



FIREARMS LICENSING THEMATIC

REVIEW 2002

HMIC
FIREARMS LICENCING REVIEW

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HMIC

Firearms Licensing Review

1. Introduction

- 1.1 In June 2001, in partnership with the then ACPO Administration of Firearms and Explosives Licensing Sub Committee Secretariat and in consultation with the Home Office and the British Shooting Sports Council, HMIC conducted a survey of the licensing departments of all forces in England and Wales.
- 1.2 The survey had, to a degree, been prompted by evidence of growing dissatisfaction on the part of members of the public and shooting associations about the quality of service they were receiving from some forces firearms licensing departments. Their concerns were primarily to do with the length of time taken to process applications for certifications and the inconsistency of approach by forces in how these matters were handled.
- 1.3 It provided HMIC with an opportunity to test the validity of these claims and objectively to assess the quality of service being provided by the forces inspected.
- 1.4 The survey also provided the opportunity to assess whether those forces were complying fully with the recommendations of Lord Cullen's report (post Dunblane in 1996) and the extent to which they were complying with ACPO policy for firearms licensing procedures agreed at Chief Constables' Council in April 2001.
- 1.5 The results of the HMIC survey were circulated to all forces in September 2001, with a letter from Mr. James Hart, Chair of the ACPO Administration of Firearms and Explosives Licensing Sub Committee. This letter advises forces of intention for HMIC to conduct follow up work in 2002.
- 1.6 Consequently, during the spring and summer of 2002, HMIC conducted an inspection of four forces in England and Wales. The selection of these forces was based upon the June 2001 survey, with the aim of looking at forces that performed well, as well

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as those where weaknesses had been identified. Following the inspection, each of the four pilot forces received a detailed report of the findings.

- 1.7 A further three forces were identified in order to quality assure emerging findings. Again this represented a cross section of forces, this time in terms of force size and the number of shotgun and firearms certifications administered. These forces were visited for one day. The firearms licensing managers, or their representatives, were interviewed to confirm or otherwise the emerging issues which were identified from the four pilot force inspections.
- 1.8 It is important to say that from the outset of this how impressed the Inspection team were with the openness, honesty, professionalism and commitment of all the staff seen during the course of these inspections. During the inspections it also became apparent that firearms licensing departments are composed of knowledgeable and enthusiastic individuals who seek to provide a high level of serviced the public with finite resources. In each of the four forces inspected HMIC found good practice.
- 1.9 In Humberside there was an aide-memoir based enquiry form and the use of epicentre for technical information. In Nottinghamshire there was good liaison with dealers and club secretaries and contentions issues being addressed by a member of ACPO. Dyfed Powys had done some excellent work in respect of management information which had assisted in addressing the lengthy backlogs had been undertaken. Whilst in Thames Valley there was an effective user group and the current entries of weaponry on to the Firearms Information System accorded exactly with the ACPO guidance.

2. Methodology

- 2.1 The Inspection Team conducting this work was made up of HMIC's Staff Officer with responsibility for firearms licensing and an experienced member of staff from a force firearms licensing department seconded to HMIC specifically for this review.
- 2.2 The on site work within each of the pilot forces was carried out over 3-4 days. During this inspection an average of 14 members of staff from each force were interviewed. These ranged from deputy chief constable, assistant chief constable, chief

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superintendent operations, firearms licensing manager, deputy firearms licensing manager, administrative staff and firearms enquiry officers (FEOs).

- 2.3 The findings of the survey conducted in June 2001 and the following documents were used as points of reference during this inspection:

HMIC thematic on Firearms Licensing (1993)

Lord Cullen's recommendations (1996)

HMIC Inspection Protocol for Firearms Licensing. (2000)

Home Office publication - 'Firearms Law: Guidance to the police' (2001)

- 2.4 The principles that were adopted during the course of this inspection were those contained within HMIC Inspection Protocols, circulated to all forces in May 2000. These being: -

- 2.5 **Public Safety** The main objective of the licensing system is to prevent unsuitable persons from having access to firearms. Public safety remains at the forefront of the Government's thinking. Under the Human Rights Act, the police also have a duty of care to protect the wider community from firearms misuse by not allowing unsuitable people to possess firearms licenses.

