

The Rt Hon Shabana Mahmood MP
Home Secretary
Home Office
2 Marsham Street
London

Our ref:TP/FC16

21 October 2026

Dear Home Secretary

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

Thank you for the opportunity to comment on this national thematic report into firearms licencing, which examined how police forces keep the public safe whilst ensuring that their possession of firearms is lawful.

There were seven recommendations affecting police forces, in relation to strengthening the governance and oversight of firearms licensing, stakeholder engagement, evidence-based decision-making and ensuring a professionally trained, competent workforce. Suffolk Constabulary accepts these recommendations and has provided a formal response. This response is attached and will also be published on my website; the Constabulary has either implemented these recommendations or is working towards full implementation.

Whilst firearms licensing is a national concern, I am particularly focussed on this within Suffolk and include this in my Police and Crime Plan, as performance locally in processing applications and renewals has been unacceptable. As such, in May this year a critical incident was declared with a dedicated Firearms Licensing Transformation Programme overseen by a Gold Group that meets fortnightly to provide strategic direction, challenge and governance. This is attended by staff in my office, and I receive regular updates on progress made.

As a result, improvements are starting to be seen in performance, with the introduction of dedicated suitability teams, enhanced performance monitoring arrangements, and the development of automated performance dashboards. A further four decision-making posts have also been introduced to increase processing capacity, although vacancies in other areas must be filled to realise the full benefits from the increased staffing capacity. An Independent Advisory Group (IAG) has also been established at my instigation; I attended the first meeting, and work is being undertaken to develop opportunities for broader scrutiny through this group.

Collectively, Norfolk and Suffolk manage one of the largest firearms licensing populations in England and Wales, with independent benchmarking identifying demand levels as among the highest in the Eastern Region. However, this is not an excuse for unacceptable delays, and I am seeking assurance that forward-facing activity, governance structures and transformation plans bring significant

improvements in the relationship between license holders and the Constabulary so communities know what is happening and when they can expect a response.

Within the next year I expect to see the backlog significantly reduced and a better level of service offered to our communities. I will be monitoring this progress through my Accountability and Performance Panel meetings, my office attendance at fortnightly Gold Group meetings, and through my regular meetings with the Chief Constable.

Yours sincerely

A handwritten signature in black ink that reads "Tim Passmore". The signature is written in a cursive, flowing style.

Tim Passmore, Police and Crime Commissioner for Suffolk



Response to HMICFRS' report: [An inspection of firearms licensing across police forces in England and Wales - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services](#), August 2026

In August 2026, HMICFRS published the national thematic report into firearms licensing, which examined how police forces keep the public safe whilst ensuring that their possession of firearms is lawful. The inspectorate raised concerns that practice and decision-making are inconsistent due to unclear legislation and poor supervisory oversight, causing a postcode lottery experienced by users of the firearms licensing service.

The report made a total of 23 recommendations, seven of which were for police forces. The focus of the recommendations for forces was around strengthening the governance and oversight of firearms licensing, stakeholder engagement, evidence-based decision-making and ensuring a professionally trained, competent workforce. Suffolk Constabulary accepts these recommendations and the responses to each are below.

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.

Suffolk and Norfolk's joint Firearms Licensing Unit acknowledges the recommendation relating to visitors' permits and the risks identified within the national inspection. The use of the visitors' permit process has been reviewed to ensure compliance with the Home Office Guide on firearms licensing law and national authorised professional practice. This work has been incorporated into the firearms licensing improvement programme and will include a review of application assessment processes, decision-making, and quality assurance arrangements. The review ensures all visitor permit applications are appropriately risk assessed and supported by auditable decision-making.

The constabularies' Firearms Licensing Unit manages visitor permits well and in line with statutory guidelines under section 17 of the Firearms (Amendment) Act 1988. Robust checks are completed on the applicant to ensure they are a fit and proper person and have good reason for their application and the possession of firearms and ammunition during their visit and that any specified firearms, shotguns or ammunition are permissible and able to be held under a visitors permit.

Sponsors of the applicant are also checked, as is the legitimacy of the named event the visitor is attending and they are required to provide specific details of the firearms and of where the shooting

will occur. Where necessary, Suffolk and Norfolk Constabularies can and do place conditions on the applicant and their permit to promote public safety, requiring the sponsor to provide evidence of where the secure storage of weapons will be, the access controls in place and the supervision arrangements where firearms are borrowed or hired.

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.

Suffolk and Norfolk's joint Firearms Licensing Unit has reviewed the firearms licensing scheme of delegation as part of a wider firearms licence improvement programme to ensure it is fit for purpose and consistent with national authorised professional practice. Existing role profiles and decision-making responsibilities have been mapped and reviewed as part of the improvement programme with a broader review of decision-making authorities and delegation opportunities undertaken in line with recommendations by the Eastern Region Innovation Network.

