

# **Firearms licensing**

**An inspection of firearms licensing  
across police forces in England  
and Wales**

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# Foreword

In England and Wales, hundreds of thousands of people lawfully possess firearms and shotguns and use them safely for work, sport and recreation. However, incidents involving the misuse of lawfully held firearms and shotguns infrequently occur. [Home Office data](#) shows that in the ten years ending 31 March 2025, shootings involving legally held firearms led to the murder of at least 39 people.

When the state allows a person to have access to a gun, both the state and the individual have a significant responsibility. The purpose of [firearms licensing](#), therefore, is to protect public safety and the peace while not restricting legitimate access and use. It should make sure that only people who are assessed as suitable are granted certificates and allowed to retain access to firearms.

It is essential that the firearms licensing system is robust, consistent and focused on protecting the public. The public should be able to trust and have confidence in the overall licensing system, with all parts operating to high standards, wherever an applicant or certificate holder resides.

Unfortunately, in this inspection we found it is not fit for purpose.

In 2015, we carried out our last [thematic inspection](#) of firearms licensing in England and Wales. In [our 'Targeting the risk' report](#), we made 18 recommendations highlighting that:

- firearms licensing guidance was too open to interpretation;
- firearms licensing practice was inconsistent; and
- basic oversight and governance weren't in place.

We concluded:

“For those responsible for the firearms licensing arrangements, both at a strategic and an operational level, the choice is stark. Accordingly, our advice is direct: continue to support existing processes which are often flawed, and accept the inevitable consequences of further tragedy, or design better processes, properly supported in law, that allow for uncompromising rigour and consistent application.”

We also highlighted in our 2015 report that since 1987, several organisations, including our own, had made more than 300 national recommendations on firearms licensing. Many of them haven't been implemented.

[Chief officers](#) of police are responsible for licensing firearms and there are 38 [firearms and explosives licensing units \(FELUs\)](#) servicing the 43 police forces in England and Wales. Disappointingly, despite finding evidence of some improvements, FELUs significantly vary in their approaches to [assessing risk](#), making decisions, providing oversight and making sure decision-making complies with legislation and guidance.

This shows incremental improvements to the licensing structure haven't achieved the consistency, resilience or assurance required. As a result, we recommend the creation of a national firearms licensing authority for England and Wales, with professional expertise, modern digital capability and robust governance arrangements. This should reduce the risk to public safety and continue to support lawful possession of firearms and shotguns.

There are also longstanding weaknesses in the legal framework, statutory guidance, national governance arrangements and the structure of firearms licensing. We also found weaknesses in the way FELUs assess visitors' permit applications. Rigorous scrutiny is essential, but we found it was often lacking.

The legal framework has become increasingly complex over time. Amendments have been added to legislation developed in a very different social and policing environment. As a result, forces across England and Wales interpret and apply the law differently. We found this was directly contributing to the variations we found in decision-making. Legislative reform is required, including alignment between [section 1 firearms and section 2 shotguns](#) under the [Firearms Act 1968](#).

The government has introduced extensive statutory guidance. This has led to some improvements. However, the guidance is unclear, allowing for different interpretations and variation rather than providing firm and enforceable rules. We recommend introducing clear, legally enforceable rules for firearms licensing.

In recent years, there have been improvements in the way medical suitability of certificate applicants and holders has been assessed. However, these arrangements don't provide consistent or sufficient assurance that a person remains medically suitable to possess firearms throughout the term of their certificate, rather than only when it is granted or renewed. The Home Office should introduce mandatory structured medical checks, carried out at least every five years, to strengthen these arrangements.

We found the supervision and governance of some FELUs, and their decision-making, was ineffective. This mirrors the concerns we raised in 2015. It shows that firearms licensing hasn't received the level of leadership attention it requires.

There is limited national oversight of firearms licensing. There is also limited understanding of demand, cost, staffing or performance. Overall, there is no comprehensive national picture of the risks associated with firearms licensing, and no comprehensive national framework for assessing how well the system operates.

The effectiveness of firearms licensing depends heavily on the competence and judgment of those who administer it. We were pleased to see that there is now national training for [firearms enquiry officers](#). Administrative staff, decision-makers and senior leaders also play critical roles in managing risk. But we found that training and [continuing professional development](#) for these roles wasn't clearly defined or readily available.

During this inspection, we issued an [accelerated cause of concern to Bedfordshire Police, Cambridgeshire Constabulary and Hertfordshire Constabulary](#). We identified serious concerns with aspects of their three-force collaboration on firearms and explosives licensing.

The findings in this report highlight the need for decisive change and co-ordinated action. Further tragedies shouldn't be required before action is taken to address issues already well understood and documented.

In this report, we make 23 recommendations. In considering all our recommendations, the Home Office should consider their implications on firearms licensing in Scotland.

The recommendations are designed to keep the public safe and support lawful firearms ownership by:

- establishing a national firearms licensing authority;
- redesigning and simplifying firearms legislation;
- introducing legally enforceable statutory rules;
- improving governance and training; and
- developing new digital capabilities.

Firearms licensing affects hundreds of thousands of people and plays a critical role in protecting the public. Most certificate holders comply with the law and use firearms responsibly. They, and the wider public, are entitled to expect a system that is clear, consistent and robust. We found that the system is none of those things and change is overdue.



**Lee Freeman KPM**

His Majesty's Inspector of Constabulary

# Recommendations

In this report, we make 23 recommendations.

## Recommendation 1

By 1 September 2029, the Home Office should establish a single [firearms licensing](#) authority for England and Wales and make it fully operational.

Such an authority should have as a minimum:

- appropriate powers;
- a decision-making function under central control;
- locally based personnel to carry out suitability visits;
- internal audit functions;
- a qualitative and quantitative performance framework that reflects both risk and timeliness;
- direct access to all relevant police [intelligence](#) and information, including access to and alerts from the [Police National Database](#);
- standardised training; and
- external inspection by an independent body, such as His Majesty's Inspectorate of Constabulary and Fire & Rescue Services.

## Recommendation 2

By 1 September 2028, the Home Office should prepare, and as soon as reasonably possible thereafter lay before Parliament, a bill setting out simplified and modernised firearms legislation for England, Wales and Scotland.

## Recommendation 3

By 1 December 2027, the Home Office should introduce a [firearms licensing](#) verification system to supplement physical certificates and permits.

## Recommendation 4

By 1 September 2028, as part of new firearms legislation, the Home Office should require all new firearm and shotgun certificate applicants to pass a standardised assessment of competence that includes the safe handling and use of firearms.

## Recommendation 5

By 1 September 2028, as part of new firearms legislation, the Home Office should work to align the [firearms licensing](#) regimes for Firearms Act 1968 [section 1](#) and [section 2](#) firearms and ammunition.

## Recommendation 6

By 1 September 2027, the Home Office and the [National Police Chiefs' Council](#) lead for [firearms licensing](#), working with the Registrar General for England and Wales and the [General Register Office](#), should seek to develop a process to:

- notify police forces regularly of all deaths registered in their area; and
- require forces to cross-reference this information with firearm and shotgun certificate records so they can recover firearms promptly after a certificate holder's death.

## Recommendation 7

By 1 September 2028, the Home Office, in consultation with the [College of Policing](#), the [National Police Chiefs' Council](#), [Police Scotland](#) and other stakeholders, should introduce legally enforceable rules for [firearms licensing](#) on a similar legal footing to the [Police and Criminal Evidence Act 1984 codes of practice](#).

This should replace firearms licensing guidance that is in the:

- [Statutory guidance for chief officers of police](#);
- [Guide on firearms licensing law](#); and
- [Firearms security handbook 2020](#).

## Recommendation 8

By 1 September 2028, the Home Office should make sure that new statutory rules for [firearms licensing](#) clearly set out the processes that apply to foreign nationals or those who have lived overseas for a prolonged period who apply for a firearm or shotgun certificate.

## Recommendation 9

By 1 September 2028, the Home Office should make sure that the new statutory rules for [firearms licensing](#) clearly set out when forces must make in-person home visits as part of the firearms licensing renewal process.

## Recommendation 10

By 1 September 2028, the Home Office should introduce a requirement for all firearm and shotgun certificate applicants, and certificate holders at renewal, to have an in-person medical assessment with an approved clinician.

## Recommendation 11

By 1 September 2028, the Home Office should establish a statutory requirement for firearms and shotgun certificate holders to notify the [firearms and explosives licensing unit](#) and when operational, the national [firearms licensing](#) authority, within seven days of any relevant changes to their medical circumstances.

## Recommendation 12

By 31 March 2027, the Home Office and the [National Police Chiefs' Council](#) should review the visitors' permit regime to reduce the inherent risks to public safety. As part of this review, they should consider whether visitors' permits should be restricted to applicants from countries with [firearms licensing](#) and safety practices similar to those in Great Britain.

In the interim, chief constables should make sure that [firearms and explosives licensing units](#) assess visitors' permit applications in line with the [Guide on firearms licensing law](#).

## Recommendation 13

By 1 December 2026, chief constables should:

- satisfy themselves that their [scheme of delegation](#) for [firearms licensing](#) is fit for purpose and in line with the [firearms licensing authorised professional practice](#); and
- check that decision-making is in accordance with that scheme.

## Recommendation 14

By 1 December 2026, chief constables should make sure that they have audit and [dip sampling](#) processes in place to review [firearms licensing](#) decisions in line with the [firearms licensing authorised professional practice](#).

## Recommendation 15

By 1 September 2029, the Home Office should consider establishing a national [firearms licensing](#) tribunal composed of appropriately qualified panel members to hear appeals.

## Recommendation 16

By 1 December 2027, the Home Office, working with the [National Police Chiefs' Council](#) and the [Police Digital Service](#) and in consultation with other stakeholders, including [Police Scotland](#), should introduce a secure, integrated, online national firearms register and firearms licensing system that:

- operates as a single authoritative record of all certificate applicants, holders, [registered firearms dealers](#), those with [section 5 authorities](#), [Home Office-approved clubs](#), [museum licensees](#) and visitor permit holders;
- allows [Border Force](#) to enter details of imported firearms and shotguns and monitor the export of firearms and shotguns at the border, and monitor the transit of visitor permit holders' firearms and shotguns;
- facilitates real-time verification that the recipient of a licensed firearm or shotgun holds a valid certificate before any sale or transfer;
- automates updates of the national register after sale or transfer; and
- operates as a case management system for all certificate applications, renewals and ongoing monitoring.

## Recommendation 17

By 1 December 2026, the [National Police Chiefs' Council](#) lead for [firearms licensing](#) should:

- make sure each region appoints a [chief officer](#) lead for firearms licensing; and
- implement a meeting structure where regions meet and then report back to the national meeting.

## Recommendation 18

By 1 December 2026, the [National Police Chiefs' Council](#) lead for [firearms licensing](#) should specify the financial information that forces need to have a clear understanding of the cost of firearms licensing. Chief constables should then record and report this information, including data on actual costs, to the National Police Chiefs' Council lead annually.

## Recommendation 19

By 1 September 2028, the Home Office should introduce legislation to:

- make sure that [firearms licensing](#) fees increase annually, at least in line with inflation; and
- stop licensing authorities from having to refund applicants' fees when they refuse an application.

## Recommendation 20

By 1 December 2026, chief constables should establish or maintain:

- a force-level [firearms licensing](#) governance structure that is compliant with the [firearms licensing authorised professional practice](#); and
- a qualitative and quantitative performance framework that covers both risk and how quickly [firearms and explosives licensing units](#) process applications.

## Recommendation 21

By 1 December 2026, chief constables should make sure they have a documented engagement plan in line with [firearms licensing authorised professional practice](#).

## **Recommendation 22**

By 1 February 2027, the Home Office and the [National Police Chiefs' Council](#) lead for [firearms licensing](#), working with the [College of Policing](#) and police forces, should secure long-term funding for national training for those involved in firearms licensing.

## **Recommendation 23**

With immediate effect, chief constables should satisfy themselves that any [firearms and explosives licensing unit](#) practitioners who are responsible for handling and transporting firearms are qualified to handle them safely.

# Introduction

## Background

Firearms are lethal weapons that can cause death or serious injury. Every death or serious injury caused by a firearm is a matter of profound public concern. We recognise the pain and distress of those who have suffered injuries and of the families and friends of people who have lost their lives.

At the same time, firearms also have long-established and legitimate uses.

In this report, the terms firearms and [firearms licensing](#) refer to firearms to which [section 1 of the Firearms Act 1968](#) applies and to shotguns to which [section 2 of the Act](#) applies, unless otherwise stated.

[Home Office statistics](#) show that on 31 March 2025, 496,904 people in England and Wales lawfully held a firearm certificate, a shotgun certificate, or both. Most certificate holders use firearms safely and responsibly. They use them for lawful recreation or as essential tools in work, such as agriculture, wildlife management and pest control. This contributes to the rural economy and sporting life.

The aim of firearms licensing isn't to restrict people using firearms safely and legitimately. It is to make sure that only those people who are suitable can obtain and retain access to them.

Most firearms homicides in England and Wales involve unlicensed firearms. However, the misuse of licensed firearms can cause devastating consequences. [Home Office data](#) shows that in the ten years ending 31 March 2025, shootings involving legally held firearms led to the murder of at least 39 people.

Access to licensed firearms also continues to pose a risk to people contemplating suicide. The [National Police Chiefs' Council](#) provided us with unpublished data showing that in the year ending 31 December 2025, 44 certificate holders took their own lives using licensed firearms.

Some academic studies have found that implementing more restrictive firearms regulations is associated with lower rates of firearms homicides. But regulation can't eliminate risk entirely. Serious incidents still occur in countries with highly restrictive licensing systems.

In 2023, a licensed firearm owner committed multiple homicides in Nakano, Japan. In 2025, two people used licensed firearms to kill 15 people in Sydney, Australia. These cases, and others, demonstrate that even the most stringent licensing regimes cannot fully remove the risk of crimes being committed and harm caused.

The [Firearms Act 1968](#) and associated legislation establish the legal framework for firearms licensing in England, Wales and Scotland. The aim of the legislation is to protect public safety by banning certain types of firearms. It also restricts lawful access to licensed firearms to people who the police assess as suitable.

[Chief officers](#) in forces are responsible for firearms licensing decisions. In practice, police [firearms and explosives licensing units \(FELUs\)](#) carry out licensing functions on their behalf. Some forces collaborate, resulting in 38 FELUs serving the 43 police forces in England and Wales.

## About us

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) independently assesses the effectiveness and efficiency of police forces and fire and rescue services to make communities safer. In preparing our reports, we ask the questions that the public would ask and publish the answers in accessible form. We use our expertise to interpret the evidence and make recommendations for improvement.

## Our commission

On 12 August 2021, Jake Davison shot and killed five people in Plymouth with a lawfully held pump-action shotgun. He wounded two others before using the shotgun to take his own life.

In April 2023, during the inquests into these five tragic deaths, the senior coroner was highly critical of Devon and Cornwall Police. He also criticised the failure of the government and the police service to act on recommendations from [our previous inspection of firearms licensing in 2015](#) and other reports.

The Home Secretary commissioned HMICFRS to carry out an urgent review of Devon and Cornwall Police's FELU. In our response, we confirmed we would also carry out a national [thematic inspection](#) of firearms licensing.

[Paragraph 3 of Schedule 6 to the Crime and Courts Act 2013](#) requires the Home Secretary to arrange for every HMICFRS report commissioned under the Act to be published in a manner they consider appropriate.

The legislation also allows any part of the relevant report to be excluded from publication if it:

- would be against the interests of national security;

- could prejudice how crime is prevented or detected, how offenders are apprehended or how offences are prosecuted; or
- might jeopardise the safety of any person.

In August 2026, we gave the Home Secretary our report on the inspection of firearms licensing in England and Wales. That report included detail of operational matters that weren't suitable for the public domain. As a result, we have prepared this version of the report with the relevant operational matters excluded.

## Our terms of reference

Our terms of reference were to examine how police forces keep the public safe while making sure that their possession of firearms is lawful.

We considered the effectiveness and efficiency of:

- national guidance and legislation;
- local policies and processes;
- national, regional and local governance arrangements;
- training for firearms licensing personnel; and
- funding and resourcing.

## Methodology

Our fieldwork took place between September 2025 and January 2026. We inspected:

- the three-force collaborated licensing unit for Bedfordshire Police, Cambridgeshire Constabulary and Hertfordshire Constabulary;
- Cheshire Constabulary;
- Gloucestershire Constabulary;
- Gwent Police;
- Kent Police; and
- Northamptonshire Police.