- 2.6 **Efficiency** As with any other area of police or government activity, the Home Office expect the licensing system to operate with due regard to efficiency and Best Value. Efficiency and value for money were the main areas on which previous HMIC reports have concentrated. This is also reflected in the levels of fees charged by police for certain services provided under the 1968 Act which are set by the Home Secretary. For this reason, the shooting community has a right to expect and demand that it should not be subsidising 'police inefficiency'.

- 2.7 **Fairness** Most shooters feel, not unreasonably, that they have a right to be treated fairly and with consistency within the law. As with any other section of the community the police are expected to maintain reasonable good relations with the respectable members of that community and in all cases avoid actions that are arbitrary, unfair or oppressive. On a practical level, shooters might successfully

appeal to the Crown Court against certain decisions made by the police that are deemed erroneous or unfair.

2.8 **The Law** While it may be obvious that the police are expected to adhere to the law, it is worth flagging up that the Firearms Act 1968 to 1997 and the Firearms Rules 1968 which accompany the Acts, require the police to carry out licensing activities in a particular manner. For example, forms of application are specified by the Firearms Rules, ensuring a corporate approach by the service. The acts also place responsibilities on chief officers for the police areas concerned, for example S26 and S57 of the 1968 Firearms Act, thus reducing the scope for the work to be carried out at a regional level.

2.9 The findings of this inspection are presented under the six headings utilised within the HMIC Inspection protocol. These being:-

Leadership

Policy and Strategy

People

Partnership and resources

Processes

Results

3. Leadership

3.1 HMIC found there to be a generally clear understanding by those staff interviewed that the chief constable was ultimately responsible for firearms licensing issues, with responsibility devolved to another member of the forces ACPO team and the firearms licensing manager.

3.2 Ten recommendations have been arrived at as a result of this interview. They are intended to address those areas where themes emerged. In light of the serious implications of these recommendations, HMIC recognises that if they are to be progressed within individual forces it will require strong leadership. This will require an individual at chief officer level within each force to take personal interest in firearms licensing in addition to being available as a point of reference for contentious issues as was identified by Lord Cullen.

- 3.3 Those issues identified in this HMIC review are not unique to individual forces but potentially have benefits for all forces and consequently all members of the public making application for firearms.
- 3.4. A consistency of approach nationally is desirable and it is suggested that this corporate framework may best be provided by the ACPO Administration of Firearms and Explosives Licensing Sub-Committee. The Sub-Committee are also in the position to assist forces in identifying good practice, a potentially valuable asset for those forces conducting Best Value Reviews of firearms licensing departments. None of the forces visited during the course of this review had, as yet, conducted such a review.

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that ACPO Administration of Firearms and Explosives Licensing Committee consider how it may best assist forces address the recommendations contained within this review in a consistent manner and to identify good practice.

4. Policy and strategy

- 4.1 HMIC were impressed by the response of staff to the question "Why does the department exist?" There was good recognition that their function was more than merely licensing and a strong appreciation that there was a service to deliver to both applicants and to the community. These included such comments as, "The need to provide a service to the public, both license holders and non licensing holders". To ensure safety of the public and those suitable to possess firearms". "To ensure that those with lawful reason for the possession of firearms act within the law and receive advice to ensure the safest way of doing so".
- 4.2 There was a range of evidence relating to policy and strategy documentation within forces. At one extreme, the team found one example of where this was almost completely absent or was, at best, out of date. This meant that no account was being taken of ECHR or the current Home Office Guidance to the police on firearms licensing. The implementation of such policy was open to the personal interpretation

of whoever was processing that application. By contrast, it also found examples of a clear, well written policy documentation that was readily available to all staff.

- 4.3 The need for adequately documented policy and strategy for firearms licensing departments is an issue that HMIC considers worthy of scrutiny at any future inspection. The policy upon which decisions in respect of the granting, conditions or refusal of Firearms and shotguns applications should be transparent.