Existing delegation arrangements are documented within force procedures and operating practices. High-risk decisions relating to grants or returns are made by the Head of Command at superintendent level, in accordance with statutory guidance and authorised professional practice. Revocations are managed and authorised by the Firearms Licencing Manager (Head of Unit) and the Firearms Licensing Unit Inspector, whilst lower risk revocation and refusal powers are delegated to Senior Firearms Enquiry and Licencing Officers appropriately for specific cases.

The force is satisfied that the proportion of revocations that were appealed is sufficiently low, providing reassurance regarding the effectiveness of current decision-making processes. Furthermore, once evidence bundles are provided by the Firearms Licensing Unit as part of the appeal process, many are subsequently withdrawn by the applicant, further reassuring the robustness of the decision-making process.

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.

The force recognises the importance of robust auditing and dip sampling in supporting effective firearms licensing decision-making. Existing dip sampling arrangements are already in place for a proportion of routine renewals and are supplemented by supervisory oversight. All returns and revocations undergo multiple levels of scrutiny through Senior Firearms Enquiry Officer, Firearms Licensing Manager and Head of Command assessments with refusals and revocations reviewed by Legal Services where appeals are lodged.

Regional Firearms Licensing Management peer-review scrutiny sessions have been agreed to provide independent review of decision-making in which Suffolk and Norfolk will actively participate. Further governance arrangements are already in place through the Firearms Licensing Gold Group and Chief Officer Scrutiny Meetings and, in addition to this, work is being undertaken to explore and develop

opportunities for broader scrutiny through the Independent Advisory Group whilst maintaining confidentiality and data protection requirements.

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.

Suffolk and Norfolk Constabularies support the development of a national understanding of firearms licensing costs. Cost submissions have already been provided by both constabularies as part of the national review of Firearms Licencing Fees and annual income generated by licencing fees have been calculated and remain under review through the Firearms Licensing Gold Group and Chief Officer Scrutiny Meetings.

Direct costs are well understood locally, and work is now being undertaken as part of the wider Firearms Licencing Improvement Programme to expand current methodology to capture indirect costs, including estates, fleet, ICT, legal services, training and accommodation costs.

This work will provide a comprehensive understanding of total firearms licensing expenditure and build a foundation for a comprehensive cost model and future reporting requirements. The forces intend to align their approach with any guidance issued by the National Police Chiefs' Council and will be well positioned to provide annual reporting when required.

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 force has established a dedicated Firearms Licensing Transformation Programme overseen by a Gold Group that meets fortnightly to provide strategic direction, challenge and governance. It is recognised that current performance reporting remains labour-intensive due to the reliance on the National Firearms Licensing Management System and the existing work management tools which are used for case management.

Enhanced performance reporting is currently being developed through a dedicated programme using a range of digital solutions which will deliver improved application tracking, management information and analytical capability. The new platform will support more consistent reporting, improved visibility of backlogs, case age and bottlenecks, whilst providing managers with enhanced information to support planning prioritisation and service improvement.

Qualitative assurance is already provided through supervisory review, legal scrutiny and dip sampling activity both within the Firearms Licensing Unit and through the Firearms Licensing Gold Group and chief officer scrutiny meetings.

Together, these existing and proposed arrangements will ensure compliance with authorised professional practice and provide clear oversight of operational performance.

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.

Suffolk and Norfolk Constabularies recognise the importance of meaningful engagement with certificate holders, representative bodies, registered firearms dealers and other stakeholders. The constabularies have established an independent advisory group and formal communications process including regular meetings and structured updates to all parties.

Communications through automated messaging has been improved providing clear information and directing certificate holders to useful links on the relevant force websites. A physical brochure is under development to pass to registered firearms dealers, gun clubs and representative bodies to distribute to those within the community who may still not have access to digital material.

A process of advocacy has been implemented whereby representative bodies are in place to provide a direct route of communication to senior decision-makers within Suffolk and Norfolk Constabularies. Through this mechanism cases can be raised where it is felt a review of circumstances and progress may be required. This provides a level of senior management oversight and governance not previously available and an opportunity to identify further learning and process improvements whilst working with partners within the shooting community.

Internal engagement through briefing products, awareness training and routine communications managed through both operational and strategic leadership is now also in place. Updates detailing what the force did in response to feedback have been created and disseminated to all Firearms Licensing Unit staff.

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.

The forces are committed to ensuring that all firearms licensing personnel involved in the handling or transportation of firearms are suitably trained and accredited. Suffolk and Norfolk Constabularies already operate an established system of assuring competency whereby all relevant firearms licensing personnel receive formal firearms handling training and mandatory annual refresher training with auditable completion records.

Additional guidance and training are provided to frontline staff regarding seizure powers, booking procedures and safe handling requirements with guidance documents and links available across both force intranet sites.

A programme of additional face-to-face training for both new recruits and existing frontline staff is being developed by the Firearms Licensing Unit with the assistance of the Learning and Development department to deliver the College of Policing-approved training package. Further learning, refresher documents and aide memoires are also available to all staff. Scoping work is underway to establish a

formal annual wellbeing/welfare assurance process for all personnel who handle or transport firearms as part of their role.