During our inspection, we carried out:

- a review of 598 documents, including policies, processes and [force management statements](#);
- a review of other relevant HMICFRS reports, including our 2015 thematic inspection of firearms licensing and reports from other organisations;
- a review of 377 firearms licensing case files, including at least 46 from each force we inspected;
- a total of 59 interviews with [police personnel](#), including leads for firearms licensing;

- a further 53 interviews with government officials, national police leads, members of the shooting community, [victims](#) of crimes involving licensed firearms, academics and external organisations;
- a total of 40 focus groups in police forces, including with supervisors, FELU personnel, investigation teams, [neighbourhood](#) and response teams, and [control rooms](#);
- data analysis of the [National Firearms Licensing Management System](#);
- a public survey to ask for the views of people with recent direct experience of firearms licensing applications in England and Wales that attracted 11,135 responses;
- a survey of [registered firearms dealers](#) that attracted 100 responses; and
- [reality testing](#) in each force we inspected by speaking to individual [police officers](#) and [staff](#).

## The scope of our recommendations

We inspected firearms licensing in England and Wales, but the relevant legislation and statutory guidance extend to Scotland. Our recommended legislative changes, and the introduction of firearms licensing rules, would therefore extend to Scotland. Some of our other recommendations, including those relating to national structures, governance and IT systems, may also benefit Scotland. We therefore sought the views of [His Majesty's Inspectorate of Constabulary in Scotland](#) and [Police Scotland](#) during the inspection.

## Terminology in this report

To make it simpler to describe the firearms licensing process from start to finish, including the roles involved, we use the following terms in this report:

### Section 1 firearm

All firearms except:

- a shotgun;
- an air weapon (unless declared especially dangerous);
- prohibited weapons, such as centre fire self-loading rifles; and
- handguns and machine guns (unless specifically authorised).

### Section 2 shotguns

A smooth bore gun (not being an air weapon) having a barrel not less than 24 inches (60.96cm) and a bore less than 2 inches (5.08cm), either having no magazine or a non-detachable magazine incapable of holding more than two cartridges and not a revolver gun.

# 1. The structure of firearms licensing

## **The firearms licensing system is not fit for purpose and should be replaced by a national firearms licensing authority for England and Wales**

The primary purpose of [firearms licensing](#) is to protect public safety and the peace. Forces work to achieve this by preventing unsuitable people from obtaining or retaining firearms. [Firearms and explosive licensing units \(FELUs\)](#) must also provide a service to applicants and certificate holders.

In [our 2015 inspection report on firearms licensing 'Targeting the risk'](#), we highlighted persistent inconsistencies in firearms licensing. Many of our recommendations aimed to resolve them by introducing rules and clear guidance. However, the Home Office and policing haven't fully actioned most of the recommendations.

During our 2025/26 inspection, we found that the continued failure to develop clear guidance has contributed to inconsistent firearms licensing processes. And this has resulted in inconsistent decision-making, risk management and overall service across England and Wales.

This approach is further compounded by the prevalence of variable supervision and limited oversight of decision-making. Differences in local priorities and risk appetite further contribute to overall inconsistency, both within individual FELUs and across forces nationally.

There is significant variation in how FELUs apply national guidance and in the length of time they take to process applications. This affects both public safety and service to applicants and certificate holders. This, in turn, affects public confidence.

These findings, taken together with recommendations from previous reports, lead us to conclude that the current system doesn't provide a fully effective and nationally consistent approach to firearms licensing.

Public safety would be better served by the creation of a national firearms licensing authority.

During our inspection, we found strong support for this recommendation from senior police leaders, most FELU personnel, representatives of shooting groups and many respondents to our survey.

## Recommendation 1

By 1 September 2029, the Home Office should establish a single [firearms licensing](#) authority for England and Wales and make it fully operational.

Such an authority should have as a minimum:

- appropriate powers;
- a decision-making function under central control;
- locally based personnel to carry out suitability visits;
- internal audit functions;
- a qualitative and quantitative performance framework that reflects both risk and timeliness;
- direct access to all relevant police [intelligence](#) and information, including access to and alerts from the [Police National Database](#);
- standardised training; and
- external inspection by an independent body, such as His Majesty's Inspectorate of Constabulary and Fire & Rescue Services.

## 2. Firearms licensing legislation

### There needs to be a complete overhaul of firearms licensing legislation

In July 2015, the [Law Commission](#) published a [scoping consultation paper on firearms law](#). In his introductory remarks, the Law Commissioner highlighted that there were over 30 pieces of legislation relating to firearms, which contain:

“numerous illogicalities and inconsistencies, and can be difficult to use. The Law Commission believes ... there is a strong case for bringing all firearms legislation under a single Act, to clarify the law, make it easier to use and future-proof it against technological change.”

In [our 2015 firearms licensing inspection report ‘Targeting the risk’](#), we stated that “we entirely agree” with this. We still do. Since then, Parliament has enacted a substantial volume of further legislation relating to [firearms licensing](#), making it even more complex.

The [2026 House of Commons Library research briefing on firearms licensing](#) highlighted that: “The law governing firearms regulation in the UK is very complex.” Many practitioners working in firearms licensing and representatives of the shooting community told us the same, describing it as “clunky” and easy to misinterpret.

This has led to inconsistencies in firearms licensing across England and Wales. For example, handguns are generally banned, but there are narrow exceptions where police can allow their use in limited situations, such as for humanely killing animals. We found that [firearms and explosive licensing units \(FELUs\)](#) interpreted the legislation differently. As a result, one unit revoked some handgun certificates when holders moved into its area, even though other units had granted them. All these units appeared to be acting within the law.

In 2023, the Home Office held [a public consultation on proposed changes to firearms licensing legislation](#). This consultation, which focused on specific areas of the law rather than the whole legislative framework, contributed to a further change in relation to referees. Home Office officials told us that the government was committed to carry out further consultation on specific issues “in due course”.

The recommendations set out in this report, and the wider police reform agenda, provide the government with an opportunity to redesign firearms law, including firearms licensing. This should follow a comprehensive review of the existing law and a broad public consultation on its findings.

In 2025, the Western Australian government carried out a comparable process with the introduction of the [Firearms Act 2024](#) and the [Firearms Regulations 2024](#). It shows how governments can make wholesale change, rather than incremental amendments, to improve clarity and coherence in the relevant legislation.

## **Recommendation 2**

By 1 September 2028, the Home Office should prepare, and as soon as reasonably possible thereafter lay before Parliament, a bill setting out simplified and modernised firearms legislation for England, Wales and Scotland.

In the rest of this chapter, we examine where the legislative framework creates inconsistency, uncertainty or unmanaged risk. And we set out the changes needed to address these problems. In considering our recommendations, the Home Office should consider the implications of the proposed changes on Scotland.

## **New legislation should remove the conditional rebuttable presumption of grant**

The [Firearms Act 1968](#) sets a conditional rebuttable presumption in favour of grant for firearm and shotgun certificates. This means [chief officers](#) of police should grant certificates unless one or more of the statutory grounds for refusal apply.

[Section 27\(1\)](#) of the Act states that the chief officer shall grant a firearms application “where the chief officer is satisfied that:

- the applicant is fit to be entrusted with a firearm to which section 1 of this Act applies and is not a person prohibited by this Act from possessing such a firearm;
- that he has a good reason for having in his possession, or for purchasing or acquiring, the firearm or ammunition in respect of which the application is made; and
- that in all the circumstances the applicant can be permitted to have the firearm or ammunition in his possession without danger to the public safety or to the peace”.

[Section 28\(1A\)](#) of the Act sets out that:

- the chief officer shall grant or renew a shotgun application if they are “satisfied that the applicant can be permitted to possess a shot gun without danger to the public safety or to the peace”.

- “No such certificate shall be granted or renewed if the chief officer of police has reason to believe that the applicant is prohibited by this Act from possessing a shot gun” or “is satisfied that the applicant does not have a good reason for possessing, purchasing or acquiring one”.

In his [Prevention of Future Deaths Reports following the Keyham inquests](#), the senior coroner for Plymouth, Torbay and South Devon stated that “the public would be better protected if the legislation provided that a certificate shall not be granted unless the applicant has satisfied the relevant chief officer of police that they are safe to hold a gun of any type”.

The Home Office didn’t include this recommendation in its 2023 consultation.

The consultation document stated:

“The government have decided not to consult on this recommendation as it is clear that these sections of the Act do already go on to specify the criteria that must be met in order for a shotgun or firearm licence to be granted ... These provisions support consistency in the police decision-making process and give certainty to the applicant whilst requiring the applicant to have met the suitability criteria and to undergo checks before a certificate is granted. Any changes to the existing legislative formula would still need to achieve these same objectives so would, essentially, make little or no difference in practice to the current application process.”

We disagree. A revised presumption would place clearer responsibility on applicants to satisfy the chief officer that they are suitable to hold a firearm or shotgun certificate.

In taxi licensing, legislation doesn’t have a rebuttal presumption of grant. [Section 51\(1\) of the Local Government \(Miscellaneous Provisions\) Act 1976](#) states that “a district council shall not grant a licence unless they are satisfied that the applicant is a fit and proper person to hold a driver’s licence.”

This places the burden of proof on the applicant. Firearms licensing legislation should be framed in the same way. It would allow FELUs to refuse applications that contain omissions or misleading statements without needing to prove deliberate dishonesty to justify refusal.

As we report in [our chapter on firearms licensing practice](#), we found inconsistent approaches across FELUs where applicants omitted (deliberately or otherwise) relevant details, such as criminal convictions or medical conditions. Concerningly, we also found that applicants had successfully appealed refusals in these circumstances.

## Firearms licensing personnel need appropriate legal powers

In 2015, we reported that FELU practitioners carrying out unannounced home visits needed certificate holders' co-operation to gain access to their property. We were concerned about the police's ability to intervene in cases where there were questions about a certificate holder's ongoing suitability to hold a certificate.

We previously recommended that: "The Home Office should ensure that, in such cases, the law enables the police to fulfil their duty by inspecting the firearm, ammunition and the site where they are stored".

This hasn't happened. And the lack of legal powers continues to cause FELU [personnel](#) problems when they attempt to effectively assess certificate holders' ongoing suitability.

This also creates problems when FELU practitioners are concerned about a certificate holder's suitability, but don't see an immediate threat to life that grants them the power to enter the property to seize the firearms. Instead, they frequently have to rely on convincing certificate holders to voluntarily surrender their firearms. This approach is unsatisfactory.

Voluntary surrender isn't part of the formal decision-making process and removes the certificate holder's right of appeal. During this inspection, shooting organisations told us that certificate holders aren't always aware of this, and that some feel pressured to agree.

In February 2025, in its [response to the 2023 consultation](#), the Home Office acknowledged:

"There is a potential public safety gap in that the police do not have a ... power to enter premises to seize firearms where there are grounds for re-assessing a certificate holder's suitability, but the certificate holder is uncooperative with the police."

It also recognised that: "The delay that is caused by the need to obtain a warrant could prove fatal." The response also announced that the government intended to provide the police with a new power of entry when there was a suitable legislative opportunity.

We are disappointed that more than a year after this statement, and more than a decade after we first recommended it, the government hasn't introduced this legislation.

At the earliest opportunity, or as part of the new firearms legislation, we recommend the Home Office should seek to introduce legislation to provide police with the power to enter premises and seize legally held firearms while they assess the continued suitability of a certificate holder.

## There isn't a clear and enforceable offence for using or carrying a firearm while intoxicated

[Section 12 of the Licensing Act 1872](#) makes it an offence to be “drunk when in possession of any loaded firearms”, with a maximum penalty of a £200 fine or one month imprisonment.

In the nine years to June 2025, proceedings were brought against two people for this primary offence. One received a fine of £10.

The offence doesn't:

- cover drug intoxication;
- set alcohol limits; or
- prescribe testing powers.

The [Road Traffic Act 1988](#) does all three in relation to driving while intoxicated.

Beyond this, firearms licensing law only addresses intoxication indirectly. [Section 30A of the Firearms Act 1968](#) empowers chief officers to revoke a section 1 firearm certificate if they have reason to believe a holder “is of intemperate habits”. The Act doesn't define ‘intemperate’ and people can interpret the term differently. There is no equivalent power for shotgun certificate holders unless they pose danger to public safety or the peace.

Some FELU practitioners have tried to breathalyse certificate holders at home when [intelligence](#) suggested they were intoxicated the night before. This isn't proportionate, and there is no statutory power to require a breath test for firearms licensing purposes.

We also heard of [police officers](#) using drug wipes to test whether certificate holders had recently used drugs. Again, there is no legal basis for this.

These examples illustrate that the absence of a clear statutory offence creates uncertainty. We don't consider it proportionate or enforceable to criminalise intoxication at home when firearms are stored lawfully and securely. But intoxication while handling, carrying or using a gun is plainly a risk to public safety.

Western Australia's Firearms Act 2024 addresses this risk directly. It makes it an offence to have immediate possession of, or use, a firearm on private or public land while under the influence of alcohol or drugs. It provides for custodial sentences of up to seven years and fines up to 60,000 Australian dollars. The Act also makes clear that a firearm held in secure storage isn't in a person's immediate possession.

The Home Office should consider introducing a similar offence as part of the new firearms legislation we have already recommended. This should include:

- explicit blood alcohol concentration and drug impairment thresholds, like those used for motoring offences; and
- a clear and limited statutory power to carry out alcohol and drug testing for the purpose of investigating this offence.

## **A digital verification system should supplement physical certificates and permits**

Under [sections 27\(2\)](#) and [28\(2\)](#) of the Firearms Act 1968, firearm and shotgun certificates must be in a “prescribed form”. The [Firearms Rules 1998](#) specify that the prescribed form for all types of certificates and permits is paper based.

[Section 32\(2\) of the Firearms \(Amendment\) Act 1997](#) deals with transferring firearms between certificate holders. It states that a person acquiring a firearm or shotgun must produce to the seller the certificate or permit that allows them to lawfully buy or acquire the firearm or ammunition.

However, firearm, shotgun and [registered firearms dealers](#) certificates are more susceptible to forgery than some other official documents. In September 2024, a man in Bedfordshire killed three people and intended to kill others with a shotgun he illegally acquired from a certificate holder using a forged certificate. This highlights the risk that using paper certificates creates. To reduce this risk, there should also be a digital verification process. Buyers would have to present verifiable digital credentials as well as their paper certificate in all transfers.

The Driver and Vehicle Licensing Agency (DVLA) offers a clear UK precedent. Since 2025, drivers have been able to generate a QR verification code that allows third parties to verify licence details in real time. Drivers can alternatively call the DVLA to get their verification code.

In [the firearms licensing technology section of this report](#), we recommend replacing the [National Firearms Licensing Management System](#) with a secure, online national firearms register and licensing platform. The digital verification system should form part of this and automatically update the platform.

Implementing this system would require a change to legislation to make sure that electronic verification meets the statutory requirement to produce a certificate at the point of transfer.

### **Recommendation 3**

By 1 December 2027, the Home Office should introduce a [firearms licensing](#) verification system to supplement physical certificates and permits.

## Certificate applicants should be required to demonstrate competence in firearm handling

There is no legal requirement for applicants in England, Wales or Scotland to have training, or undergo an assessment of competence, on how to handle or use firearms safely, or on firearms law. This is unusual among comparable jurisdictions. Canada, all Australian states, New Zealand and many members of the European Union mandate at least safe handling training.

Requiring applicants to pass a standardised assessment of competence prior to submitting a licence application would make it easier for FELUs to assess applicants' suitability. We found broad support for this among the FELU practitioners we interviewed, as well as several other police officers and certificate holders.

### Recommendation 4

By 1 September 2028, as part of new firearms legislation, the Home Office should require all new firearm and shotgun certificate applicants to pass a standardised assessment of competence that includes the safe handling and use of firearms.

## The licensing regimes for section 1 firearms and section 2 shotguns should be aligned

Under the Firearms Act 1968, the licensing regime for section 1 firearms is stricter than the regime for section 2 shotguns in several respects.

In recent years, several reports have recommended removing the distinction between firearms and shotgun certificate requirements. This includes the [Independent Office for Police Conduct's investigation into the Plymouth mass shooting in 2021](#) and the UK Parliament's Scottish Affairs Committee's [2022–23 review of firearms licensing regulations](#). The senior coroner for Plymouth, Torbay and South Devon's report also raised concerns about "the continuing distinction between section 1 shotguns in respect of the conditions for granting a licence".

The government's 2023 public consultation didn't include aligning section 1 and section 2 controls, apart from introducing a requirement for section 2 applicants to provide two referees in line with section 1 applicants.

The subsequent government adopted a different position. In its February 2025 response to the consultation it stated:

"The Government takes the view that shotguns are no less lethal than other firearms that are controlled under section 1 of the Firearms Act 1968, and that it is right to look again at the differences in the controls."

We have assessed the case for aligning specific elements of the section 1 and section 2 licensing regimes.

**Legislation should require applicants and certificate holders to provide a good reason for acquiring and possessing each section 2 shotgun**

Section 27(1) of the Firearms Act 1968 requires a person applying for a section 1 firearm certificate to show “a good reason for having in his possession, or for purchasing or acquiring, the firearm or ammunition”.

As a result, the applicant must provide a good reason for each individual firearm. A section 1 firearm certificate holder who wants to acquire an additional firearm must apply to the chief officer for a variation to their certificate. In this application, they must set out the firearm they wish to acquire and their good reason for doing so.

