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Executive summary

This paper, prepared by David Orford, consultant to the Countryside Alliance and former National Police Chiefs Council lead on Firearms Licensing whilst Deputy Chief Constable of Durham Constabulary, sets out the case for reforming the firearms and explosives licensing system in the United Kingdom. The current model, rooted in legislation dating back to the Firearms Act 1968 and earlier, delegates responsibility for issuing firearms and shotgun certificates to local police forces under the authority of chief constables. While the system has evolved in response to tragic incidents such as Hungerford (1987), Dunblane (1996), and Plymouth (2021), its structural foundations have remained largely unchanged for over a century.

Today's approach is characterised by inconsistency, inefficiency, and uneven service delivery across different police forces. Applicants face a "postcode lottery" where processes, timescales, and decision-making standards vary widely, despite paying nationally standardised fees. Recent inspections and coroners' inquests have repeatedly highlighted weaknesses in governance, risk assessment, oversight, and information sharing. In contrast, many other high-risk sectors in the UK such as security, aviation, and healthcare are overseen by national licensing bodies that ensure fairness, consistency, and efficiency.

International comparisons further underscore the UK's outdated structure. Many developed nations operate centralised licensing agencies with uniform processes, comprehensive vetting, and clear lines of accountability. By contrast, the UK system continues to rely on local police discretion, despite modern data-sharing capabilities that render its 1960s-era structure obsolete.

The fundamental truth of firearms licensing is that the law is not the issue; it is the structure that delivers the law. The coroner commented in relation to Devon and Cornwall Police's firearms licensing structure following the Keyham shooting that it was a "dangerous shambles". Failure to address the structural foundation of firearms licensing means that this risk of firearms ending up in the wrong hands remains.

This paper identifies two broad options for the future: retaining the current system, or establishing a new national licensing agency. Maintaining the current system would perpetuate existing weaknesses, while further sporadic consolidation would deliver only some improvements.

The establishment of a National Firearms & Explosives Licensing Agency (NFELA) offers the most promising solution. A single body would improve consistency, strengthen governance, modernise IT systems, streamline training and recruitment, and provide transparent financial accountability. Importantly, it would enhance public safety while offering fairer, more efficient and consistent services to certificate holders.

Recommendation:

The Home Office should broaden its forthcoming consultation to include the option of establishing a national licensing agency for firearms and explosives. This would modernise a system that has remained structurally unchanged for over a century, align the UK with international best practice, and address the fundamental issues of inconsistency, inefficiency, and lack of accountability that undermine the current framework.

The history and development of firearms & explosives licensing legislation in the United Kingdom

Before the 20th century, Britain had no general licensing requirement for owning a firearm. This changed with the Firearms Act 1920, passed partly in response to post-World War I fears of political instability and rising gun crime. It introduced a licensing system for most firearms, requiring police-issued certificates, and set out the principle that possession should only be permitted to those with "good reason". Shotguns were initially exempt from licensing, deemed a tool for pest control and sport rather than a weapon of insurrection.

Later, the Firearms Act 1937 (as amended) and the Firearms Act 1968 consolidated previous legislation into a single framework, covering rifles, pistols, and shotguns. The 1968 Act (as amended) remains the foundation of UK firearms law, establishing definitions, penalties, and licensing conditions. Shotguns came under stricter control following the Criminal Justice Act 1967 and Firearms (Amendment) Act 1988, the latter prompted by the Hungerford shooting, which prohibited most self-loading rifles and introduced shotgun registration.

Two key tragedies reshaped firearms law: Along with the Hungerford shooting in 1987, the Dunblane school shooting (1996) led to the Firearms (Amendment) Acts of 1997, which banned almost all handguns in Great Britain. Licensing criteria became more stringent, with increased background checks, secure storage requirements, and limits on firearms and their ammunition.

Explosives legislation was modernised through the Explosives Regulations 2014, consolidating earlier Acts to align with modern safety standards and European directives.

Fundamentally, the generally unarmed police service of the United Kingdom is not a body established or structured as a licensing organisation. Whilst there is clearly a link to public safety, the reason for police taking on the role of licensing firearms is probably due to their being nobody better able to do it. This cannot be an approach that remains justifiable in 2025.

100 years of firearms licensing

1920

First Firearms Act

Introduced in wake of WWI to keep ex-military rifles out of the hands of revolutionaries – police only option to issue licences.

1968

Firearms Act consolidated

Shotguns start to be licensed at this point. This Act is still the basis of licensing today.