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that force policy and procedure in respect of firearms licensing should mirror Lord Cullen's recommendations and ACPO Policy, Home Office Guidance and ACPO, 'Procedural Good Practice Guide'.

5. People

- 5.1 As has been commented upon earlier within this report, HMIC were impressed by the knowledge, enthusiasm and the hard work of all the licensing staff during the course of this review where seven forces were visited. This level of knowledge has the potential for further positive impact upon the quality of service delivered if properly harnessed.
- 5.2 Evidence was found however, that the training of those officers involved in firearms enquiries was inconsistent and, in some instances, wholly inadequate. This was particularly evident in cases where non-dedicated staff were used to carry out such enquiries. The use of untrained staff in such circumstances is not in accordance with Lord Cullen's recommendation nor ACPO policy, agreed at Chief Constables' Council in April 2001. This is of concern to HMIC.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that forces ensure that staff conducting firearms enquiries are trained, conversant with current ACPO/Home Office guidance and competent to fulfil their role.

5.3 This will ensure that staff are competent to complete their work in a consistent and corporate matter. Whilst a framework is provided by the Home Office Guidance, HMIC are pleased to note the significant practical assistance now available to all forces in the recently published ACPO 'Procedural Good Practice Guide'. HMIC would wish to acknowledge the considerable work that has gone into this document which represents a welcome and positive step towards achieving the national consistency of approach which is being sought.

6. Partnership and resources

Staffing levels.

- 6.1 During the course of this work HMIC found that forces' approach to the issue of staffing varied considerably. In one force they were unable to find any evidence of a strategy addressing the numbers of staff, or full time equivalent posts, required for the unit to meet projected demand over the 5 year licensing cycle. By contrast in Dyfed Powys Police staffing levels within the Firearms Licensing Department were established as a consequence of a well-structured, costed plan.
- 6.2 During the course of this review HMIC noted that Dyfed Powys Police and Thames Valley had conducted preparatory work to identify aspects of firearms licensing work that should be addressed in the years 2003 and 2004. This is the period when the projected demand of firearms and shotgun renewals will be lower than the previous 3 years. This temporary reduction in demand is a national one which has occurred as a result of changing the length of certificates from 3 to 5 years. The work conducted in respect of this HMIC review would indicate that the retention of staff within forces during this period would make good long term business sense with benefits both to the forces and to members of the public who will be making applications.
- 6.3 HMIC are of the view that the renewal of certificates, whilst a significant part of firearms licensing work, is not its entire 'raison d'être'. There are other important areas of work that must be addressed if the police are to ensure public safety. Some of these functions have, historically, been afforded a lower priority, given the volume of renewal applications, and in consequence has been somewhat neglected.

- 6.4 If current staffing is maintained, the period 2003 and 2004 would provide a timely opportunity to address those issues which have been afforded a lower priority. HMIC are of the view that such a policy would generate long-term benefits. Additionally, when the volume of renewals increases in 2005 the police will have well trained staff able to process applications efficiently.
- 6.5 It should not be forgotten that this was not the case at the time of HMIC's last survey into firearms licensing when the police appeared to take too long to process applications and were inconsistent in their approach. As a consequence there was a large backlog in many forces in England and Wales.

Preparing for the future

- 6.6 During the course of the review, anecdotal evidence was given to the inspection team about the helpfulness of registered firearms dealers. It became apparent however that many dealers have not been subject to detailed and thorough inspections including stock checks against the dealer's registers. Similarly, Home Office Approved Clubs have not been subject to thorough inspection. As was identified in Paragraph 6.3 above HMIC considers that this is an aspect of Firearms licensing that could be addressed when the opportunity presents itself in years 2003 and 2004.
- 6.7 During the course of the review HMIC identified that some forces had failed to maintain an up to date register of land over which shooting of firearms takes place. The value of such a register, which identifies rifle calibres which may be reasonably used over that land, will certainly vary from force to force. The time taken to conduct land survey checks is, however, not insignificant when also processing applications but can be greatly reduced by the maintenance of an up to date register in those forces with an extensive rural area.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that forces utilise the period 2003 - 2004 to identify and address those areas of firearms licensing that have been afforded a lower priority during the preceding three year period.