By contrast, section 28(1A) states that a shotgun certificate mustn’t be granted or renewed if the chief officer of police is satisfied that the applicant doesn’t have a good reason for possessing, purchasing or acquiring a shotgun.

In practice, FELUs assess whether the applicant lacks good reason to possess a shotgun certificate. Once granted, a section 2 certificate holder may possess as many shotguns as they like, without having to provide a good reason for each.

Under [section 33](#) of the Firearms (Amendment) Act 1997, certificate holders only need to notify the chief officer within 7 days of taking possession of a shotgun for more than 72 hours.

Changing the law to require section 2 applicants and certificate holders to give a good reason for possessing each shotgun would:

- allow FELUs to refuse applications for shotguns that lack good reason;
- give FELUs richer data to continuously assess certificate holders’ suitability to hold a certificate; and
- improve the accuracy of a national firearms register by requiring the chief officer to approve each acquisition in advance.

With the digital verification we proposed [in the digital verification section](#), the certificate would update automatically when a FELU approved a variation. The certificate holder would then present verifiable digital credentials at point of sale or transfer, confirming the FELU’s approval for the specific shotgun.

Shooting organisations object to the introduction of good reason for each individual shotgun, arguing that it would place a disproportionate burden on legitimate users who often own several shotguns for varied purposes.

However, [Home Office statistics](#) show that as at 31 March 2025, an average of 2.8 shotguns were held on each shotgun certificate, compared to 4.3 firearms on each firearm certificate. On this basis, a ‘good reason per gun’ model would, on average, place a lighter administrative burden on shotgun certificate holders than the burden firearm certificate holders already experience.

Some interviewees, including from shooting groups, representatives of the gun trade and some police personnel in firearms licensing roles, raised concerns about the potential harmful effect this proposal would have on the gun trade and the wider UK economy.

A wide range of interviewees, including many who support alignment, also raised concerns that this would increase demand for FELUs and increase processing times. Appropriate resourcing of FELUs and, in time, the new national firearms licensing authority recommended in [the firearms licensing structure section](#), would be necessary.

### **FELUs should be able to place conditions on how certificate holders use and store individual shotguns**

Under section 27(2) of the Firearms Act 1968, a chief officer may impose specific conditions on individual firearms. These conditions can specify how, where or for what purpose a certificate holder may possess or use a firearm.

By contrast, [rule 4\(4\) of the Firearms Rules 1998](#) provides that a shotgun certificate “shall be granted or renewed subject to the following conditions”. The prescribed conditions are far less specific than those FELUs can apply to firearms. FELUs have no power to tailor conditions to individual shotguns.

### **FELUs should have power to partially revoke section 2 shotgun certificates**

[Section 30B of the Firearms Act 1968](#) gives chief officers the power to partially revoke a section 1 firearm certificate where the holder no longer has a good reason for possessing a particular firearm or ammunition. As the section 2 regime doesn’t require a good reason for each shotgun, there is no equivalent power for individual shotguns.

If Parliament aligns the good reason test across firearms and shotguns, it should also provide a power of partial revocation for shotgun certificates.

### **Legislation should have a simplified and consistent minimum age framework**

The minimum age requirements that apply to section 1 firearms and section 2 shotguns are complex and inconsistent. The requirements differ depending on whether:

- a person is purchasing, possessing, given, or using a gun;
- the activity takes place under supervision or as part of an organised activity; or
- the gun is a section 1 or section 2 firearm.

For example, the law sets a minimum age of 14 to hold a firearm certificate but imposes no minimum age for the grant of a shotgun certificate. In some respects, however, shotgun restrictions are tighter. A 14-year-old with a section 1 certificate may lawfully possess a firearm. But a 14-year-old commits an offence if they have an assembled shotgun, unless supervised by someone over 21 or the shotgun is securely fastened so that it can't be fired.

There should be consistent and simplified rules for firearms minimum age requirements.

### **Alignment of the section 1 and section 2 firearms licensing regimes should include ammunition**

The licensing regimes also control ammunition differently. It is an offence for a non-certificate holder to possess section 1 ammunition. But anyone can buy section 2 ammunition with a certificate holder's certificate and their written permission.

[Rule 3\(4\)\(iv\)\(a\) of the Firearms Rules 1998](#) requires the holder of a firearm certificate to securely store the firearms and section 1 ammunition covered by the certificate. There is no similar requirement for section 2 ammunition. This is despite the government's [Firearms security handbook](#) recommending that such ammunition is "locked away".

We recommend the alignment of section 1 and 2 ammunition controls. We recognise the implications, including potential costs to some certificate holders. It would also introduce controls on the maximum amount of section 2 ammunition certificate holders could possess at any one time. To reduce the burden of this on both FELUs and certificate holders, we suggest that FELUs need only specify the maximum number of cartridges per gauge.

We heard that alignment of ammunition would increase the cost of transporting section 2 ammunition. We disagree. Rule 3(4)(iv)(b) of the Firearms Rules allows for a relaxation of otherwise very strict security requirements for section 1 ammunition, with reasonable precautions, in the following circumstances:

"Where a firearm or ammunition to which the certificate relates is in use or the holder of the certificate has the firearm with him for the purpose of cleaning, repairing or testing it or for some other purpose connected with its use, transfer or sale, or the firearm or ammunition is in transit to or from a place in connection with its use or any such purpose, reasonable precautions must be taken for the safe custody of the firearm or the ammunition."

### **Alignment of the section 1 and section 2 licensing regimes is necessary**

We recognise concerns about potential administrative burden, resourcing and economic implications, but we consider that alignment of the section 1 and section 2 licensing regimes is necessary and proportionate.

As part of this, the government should consider reviewing the list of good reasons for firearms and shotguns.

This would strengthen the police's ability to assess and manage risk to keep the public safe.

The perpetrators in Woodmancote (2020), Keyham (2021) and Epsom (2023) committed multiple murders with shotguns. These cases underline that the risks posed by section 2 firearms are, in practice, no lower than those posed by section 1 firearms.

### **Recommendation 5**

By 1 September 2028, as part of new firearms legislation, the Home Office should work to align the [firearms licensing](#) regimes for Firearms Act 1968 [section 1](#) and [section 2](#) firearms and ammunition.

## **There should be a statutory responsibility to inform FELUs about the death of certificate holders**

There is no statutory requirement to tell police forces about the death of a certificate holder and there is no arrangement in place for the national [General Register Office](#), or local superintendent registrars, to share notifications of deaths with the police. This creates a clear risk. In one FELU, when personnel visited certificate holders over 70 years old, 6 of the first 12 had died and their firearms were still in the house.

### **Recommendation 6**

By 1 September 2027, the Home Office and the [National Police Chiefs' Council](#) lead for [firearms licensing](#), working with the Registrar General for England and Wales and the [General Register Office](#), should seek to develop a process to:

- notify police forces regularly of all deaths registered in their area; and
- require forces to cross-reference this information with firearm and shotgun certificate records so they can recover firearms promptly after a certificate holder's death.

## **Other legislative amendments**

Later in this report, we highlight issues relating to [fees](#) and [appeals](#) and make recommendations that will also require legislative changes.

### 3. Firearms licensing guidance

#### **The Home Office and policing have failed to develop clear firearms licensing rules and guidance**

##### **We highlighted problems with firearms licensing guidance in 2015**

The licensing of firearms is a legal requirement that police forces must apply consistently across England and Wales. However, in [our 2015 firearms licensing inspection report 'Targeting the risk'](#), we stated:

“On too many occasions, the police are not following the Home Office guidance or the Authorised Professional Practice that are in place. And the guidance and practice in many respects are inadequate, allowing room for interpretation and the creation of inconsistency in the way firearms licensing is undertaken within and between police forces. This creates an environment in which members of the public are let down and their safety compromised. This is not acceptable.”

Over a decade later, this is still an accurate description of [firearms licensing](#) in England and Wales.

In our 2015 report, we highlighted:

“Substantial volumes of guidance can be distilled into a far simpler set of requirements which, if drafted appropriately, need not be spread over hundreds of pages. This will ensure greater clarity, better accessibility and considerably more consistency of approach.”

We recommended that:

“Immediately, the Home Office should take the steps necessary to distil the key elements of its guidance into a set of rules which carry the weight of the law to facilitate their consistent application and enforcement.”

In response to our recommendations, the government introduced [section 55A](#) of the [Firearms Act 1968](#). This provision empowers the Home Secretary to issue guidance to [chief officers](#) of police in relation to firearms licensing.

In 2021, following consultation, the Home Office published [Firearms licensing: statutory guidance for chief officers of police](#). This is intended to help chief officers in carrying out appropriate, proportionate and consistent checks and assessments in order to come to an informed decision. It updated the guidance in 2023 and again in 2025.

We found that forces were interpreting the guidance differently, which is creating inconsistency in firearms licensing decisions.

At the time of our inspection, the Home Office website hosted two versions of the 2025 statutory guidance, in PDF and HTML format. These versions weren't identical. We made Home Office officials aware and, by time of writing, they had resolved the problem.

### **Statutory guidance hasn't created a clear, enforceable framework for firearms licensing**

#### [Guidance is still fragmented over multiple documents](#)

The statutory guidance isn't a consolidation of the substantial volumes of guidance that we recommended in 2015. Instead, crucial guidance on elements of firearms licensing is included in:

- the 45-page statutory guidance;
- the 51-page [Firearms security handbook 2020](#);
- the [College of Policing's firearms licensing authorised professional practice](#); and
- the 224-page [guide on firearms licensing law](#), known as the 'Home Office Guide'.

Large sections of the Home Office Guide focus on interpreting and reconciling the complex and fragmented legislative framework we describe in [our chapter on legislation](#). It also includes guidance on some high-risk areas, such as visitors' permits, that aren't covered in the statutory guidance. As a result, the statutory guidance doesn't provide a complete account of firearms licensing practice on its own.

[Statutory guidance doesn't represent the clear set of rules which "carry the weight of the law" that we recommended in 2015](#)

Our recommendation echoed those made in the Home Affairs Commons Select Committee [2010 report on firearms controls](#), an Association of Chief Police Officers' [report into the shootings in Cumbria in 2010](#) and a report by the then Independent Police Complaints Commission following the same incident. All three reports recommended changing the status of Home Office guidance to an approved code of practice.

In our 2015 report, we noted that "action has not been taken to implement these recommendations". Despite our recommendation, it still hasn't.

Unlike the [Police and Criminal Evidence Act 1984 codes of practice](#), there is no statutory process to monitor forces' compliance with the guidance, or to assess justifications for departure from it. The PDF version of statutory guidance states that:

“Chief officers of police must have regard to such guidance [and it] must be taken into account and if there is a decision to depart from it, there must be clear reasons to justify that departure on a case-by-case basis.”

We found that some forces have adopted blanket departures from elements of the guidance, rather than deciding on a case-by-case basis.

### Statutory guidance is too open to interpretation

Even if the statutory guidance was enforceable, it isn't fit for purpose. It is ambiguous and doesn't make chief officer actions mandatory. Forces are therefore continuing to interpret it differently. For example, it states chief officers “should consider” applications for renewal on a case-by-case basis and “may wish” to take into account certain factors. It also states that where an applicant has changed referees, police “should be prepared to” look into the reasons why the referees have changed.

The government should introduce mandatory rules for firearms licensing, on the same legal footing as the Police and Criminal Evidence Act 1984 codes of practice.

### Recommendation 7

By 1 September 2028, the Home Office, in consultation with the [College of Policing](#), the [National Police Chiefs' Council](#), [Police Scotland](#) and other stakeholders, should introduce legally enforceable rules for [firearms licensing](#) on a similar legal footing to the [Police and Criminal Evidence Act 1984 codes of practice](#).

This should replace firearms licensing guidance that is in the:

- [Statutory guidance for chief officers of police](#);
- [Guide on firearms licensing law](#); and
- [Firearms security handbook 2020](#).

## 4. Firearms licensing practice

During our inspection, we found that [firearms and explosives licensing units \(FELUs\)](#) were inconsistent in how they interpreted guidance and carried out [firearms licensing](#). In this chapter, we highlight these inconsistencies, which support our recommendation for the Home Office to establish a national firearms licensing authority.

### **FELUs are inconsistent in the suitability checks they carry out**

Grant and renewal are distinct stages in the firearms licensing process. In both, FELUs assess the suitability of a person to possess a firearm.

#### **FELUs don't carry out consistent checks of police systems**

The Home Office [Firearms licensing: statutory guidance for chief officers of police](#) states that “all applicants should be checked against the widest relevant databases to gather conviction, intelligence and counter terrorism data”. However, it doesn't specify which systems FELUs must check or set minimum expectations for the depth of those checks.

While statutory guidance stipulates that “background checks ... apply to renewals as they do to grants”, it is less prescriptive in relation to renewals. Aside from medical checks [described in the medical suitability assessments section of this report](#), the guidance provides no clear direction, stating instead that “it is a matter for chief officers to consider whether any additional checks are necessary ... but, in doing so, the primary consideration must be public safety”. It directs readers to a section on additional checks and a list of factors they “may wish to take into account”.

As a result, we found practice to be inconsistent. All the FELUs we inspected carried out police background checks of grant and renewal applications, but the breadth and depth of those checks varied. Applicants and certificate holders may therefore be subject to different levels of scrutiny depending on the force to which they apply.

#### **FELUs take inconsistent approaches to the period covered by their renewal checks**

Statutory guidance doesn't specify how far back firearms licensing [personnel](#) should look when checking applicants' suitability at renewal. As a result, we found different practices across the FELUs we inspected.

Some routinely carried out checks covering the whole of the applicant's life, while others only looked back five or ten years. One unit had recently shortened the period they checked to manage backlog pressures, prioritising demand over risk. Even within one FELU, we found different personnel going back further than others, demonstrating poor supervision and oversight.

Limiting checks to a set number of years carries inherent risks. It may prevent FELUs from:

- assessing certificate holders against new suitability criteria that statutory guidance introduced in 2023 and 2025;
- identifying patterns of behaviour; or
- detecting risks that the FELU didn't adequately consider at the original grant.

New rules should therefore require that, when there has been a change in guidance since the grant or last renewal, FELUs should carry out suitability checks covering the lifetime of the applicant, as they would for first time applicants.

### **FELUs don't carry out consistent background checks on people who live at, or have access to, the address where certificate holders store their firearms**

Certificate holders must store their firearms securely. Failure to do so can have tragic consequences. Unpublished [National Police Chiefs' Council \(NPCC\)](#) data shows that during 2025, five people who weren't certificate holders but had access to premises where licensed firearms were stored took their own lives using a certificate holder's firearm.

It is therefore essential that FELUs don't assess applicants' and certificate holders' suitability without considering the people who have access to the premises where the firearms will be stored. However, the statutory guidance doesn't provide an effective or consistent framework for identifying household-related risks.

The guidance states that FELUs must refuse or revoke a certificate where there is evidence linking a household member, or associate with access to the address, to serious risk factors. These factors include sexual offending and [domestic abuse](#). This applies unless there are exceptional circumstances.

It also includes a non-exhaustive list of "other serious factors" which, where they apply to the applicant, a household member or an associate, "will tend to demonstrate a potential danger to public safety or to the peace".

These factors support decisions to refuse an application or revoke a certificate. But the guidance doesn't require FELUs to carry out routine enquiries into household members or associates with unsupervised access to the address where the certificate holder stores their firearms. Instead, it treats these checks as one of several additional steps that FELUs may wish to take when assessing grant applications, where initial

enquiries lead them to believe further checks are necessary. It only lists these checks at renewal as matters that FELUs “may wish to take into account”.

We found differing practices in the FELUs we inspected. Four carried out checks on household members or associates routinely, whereas two applied a case-by-case approach. Among those that carried out checks, there were further differences in how they defined ‘associates’ and in the minimum age of household members subject to checks, ranging from all household members to those aged eight or over.

New rules should require FELUs to routinely assess the suitability of household members from a specified age. Any adverse findings wouldn’t necessarily render an applicant or certificate holder unsuitable. Instead, they may indicate that firearms should be stored at another location.

### **FELUs don’t always contact referees at grant or renewal**

Following [our 2015 firearms licensing inspection](#), we reported that Home Office guidance didn’t explicitly require forces to contact referees and found that only 28 forces did so. We concluded that there should be no discretion in this matter and that the lack of consistency in whether forces contacted referees at both grant and renewal was unacceptable.

Statutory guidance now clearly states that, at grant, all applicants must provide two referees and that “both of the applicant’s referees must be contacted”.

This isn’t happening in all cases. A manager in one of the FELUs we inspected told us that due to insufficient staffing, firearms licensing practitioners assessing applications would speak to one referee and decide whether it was necessary to contact a second. This is a clear failure to comply with statutory guidance.

During our case file review in another FELU, we saw that personnel had granted an initial application without contacting either referee. As the force’s policy required referees to be contacted, this appears to be another example of poor supervision and oversight.