Summary of the current system, including dealers

Today, anyone wishing to possess most firearms or explosives in the UK must obtain a certificate from the police or, for certain explosives, a licence from the Health and Safety Executive. Applicants must demonstrate a legitimate purpose such as sport shooting, hunting, or work, undergo background checks, and meet strict storage and safety conditions. The costs for an applicant are at least £198 for the initial grant of a firearm certificate, and £194 for a shotgun certificate. In addition to this are medical record checks with fees paid directly to doctors and a home visit from the applicant's local police force.

However, the foundation of licensing has remained closely aligned to the structure of policing in the United Kingdom from its outset. This places the office of chief constable at the pinnacle of the process, which gives an inconsistency of approach, because different chief constables have different challenges. They must make local decisions in relation to finance and resources to best police their areas within their budgets, along with their respective police and crime commissioner or equivalent democratic oversight.

The Countryside Alliance has even had reports of members moving police force areas due to the different approaches taken by different chief constables to firearms licensing.

In the UK, most firearms require a Firearm Certificate (FAC) issued by the local police, while shotguns require a separate Shotgun Certificate (SGC). They are granted if the applicant can demonstrate a legitimate reason for ownership (such as sport shooting, hunting, or work), is deemed fit to possess a gun, and meets strict security requirements for safe storage. Applicants undergo detailed background checks, including criminal record and medical history reviews, and the police may interview them and their referees. A FAC specifies each firearm, calibre, and ammunition limit the holder is allowed, whereas an SGC allows possession of any number of shotguns meeting the legal definition. Certificates last five years, after which renewal involves repeating the application and vetting process. As of March 2025, there are over 700,000 firearm and shotgun certificates in Great Britain.

Firearms licensing system has evolved in reactive response to tragic incidents

1987

Hungerford

1988 Restricted: shotguns that fire >3 shots (although not used in attack); Banned: semi-auto full bore rifles.

1996

Dunblane

1997 Banned: handguns.

2021

Plymouth

2024 Referee requirement for shotguns doubled; Firearms Enquiry Officer training introduced.

2025

Proposal for reform to a single, national licensing authority.

In the UK, most explosives such as gunpowder for reloading ammunition, commercial blasting materials, or certain pyrotechnics require a licence or registration issued either by the local police or the Health and Safety Executive (HSE), depending on the type and quantity involved. Applicants must show a legitimate purpose (e.g., quarrying, construction, film special effects, or sporting use), undergo background and security checks, and comply with strict storage and safety regulations set out in the legislation. Storage sites must meet approved safety distances, security standards, and fire precautions, and may be inspected before a licence is granted.

In the UK, anyone wishing to trade in firearms or ammunition must be registered with the police as a Registered Firearms Dealer (RFD) under the Firearms Act 1968 (as amended). Applicants undergo rigorous background checks to confirm they are not prohibited from possessing firearms and are fit to hold dealer status, and their business premises are inspected to ensure they meet strict security requirements, such as secure storage and alarm systems. Once approved, an RFD certificate is valid for three years and authorises the holder to trade in the categories of firearms for which they are registered. Section I dealers may handle firearms and ammunition requiring a Firearm Certificate (e.g., rifles, muzzle-loading pistols, and certain shotguns with magazine capacity >2 cartridges). Section 2 dealers are authorised to trade in shotguns that fall under the Shotgun Certificate rules (e.g., smooth-bore guns with a barrel length over 24 inches and a maximum two-round magazine).

Section 5 dealers have the highest level of authority, allowing them to handle prohibited weapons such as handguns, fully automatic firearms, and certain military-grade ammunition. These certificates are granted only in exceptional cases, usually to dealers supplying the police, armed forces, or for specific authorised purposes. All dealers must keep accurate records of every firearm and ammunition transaction, which are open to inspection at any time, and police may conduct unannounced visits to ensure ongoing compliance.

In the UK, Section 5 dealers are those authorised to possess and trade in prohibited weapons under Section 5 of the Firearms Act 1968 and are licensed directly by the Home Office, not by local police. While the police are still involved in security inspections and background checks as part of the application process, the final authority to grant, refuse, or revoke a Section 5 authority rests with the Secretary of State.

"Section 5 dealers are those authorised to possess and trade in prohibited weapons under Section 5 of the Firearms Act 1968 and are licensed directly by the Home Office, not by local police"

Practically this means that most certificates are issued under the direction and control of chief constables or their equivalent. By virtue of the structure of policing this creates a wide and diverse inconsistency of standards and service for section one and two certificate holders despite statutory guidance. There is slightly different legislation in place due to the special circumstances and history of Northern Ireland, however the principle of police oversight and scrutiny, along with medical considerations remains the same.