Budgets

- 6.8 In January 2001 the fees for the licensing of firearms were amended by a Fees Order. The charge levied for the grant of a shotgun certificate was increased from £43 to £50. The cost of a renewal for a shotgun certificate was increased from £18 to £40. Whilst there has been some decrease in the fees levied for the process of firearms certificates the net effect has been to increase the revenue generated by firearm licensing departments for forces.
- 6.9 Prior to amendments to fees, forces were asked to indicate a fee structure that would enable them to process applications in a manner that would take into account the recommendation from Lord Cullen, supported by ACPO, that all grant and renewal applications should include a home visit by the Police.
- 6.10 A Parliamentary Question in December 2000 was asked as to why the cost of shotgun grant and renewals applications were being increased. The Home Secretary's reply was as follows:
- “The increase in fees which the police can charge for the issue and renewing firearms and shotgun certificates will enable forces to allocate additional resources to this task when this is necessary to reduce delays”
- 6.11 In the forces visited in this review, the system is that all revenue generated by firearm grants and renewals is paid into a centralised income account within forces finance department.
- 6.12 During the course of this inspection it was identified that Dyfed Powys Police and Thames Valley Police had carried out analyses to ascertain the cost of the activities undertaken by the firearms licensing department. This enables them to calculate the costs associated with the processing of applications including those for which no fees are levied. In so doing these forces are able to evidence projected costs and income over the 5 year licensing cycle and the actual costs to forces. HMIC consider such costing activities to be good practice.

Recommendation 5

Her Majesty's Inspector of Constabulary recommends that forces should be able to evidence projected costs and income over the 5 year licensing cycle and in so doing establish the actual cost of firearms licensing activities to forces.

Data Storage and Retrieval

- 6.13 HMIC found that the majority of forces visited had completed all the work required in preparation for the implementation of the Section 39 database of all shotgun and firearm certificate holders, originally due to go live on PNC in late 2002. It is now understood that the implementation of the Section 39 database has been considerably delayed. HMIC are conscious of the fact that firearms licensing departments have expended resources in preparation for implementation at a time when they could ill afford to do so.
- 6.14 During the course of the review it was identified that data input protocols adopted by forces for their Firearms Information Systems (FIS) were inconsistent and frequently inadequate. For example, descriptions of weapons and calibres did not conform to ACPO 'Guidance on the Categorisation of Firearms'. As a consequence, system searches may result in false negatives with potentially dire consequences. For example, in one force, the calibre 7.62mm x 51/.308 was found in the Firearms Information System with at least 6 variations.
- 6.15 This was exacerbated by similarly inconsistent terminology used by administration staff and FEPs in their reports. In addition to incorrectly described calibres and weapons, reports contained poor phraseology such as *controlling vermin* instead of *shooting vermin* and *slots on ticket* instead of *authorities to acquire on a firearm certificate*. In another, the phrase *up and under* shotgun appeared on a number of occasions.

Recommendation 6

Her Majesty's Inspector of Constabulary recommends that firearms licensing departments establish protocols for report writing and data input that takes full cognisance of ACPO guidance on the categorisation of firearms, Home Office Guidance and the ACPO Procedural Good practice Guide.

Partnerships

- 6.16 Only one force visited during the course of the review holds liaison meetings with a user group made up of cross section of certificate holders, registered firearms dealers, or Home Office Approved Clubs, other forces had no such meetings. The potential benefits of such liaison may include user testing of refinements to renewal packs, procedures and non-statutory forms. HMIC endorse the establishment of such user groups and would see this as good practice.
- 6.17 Similarly, while Home Office Approved Clubs have nominated liaison officers, of the forces visited only one held regular liaison meetings with representatives of such clubs. Such meetings would support Lord Cullen's recommendation that there should be adequate communication between Approved Clubs and the police. HMIC also recognise the advantages of holding such meetings with registered firearms dealers.

