

Performance and Resources Scrutiny Programme 2020**Report to the Office of the Police, Fire and Crime Commissioner for Essex**

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1.0 **Purpose of Report**

To provide an update on the performance of the Firearms, Shotguns and Explosives Licensing (FSEL) department between May and September 2020. This includes an update on the temporary actions taken in response to COVID-19, as well as longer term demand management considerations.

2.0 **Recommendations**

Update to previous recommendations.

Board to note:

- Single Online Home (SOH) for Essex FSEL went live 26th February 2020.
- Introduction of Medical Screening for all new applications, which went live November 2019 for new grants and February 2020 for renewals.
- Risk based approach for low risk shotgun renewals applications was adopted in February 2020.
- Change in Firearms Licensing decision reducing delegated authority from ACC to Superintendent, in line with Kent.
- Following measures introduced to deal with Covid-19, a request has been made to adopt 'virtual visits' for all renewals as business as usual for FSEL. This process replaces a 'home visit' for renewals (only). This is a telephone interview with the applicant, plus they email photographs of the serial numbers of their guns and storage location to the FEO to check against their file. When the compatibility issues between 'Teams' and 'Cyclops' is resolved the ambition is to conduct interviews using this.

3.0 **Executive Summary**

COVID-19 Response

Due to the COVID-19 pandemic, Chief Officers agreed to the following changes to process within FSEL:

- Suspension of new grant applications via SOH, with Firearms Enquiry Officers (FEO's) unable to conduct home visits.
- Suspension of variations to a certificate i.e. notification of buying/selling a gun
- Issuing of Temporary Permits where applicants are unable to obtain a medical screening form.
- Renewal enquires conducted by telephone where appropriate in a process called 'virtual visit'.
- Certificate holders under review where no face to face FEO enquiry could be conducted, review held until restriction lifted.

4.0 Introduction/Background

Essex FSEL manages all aspects of the licensing process of firearms and explosives for the (approx.) 27,000 firearms and shotgun certificate holders in Essex. The team are based at Police HQ and are responsible for:

- Managing applications for firearms, shotguns and explosives certificates.
- Issuing and maintaining records relating to certificates and permits in the Essex Police area.
- Assessing risk in relation to current certificate holders and, if required, revocation.
- Managing registered firearms dealers and Home Office approved gun clubs.

Current Staff Structure

FSEL	Essex-numbers
Office Manager	1.00
Office supervisor	1.00
Senior/Firearms Enquiry officer	1.00
Field Enquiry officers	9.00
Team Leaders	3.00
Case workers	10.5
Review officer	1.00
Clerk	1.00 (vacancy)
Total	27.5

The team are a source of income generation for Essex Police however, the costs recovered by the NPCC fixed license (table 1) fees do not cover the running costs of the department (table 2), a pattern which is replicated nationally.

	Shotgun licence	Firearm Licence	Co Terminus (firearm and Shotgun)
Renewal of a licence	£49.00	£62.00	£65.00

Table 1. Costs for FSEL grants and renewals

Year	Department Costs (£)	Income from applications (£)	Difference (£)
2015-16	656,165	325,537	-330,628
2016-17	821,862	332,080	-489,782
2017-18	845,704	312,123	-533,581
2018-19	881,466	207,522	-673,944
2019-2020	862,969	206,943	-656,026

Table 2. FSEL annual Costs and income for period 2015-2020.

(The projected income from grants and renewals for the period 2020-21 is £342,091)

FSEL income only comes from new applications or renewals. The renewal process goes through a 5-year cycle where demand in renewal applications peaks as illustrated in the graph inserted at point 6 on this paper. The next peak will be in 2022.

5.0 Current Work and Performance –

Since COVID-19 restrictions were introduced, FSEL has been operating remotely, with staff working from home. As outlined in section 3.0, changes to processes were adapted where business as usual practice could not be maintained. FSEL has recently returned to BAU in some areas:

