs and the use of police time, but instead were increased from three to five years in 1994 via the Firearms (Period of Certificate) Order (**Section 2.1**).

The police service recognised that the change from three to five year certificates held considerable advantages for both the police and the shooting community. However the police also made recommendations prior to the transition including ensuring the prevention of peaks and troughs in licensing department workloads. This did not occur and such peaks and troughs still occur today (**Section 2.1; Section 3.2**), causing problems for police staffing and delays for certificate holders, even in non-renewal years. Incoming contacts to the BASC Firearms Team have increased by 160% between 1999 and 2014 in non-renewal years alone. When comparing renewal years (2010 and 2015), there is an even greater increase in reports. In the first eight months of 2015 (1st January to 31st August), BASC saw a 178% increase in incoming contacts related to delays compared to those received during the entire year of 2010. If this trend continues, it will represent a 317% increase. These increases are set against a backdrop of a 3% decrease in certificates on issue in England and Wales within the same timeframe. This suggests that delays are due to a burden on police licensing departments rather than an increase in certificates on issue (**Section 3.2.2**). More seriously, peaks and troughs result in pressure on licensing departments and the loss of experienced staff within licensing departments, both of which could have adverse consequences for public safety (**Section 3.2.2**).

Historically, the risk associated with firearms ownership was influenced by time since certificate grant. However, under the modern system of police intelligence gathering and sharing, the suitability of certificate holders is under constant review. Such improvements mean that renewals after five years serve no added benefit to enforcement, because the duration of certificates has become immaterial with advances in 'real time' monitoring (**Section 3.1**). Introducing ten year certificates therefore, would present the opportunity to maintain public safety whilst at the same time reducing burden and improving efficiency for the police. Phasing in ten year certificates using the recommended method would smooth the peaks and troughs in firearms licensing department workloads (**Section 3.2.1**), which would have the following benefits for the police, public safety and shooting community (**Section 3.2.2**):

Improve police efficiency by:

- resulting in a more efficient licensing process by reducing overall workload and negating the need for a constant cycle of recruitment and training.
- creating a more stable job environment for, and reducing pressure on, licensing staff.

Improve public safety by:

- reducing strain on police licensing staff and allowing the long-term retention of experienced staff to ensure vital expertise remains within the force.
- enabling resources and staff to be better directed toward enforcement and 'the front line.'

Improve the licensing process for certificate holders by:

- reducing delays and the need for regular renewals.
- improving service.

The police service has faced, and continues to face, heavy budget cuts under austerity. Any method to reduce costs for the police will help contribute to public safety, and as around 80% of police budget is due to staff costs, a measure which reduces the need for staff time could help to dramatically decrease police budgets. The latest Spending Review (HM Treasury 2015a) states that one of the measures the Government will take to build on progress made over the last Parliament, will be: 'Supporting the police to innovate and exploit opportunities for greater efficiency and value for money.' Ten year certificates represent one such opportunity for greater efficiency.

Treasury guidelines (HM Treasury 2015a) encourage proportionate administration and enforcement mechanisms, without unnecessary complexity. Five year certificates are no longer proportionate and are overly restrictive in the current system of police intelligence sharing and data gathering. The Principles of Good Regulation guidelines (Better Regulation Task Force 2003) state 'Where regulation is poorly designed or overly complicated it can impose excessive costs and inhibit productivity' and 'Regulations should be systematically reviewed to test whether they are still necessary and effective. If not, they should be modified or eliminated.' Five year certificates are no longer necessary and ten year certificates meet the principles of better regulation (**Section 4.2**).

*The introduction of phased in 10 year certificates would be an example of better regulation and would significantly improve the enforcement of firearms law, bringing benefits to public safety, the police service and to certificate holders.*

Phasing in ten year certificates using the recommended method would significantly improve the enforcement of firearms law, bringing benefits to public safety, the police service and to certificate holders.