In relation to renewals, statutory guidance isn’t clear. It states that: “Chief officers should determine whether it is necessary to contact referees, but the assumption should always be that referees will be contacted unless there are specific good reasons why this is not necessary.”

This has resulted in widespread inconsistencies. One of the FELUs we inspected mandated contacting referees at renewals. Another told us it didn’t do so, as it would need “a massive staffing uplift”. And firearms licensing practitioners in a third told us there was no local policy or standard operating procedure for this.

Inconsistent practice such as this remains unacceptable.

## **Not all FELUs pay sufficient attention to why a certificate holder has changed referees**

Statutory guidance states that “particular attention should be paid in cases where the referees have changed since the original application”.

While some FELUs we inspected follow this guidance, one told us it had formally departed from it on the basis that it was “unnecessary” and of “no benefit”. This doesn’t meet the threshold for a case-by-case departure from statutory guidance. By failing to follow statutory guidance, these practices create avoidable risks.

## **FELUs set different requirements on applications from foreign nationals and those who have resided overseas for prolonged periods**

Statutory guidance states that foreign nationals “should be required to provide a background check (such as a police certificate or equivalent) from their country of nationality and any other country where they have lived”. Where this isn’t available, the application “should normally be refused, unless there are exceptional circumstances”.

The guidance also states that where any applicant, including UK nationals, has been resident overseas for a significant period (more than six consecutive months), FELUs “should” check the overseas police’s [intelligence](#) records.

FELUs have developed different practices. One FELU we inspected required [INTERPOL](#) checks along with foreign police certificates, while another relied solely on foreign police certificates. Some interviewees acknowledged the risks associated with relying on foreign police certificates. They have no way of authenticating a translation of a foreign police certificate or the certificate itself. As one firearms licensing manager said, they just must “trust it”. Suitability assessments that depend on trusting an applicant, rather than on verifiable evidence, carry risks.

In contrast, the Welsh Government’s [Guidance for licensing taxi and private hire vehicles](#) is explicit. It states that applicants who have spent six months or more residing outside the UK while aged 18 or over need to provide a criminal record check from the country or countries visited during that period. It continues:

“For those countries for which checks are not available, the Licensing authority will require a certificate of good conduct authenticated by the relevant embassy. The certificate must be authenticated, translated and sealed by the Embassy or High Commission.”

A competent judicial or administrative authority for the relevant country issues the certificate, which is an extract from the judicial record or equivalent document. It should document any convictions relating to the individual or confirm “good conduct”.

The UK government publishes [guidance on how to apply for criminal record checks relating to periods spent overseas](#).

Firearms licensing needs similarly clear instruction. Rules should set out defined expectations, or a consistent [risk assessment](#) framework, for applicants who can't obtain a criminal record check or a certificate of good conduct.

### **Recommendation 8**

By 1 September 2028, the Home Office should make sure that the new statutory rules for [firearms licensing](#) clearly set out the processes that apply to foreign nationals or those who have lived overseas for a prolonged period who apply for a firearm or shotgun certificate.

### **FELUs grant some initial certificates without a home visit**

In 2015, we recommended that “the Home Office should amend its firearms licensing guidance so that it explicitly requires the police to conduct home visits for all new grant applications”. The Home Office has implemented this recommendation.

Statutory guidance is now unequivocal about the requirement for a home visit at grant. Such visits provide assurance about suitability and security. The six FELUs we inspected all had policies reflecting this requirement. FELUs followed those policies in 370 out of the 377 cases we reviewed.

However, our case file review identified five initial grant applications, across four FELUs, where personnel didn't carry out an in-person home visit. In a further two cases, there wasn't enough evidence to determine whether a home visit had taken place.

### **FELUs' approach to home visits at renewal remains inconsistent**

In 2015, we reported that FELUs took different approaches to deciding whether to carry out home visits at renewal.

Although guidance allowed FELUs to risk assess when home visits were appropriate, it didn't specify the factors that should inform whether a visit should take place. We recommended that “the guidance should also set out more clearly the way in which the risk assessment process should be used to establish whether a home visit is required”.

Statutory guidance remains unclear and simply states:

“Home visits and inspections should be considered at the renewal of a certificate ... [and if] aspects of the home visit are not required ... an interview ... can be completed by an online video call or over the telephone although a home visit is preferable.”

It refers the [chief officer](#) to the list of factors they “may wish to take into account”.

As a result, significant inconsistencies persist across England and Wales. All the FELUs we inspected carry out some home visits at renewal. But they apply different thresholds for when to carry out an in-person visit, a virtual inspection or only make a telephone call.

In one force, shotgun certificate holders that the FELU assessed as low risk didn't even receive a phone call at renewal. One certificate holder told us they hadn't received a home visit since they moved to that FELU's area 24 years earlier. Not contacting certificate holders at renewal at all, or having such a long period between home visits, presents an unacceptable risk to public safety.

Carrying out a home visit at every renewal would provide greater assurance. In-person visits may identify concerns about a person's circumstances or household that wouldn't be apparent through remote contact.

Some FELU practitioners and managers said they would prefer this approach if resources allowed.

### **Case study 1**

A certificate holder applied to renew their shotgun certificate. They declared no relevant medical conditions. The medical proforma completed by the GP supported that declaration.

The [firearms and explosives licensing unit \(FELU\)](#) checked all relevant police systems. They found no cause for concern.

In some FELUs, this would have resulted in the renewal of the shotgun certificate without further enquiries or a visit to the applicant.

The FELU in this case arranged to visit the applicant as they were over 75 years old. A [firearms enquiry officer \(FEO\)](#) went to their home address at the prearranged time. They found the certificate holder drunk.

When challenged, the certificate holder told the FEO that if they wanted to find them sober, the appointment would have to be before 10am. The certificate holder's partner told the FEO that, since a bereavement, the certificate holder drank a bottle of whisky every morning. Their GP wasn't aware.

The FEO arranged for seizure of the weapons and ammunition. The FELU refused the renewal application.

## Recommendation 9

By 1 September 2028, the Home Office should make sure that the new statutory rules for [firearms licensing](#) clearly set out when forces must make in-person home visits as part of the firearms licensing renewal process.

### **There is no standard approach for the use of risk matrices and other checks**

All the FELUs we inspected had developed risk matrices to assess applications. However, their approaches differed significantly. None used the same criteria to assess risk. The number of risk categories also differed, resulting in inconsistent grading of applications.

FELUs used the risk gradings to:

- help determine what, if any, additional suitability checks to carry out;
- allocate cases to particular personnel; and
- decide who could make the final decision on whether to approve the application.

None of these approaches were consistent across the FELUs we inspected.

### **There is a risk that certificate holders remain in possession of firearms after their certificate expires**

FELUs must make sure that certificate holders don't keep possession of firearms once their certificate expires. In 2015, we stated that:

“For forces to allow certificate holders to possess firearms unlawfully is a serious failure; arguably, they have colluded in breaking the law. It is unacceptable behaviour which must stop immediately.”

We recommended that forces have “effective systems ... to ensure certificate holders are not permitted, at any time, to remain in unlawful possession of a firearm”.

In several FELUs we inspected, personnel proactively contacted certificate holders who either hadn't submitted a renewal application or had submitted one less than eight weeks before expiry. In each case, they told the certificate holder to lodge their firearms with a [registered firearms dealer](#) or with another certificate holder before the certificate expired.

Most units then carried out checks after expiry to confirm that certificate holders had lodged their firearms or arranged seizure where this hadn't occurred. But one unit didn't do so. Instead, personnel told us that if a certificate holder told them their firearms were in storage, they “must trust them” as the unit didn't have the resources to visit and verify this.

FELUs must make sure that effective arrangements are in place to verify compliance and take enforcement action where necessary.

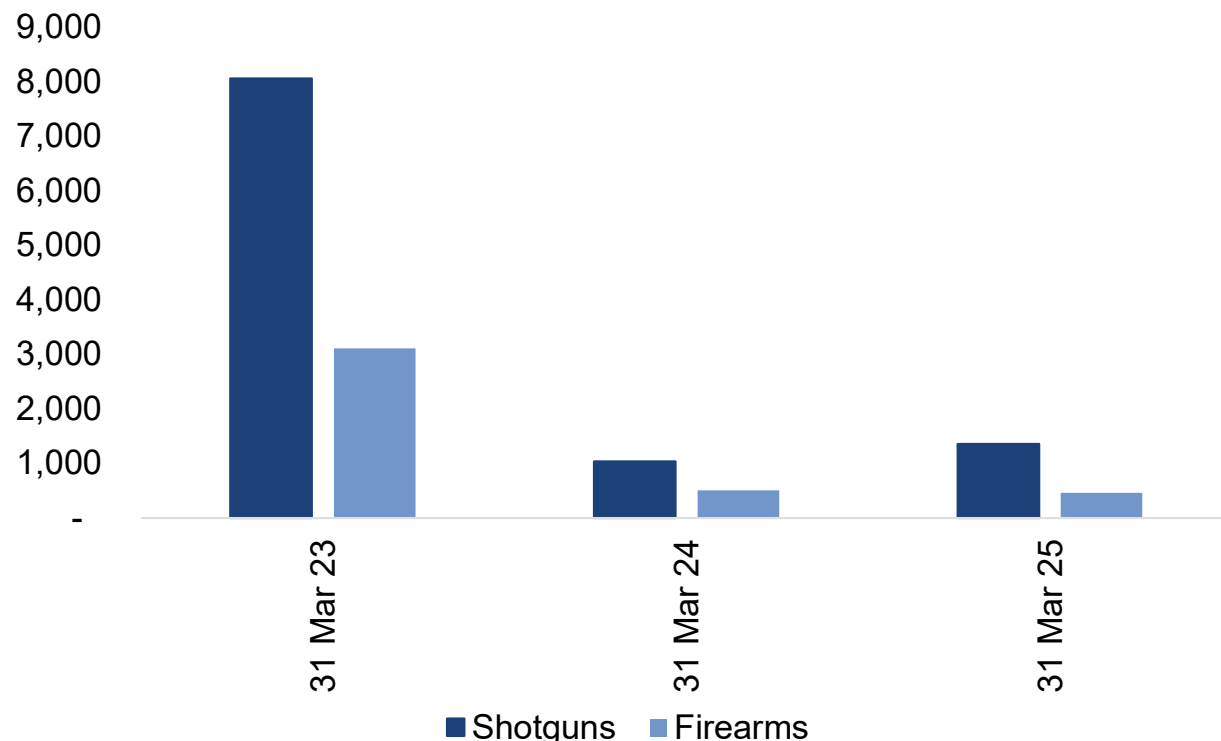
### Most FELUs don't rely on temporary permits to manage demand

[Section 7 of the Firearms Act 1968](#) allows chief officers to issue a temporary permit to allow a person to lawfully possess a firearm and ammunition in accordance with the terms in the permit. Historically, several FELUs have made significant use of temporary permits to manage certificate renewal backlogs. In 2015, we described this practice as an inefficient way of working.

Since 2023, the statutory guidance has been clear that “this practice must now be avoided as it conflicts with the principle of maintaining efficient and effective licensing arrangements”. The guidance also instructs chief officers to make sure that their firearms licensing departments have enough resources to effectively process applications, avoiding the need to rely routinely on temporary permits.

This change has been broadly successful, with a marked reduction in the number of temporary permits over time. Between the year ending 31 March 2023 and the year ending 31 March 2025, there was an 84 percent reduction in FELUs' use of temporary permits.

**Figure 1: Total number of temporary shotgun and firearm permits issued by forces in England and Wales between the year ending 31 March 2023 and the year ending 31 March 2025**



Source: [Firearms and shotgun certificates April 2024 to March 2025: data tables](#) from the Home Office

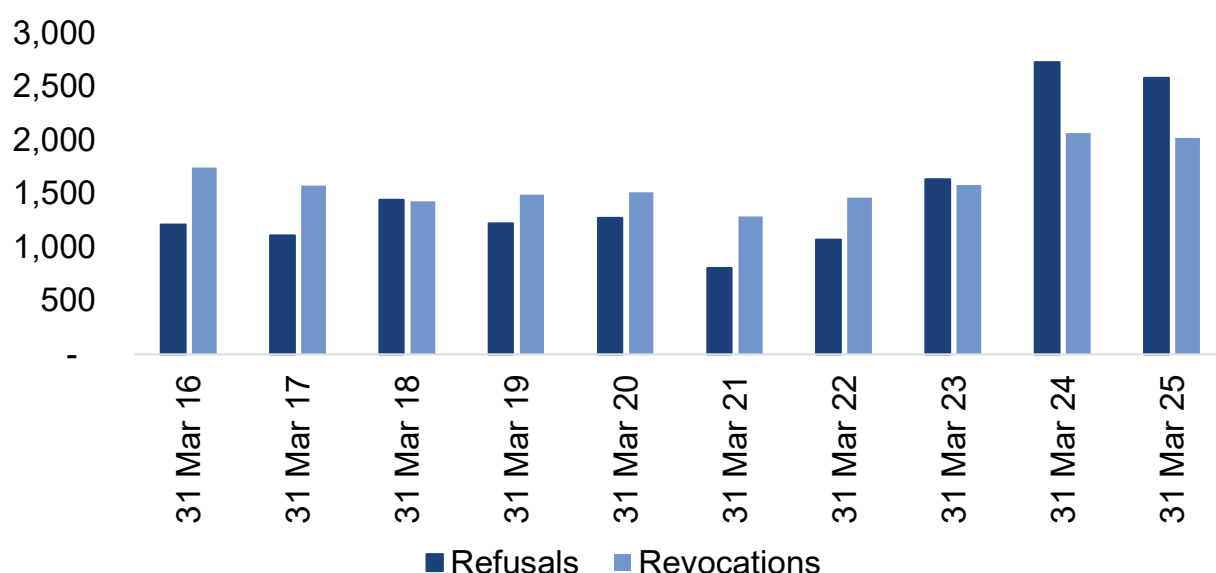
Chart description: Vertical bar chart showing the number of temporary permits over a three-year period. The number of temporary permits fell sharply between the year ending 31 March 2023 and the year ending 31 March 2024 for both shotguns and firearms. In the year ending 31 March 2025, permit numbers remained much lower than in 2022/23: shotgun permits increased slightly compared with 2023/24, while firearm permits decreased further.

As at 31 March 2025, 27 of the 38 FELUs had fewer than ten temporary permits. Of the remaining 11 FELUs, 1 accounted for 78 percent of all temporary permits nationally and continued to rely on using them to manage significant backlogs.

Chief officers should make sure that FELUs don't use temporary permits to manage demand and instead address backlogs through effective resourcing and governance.

### National data shows there has been an increase in the number of refusals and revocations

**Figure 2: Total number of refusals and revocations for firearms licensing applications made by forces in England and Wales between the year ending 31 March 2016 and the year ending 31 March 2025**



Source: [Firearms and shotgun certificates April 2024 to March 2025: data tables](#) from the Home Office

Chart description: Vertical bar chart showing the number of refusals and revocations for [firearms licensing](#) applications. The data shows a trend towards increasing numbers of refused and revoked applications, with a sharp increase for both in the year ending 31 March 2024. This continued into the year ending 31 March 2025 after relatively consistent numbers in the preceding years. The largest increases in the last two years are seen in the number of refused firearms licensing applications.

The increase in refusals and revocations, taken with the reductions in temporary permits, suggest that some FELUs are now more robust in their suitability assessments.

The underlying reasons for this may include:

- learning from the coroner's findings following the Plymouth shootings and from other inquests;
- changes to statutory guidance; and
- improved [professional curiosity](#) resulting from the [College of Policing](#) training for FEOs (see [our chapter on training](#)).

## Ongoing monitoring of risk following the grant of a certificate

Statutory guidance requires chief officers to have processes that help them to continuously assess certificate holders' suitability.

### FELUs are aware of certificate holders who come to police attention within their force area

All the forces we inspected had systems to notify their FELU when a certificate holder comes to police attention within their own force area. These arrangements generally worked effectively.

However, we identified an incident in which force systems didn't alert a FELU that police had [bailed](#) an individual to a firearm or shotgun certificate holder's address. This illustrates a gap in local notification arrangements and presents a clear risk. Forces and FELUs should make sure that their procedures are robust enough to identify such scenarios and mitigate the risk they present.

As part of our inspection, we checked whether forces correctly recorded firearm and shotgun certificate holders on their systems. We randomly selected 160 certificate holders from the [National Firearms Licensing Management System](#) across the FELUs we inspected and checked whether the police forces had applied the appropriate markers on their systems.

All 160 certificate holders had the correct markers on both the [Police National Database \(PND\)](#) and the [Police National Computer \(PNC\)](#), demonstrating strong compliance with national recording requirements.

On intelligence systems, forces correctly recorded name-based markers for 155 certificate holders and address-based markers for 133. One force accounted for 20 missing address markers. We raised this with the force. It told us it would take steps to address it.

### Many FELUs don't receive notification when certificate holders come to police attention in other force areas

The local systems that police use to [flag](#) incidents involving certificate holders typically operate only within a single force, or a small number of collaborating forces. As a result, they don't generate alerts when a certificate holder comes to police attention in another force area.