Given the history of capabilities within policing this development is not an unreasonable situation to expect. When the Firearms Act of 1968 was implemented, there were none of the data and information sources that are available to police forces today. Knowledge of the suitability of an applicant may very well have rested in the awareness of their local neighbourhood beat officer, combined with scrutiny of locally held paper records.

Historically it made perfect sense for local forces to judge the suitability of applicants to possess firearms and shotguns within communities. However, the development of firearms legislation since 1968 has not been driven by changes in policing capability, but rather in the response to tragedies due to the misuse of firearms.

Yet policing capabilities to judge the suitability of applicants has been transformed since 1968. Information sources are now widely available and accessible to all forces, including not only conviction data, but also intelligence and information held in all police forces and accessible by all. Practically this means that where an applicant applies to a single force, then that force can access data held across all forces.

Over this time, the Home Office has also attempted to introduce greater consistency in firearms licensing with the regular publication of statutory guidance to forces. The most recent being published in 2025.

"Within England & Wales, 43 different police forces apply these processes and laws to persons who reside within their boundaries, even though the firearms and ammunition authorised may be used across different boundaries"

Finally, there is a national memorandum of understanding signed in 2019 between the Home Office, the British Medical Association (BMA) and the National Police Chiefs Council in relation to the responsibility of doctors and the police to assess the suitability of applicants from a medical perspective.

At a macro level all of these three aspects in relation to police data, medical suitability and national guidance seek to minimise the inherent structural weaknesses of a model based on the capability and structure of policing in 1968.

These structural aspects are also illustrated in the different approaches taken within England & Wales, Scotland and Northern Ireland. Each country within the United Kingdom has their own nuances, and differences within the framework. The greatest difference being the approach in Northern Ireland. However, the scope of this document is not to address tolerances to risk as outlined within legislation as to who should be allowed in law to possess firearms, or which firearms, but rather the processes that are used to apply those risk judgements.

"The system, processes and service improved significantly with the amalgamation of forces into Police Scotland"

Within England & Wales, 43 different police forces apply these processes and laws to persons who reside within their boundaries, even though the firearms and ammunition authorised may be used across different boundaries. In Scotland and Northern Ireland there is a single process that applies to all applicants within their country. Additionally in Northern Ireland there are slightly different appeal processes.

These processes are administered largely by non-warranted civilian staff including those in management and decision-making positions.

It is the experience of the Scottish Countryside Alliance that the system, processes and service improved significantly with the amalgamation of forces into Police Scotland. This in effect created a national licensing agency for Scotland. Members report a significant improvement in consistency, and timeliness since this transition. The experience is quite stark in comparison to that reported by members in England & Wales.

Findings from previous inspections into firearms licensing (including inquests)

His Majesty's Inspectorate of Constabulary and Fire & Rescue Services' (HMICFRS) first dedicated national inspection into firearms licensing came in 1993 with the Administration of Firearms thematic review, which examined how police forces processed applications, maintained records, and enforced compliance. This was followed in 2002 by Safe Hands - Secure Arms, a more in-depth study involving pilot forces and follow-up visits. That inspection found significant inconsistencies in how forces applied "good reason" and "fit person" tests, and it recommended improvements in policy, staffing, performance monitoring, and training to bring greater uniformity across England and Wales.

In 2014–2015, HMICFRS published Targeting the Risk, the first modern, nationwide inspection of firearms licensing. It assessed governance, risk management, and consistency of decision-making across all forces in England and Wales. The findings highlighted weaknesses in applying guidance and risk assessment, leading to a push for the Home Office's licensing guidance to gain statutory status, which was achieved through the Policing and Crime Act 2017.

"Systemic failure in Devon and Cornwall Police that gave rise to a "dangerous shambles" in their firearms licensing structure"

Scotland's licensing arrangements were reviewed in March 2018 by HM Inspectorate of Constabulary in Scotland (HMICS). This inspection of Police Scotland's service examined training, governance, data quality, unannounced visits, and stakeholder engagement, and made 24 recommendations to strengthen consistency and service quality.

A new thematic inspection of firearms licensing in England and Wales is scheduled for the 2025–2026 period by HMICFRS.

Within society, Coroners have a vital role to assist with the prevention of future deaths through their examination of the circumstances that lead to the loss of life. Where this is related to the misuse of a firearm or shotgun it is vital that the relevant authorities consider their findings. These are often given under a Rule 43 (Coroners Rules 1984) notification.

There have been significant inquests over the period modern firearms licensing legislation has been in place. These findings have often focused on the capability and training of decision makers to assess risk and suitability, the oversight scrutiny of systems and processes, and the effectiveness of both accessing and sharing information relevant to risk assessments.