## 6.1 Expert opinion



### Chief Constable Andy Marsh

**Andy is the Chief Constable of Hampshire Constabulary and the national lead for firearms within the National Police Chiefs' Council (NPCC) and the Chair of the Firearms and Explosives Licensing Working Group (FELWG). Here he explains his perspective on his qualified approval for ten year certification for firearms.**

Historically, risk was treated as a product of time since grant, to the point that a historic assessment of risk and suitability might change over time. That is now not the primary way that forces now manage risk. During the past decade the UK police service has substantially improved on the delivery of firearms licensing and has significantly improved the overall management of risk, thereby delivering enhanced public safety. Within this time, reducing the risk of foreseeable harm has become a key tenet within the policing. This important principle was formally enshrined in the College of Policing's Authorised Professional Practice (APP) which was agreed and signed up to by all Chief Constables in October 2014. It states that: "The requirement to monitor and assess risk is a continuous 24/7/365 and ongoing process".

Forces have worked to develop these essential monitoring processes by improving 24/7/365 reviewing of the Police National Computer (PNC), as well as better utilising and integrating their local crime, intelligence and command and control systems. Nationally, a significantly more 'multi-agency' type approach to managing risk, with improvements in the sharing and management of data and intelligence, has been considered and delivered. For example, the National Firearms Licensing Management System (NFLMS), which was introduced in 2007, delivers on-going monitoring via a link between NFLMS and the PNC. The Police National Database (PND) has also been developed and implemented to further enhance this approach.

However, the somewhat current disparate nature of police technology across forces means that forces deploy different approaches to 24/7/365 monitoring with varying degrees of automation. Automation and automatic reporting is important. The case for extending certification to ten years duration would be strengthened by the ability of the Police National Database (PND) to push alerts to forces to review a certificate holder should they come to notice. I have initiated this work as the national firearms lead but it has yet to progress to a business case. This would standardise and underpin the 24/7/365 approach. However, the current absence of this approach does not in my opinion negate the idea of ten year certification but in its stead effective delivery of local systems is essential and are the responsibility of the local Chief Constable.

Very importantly, in recognising that other agencies may observe changes and developments in certificate holders' medical conditions which may have a potential bearing on risk (notably the medical community via General Practitioners) I have developed a protocol to notify doctors on grant and renewal of licences and certificates. This has been in place since 2012 and since that time information disclosed by GPs has led to reviews and sometimes revocations which otherwise would not have happened. On the other hand, it has on occasions also led to forces not seeking automatic revocation but working with certificate holders and their GPs to get past any immediate problems to deliver mutually acceptable actions short of revocation which do not compromise public safety.

However much of an improvement this is it does not in my view go far enough. The process of risk management would be improved, both proportionally and lawfully, by the development and deployment of an 'encoded reminder' on all GPs patients' records that legally possess firearms for the duration of them being the holder of a certificate. This would deliver even better information and intelligence and further increase confidence in public safety. I highly value that BASC have supported this general principle within the Home Office Working Group on Medical Issues where we both sit with other interested bodies. It is a group which has been working together for a number of years but now seems to be close to resolution and delivery of this important aim. I see this as an essential precursor to ten year certification.

The other important consideration that I believe needs to be looked at before the introduction of ten year certification is cost. The police service has suffered significant and far reaching reductions in budgets in recent years with more being planned. I would argue that ten year certification may further reduce policing resources and that therefore the financial considerations need to be thought through and debated thoroughly before we move to ten year certification. I am very proud of the work we have done to improve service and enhance public safety and there should be more public recognition and celebration of the benefits that shooting brings together with the understanding the partnership work we undertake to make gun crime levels amongst the lowest in the world. There is an opportunity, with appropriate supporting developments, to deliver ten year certification without compromising on public safety and on that basis I will work towards that end in support of BASC's proposal.



## **Gary Ashton**

**Gary is BASC's Director of Wales, Sporting Services and Firearms Ops. Here he explains his perspective on ten year certificates.**

### **Managing risk**

The concept of multi-agency management of risk works well in other areas of Police work and BASC agrees with this concept being applied to firearms ownership. Assessment of risk at the point of application or renewal is only a snapshot of time and people's personal circumstances and therefore suitability to possess firearms may change, whether in relation to their health or personal circumstances.

However, as the licensing authority for firearms and shotgun certificates, the onus is on the Police to ensure they are undertaking 24/7/365 risk management. Success in achieving this depends upon the Police Service's own management, irrespective of the maturity of their disparate technologies.

### **Customer Service**

The BASC Firearms Team is contacted by members on a daily basis seeking advice and guidance on firearm licensing matters. Increasingly the calls relate to complaints of poor service and delays within the Police firearms licensing process, particularly in respect of the grant and renewal of firearm and shotgun certificates. Whilst there are some outstanding examples of efficiency in processing renewals it is our experience that these are the exception and not the rule.