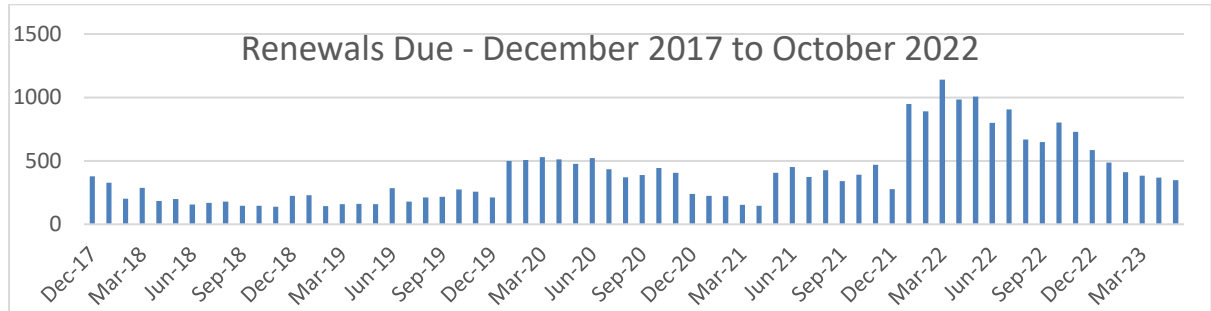
- In the early stages of Covid, new applications were paused due to the issues around home visits. They were restarted again on 1st August 2020 following government advice and local risk assessments conducted meaning we have restarted home visits.
- FSEL alongside other forces and as suggested by the Firearms and Explosives Licensing Working Group (FELWG), the option to download a paper application for a new grant will be removed. However, a paper version will be available on request and will still be accepted by FSEL.
- Due to the significant demands Covid-19 placed on our NHS, we decided rather than add to the burden by requesting 'medical screening forms' we would issue temporary permits, allowing holders an additional 12 months to get the medical screening form signed. When they supply the medical form, this will automatically become a formal renewal.
- The process of conducting virtual visits utilising email, telephone and MS Teams will continue.
- FSEL office staff continue their agile working approach.

Throughout the COVID-19 lockdown period, the FSEL has managed and maintained the 5-year renewal element of the licensing system throughout, with no certificate holders moving into unlawful possession.

Appendix 1 & 2 contains a summary of a meeting in June between the Policing Minister, DCC Dave Orford (Durham) and representatives of several interested

parties, and a covering letter dated from the Minister. Broad support is given for the medical screening process suggested by Mr Orford, which is really encouraging for the future and reinforces the changes already implemented in Essex FSEL.

6.0 Implications (Issues)



From January 2020, the renewal application demand will increase circa 50%. This is a national trend and is a legacy from the 1990's when the renewal cycle was increased from 3 years to 5 Years.

Ordinarily, FSEL process around 90 new grant applications per month. When SOH is reopened to accept new grants, there is a degree of unknown risk around the volume of a new grant applications that may be submitted, potentially creating a backlog. This may be further compounded where colleagues have moved annual leave from the early summer months to later in the year. At this stage, it is forecast that FSEL will remain self-sufficient through 2020 despite the increase in renewals.

Plans are being submitted through the Chief Officer Group (FSEL surge paper Appendix 3) with further efficiencies and plans to 'flatten the curve' of the incoming demand in 2021/22. A suite of options has been suggested that includes;

- Financially incentivise certificate holder to renew early (pull demand forward)
- Issue of temporary permits (push demand back)
- Adoption of virtual renewals used during Covid-19
- Seeking support of Special Constabulary to create and train an 'FSEL Team', to help staff deal with the increase in demand.

6.1 Links to Police and Crime Plan Priorities-

Keeping People Safe

FSEL continually risk assesses the suitability of certificate holders to own and possess firearms and take swift and effective action to review any certificate holder or others living at that the home address who come to the adverse attention of police or FSEL.

The team recommend the refusal or revocation of unsuitable applicants or those license holders who through their behaviour are assessed to be no longer fit to be trusted with owning and possessing firearms. They obtain medical verification from

GPs to ensure relevant medical conditions are considered during the decision-making process.

Since the previous reporting period, there have been 39 certificates revoked and 20 new applications refused. There are currently 7 decisions being appealed.

Help People

FSEL are involved in several public engagement activities with the shooting community. This includes a quarterly Firearms Licensing Advisory Group (FLAG) meeting with registered firearms dealers, shooting clubs and certificate holders.

FSEL have also been present at several public engagement events including having an information stall at The Blackwater Country Fair, Young Shots experience days and Young Farmers Annual Fair.

Note: Due to the COVID-19 restriction, currently all public engagement events are on hold.

Catching Criminals

In June 2019 an FSEL enquiry officer was on hand to support Op Farrow. This was the discovery and removal of over 200 guns from a private residence in Essex. FSEL staff supported Essex Police officers identifying the illegal possession of guns and other breaches under the Firearms Act.

FSEL officers supported the closing down of a rifle range (Full Metal Jacket) operating in Harlow, that was a danger to the public and was frequented by members of London based OCG's. This range was set up by the operator using a loophole in the Firearms Act to obtain Section 1 firearms.

6.2 Demand

From data held within the National Firearms Licensing Management System (NFLMS), we can accurately predict the demand for applications to renew an existing license. A five-year average is used to predict the month to month applications for new grants. This allows for accurate forward planning of resource in both administration and field-based functions.