This lack of available information presents a significant risk to FELUs' ability to carry out continuous suitability assessment.

To address this problem, in 2022, Northamptonshire Police began a pilot to identify incidents in other force areas that involved its certificate holders. Each month, the force's FELU sends the system operator for the PND a list of its certificate holders. The system operator then manually uploads the list onto the PND. Each day, the FELU receives a list of notifications where new PND entries have matched the names, addresses or phone numbers of its certificate holders.

By November 2025, it had generated approximately 2,800 searches per day and sent more than 30,000 notifications to the FELU. Most of the notifications related to incidents outside Northamptonshire that the FELU wouldn't otherwise have been aware of.

### Case study 2

A certificate holder took a licensed shotgun from home to another police force area as they were planning to shoot while there. They should have stored the gun securely. However, they left the gun under their bed and forgot about it.

A cleaner found the gun and contacted the local police force, which issued a warning to the certificate holder but didn't take any formal action.

Consequently, there was no relevant entry on the [Police National Computer](#). The officers in the case didn't inform Northamptonshire Police's [firearms and explosives licensing unit](#) of the incident.

The unit only learned of the incident through a [Police National Database](#) notification. The unit carried out a suitability review and revoked the holder's certificate.

The pilot also included incidents where certificate holders' addresses had been used as a custody bail address. Reviewing these notifications was manageable and proportionate.

However, at the time of our inspection, the pilot couldn't be scaled nationally because:

- it relies on some manual processing; and
- the PND's existing infrastructure can't support the millions of daily searches that nationwide continuous monitoring would require.

The NPCC lead for firearms licensing has raised this problem with the Home Office. The Home Office should support the NPCC in looking for a technical solution to resolve this problem.

## Medical suitability assessments need to be strengthened

### The arrangements for medical suitability assessments of applicants are inconsistent

In our 2015 report, we raised concerns about how FELUs assessed applicants' medical suitability. We recommended the Home Office introduce a system that:

“Does not allow licensing to take place without a current medical report from the applicant's GP, obtained and paid for by the applicant in advance of an application for the granting or renewal of a certificate and which meets requirements prescribed by law”.

Since then, the Home Office, working with the NPCC and the British Medical Association, has introduced arrangements that represent progress. Applicants must now ask their GP, or another suitably qualified doctor registered with the General Medical Council, to complete a medical information proforma. The proforma tells the applicant they must “disclose any relevant physical or mental health conditions that they have been diagnosed with or treated for in the past”.

The statutory guidance is clear that a FELU mustn't grant or renew a certificate if the applicant doesn't provide a completed medical proforma. All the authorised grants we reviewed complied with this requirement.

Doctors should provide information based on a review of an applicant's full medical history, but they don't determine suitability. Instead, FELUs are responsible for taking the medical information into account when determining suitability. But FELU personnel have no medical training. We found problems and variations in the way that the medical proforma process is working, which we outline in this section of the report.

### Forces have different policies on obtaining medical history

Statutory guidance states that doctors should provide information based on the applicant's full medical history. It goes on to state that where records are incomplete, forces should judge whether the information provided is enough to judge an applicant's suitability.

In the absence of clear national rules, FELUs have developed different local approaches. For example, two FELUs had different policies for how many years of medical records they would accept if GPs were unable to review a full medical history.

One FELU we inspected only accepted applications where:

- at least 20 years of medical records were available;
- a GP had provided written confirmation of any gaps from the record; and
- they received a self-declaration from the applicant.

Another unit accepted ten years' medical history for grants and five years for renewals. It rejected applications that fell even slightly short of these thresholds.

As a result, an application could be refused on medical grounds by one FELU but could be granted by another.

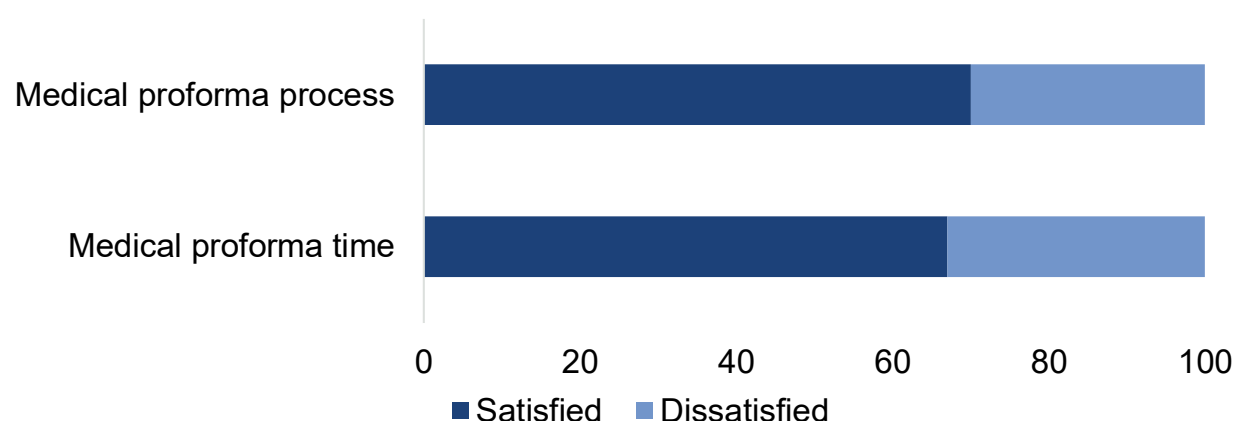
### The process for managing medical evidence has limitations

The quality of completed medical proformas varies significantly. Some contain detailed and meaningful information. Others provide minimal detail that requires FELUs to ask for clarification before assessing suitability.

It is not in GPs' NHS contract to carry out this role. Some GPs use IT systems that populate the form automatically using coded entries. This can simplify the task but can also miss relevant information recorded in free text. GP records in some NHS trusts aren't fully digital. This means GPs must review older paper files, some of which are incomplete or illegible.

The results of our survey of firearms certificate holders showed that 70 percent of applicants were satisfied with the medical proforma process, with 30 percent dissatisfied.

**Figure 3: Proportion of survey respondents who reported they were satisfied with the medical proforma completion process and how long the process took**



Source: [Firearms certificate holders survey](#) from HMICFRS

Chart description: Horizontal bar chart showing process and time satisfaction levels across survey respondents. The chart shows that respondents' views of the medical proforma are broadly positive, with slightly higher satisfaction expressed with the process than with the time taken to complete. 70 percent of respondents (7,055) reported being satisfied with how the medical proforma process worked overall, while 30 percent (2,999) were dissatisfied. Satisfaction with the time taken to complete the medical proforma was marginally lower, with 67 percent satisfied and 33 percent dissatisfied.

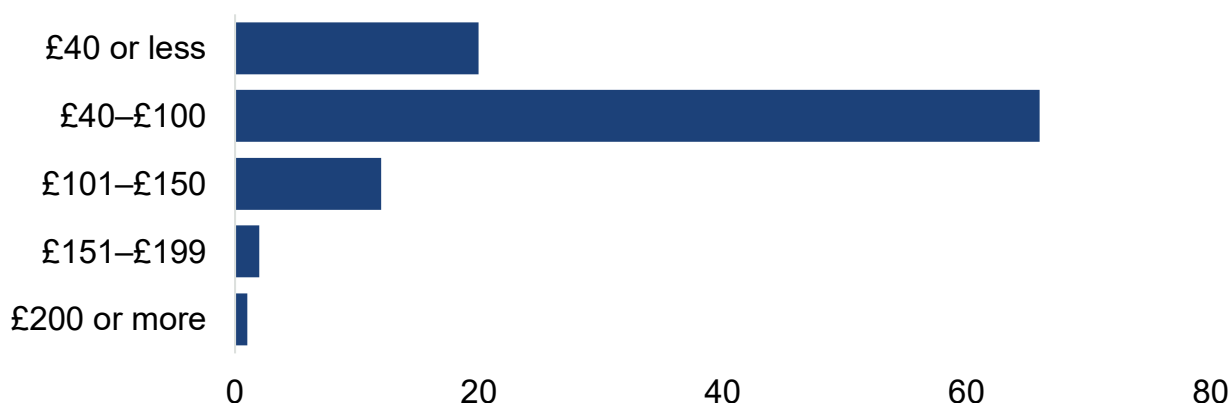
They also reported concerns with the time GPs take to complete it (33 percent dissatisfied) and reported lost medical records.

One respondent told us:

“The biggest problem with the process is the GPs’ unwillingness to provide forms in a timely manner. It took three attempts and three copies of documents to finally get them to do the paperwork. It took them months.”

Cost also emerged as a consistent concern for respondents, with a wide variation in how much they reported paying for the medical proforma. This has implications for fairness and accessibility.

**Figure 4: Proportion of survey respondents who reported how much their medical proforma cost as part of the firearms licensing process**



**Source:** [Firearms certificate holders survey](#) from HMICFRS

Chart description: Horizontal bar chart showing the amount respondents paid for their medical proforma. Around two thirds of respondents (66 percent, 6,614 applicants) reported costs in the range of £41–£100, making this the most common experience. A further 20 percent (2,013) paid under £40. While a smaller but notable minority faced higher costs, with around 12 percent (1,175) paying between £101 and £199 and a very small proportion (around 1 percent, 173 applicants) paying over £200.

The police aren’t responsible for these issues, but they affect the overall service that applicants receive and contribute to inconsistency across the licensing system.

Although the proforma system is an improvement, it doesn’t provide consistent assurance to police or the public and risks to public safety remain.

### **There is a risk that FELUs don’t receive information about relevant changes to certificate holders’ medical circumstances**

In our 2015 inspection report, we recommended the Home Office develops:

“A process whereby GPs are required, during the currency of a certificate, to notify the police of any changes to the medical circumstances (including mental health) of the certificate holder which are relevant to the police assessment of suitability for such a certificate.”

Since then, the NHS has introduced a digital firearms marker on the main GP clinical systems in England. The system wasn't fully in place until 2023. When a patient applies for or is granted a firearm certificate or a shotgun certificate, the GP should add the firearms marker to the patient's medical records. The marker prompts the GP to alert the police if the certificate holder develops a relevant medical condition.

In England, between January 2022 and December 2025, the digital firearms marker led GPs to inform the police of medical concerns about certificate holders on 3,360 occasions.

### **The Home Office hasn't mandated that GPs use firearms digital markers**

GPs don't have to use firearms digital markers. Instead, a 2019 memorandum of understanding, signed by the British Medical Association, the NPCC and the Home Office states:

"GPs are encouraged to place a firearms flag on GP records, to alert the GP if a patient begins to suffer from a relevant medical condition while the firearms licence is valid ... the GP will endeavour to share such information with the police, while recognising no legal liability if they fail to do so."

In its [2023 public consultation](#), the Home Office asked for views on whether to mandate GPs to use the firearms digital marker and to provide medical information at application and renewal. Police and law enforcement representatives, [victims](#), friends or family of victims, members of the shooting community, and farming and rural communities all strongly supported introducing this, as did a small majority of medical professionals.

During our inspection, many people, including FELU practitioners, other policing personnel and representatives of local medical committees echoed these views.

The government decided not to mandate GPs to use digital markers. In its [response to the consultation](#), it noted the successful roll-out of the digital medical marker to all GP surgeries in England. It stated that it would "keep the issue under review". In January 2026, the government reiterated that it doesn't consider it necessary to mandate markers as "the available data indicates that most GPs in England are applying the digital firearms marker as they are expected to".

We appreciate the work the government has done to try to strengthen the arrangements and its wish to avoid imposing additional obligations on general practice. Mandating GP compliance would require legislative change or contractual agreement. It would also require careful arrangements to manage non-compliance.

However, in a licensing regime that is critical to public safety, we consider that all, not most, certificate holders should be subject to the same level of medical monitoring. The memorandum of understanding's model, which interviewees described as requiring GPs to make "best endeavours", hasn't achieved this. Gaps in coverage and risk are inevitable if GPs' compliance is voluntary.

For these reasons, we consider that mandating the use of firearms digital markers on medical records would reduce the risk to public safety and provide a more consistent national framework for ongoing medical monitoring.

### **There are significant gaps in the systems for ongoing assessment of medical suitability**

At the time of our inspection, NHS Wales didn't have a digital firearms marker for certificate holders. It is due to introduce this in 2026, which should bring arrangements more closely in line with those in England.

NHS IT systems are fragmented. A GP may not find out about relevant diagnoses or prescriptions from hospitals, walk-in centres or mental health teams in a timely manner, or at all.

There are existing markers used across the NHS for some [safeguarding](#) purposes. The government should consider exploring the feasibility of introducing a similar NHS-wide marker for firearms licensing. This would help relevant clinicians across the NHS to identify certificate holders and route concerns appropriately.

Even this wouldn't flag all relevant medical changes, as it wouldn't cover private treatment, or treatment obtained online or overseas. The double murder in Epsom in February 2023 illustrates this risk. An online doctor had treated the certificate holder's anxiety. Neither the GP nor police knew about this, and the certificate holder didn't disclose it at renewal.

This case shows that some risks arise not only from failures of information gathering or sharing within health systems, but from the absence of a clear, enforceable duty on certificate holders to notify the police of relevant changes in their medical circumstances.

In our 2015 inspection, we recommended that the Home Office introduce a statutory requirement for certificate holders to notify the police of any relevant changes to their medical circumstances. The Home Office hasn't implemented this recommendation.

This requirement wouldn't eliminate risk. However, it would make expectations clear to certificate holders, reinforcing the seriousness of their responsibilities. It would also support effective licensing decision-making by providing a clearer basis for assessing non-disclosure where information later becomes known.

We heard that some certificate holders avoid visiting their GP for fear of losing their certificate. This is detrimental to their health and creates unmanaged risk to public safety.

## **To manage risk effectively, applicants should also have a medical assessment**

We consider that even a mandated system of record-based proformas, GP markers, and self-disclosure alone wouldn't provide sufficient assurance of the ongoing medical suitability of applicants and certificate holders.

A stronger and more proportionate approach would be a model that combines:

- in-person, health practitioner-led medical assessments when applying for or renewing a certificate, to assess fitness and identify any concerns that may not be visible in records;
- mandatory information-sharing arrangements that make sure relevant changes in a certificate holder's medical circumstances identified anywhere in the NHS are brought to the attention of the FELU; and
- a statutory requirement for certificate holders to notify the police of any relevant changes to their medical circumstances.

The assessments should be carried out by registered healthcare professionals who have been trained to carry out this role. A central medical unit in a national firearms licensing authority would receive these assessments and decide medical suitability. This would inform firearm licensing personnel's overall decision to grant or renew a certificate. This approach would improve consistency and reduce pressure on general practice.

Western Australia's licensing system has introduced structured medical assessments designed to assess a person's suitability to possess and use firearms safely at grant and renewal. In the UK, pilots and heavy goods vehicle licence holders have to take periodic health assessments. These examples illustrate that medical assessments can and do form part of modern licensing systems.

### **Recommendation 10**

By 1 September 2028, the Home Office should introduce a requirement for all firearm and shotgun certificate applicants, and certificate holders at renewal, to have an in-person medical assessment with an approved clinician.

### **Recommendation 11**

By 1 September 2028, the Home Office should establish a statutory requirement for firearms and shotgun certificate holders to notify the [firearms and explosives licensing unit](#) and when operational, the national [firearms licensing](#) authority, within seven days of any relevant changes to their medical circumstances.

## Arrangements for processing visitors' permits pose potential risks to public safety

[Section 17 of the Firearms \(Amendment\) Act 1988](#) allows visitors to Great Britain to possess firearms, shotguns or ammunition without holding a certificate, provided the police grant them a visitors' permit. A sponsor, either a company based in Great Britain or a resident, must apply on the visitor's behalf. The sponsor doesn't have to be a certificate holder. As with certificates, forces mustn't grant a permit if doing so could endanger public safety. They must also be satisfied that the visitor has a good reason for each firearm.

The [guide on firearms licensing law](#) recognises that forces can't make detailed enquiries into a visitor's suitability to hold a firearm. It instructs them to direct enquiries to the sponsor rather than the visitor.

FELUs, therefore, must base their determination of suitability on:

- seeing the visitor's home country firearm certificate, shotgun certificate, hunting licence or similar authorisation; and
- checking the sponsor's identity and the accuracy of the information they provide.

This approach poses risks.

Sponsors often don't know visitors personally and there is no requirement for sponsors to provide criminal record checks or other background checks relating to the visitor. As a result, forces must rely on the robustness of firearms licensing arrangements in the visitor's home country.

While this is consistent with practice in many similar jurisdictions, it presents a risk. The Home Office should consider the approach taken by the [New Zealand Te Tari Pūreke Firearms Safety Authority](#), which restricts visitor licence eligibility to applicants from countries that have similar firearms safety and licensing practices.