Recommendation 7

Her Majesty's Inspector of Constabulary recommends that forces establish a user group and hold regular liaison meetings with representatives of Home Office Approved Clubs and registered firearms dealers.

7. Processes

- 7.1 HMIC perceived that there was some confusion within forces with regard to *fittedness* and *good reason* in relation to firearm applications and *no good reason* in relation to shotgun applications.
- 7.2 HMIC found evidence that forces were taking cognisance of these Important issues in accordance with Lord Cullen's recommendations and the recent Home Office document 'Firearms Law - Guidance to the Police' (December 2001). In some forces, however, it is unclear who holds responsibility for ensuring their corporate interpretation. In a number of forces evidence was found that FEOs have been making their own interpretation and HMIC considers that this has the potential for inconsistencies and poor decision making.

- 7.3 During the inspections HMIC found several instances where licenses had been granted where the calibre of firearms or amount of ammunition authorised did not accord with Home Office Guidance. HMIC is not in a position to comment on the appropriateness of these applications. In the event of an incident that resulted in any investigation or enquiry, however, the force may find it difficult to justify its decision making in circumstances that did not accord with the Home Office Guidance unless evidence to support that decision is recorded.

Recommendation 8

Her Majesty's Inspector of Constabulary recommends that forces ensure a consistent interpretation of Home Office guidance and ACPO Procedural Good Practice Guide amongst firearm licensing staff.

(This recommendation complements recommendation 3)

Home Visits

- 7.4 HMIC found that a number of forces were not adhering to ACPO policy on home visits.
- 7.5 In one forces visited at the time of the survey there were no FEOs. Local uniformed officers were used to conduct the home visits. Quite apart from the issue of their not being trained, firearms enquiries were not their sole duty and the demands of responsive policing often resulted in firearms enquiries receiving a low priority. In another force, due to inadequate staffing, renewal enquiries were more often than not conducted over the telephone. From a dip sample of over 1000 shotgun and firearms renewals and firearms variation applications, 56% were conducted over the telephone and only 44% by way of personal visit.

Recommendation 9

Her Majesty's Inspector of Constabulary recommends that forces ensure that they accord with Lord Cullen's recommendations and ACPO policy on home visits for weapon grant and renewal applications.

Certificate Renewal Process

- 7.6 Forces visited send out applications for renewals for Shotgun and Firearm applications 8 weeks before expiry. HMIC were pleased to note that if no response had been received, a reminder was sent 6 weeks later, 2 weeks in advance of expiry.
- 7.7 During the course of this work it was identified that the average time taken to process renewal applications at the time of the visits to the forces was 8 - 9 weeks. This being the case, certificates will frequently not be renewed on time.
- 7.8 HMIC recognise that this problem is exacerbated by the submission of applications by licence holders close to the expiry of their current certificates and that this may be an issue for discussion within user groups and shooters organisations (referred to within paragraph 6.15 - 6.16 and recommendation 7 above).

8. Results

Measurement of performance

- 8.1 During the course of this review HMIC were presented with evidence that suggested that the measurement of performance has been partly addressed through the use of management information derived from firearms information systems.
- 8.2 Within Dyfed Powys Police management information derived from the Firearms Information System had been utilised to illustrate that the turn around time for applications had been reduced significantly. For example, in 2000 the average turn around time for firearm and shotgun renewals was 183 days. In the first quarter of 2002 this has been reduced to 76 days and this was continue to improve.
- 8.3 In addition the dputy FLM had devised a matrix which illustrated the time taken at the different stages of enquiries. This provided a starting point from which Dyfed-Powys Police intended further to reduce turn around time and improve the level of service provided by the firearms licensing department. Neither the statistical information nor enquiry time matrix, however, suggested target levels of performance in order to achieve this.