With the introduction of Single Online Home, GP verification and Risk Based Renewals, it is envisaged that these changes will enhance the effectiveness of the department by making the process more efficient.

It is expected the impact of COVID-19 will slow the renewal process where FSEL await outstanding GP reports. It is not envisaged at this time that this will necessitate any additional resource.

A paper illustrating a significant demand in renewal application forecast for 2022 and a suite of options has been submitted to COG (FSEL Surge Paper – Appendix 3).

6.3 Risks/Mitigation

At present there are sufficient resources in FSEL to manage the increased demand throughout 2020 and the impact of COVID-19.

Board to note:

The changes to business as usual process due to COVID-19 will significantly limit FSEL ability to accurately report performance statistics. As previously mentioned in this report waiting times are reported in the number of days taken to process/issue a certificate. As highlighted FSEL will be issuing Temporary Permits during the COVID-19 situation. Temporary Permits remain in the NFLMS system with a 'received but incomplete status'. This will significantly distort the data when viewed against turnaround times as we are allowing applicants up to 1 year to obtain a GP report.

6.4 Equality and/or Human Rights Implications

No identified implications on equality, diversity or human rights have been evidenced whilst completing this report.

6.5 Health and Safety Implications

- GP Medical screening. With the introduction of mandatory GP verification at the point of application, the risk of fraudulent applications where a relevant medical condition has not been disclosed by the applicant has been significantly reduced.
- Certificate holders applying to renew an existing shotgun certificate will be assessed to establish if they are suitable to be processed as a Risk Based Renewal. This is where no aggravating factors are identified i.e. coming to police attention or GP highlights an issue with a relevant medical condition. The certificate will be renewed without the need for any type of visit.

7.0 Consultation/Engagement

Relevant command team members within OPC have been consulted and contributed to this paper.

8.0 Actions for Improvement

None identified at this time

9.0 Future Work/Development and Expected Outcome

- FSEL has been identified as a department suitable for relocation, with consultation due to start on 7th September 2020. Prior to, and during COVID-

19, FSEL were focused on agile working, therefore moving the team and reducing the number of 'hot desks' is not seen as a significant issue.




- Op Hexagon - Collaboration between Kent and Essex Police
 - Kent COG have authorised adding Cyclops within Kent FSEL to the IT program of work 20/21.
 - Essex FSEL are moving forward seeking authority for a business case for change, following Essex and Kent jointly designing more efficient processes within FSEL. These processes are more efficient and (when Kent have the IT in place and start to implement these changes) will lead to more convergence opportunities. Essex have decided to get to business case agreed now because even as a standalone model, the efficiencies will help moving into a period of surge.

- Phase 2 – Single On-Line Home (SOH)
 - Currently Hampshire are trialling phase 2 of SOH, which trials a Robotic Process Automation (RPA) for the inputting of data from SOH forms onto NFLMS. After initial discussions, it was decided that the trial would only be in respect of renewal applications.
 - The RPA was developed to identify an existing holder and process the application as the certificate holders' information already exist in NFLMS. The system reviews applications from the email box into which SOH delivers the documents interfaces with NFLMS and processes the application in exactly the same way as a human operator, dealing with address amendments and any change of name (marriage or deed pole), as well as updating GP, referee, and subject image.
 - As it runs through the process, it maintains a log (Excel) of any exceptions found, such as change in height, query over place of birth or referee. At the end of this processing run, it sends the report by email to FSEL staff documenting what has been processed and highlighting any exceptions that requires human intervention.
 - If the robotic system is not able to confirm the identity of the applicant against NFLMS, or if there is another significant exception (e.g. renewal submitted when it should be a grant), it adds this as a hard stop to his report, for a member of staff to resolve.
 - Since going live on 21st April, Hampshire report that they we have seen real 'time saving' benefits, which they believe equates to a 25% saving. As well as the time saving, they have also reduced the

(human) error rate; with the RBA dealing with data entry and administrative tasks, rather than their administrators.

- Hampshire FSEL have not been informed as to how long the trial is going to last but have recently received permission to add TVP (their collaborative partners) to the trial as they scale up.
- Hampshire have said the system is such a success, even if it doesn't get national rollout, they intend to purchase this software, and look to develop into other areas of their business such as vetting.
- The makers of Cyclops have recently approached Essex to consider if they would be willing to trial a similar system designed by them to link to Cyclops. It should be stressed this is at a very early (conversation and concept) stage at this time, and if this is considered viable then a paper will be taken to COG with a full business case.

Appendices

1.	Home Office letter regarding medical screening.	 Medical arrangements for fir
2.	Home Office medical screening, next steps.	 Summary and next steps - Medical arrar
3.	FSEL Surge Paper submitted to COG.	 June 2020 COG Paper - FSEL Surge v2