Given the limited information available to FELUs about visitors, it is essential they strictly apply the requirements of the guide on firearms licensing law. However, our review of 27 case files found widespread non-compliance:

- Across two FELUs, in three cases practitioners hadn't recorded how they verified the sponsor.
- Across three FELUs, personnel granted six permits without robust confirmation that the visitor held relevant permissions in their home country. For example, they accepted a hunting and fishing permit as appropriate evidence and accepted a document without translating it into English.
- In five cases, across two FELUs, we found no evidence that FELU personnel had verified a visitor's "good reason" for having a firearm, despite the guide making it clear they should usually confirm this with the sponsor.

- In 21 cases, across five FELUs, we didn't find a sufficiently detailed rationale for the FELU's decision to issue the permit.
- Across three FELUs, practitioners granted five permits despite the sponsor failing to specify where guns would be stored or detail appropriate security arrangements.

Taken together, these findings demonstrate that many FELUs treat visitors' permit applications as a largely administrative task rather than as a suitability assessment with significant public safety implications.

## Recommendation 12

By 31 March 2027, the Home Office and the [National Police Chiefs' Council](#) should review the visitors' permit regime to reduce the inherent risks to public safety. As part of this review, they should consider whether visitors' permits should be restricted to applicants from countries with [firearms licensing](#) and safety practices similar to those in Great Britain.

In the interim, chief constables should make sure that [firearms and explosives licensing units](#) assess visitors' permit applications in line with the [Guide on firearms licensing law](#).

We also found weaknesses in the monitoring arrangements for firearms brought into Great Britain under the visitors' permit regime. These weaknesses create risks to public safety.

## Firearms importation processes pose significant risk to public safety

We found weaknesses in the arrangements for sharing and recording information relating to firearms imported and exported by registered firearms dealers. These weaknesses limit FELU's ability to maintain effective oversight, which creates a significant risk to public safety.

## Decision-making is inconsistent

### Law and guidance aren't suitably robust or clear whether applicants with a criminal history are prohibited from having a certificate

Chief officers and FELUs are required to decide whether an applicant can possess a firearm without endangering public safety. In making this judgment, decision-makers consider many factors, including past criminal or alleged criminal behaviour. However, the law and guidance are unclear when such behaviour should result in a decision to refuse an application or revoke a certificate.

[Section 21 of the Firearms Act 1968](#) automatically bans a person from possessing a firearm based on the length of a custodial sentence. A sentence of three months or more, but less than three years, leads to a five-year ban, while a sentence of three years or more results in a lifetime ban. However, sentencing practices have changed over time, creating unfair outcomes. Individuals who committed similar offences may face different firearm eligibility depending on when they were sentenced.

Following the Keyham inquests, the senior coroner argued that sentence-based bans no longer reflect modern criminal justice practices and fail to link firearm restrictions to the nature of offending. Although the government considered reforming the law in its 2023 public consultation, it chose instead to rely on strengthened statutory guidance, stating that police already have powers to refuse certificates where applicants pose a risk.

The statutory guidance allows chief officers to refuse or revoke certificates on the balance of probabilities, where applicants present a risk despite not being legally prohibited. It allows chief officers to consider a wide range of criminal and non-criminal information, including arrests, [out-of-court disposals](#) and acquittals. However, unlike mandatory bans, the guidance requires case-by-case assessments based on evidence strength, time elapsed, patterns of behaviour and seriousness.

The guidance offers limited direction on how to assess rehabilitation or good character, despite allowing these factors to override serious concerns. It also treats overseas convictions inconsistently, as foreign custodial sentences don't trigger automatic statutory prohibition.

In relation to domestic abuse, the guidance contains contradictions. At one point, it states clearly "the police will need to be satisfied that anybody who has perpetrated domestic abuse is not issued with, or retains, a firearms certificate". Later, it says police should assess this on a case-by-case basis and then includes domestic abuse in the list of "more serious factors".

This lack of clarity has caused varied decisions. One FELU interpreted the guidance to mean that all domestic abuse perpetrators could never have a firearm. They refused any application from applicants who faced allegations of domestic abuse. Some applicants successfully appealed these decisions.

While some case-by-case assessment is unavoidable, the combination of mandatory bans, discretionary judgment and contradictory guidance increases the risk of unsafe licensing decisions. To address this, the government should introduce clear mandatory prohibitions for offences incompatible with firearm ownership and strengthen guidance on assessing rehabilitation and good character. As we recommend [in the chapter on the structure of firearms licensing](#), it should also establish a national firearms licensing authority to improve consistency and oversight.

## **FELUs make inconsistent decisions when applicants fail to disclose relevant information**

[Section 28A\(7\) of the Firearms Act 1968](#) makes it a criminal offence to “knowingly or recklessly to make any statement which is false in any material particular for the purpose of procuring (whether for himself or another) the grant or renewal of a certificate under this Act”. However, the legislative framework creates a conditional rebuttable presumption in favour of grant, placing the burden on police to justify refusal rather than on applicants to demonstrate suitability. This has practical consequences for decision-making where applicants leave out relevant information.

The [domestic homicide review into the Sussex shootings in 2020 \(Woodmancote\)](#) identified non-disclosure and dishonesty as important risk factors. It recommended that FELUs should no longer use warning letters where information comes to light that may indicate dishonesty, deceit, risk or danger to the public. Instead, FELUs should refuse applications or revoke certificates. It recommended that “integrity should have similar explicit weight and importance to that of dishonesty”.

In practice, FELUs’ decision-making is inconsistent in cases where applicants have left out information.

In the five years to September 2025, 38 people from eight force areas were subject to legal proceedings for knowingly or recklessly making a false statement to obtain a firearm or shotgun certificate. Of these, 24 were convicted, with an average fine of £222.

In some other cases, FELUs simply refused or revoked certificates. But in some of these cases, decisions were overturned on appeal because the FELU couldn’t establish dishonesty.

We also reviewed cases where FELUs issued warning letters and granted certificates where applicants had failed to disclose relevant convictions or health information, despite the domestic homicide review’s recommendation.

## **Delegated authority levels remain inconsistent across forces**

[Section 55 of the Firearms Act 1968](#) sets out that chief officers can delegate their authority to make firearms licensing decisions to selected personnel.

In 2015, we reported that neither the Home Office guidance nor [firearms licensing authorised professional practice \(APP\)](#) prescribed how chief officers should delegate their authority. We highlighted unsurprising inconsistencies in the role and rank at which decisions, including refusals to grant or renew or to revoke a certificate, were made. We recommended that:

“The Home Office, in consultation with the national policing lead for firearms licensing, should amend the Home Office guidance to prescribe the level to

which each type of firearms licensing decision may be delegated by the chief officer of police.”

This is another recommendation that hasn’t been actioned.

In one FELU, only the firearms licensing manager and their deputy held delegated authority for most decisions, including grants, renewals, refusals, revocations and returning guns after a previous revocation or seizure. In two FELUs, firearms enquiry officers had delegated authority to grant applications. In all FELUs we inspected, more senior personnel made higher-risk decisions, but the level of seniority varied between forces.

### **Forces need accurate schemes of delegation**

The firearms licensing APP states that “the chief constable should define, agree and communicate in writing the parameters of delegated authorities [and] what decisions can be made and by whom”.

It goes on to state “forces need to ensure arrangements are in place to provide delegated authority 24/7, all year round – for example, to make urgent decisions around revocation”.

All the FELUs we inspected had a [scheme of delegation](#). In more than half of these, the scheme didn’t match what FELUs were doing in practice. For example, in one FELU, administrators were routinely authorising renewals, despite the scheme of delegation not giving them delegated authority.

### **Recommendation 13**

By 1 December 2026, chief constables should:

- satisfy themselves that their [scheme of delegation](#) for [firearms licensing](#) is fit for purpose and in line with the [firearms licensing authorised professional practice](#); and
- check that decision-making is in accordance with that scheme.

### **Supervision of firearms licensing practice needs to improve**

During our case file review, we found a lack of effective supervision and oversight in 51 percent of the cases we examined. Consequently, most FELUs lacked effective oversight capable of identifying errors in this high-risk licensing regime.

Errors can erode trust. Respondents to our survey of firearms certificate holders provided information about errors that negatively affected their experience during the licensing process. Analysis revealed cases of mistakes on certificates, insecure document handling, lost applications and wrongly seized firearms.

## There is insufficient oversight of decision-making

In 2015, we found that most forces we inspected lacked effective monitoring and audit processes. We described this as a “cause of grave concern”.

It is even more concerning that this position hasn’t improved in the decade since.

Five of the six FELUs we inspected lacked effective monitoring. Some examples include:

- In one unit, the manager made the final decision in almost all grants and renewals, including all high-risk cases; but there was no [dip sampling](#), quality assurance, audit or supervisory review of those decisions.
- In another unit, supervisors dip sampled a small proportion of low-risk cases; but there was no routine dip sampling or quality assurance of the medium or high-risk decisions made by supervisors and the FELU manager.
- In another, the FELU selected four cases per month for review by the chief inspector, who hadn’t received firearms licensing training; this process lacked independence and wasn’t risk-based.
- In another, a chief inspector only reviewed three cases per quarter as part of a process which even they described as “limited in scope” and “not as robust or thorough as it should be”.

In 25 out of 229 cases, across four of the six FELUs, we found decision-makers hadn’t sufficiently recorded the reasons for their decision. The application or renewal was granted in each of the 25 cases.

The firearms licensing APP states “the strategic lead for firearms licensing or the firearms licensing manager should develop and own a quality assurance ... strategy that covers all aspects of firearms licensing”.

It goes on to state that dip sampling the decisions made can help achieve this. It then highlights there should be a regular governance meeting that should review firearms licensing practice. Forces need to follow the APP.

### Recommendation 14

By 1 December 2026, chief constables should make sure that they have audit and [dip sampling](#) processes in place to review [firearms licensing](#) decisions in line with the [firearms licensing authorised professional practice](#).

## Firearms licensing appeals should be heard by a specialist national tribunal

[Section 44 of the Firearms Act 1968](#) sets out that the Crown Court in England and Wales, and the Sheriff Courts in Scotland, are the appeals bodies for firearms licensing decisions.

Several forces and legal services departments told us that the appeals process works well. They described it as robust and said that courts understood it well, generally giving proper consideration to the statutory guidance. In some regions, forces reported constructive relationships with local courts and consistent decision-making.

However, many firearms licensing practitioners and members of stakeholder groups highlighted problems. The most common concern was timeliness, reflecting wider pressures on the criminal courts. Courts can take months to list appeals and then adjourn hearings when criminal trials take priority. In some appeals, the delays are so long that appellants' circumstances have substantially changed by the time the court hears the appeal. We heard of an appeal taking six years to reach court.

These delays have practical consequences for both forces and appellants. They prolong uncertainty, require FELUs to revisit decisions and increase workloads as FELU personnel must do more checks and reconsider evidence.

Throughout our inspection, many interviewees suggested that an independent specialist tribunal would be better placed to hear appeals. This model of dealing with appeals could:

- reduce demand on the Crown Court;
- develop expertise and experience;
- reduce delays;
- increase national consistency; and
- reduce costs for applicants.

### Recommendation 15

By 1 September 2029, the Home Office should consider establishing a national [firearms licensing](#) tribunal composed of appropriately qualified panel members to hear appeals.

## 5. Firearms licensing technology

### **The National Firearms Licensing Management System isn't fit for purpose**

The [National Firearms Licensing Management System \(NFLMS\)](#) is the central register of firearms applicants, certificate holders and licensed firearms. For nearly 20 years all forces in England and Wales have used the NFLMS, and it remains the only national system of record for [firearms licensing](#).

### **The NFLMS is at the end of its operational life and lacks functionality**

The NFLMS is at the end of its operational life and a new system is due to replace it in 2027. We welcome this. The system's limitations are undermining the efficiency and effectiveness of firearms licensing.

Firearms licensing practitioners told us that the system is prone to crashing and system updates can take many hours to complete. This prevents [firearms and explosive licensing units \(FELUs\)](#) from carrying out core work. Search functionality is limited and the system relies heavily on free text entries. These factors make it difficult to locate records and to make sure [personnel](#) record information consistently.

There is no user manual or national training, so firearms licensing practitioners tend to learn from colleagues. In one FELU, we heard an experienced practitioner showing a new colleague how to record information on the system, explaining that "this is how I do it" and that "others might do it differently". Unsurprisingly, there are significant variations in how FELUs use the system.

The NFLMS isn't a case management system. It was initially designed as a register. As a result, FELUs rely on a range of local systems to record information. This leads to practitioners having to manually enter the same information on different systems. It also means that some information about applicants and certificate holders isn't visible to personnel in other FELUs.

The system lacks the functionality to integrate effectively with some police and law enforcement systems. It also doesn't show the whereabouts of all licensed firearms in real time. Some local recording practices mean that the history of a firearm can be lost when a certificate holder moves between force areas.

## **Police National Computer records sometimes don't match NFLMS information**

The NFLMS transfers information to the [Police National Computer \(PNC\)](#).

When forces enter data in the wrong format or leave required fields incomplete, the PNC doesn't update automatically. Instead, the NFLMS generates an error notification for the force. Forces should correct the NFLMS record without delay.

In [our 2015 firearms licensing inspection report 'Targeting the risk'](#), we reported that several forces we inspected lacked adequate processes to manage these notifications and had issued certificates while error messages remained outstanding. This meant the PNC didn't reflect the correct licensing status even though the NFLMS did.

We recommended that all chief constables should address this immediately. So, we were disappointed to find that this is still a problem in some FELUs. A firearms licensing manager in one FELU told us that processes for managing the error notifications are less robust than they used to be. They expressed concern that personnel don't always clear notifications when they should.

We reiterate our 2015 recommendation. All chief constables should make sure this is managed effectively.

## **The National Police Chiefs' Council and the Home Office should make sure the NFLMS replacement addresses existing weaknesses**

We are pleased to see that the [National Police Chiefs' Council \(NPCC\)](#) and the Home Office have made significant progress to secure a replacement system.

It is important that the replacement is part of a secure, integrated, online national firearms licensing platform that addresses the structural weaknesses of the NFLMS.

At a minimum, a new platform should operate as a single, authoritative, real-time record of all certificate applicants, holders, [registered firearms dealers](#), people with [section 5 authorities](#), [Home Office-approved clubs](#), [museum licensees](#) and licensed firearms. This should include timely, accurate information about who the certificate holder is, and who is in possession of each firearm (they may be different). To achieve this, the government should amend legislation to require registered firearms dealers to record all firearms and shotguns on the system and to process all sales, transfers, imports and other transactions through it, including transactions between dealers.

We are aware that many licensed firearms don't have unique serial numbers. In the longer term, the government should introduce a system that requires unique firearms identification numbers. This would improve the accuracy of the national register and support firearms licensing personnel to match the firearms they inspect during visits with those authorised on a certificate.

The platform should also support digital identity verification for certificate holders, as set out [in the digital verification section of this report](#). This would reduce the risk of forged certificates, support secure transfers and make sure that changes to certificate status automatically update the national firearms register.

Certificate holders, registered firearms dealers and officials in Home Office-approved clubs should have limited access to details of their certificate and firearms on the system. They should also be able to use the system to apply for variations, and update firearms licensing personnel about information such as medical changes, lodging firearms and private sales.

### **The Single Online Home portal for applications can be difficult to use**

Most applicants submit their applications online, using the [Single Online Home](#) portal. Some survey respondents criticised the portal, reporting that:

- they couldn't save their progress and return later;
- they had to re-enter the same information multiple times;
- they couldn't carry forward details from previous applications; and
- the forms are poorly designed and difficult to use.

Some respondents suggested introducing a national portal, similar to the driving licence portal, with status tracking.

### **Recommendation 16**

By 1 December 2027, the Home Office, working with the [National Police Chiefs' Council](#) and the [Police Digital Service](#) and in consultation with other stakeholders, including [Police Scotland](#), should introduce a secure, integrated, online national firearms register and firearms licensing system that:

- operates as a single authoritative record of all certificate applicants, holders, [registered firearms dealers](#), those with [section 5 authorities](#), [Home Office-approved clubs](#), [museum licensees](#) and visitor permit holders;
- allows [Border Force](#) to enter details of imported firearms and shotguns and monitor the export of firearms and shotguns at the border, and monitor the transit of visitor permit holders' firearms and shotguns;
- facilitates real-time verification that the recipient of a licensed firearm or shotgun holds a valid certificate before any sale or transfer;
- automates updates of the national register after sale or transfer; and
- operates as a case management system for all certificate applications, renewals and ongoing monitoring.

## **FELUs' use of new technologies is limited**

We found that FELUs' use of automation and advanced digital tools was limited. No force we inspected was using artificial intelligence to streamline its firearms licensing processes.

However, during our inspection we heard that one FELU was trialling "robotic process automation" to transfer data from the Single Online Home portal into the NFLMS, reducing manual data entry. The NPCC lead for firearms licensing, working with the Police Digital Service, should review the potential benefits of robotic process automation and artificial intelligence.