- 8.4 Those forces visited informed HMIC that they had a good working relationship with external bodies such as the British Association for Shooting and Conservation (BASC). Similarly, HMIC were informed of letters and phone calls of appreciation received from some applicants for the way these letters were filed, these were not easily identifiable or easy to locate. In consequence, HMIC concluded that the recording of qualitative measures of performance, in particular letters or phone calls of appreciation or complaint, appeared inadequate.
- 8.5 In HMIC's view, there is potential for improved quantitative measures from the Firearms Information Systems within forces. The knowledge of the systems and level of expertise within those forces visited, however, varied widely and consequently there was inconsistency in how performance was recorded.
- 8.6 The monitoring and evaluation of performance was the subject of recommendation within the HMIC report on the Administration of Firearms Licensing (1993). Then it was recommended that the monitoring and evaluation of the effectiveness of the service be carried out as a matter of routine and that targets be set to provide clear priorities for administrative and enquiry staff and for management information purposes.
- 8.7 During the course of this review HMIC identified good work in respect of quantitative measures of process/performance within firearms licensing departments. Similarly some quantitative information on performance from applicants was also kept albeit difficult to access. HMIC would consider the development of a simple matrix of data from the Firearms Information Systems and letters/phone calls received from applicants which comment upon the performance of the firearms licensing department to be good practice. Consideration should also be given to the inclusion of the ratio of staff to the number of certificates processed by a department. This matrix should not be overly burdensome or bureaucratic. It should however be recognised as an indicator by which forces could consider their performance.

Recommendation 10

Her Majesty's Inspector of Constabulary recommends that the ACPO Administration of Firearms and Explosives Licensing Committee leads on the

development of a simple matrix of qualitative and quantitative indicators for firearms licensing departments.

9. Conclusion

9.1 The enthusiasm, expertise and commitment of all staff seen impressed those involved in this inspection. Their openness and honesty has greatly assisted in identifying those issues that will have implications for most, if not all, forces in England and Wales.

9.2 HMIC were pleased to note that the majority of forces visited had made good use of information contained within the 2001 survey and HMIC Inspection Protocols in respect of Firearms Licensing. In one force in particular, this had undoubtedly given impetus to the marked improvement.

9.3 The December 2001 Home Office publication 'Firearms Law: Guidance to the Police' has been very well received by firearms licensing departments and found to be very much more user friendly than its predecessor. This document has certainly improved consistency of practice across forces. The ACPO Procedural Good Practice Guide will further assist firearms licensing departments in identify good practice and a corporate approach by the service.

9.4 The police service is the exclusive licensing authority for firearms, shotguns and firearm dealers. It is therefore imperative that chief officers ensure that the public receives the best possible quality of service by embracing Home Office Guidance. In addition chief officers would be well advised to take cognisance of Lord Cullen's recommendations and ACPO Policy relating to firearms licensing.

9.5 It should be noted that HMIC will be updating its inspection protocols for firearms licensing to reflect the issues identified in this thematic review and the subsequent recommendations. In terms of progressing the issues identified at a national level, however, HMIC believes that they may best be co-ordinated by the ACPO Firearms and Explosives Licensing Committee.

10. Summary of recommendations

Recommendation 1

Her Majesty's Inspector of Constabulary recommends that the ACPO Administration of Firearms and Explosives Licensing Committee consider how it may best assist forces address the recommendations within this review in a consistent manner and to identify good practice.

Recommendation 2

Her Majesty's Inspector of Constabulary recommends that force policy and procedure in respect of firearms licensing should mirror Lord Cullen's recommendations and ACPO policy, Home Office Guidance and ACPO, 'Procedural Good Practice Guide'.

Recommendation 3

Her Majesty's Inspector of Constabulary recommends that forces ensure staff conducting firearms enquiries are trained, conversant with current ACPO/Home Office guidance and competent to fulfil their role.

Recommendation 4

Her Majesty's Inspector of Constabulary recommends that forces utilise the period 2003 - 2004 to identify and address those areas of firearms licensing that have been afforded a lower priority during the preceding three year period.

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