BASC records all complaints received and analyses the data in order to monitor police performance and emerging trends. Our latest review, covering the first 6 months of 2015, reveals an alarming drop in performance by a number of forces around the country. BASC has compared the number of complaints received during the first 6 months of this year with the corresponding period for last year. The total number of complaints as a whole has risen by 38%.

In some areas BASC Members are reporting delays of up to 6 months with clear reluctance to issue Temporary Permits as recommended in Home Office guidance. Furthermore, and as a consequence of those delays registered firearm dealers have reported that they no longer have storage capacity due to the number of certificate holders having to lodge their guns whilst their renewal is processed.

### **Certificate Fees**

It is important to recognise that the Police Service is still struggling with the significant challenges presented by huge reductions to their budgets. In times of ever-increasing demand it is perhaps therefore unsurprising that the Police would seek to cover costs of in-life monitoring of risk from certificate holders by wrapping it up in the cost of a grant and the renewal of certificates.

However, the legislation (S32 (1) Firearms Act 1968) makes it clear that the fee is connected only with the grant, renewal, variation or replacement of the certificate. Further clarification is contained within Treasury guidelines (Managing Public Money Chapter 6 - A6.1A “features to be taken into account in measuring the annual cost of a service” Box A6.1A “but not enforcement” & CLASS 2010 (2) – 2.14, “the charge should not exceed the identifiable costs of providing the goods and services delivered to the individual” 4.25 “Enforcement vs monitoring” & 4.27 “Enforcement processes are instigated by the enforcers, perhaps in response to complaints, perhaps on a sample or perhaps on all licence holders.”)

It is therefore clear that costs associated with enforcement are contained within the annual Police Grant from the Home Office and is core police business. This was recently reinforced by Parliament’s decision to set the fees at the current levels and not at the level requested by the Police Service which reflected the costs associated with in-life monitoring.

The relevant fee is payable upon the grant or renewal of a certificate irrespective of whether that happens annually, every five years or once every ten years. The Police are getting reimbursed for the costs associated with issuing that certificate. Anything else is core Police business.

### **Matching demand to resource levels**

The Police Service frequently describes those years with the greatest number of certificates requiring renewal as ‘peak’ demand and the years in between as fallow. However, broadly speaking, what they previously did in three years, they now have five years to achieve, and so ‘peak years’ are just the normal years under the previous three year certificate.

Implementation of a ten year certificate presents an opportunity for the Police Service to address the boom and bust approach to staffing levels in Firearms Licensing Departments.

On average over the past five renewal and fallow years there has been a 61% difference in workload between peak and fallow years. By adopting our recommended implementation

model that would reduce to a 21% difference on average, representing an 82% reduction in the difference between workloads in fallow and peak years. Furthermore after the initial five year cycle following introduction of ten year certificates, workload in renewal years alone would be reduced by 50% (see Figure 5).

Alternatively all certificates could be reissued with a ten year renewal date which would then only require sufficient staff to be retained to deal with grants and variations. This might be appealing given budget pressures, but kicking the can down the road in this instance would store up problems for future Chief Officers to address.

It is important that the opportunity that went begging when the certificate life was extended from three to five years is not missed again as this has a direct bearing on staffing levels in Firearms Licensing Departments, the skills and experience of those staff, customer satisfaction and effective risk management.

### Conclusion

Ten year certificates, supported by appropriate multi-agency risk management processes, present an opportunity to remove the boom and bust approach to staffing in Firearms Licensing Departments, thereby releasing non cashable efficiencies and increasing capacity elsewhere in the Police Service and improving service to a section of the community which is overwhelmingly law abiding and can demonstrate good cause.

## 7. RECOMMENDATIONS

- **Recognition by Government that renewals after five years serve no added benefit to enforcement**, as improvements in police information gathering and sharing have led to 'real time' monitoring, rendering the duration of certificates immaterial.
- **Recognition by Government that phased introduction of ten year certificates would significantly improve the enforcement of firearms law**, bringing benefits to public safety, the police service and to certificate holders by preventing the current peaks and troughs of the renewals process in firearms licensing departments.
- **That ten year shotgun and firearm certificates be introduced and phased in using the 50% method** within the UK. As an exemplar of better regulation, this would bring benefits to the public, the police and certificate holders.

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