## 6. Firearms licensing governance

### Firearms licensing governance arrangements need to improve

Since 2022, the Home Office has chaired a twice-yearly [firearms licensing enforcement board](#) to discuss strategic issues. Attendees include the [National Police Chiefs' Council \(NPCC\)](#) lead for firearms licensing, [Police Scotland](#), the Scottish Government, the Department of Health and Social Care and the [College of Policing](#). These meetings should provide strategic direction for firearms licensing. However, we found that the firearms and explosives licensing working group serves as the main national meeting.

The working group is chaired by the NPCC's strategic co-ordinator for firearms licensing and attended by [firearms and explosives licensing unit \(FELU\)](#) managers or their representatives. The group meets quarterly with over 40 attendees, many of whom are firearms licensing practitioners. Some interviewees told us the meetings focus mainly on tactical issues rather than strategic matters. We observed two of these meetings and agree. It is useful as a tactical forum, but it shouldn't be the strategic meeting.

Regional governance arrangements also lack clarity and consistency. Many regions have no formal governance arrangements.

We recommend establishing a national to regional meeting structure. Each region should appoint a senior officer lead who would hold regular regional meetings with FELU managers. The regional leads would bring strategic issues to a national meeting chaired by the NPCC lead for firearms licensing. This structure could encourage consistent decision-making, co-ordinated performance improvement, sharing of best practice and peer support. Similar governance structures already exist in many areas of policing.

Firearms licensing is a niche area of policing that involves high-risk decision-making, such as returning firearms that have been seized from certificate holders. Regional forums could review such decisions and allow legal departments to discuss cases and share advice.

Some regions already hold regular meetings and have effective governance arrangements. Expanding this approach nationally would strengthen governance and consistency in firearms licensing decisions.

In making a recommendation to address this, we recognise that these arrangements would change with the creation of a national firearms licensing authority.

### **Recommendation 17**

By 1 December 2026, the [National Police Chiefs' Council](#) lead for [firearms licensing](#) should:

- make sure each region appoints a [chief officer](#) lead for firearms licensing; and
- implement a meeting structure where regions meet and then report back to the national meeting.

### **There aren't enough resources to provide effective national oversight of firearms licensing**

The NPCC hasn't allocated enough resources to its oversight of firearms licensing. Its lead for firearms licensing only has one member of staff. This person is both the NPCC strategic co-ordinator and the policing standards manager to the College of Policing for firearms licensing. They are also involved in training [firearms enquiry officers](#). Given the risks associated with firearms licensing and the scope of the recommendations in this report, the NPCC should consider increasing the number of staff supporting the lead for firearms licensing.

The NPCC also needs to consider addressing the lack of performance data and provide analytical support. At the time of our inspection, there was one chief inspector who provided this support in addition to their full-time role in a force. There is no comprehensive data set covering costs, staffing or workload in relation to firearms licensing. The only national performance measure relates to the percentage of applications that forces complete within four months. This could potentially lead to perverse incentives, as a FELU could do fewer checks to process applications more quickly.

There should be an agreed common performance framework with qualitative as well as quantitative measures. This would support the police and the Home Office to design and operate an efficient and effective licensing system.

### **There isn't enough financial data to fully understand the cost of firearms licensing**

There is insufficient national data on the cost of firearms licensing. Forces capture financial data differently. Some only record direct salary costs. Others record partial overheads. Many don't include IT, training, fleet, estates or wider support costs. As a result, the cost of running firearms licensing is unknown at force or national level.

Although forces submit high-level budget data to the Chartered Institute of Public Finance and Accountancy, it isn't easy to break down. As a result, performance can't be [benchmarked](#), inefficiencies are hard to identify and best practice is difficult to share.

The limited financial, staffing and performance data means the police service doesn't have a clear understanding of the demand it faces. It also can't accurately assess how many [personnel](#) it needs to meet that demand, including future demand. This undermines efforts to reform the system or improve efficiency.

### **Recommendation 18**

By 1 December 2026, the [National Police Chiefs' Council](#) lead for [firearms licensing](#) should specify the financial information that forces need to have a clear understanding of the cost of firearms licensing. Chief constables should then record and report this information, including data on actual costs, to the National Police Chiefs' Council lead annually.

### **An increase in fees has improved funding and police resourcing but this needs to be maintained**

The [Firearms \(Variation of Fees\) Order 2025](#) increased firearms licensing fees for firearm and shotgun certificates, [registered firearms dealers](#) and visitor permits. The [explanatory memorandum to that order](#) states that "firearms licensing fees will be reviewed annually and a comprehensive review will take place every three years, to assess whether the fees still provide full-cost recovery".

Under the [Circular 001/2026: Firearms \(Variation of Fees\) Order 2026](#), the Home Office increased fees again in June 2026.

During our inspection, forces generally welcomed the increase in fees. There is uncertainty over costs, but many told us that the fees are still not sufficient to cover all firearms licensing costs. As a result, funding for some of their firearms licensing work continues to come from wider policing budgets.

Fees should increase annually, at least in line with inflation, to provide stable and sustainable funding and support an effective licensing system.

### **FELUs shouldn't refund fees for refused applications**

Applicants pay a fee when they apply for a certificate, variation or permit. FELUs may spend a considerable amount of time processing applications and carrying out detailed checks. If the police conclude that an applicant is unsuitable and refuse the application, they must refund the fee even though they have incurred the full cost of the work.

We recommend that the government amends legislation to require applicants to pay the fee at the point of application rather than on grant of a certificate. This would align with the Scottish Government's process for air weapon licence applications under the [guidance on the practical application of the Air Weapons and Licensing \(Scotland\) Act 2015](#).

### **Recommendation 19**

By 1 September 2028, the Home Office should introduce legislation to:

- make sure that [firearms licensing](#) fees increase annually, at least in line with inflation; and
- stop licensing authorities from having to refund applicants' fees when they refuse an application.

### **Force-level governance lacks consistency and assurance**

Firearms licensing isn't typically seen as a frontline policing priority. It has to compete for resources with priorities such as serious violence, [safeguarding](#), [serious and organised crime](#) and [neighbourhood policing](#). However, this shouldn't reduce the importance of robust governance of firearms licensing. Effective oversight is essential to public safety and to maintaining the confidence of certificate holders. We found that at force level, governance arrangements vary significantly. All forces we inspected had some form of oversight of firearms licensing. This was often included within broader management meetings and not treated as a distinct area requiring specialist governance and assurance.

Not all the forces we inspected had a comprehensive firearms licensing governance board, chaired by the strategic lead. Essential components set out in the [College of Policing's firearms licensing authorised professional practice \(APP\)](#) were frequently missing, including:

- monitoring grants, renewals, refusals and revocations;
- timeliness and backlog reviews;
- [dip sampling](#) and quality assuring decisions;
- systematic review of appeals and case learning; and
- structured [peer review](#) of complex or high-risk cases.

In 2024, the NPCC asked all forces to complete a firearms licensing strategic demand assessment as part of planning and risk management. Although each force we inspected completed these assessments for 2024/25, none had an up-to-date version.

In [our 2015 firearms licensing inspection report 'Targeting the risk'](#), we recommended all forces should make sure their firearms licensing governance arrangements meet the standards set out in the firearms licensing APP. Not all forces we inspected had achieved this. We reiterate this recommendation.

### **Recommendation 20**

By 1 December 2026, chief constables should establish or maintain:

- a force-level [firearms licensing](#) governance structure that is compliant with the [firearms licensing authorised professional practice](#); and
- a qualitative and quantitative performance framework that covers both risk and how quickly [firearms and explosives licensing units](#) process applications.

## **The way police engage with certificate holders and others connected with firearms licensing needs to improve**

In our 2015 report, we stated that the level of engagement with the public varied across forces. We made a recommendation to address this.

Also, the firearms licensing APP states:

“The ways in which the police engage and interact with the community – as well as the negative and positive experiences of the public when accessing firearms licensing services – can influence subsequent perceptions of police fairness and legitimacy, and confidence in the police.”

It adds that the firearms licensing manager should:

“Engage with internal and external stakeholders through an engagement plan, to build and maintain effective working relationships and partnerships. This can help licensing and decision-making processes. This plan should be agreed with the strategic lead.”

During our inspection, we held focus groups and interviews with certificate holders, groups that represent the shooting community, the [Gun Control Network](#), medical professionals and the wider public. We found forces worked with them to varying degrees.

Only one FELU was able to provide us with a clear, structured external engagement plan in line with APP. Four of the FELUs had independent stakeholder groups and a fifth was due to have its first meeting shortly after we visited. Some groups worked well and were seen positively by forces and external groups.

We observed some stakeholder group meetings and spoke to attendees. Some attendees were critical of the meetings. In one force, they told us the meetings didn't have an agenda, and they were unsure what the meetings were trying to achieve. In another, some stakeholders told us it was led by the police who set the agenda with no input from the attendees.

Only one FELU had carried out a satisfaction survey. The FELU launched the survey shortly before our inspection and hadn't analysed the results by the time of our visit.

We were pleased to see an effective level of engagement in one force where there was a good communication strategy and strategic leadership.

### **Many certificate holders find it difficult to contact the FELU**

Some stakeholder group members highlighted that some FELUs were easy to contact through published phone numbers. Two FELUs held drop-in sessions to help certificate holders. However, some responses to our firearms certificate holders survey were less positive.

Respondents frequently described difficulties contacting FELUs and a lack of proactive updates once applications had been submitted. Several said that long periods passed without communication, leaving them uncertain about progress and timescales. As one respondent explained: "The whole process is taking far too long with little to no information. They are not open or clear about the timescales."

At the same time, many respondents clearly distinguished between individual firearms licensing practitioners and the wider system. While applicants expressed frustration with accessibility and responsiveness, they often described positive interactions once contact was made. One respondent noted: "When I finally spoke to the firearms enquiry officer, they were professional and helpful. The problem was getting hold of anyone in the first place." Another said: "Staff were polite and knowledgeable, but the process itself is slow and communication is poor."

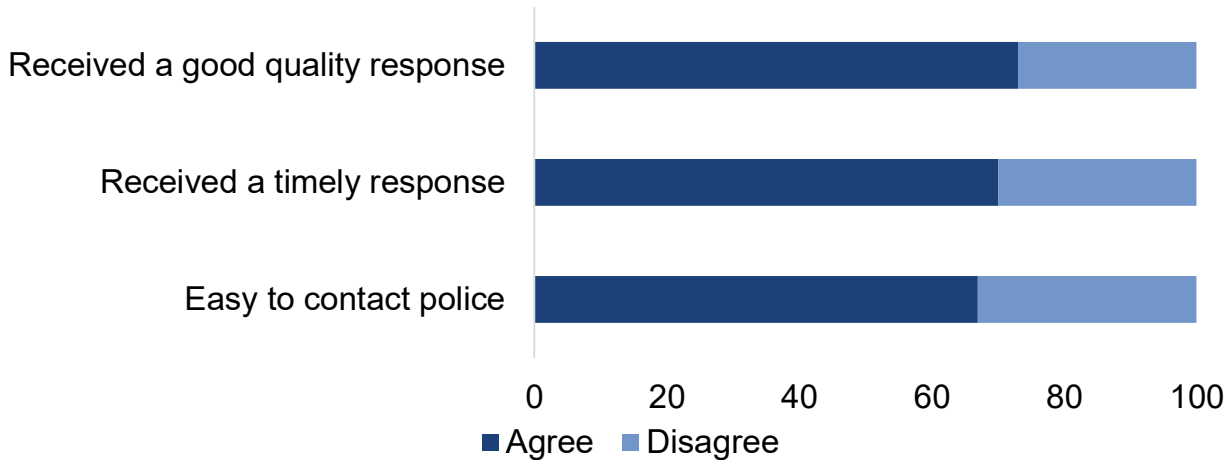
During our inspection, we found that one FELU had a backlog of 2,190 unanswered emails and no telephone number for the public. As a result, certificate holders were calling the force [control room](#) directly, creating additional work for call takers.

### **Certificate holders' satisfaction with police firearms licensing varies**

Overall, 70 percent of our survey respondents reported they were satisfied with the police during the licensing process. Registered firearms dealers reported similar satisfaction levels about police performance. However, we also heard about many frustrations respondents had with the firearms licensing process and the level of resourcing in some FELUs. Forces need to work with certificate holders more, and make sure their stakeholder groups are effective, to address this and improve public confidence.

The survey results suggest that dissatisfaction relates more to speed of response and ease of communication, than to the conduct or professionalism of personnel.

**Figure 5: Proportion of survey respondents who had contact with the police and were satisfied with police contact, response timeliness and response quality**



Source: [Firearms certificate holders survey](#) from HMICFRS

Chart description: Horizontal bar chart showing satisfaction levels with police contact, response timeliness and response quality. Around two thirds (67 percent) of respondents said they found the police easy to contact, while 70 percent reported receiving a timely response and 73 percent reported receiving a good-quality response.

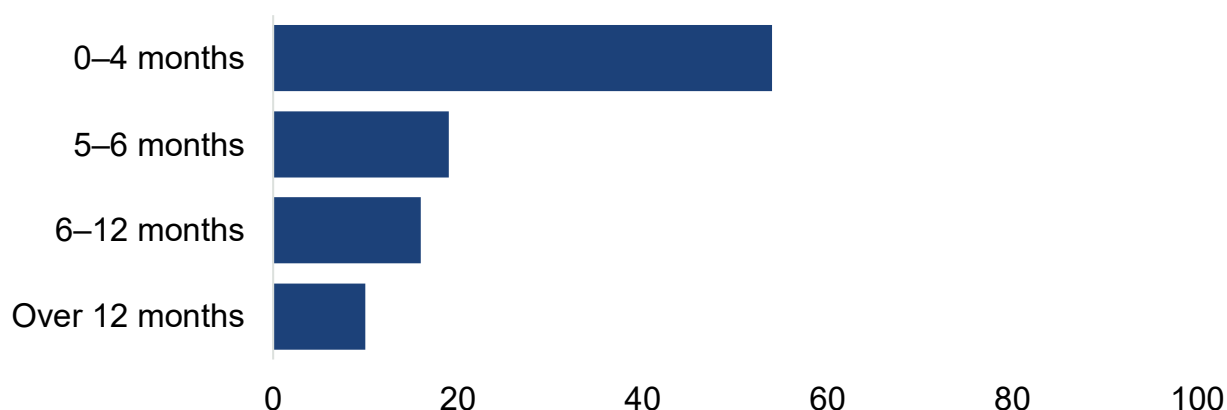
**Recommendation 21**

By 1 December 2026, chief constables should make sure they have a documented engagement plan in line with [firearms licensing authorised professional practice](#).

**The timeliness of the firearms licensing process affects applicants’ satisfaction**

Survey analysis showed that an important issue for respondents was that the process took too long. Overall, 53 percent of respondents reported that they were satisfied with how long the process took. However, satisfaction with timeliness falls sharply from 70 percent when applications are completed within six months to 9 percent when they exceed six months. Satisfaction with the quality of the police response drops from 82 percent to 37 percent, and ease of contact satisfaction reduces from 65 percent to 38 percent. Delays beyond six months remain common and affected more than a quarter of respondents to our survey.

**Figure 6: Proportion of survey respondents by reported length of time taken for their firearms licence to be processed**



Source: [Firearms certificate holders survey](#) from HMICFRS

Chart description: Horizontal bar chart showing how long respondents reported it took for their firearms licence to be processed. Over half of respondents to our survey (54 percent) reported that the process took less than four months. However, 19 percent waited between five and six months, 16 percent between 6 and 12 months and 10 percent reported waiting over 12 months.

One respondent said: “It takes way, way too long. It isn’t a complex process for them. I have no medical or criminal history. Why it took 18 weeks is beyond me, and that’s considered quick!”

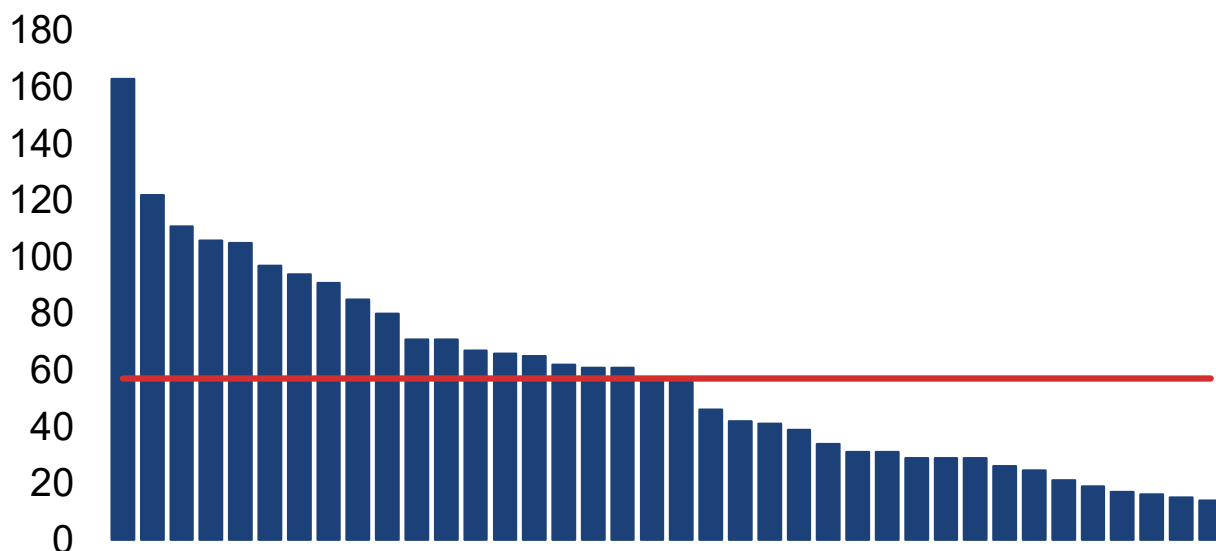
Another said:

“The whole process is taking far too long with little to no information. They aren’t open or clear about the timescales and when they eventually give an answer it is an estimate of 18 months which is totally unacceptable and especially with the price increase this seems like there is no service at all.”

However, while undue delays should be avoided, this cannot be at the expense of thorough and consistent checks to prevent risks to public safety.

## The time taken to process firearms applications varies substantially across forces

**Figure 7: Median time taken (days) to process firearms licensing applications across firearms and explosives licensing units in England and Wales for the year ending 31 March 2025**



**Source:** Data for each firearms and explosives licensing unit from the [National Firearms Licensing Management System](#)

Note: This chart has been anonymised to illustrate national patterns and variation, rather than to rank individual firearms and explosives licensing units (FELUs).

Chart description: Vertical bar chart showing the median time taken to process firearms applications across FELUs. This chart shows the variation in resourcing in FELUs across forces in England and Wales for the year ending 31 March 2025. Each bar represents one FELU and highlights the median number of days taken to process an application. The red line shows the median time all FELUs took to process applications in England and Wales during the year ending 31 March 2025. FELUs under this line process applications more quickly than the national median and FELUs above this line process applications more slowly. The longest time taken to process an application across FELUs was 163 days and the shortest was 14 days.

[The accessible data table for figure 7 is available on our website.](#)

It is important to recognise that this doesn't take account of different processes and risk appetites across FELUs. We analysed national data on firearms and shotgun licensing, including:

- Home Office data on the total number of firearm and shotgun certificates; and
- information from all police forces on the number of [officers](#) and [staff](#) working in its FELUs as at 1 January 2025.

Using this, we calculated the number of certificate holders managed by each FELU as an indicator of workload. We also examined data from the National Firearms Licensing Management System that showed the median time taken by each FELU to process a firearms licensing application.

Our analysis showed that there was no relationship between FELU resourcing levels and time taken to process applications. In practice, this shows that difference in resources can't explain the large variation seen in processing times across the country.

## 7. Firearms licensing training and personnel

### **The Home Office and policing have been too slow to put in place nationally accredited training for firearms licensing**

In the [report of the inquiry into the shootings at Dunblane Primary School in March 1996](#), Lord Cullen recommended that “enquiry officers should be given as much training and guidance for their work as is practicable”.

In [our 2002 firearms licensing thematic inspection report](#), we found that “the training of those officers involved in firearms enquiries was inconsistent and, in some instances, wholly inadequate”. We recommended “that forces ensure that staff conducting firearms enquiries are trained, conversant with current ACPO/Home Office guidance and competent to fulfil their role”.

Later, in [our 2015 firearms licensing inspection report ‘Targeting the risk’](#), we expressed concern at the continuing absence of nationally accredited training. We reported that “some staff involved in the licensing arrangements, in particular those charged with making firearms licensing decisions, have yet to receive sufficient training, commensurate with their role and responsibility”.

We recommended:

“Within 12 months, the national policing lead for firearms licensing, in conjunction with the College of Policing, should identify the skills required by those staff involved in the firearms licensing process. Thereafter they should introduce professional development arrangements to ensure a consistent national approach to firearms licensing. Consideration should also be given to the accreditation of these arrangements.”

Coroners at several inquests following shootings by certificate holders have made similar recommendations. In his [prevention of future deaths report following the Keyham inquests](#), the senior coroner for Plymouth, Torbay and South Devon referred to “27 years of wholesale failure to devise and maintain adequate training provision for firearms licensing staff”.

Against this background of a historical failure to act, we found evidence that, more recently, police and Home Office leaders have taken action. In 2023, the Home Office accepted the need for accredited training for [firearms licensing](#) and provided the [College of Policing](#) with £500,000 funding to achieve it.

In November 2024, the College of Policing introduced its national [firearms enquiry officer \(FEO\)](#) course. At the time of our inspection, 301 FEOs had completed the course, with 97 awaiting training. The College of Policing told us that it expects to train all FEOs in post at the time of our inspection by April 2027.

The five-day course has an additional two-day module on [domestic abuse](#) and health and well-being. Some FEOs who had completed the course told us it was relevant and engaging, providing a strong grounding in legislation and licensing processes. We observed two days of the course that covered legislation and guidance, and support this view. However, some attendees told us they found it difficult to put the theory into practice due to their force's processes.

In February 2025, the Home Office told forces they should use the increase in certificate fees to fund the mandatory training and stopped funding the course. Forces were reluctant to pay for their FEOs to attend because the fee increase already failed to cover the full cost of firearms licensing. In June 2025, the [National Police Chiefs' Council \(NPCC\)](#) agreed to contribute to the cost of the training until March 2027.

### **There is still no national training programme for firearms and explosives licensing unit administrators or decision-makers**

There isn't a national course for other firearms licensing [personnel](#), including administrators, firearms licensing managers and decision-makers. As a result, training is varied. One force had comprehensive online training packages. Others relied on informal learning from colleagues. This can lead to personnel making mistakes. In interviews, groups representing certificate holders told us that administrative errors contributed to delays in processing applications.

While chief constables hold legal responsibility for firearms licensing, they can delegate decision-making to nominated personnel. Despite the high-risk nature of these decisions, there is no national training course for those with delegated authority.

We found significant variation in the training forces gave senior leaders and decision-makers. In two forces, decision-makers reported receiving little to no firearms licensing training. In other forces, people in these roles said they had no formal training and instead learned from colleagues. Only one force required personnel with delegated authority to receive training before starting in the role.

In his 2023 report, the senior coroner for Plymouth, Torbay and South Devon commented on the lack of accredited training. He said:

“HMIC noted in 2015 that proposals for accredited training were ‘under consideration’ by the national policing lead for firearms licensing and the College of Policing. However, the evidence I heard at the inquest was that this ‘consideration’ did not result in any accredited training being developed. Even today, some eight years later, accredited training for those charged with making firearms licensing decisions does not exist.”

The College of Policing told us that it had prioritised FEO training and is now developing a national training programme for those with delegated authority. It plans to start the training in autumn 2026. This programme will include an accreditation process and [continuing professional development](#). The College is also developing training for administrators, which it aims to introduce in spring 2027.

There is no long-term funding arrangement for any of this important training. The Home Office, College of Policing, the NPCC and police forces need to urgently resolve this.

### **Recommendation 22**

By 1 February 2027, the Home Office and the [National Police Chiefs’ Council](#) lead for [firearms licensing](#), working with the [College of Policing](#) and police forces, should secure long-term funding for national training for those involved in firearms licensing.

## **Firearms and explosives licensing unit role profiles aren’t fit for purpose and should be reviewed**

[Firearms and explosives licensing units \(FELUs\)](#) are structured differently across forces, and the responsibilities attached to equivalent roles vary significantly. However, the units generally include FEOs, decision-makers and managers, and administrative and case work personnel.

We found that some FELUs had personnel who worked in an investigative capacity. Other senior managers, who didn’t sit directly within the FELU, were responsible for making decisions regarding firearms licensing. They had delegated authority to make decisions on behalf of the chief constable.

While all forces inspected had role profiles for the FELU personnel, the duties they assigned to each role differed markedly. The existing role profiles within the [firearms licensing authorised professional practice \(APP\)](#), particularly for FEOs, aren’t fit for purpose. At the time of our inspection, the College of Policing was reviewing and updating them. This should standardise the skills and work expected of FEOs across forces.

## **FELUs benefit from having officers and staff with investigative experience**

In his 2023 report, the senior coroner for Plymouth, Torbay and South Devon said there had been a lack of [professional curiosity](#) at all levels.

The firearms licensing APP states that “staff should exercise professional curiosity to actively identify and investigate suitability”. This includes asking questions and keeping an open mind, clarifying ambiguities and not accepting things at face value.

In two of the FELUs we inspected, the units had investigation officers who were responsible for making further enquiries into more complex firearms licensing applications. In some other FELUs, the forces had posted [officers](#) with investigative experience into the unit. These forces told us there were significant benefits of having personnel with this experience in the units.

We were pleased to see that in one force, supervisors had started to set investigation plans with clear directions for FELU practitioners to follow for new certificate grants and renewals. We encourage all FELUs to take a similar approach.

## **Staffing FELUs is challenging**

Many FELUs reported high vacancy rates and forces struggle to attract and retain personnel. FELU practitioners told us that this was because of low pay and limited progression opportunities.

Firearms certificates are valid for five years. When the number of new applications changes, this affects the demand for renewals in five years' time. Other factors affect demand within FELUs, such as changes to legislation.

Some forces respond to peaks in demand by temporarily posting personnel into FELUs. While this increases capacity in the short term, it limits resilience. Temporary personnel often lack the experience required to assess complex applications. This can lead to inconsistent decisions and increased supervisory burden. The NPCC strategic co-ordinator told us that he is liaising with forces on ways to address these peaks in demand.

Firearms licensing is a specialist function that requires forces to plan to recruit and retain trained and experienced personnel. A national firearms licensing authority, with a larger and stable workforce, would improve resilience and reduce reliance on short-term or redeployed personnel. Permanent specialist staff would build greater experience over time, leading to better and more consistent decision-making.

## **FELU staff need training in the safe handling of firearms**

Any personnel required to take possession of firearms need to be able to do so safely. Forces sometimes require their FELU personnel to seize or take firearms from certificate holders. In most of the FELUs we inspected, the force trained personnel on how to safely take possession of firearms and transport them.

However, we are concerned that in one FELU, personnel responsible for seizing firearms hadn't received any training on how to do this safely. This is completely unacceptable. It poses a clear risk to personnel and to public safety. We made the force aware at the time, and it told us it would take action to rectify this.

### **Recommendation 23**

With immediate effect, chief constables should satisfy themselves that any [firearms and explosives licensing unit](#) practitioners who are responsible for handling and transporting firearms are qualified to handle them safely.

### **Forces need to make sure frontline staff are aware of their powers in relation to firearms licensing**

In our inspection, response officers, [control room](#) officers and [staff](#), and those working in specialist roles told us they had limited understanding of firearms licensing processes or seizure powers. Only two of the forces we inspected had bespoke firearms licensing training for control room personnel. Forces should make sure that any personnel who are likely to encounter certificate holders are aware of their powers in relation to firearms licensing.

# Annex A – About the data

The data in this report has been compiled from:

- [firearms licensing statistics](#) published by the Home Office;
- the [National Firearms Licensing Management System](#);
- evidence we gathered during our inspection fieldwork; and
- data we collected directly from all 43 police forces in England and Wales.

We agreed our data collection methodology with police forces and other interested parties, such as the Home Office. We gave forces several opportunities to quality assure and validate the information they gave us, to make sure it was accurate.

## Methodology

### Case file analysis

In each of the six [firearms and explosives licensing units \(FELUs\)](#) we inspected, we reviewed case files relating to:

- 229 [firearms licensing](#) applications finalised by FELUs before 5 August 2025, to assess whether FELUs were complying with the 2023 statutory guidance on firearms licensing.
- 103 firearms licensing applications finalised by FELUs after 5 August 2025, to assess whether FELUs were complying with the new [2025 Firearms licensing: statutory guidance for chief officers of police](#).
- 18 applications from [registered firearms dealers \(RFDs\)](#) finalised by FELUs since 5 August 2025, to assess FELUs' compliance with statutory guidance.
- 27 visitor permit applications finalised by FELUs between 5 August 2025 and 14 November 2025 and granted by the FELU, to assess FELUs' compliance with the [Guide on firearms licensing law](#).

We selected case files to include a mix of different certificate types, such as firearm, shotgun and combined certificates.

We collated the responses to:

- numerically assess compliance with statutory guidance and the guide on firearms licensing law;
- assess supervision and oversight; and
- identify other good and poor practice.

## Surveys

We carried out two surveys between 24 November and 5 December 2025.

These included open and closed questions and sought the views and experiences of firearms certificate holders and RFDs in England and Wales on the firearms licensing process.

The [British Association of Shooting and Conservation \(BASC\)](#) disseminated both surveys on our behalf. At our request, the association sent emails explaining the purpose of the survey to their membership and other organisations it works with. The surveys asked respondents to confirm they had either applied for a licence in the past two years or were an RFD in England and Wales. We used this approach to reduce the risk of people without recent experience of firearms licensing responding to the survey.

We received 11,135 responses to the firearms certificate holders survey.

This represents 2.2 percent of certificate holders in England and Wales (496,904 as of 31 March 2025). The proportion of respondents from each force broadly reflected the distribution of certificate holders across forces.

**Table 1: Number of responses to our certificate holders survey compared with the number of firearm certificate holders in the year ending 31 March 2025 by region**

| <b>Region</b>        | <b>Total<br/>number of<br/>holders<br/>31 March 25</b> | <b>Proportion<br/>of holders</b> | <b>Total<br/>number of<br/>responses</b> | <b>Proportion<br/>of<br/>responses</b> |
|----------------------|--------------------------------------------------------|----------------------------------|------------------------------------------|----------------------------------------|
| East Midlands        | 50,710                                                 | 10%                              | 1,075                                    | 10%                                    |
| Eastern              | 73,559                                                 | 15%                              | 1,740                                    | 16%                                    |
| London               | 20,518                                                 | 4%                               | 543                                      | 5%                                     |
| North East           | 16,570                                                 | 3%                               | 375                                      | 3%                                     |
| North West           | 47,595                                                 | 10%                              | 927                                      | 8%                                     |
| South East           | 89,481                                                 | 18%                              | 2,553                                    | 23%                                    |
| South West           | 79,401                                                 | 16%                              | 1,704                                    | 15%                                    |
| Southern Wales       | 23,131                                                 | 5%                               | 423                                      | 4%                                     |
| West Midlands        | 52,208                                                 | 11%                              | 925                                      | 8%                                     |
| Yorkshire and Humber | 43,731                                                 | 9%                               | 870                                      | 8%                                     |
| <b>Total</b>         | <b>496,904</b>                                         | <b>–</b>                         | <b>11,135</b>                            | <b>–</b>                               |

We also received 100 responses to the RFD survey. This represents 3.6 percent of RFDs in England and Wales (2,782 as of 31 March 2025).

### **Survey analysis**

To understand respondents' views, we carried out descriptive analysis of the closed questions. This allowed us to identify the views held by most respondents.

Given the high volume of written responses to the open questions, it wasn't practical to analyse every answer in detail. We therefore commissioned [IFF Research](#) to analyse a sample of 15,000 free-text responses to these questions. We selected responses randomly from each region to make sure the findings reflected firearms licensing nationally.

For the firearms certificate holders survey, we provided IFF Research with a stratified sample of 4,924 responses from each of three open questions for analysis (a total of 14,772). A researcher reviewed and grouped 600 responses to each of the three questions into themes. A second researcher then checked and verified this work. IFF Research then used an automated tool to group the remaining responses using these same themes.

For the RFD survey, we provided IFF with all responses to the three open questions (a total of 228). Due to the small number of responses to the RFD survey, the researcher read all the answers. A second researcher checked and verified this work.

## Considerations

We shared the surveys with BASC to try to prevent it being completed by non-certificate holders. However, shortly after the certificate holders survey went live, individuals shared the link widely on websites, social media and messaging platforms. We closed the link and created a replacement. But people then shared the new link on a social media platform.

The wider sharing resulted in a large increase in responses. To assess whether this affected the findings, we analysed responses to eight key questions. These covered:

- overall satisfaction;
- satisfaction with the police;
- satisfaction with the time taken to complete licensing processes; and
- views on the cost and time involved in completing the medical proforma.

This analysis showed no meaningful differences in views between responses submitted before the link was shared, during the period it was shared more widely and after the survey reopened.

The only variation was a higher proportion of shotgun certificate holders responding during the later periods. However, the overall profile matched what would be expected based on Home Office's [published national firearms and shotgun certificate data](#).

We also analysed the free-text responses and found no differences in themes across the three time periods. Taken together, this indicated that the wider sharing of the link hadn't affected the survey results. We therefore included all responses in our final analysis.

As both surveys relied on voluntary participation, the findings don't present a statistically representative picture of the wider population. However, they offer useful insights when considered alongside other evidence.

## Annex B – Survey data

We carried out two surveys: one for firearms certificate holders and one for registered firearms dealers. [More information about both surveys is available on our website.](#)

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