Following the Keyham shootings in 2021 the coroner made significant recommendations which fundamentally pointed to a systemic failure in Devon and Cornwall Police that gave rise to a "dangerous shambles" in their firearms licensing structure.

There is no regular or planned oversight and inspection regime in place to scrutinise the effectiveness and efficiency of firearms licensing in the United Kingdom. It is very much lead on an irregular case driven basis either through infrequent thematic inspections by HMICFRS or through the coronal examination of deaths following a tragedy.

Other international systems and approaches

Firearms licensing systems vary widely across the developed world, reflecting different historical experiences, legal traditions, and cultural attitudes toward guns. In Europe, most countries operate restrictive "may issue" or "shall issue with conditions" systems, where applicants must demonstrate a legitimate purpose, pass background checks, and meet strict storage standards. Nations such as the United Kingdom and Japan have among the toughest regimes requiring comprehensive vetting, medical checks, and police interviews while still allowing limited civilian ownership for sport, hunting, or work-related needs. Many European states, including Germany and France, require regular renewals, psychometric or medical assessments, and proof of ongoing training or club membership.

In North America, there is a stark contrast between the United States and Canada. Canada maintains a licensing system under the Firearms Act 1995, which requires a Possession and Acquisition Licence (PAL), background checks, and completion of a safety course. Handguns and certain rifles are restricted or prohibited. The United States, by contrast, has no unified federal licensing requirement for firearm ownership though federal law does regulate dealer licensing and prohibited persons. Licensing and carry regulations are determined at the state level, ranging from very permissive in some states to relatively strict in others, such as New York or California where applicants may need permits, safety training, and extensive vetting.

Australia and New Zealand overhauled their firearms laws after mass shootings in 1996 and 2019 respectively. Australia's system requires a "genuine reason" for ownership (self-defence is excluded), police background checks, and secure storage, with most semi-automatic rifles and shotguns banned. New Zealand now operates a stricter licensing regime with regular renewals, vetting interviews with family or household members, and mandatory safety training.

East Asian jurisdictions such as Japan and South Korea maintain highly restrictive systems. In Japan, civilian ownership is limited to shotguns and air rifles for hunting or sport, with rigorous training, written and practical exams, mental health checks, and police inspections. South Korea similarly restricts ownership and requires firearms to be stored at police stations when not in use.

Overall, while approaches differ, most developed countries outside the United States rely on a licensing model built on demonstrated need, suitability checks, mandatory training, and secure storage. The strictness of these systems generally correlates with lower rates of gun related crime and mass shootings, though cultural and social factors also play a significant role.

"Nations such as the United Kingdom and Japan have among the toughest regimes requiring comprehensive vetting, medical checks, and police interviews"

Scotland

It is worth mentioning Scotland in terms of international comparisons, as Scotland follows the same laws as England & Wales in for firearms licensing.

Police Scotland was formed in April 2013 by amalgamating the eight regional forces previously covering Scotland. This merged the eight different firearms licensing departments and placed the authority under a single Chief Constable. In effect it is a centralised licensing system due to having a single police force.

It is the experience of Countryside Alliance members that they receive a highly professional, consistent and timely service from Police Scotland.

This shows that it is perfectly feasible to bring together different approaches locally to firearms licensing and deliver a national service under current legislation.

UK national licensing systems in other areas

Having considered the history and development as to how the United Kingdom has developed its licensing approach to firearms, shotguns and explosives, it is worth noting other systems designed to ensure public safety related to individuals within society.

"This merged the eight different firearms licensing departments and placed the authority under a single Chief Constable. [... Our members report] that they receive a highly professional consistent and timely service from Police Scotland"

In the UK, the Disclosure and Barring Service (DBS) is a government body under the Home Office that helps employers make safer recruitment decisions and protects vulnerable groups, including children and adults, from harm. Its main role is to provide criminal record checks at different levels (basic, standard, enhanced, and enhanced with barred list checks), enabling employers to see relevant convictions or cautions when hiring for sensitive roles. The DBS also maintains the Children's Barred List and the Adults' Barred List, which contain individuals who are legally prohibited from working with these groups, and makes barring decisions when someone's criminal history or behaviour suggests they may pose a safeguarding risk. By combining these disclosure and barring functions, the DBS plays a vital role in safeguarding across the UK by preventing unsuitable individuals from working in positions of trust and responsibility.

The Security Industry Authority (SIA) is the UK's statutory regulator for the private security industry, established under the Private Security Industry Act 200I. Its role is to ensure that individuals and businesses providing certain security services meet professional standards, are fit and proper to operate, and do not pose risks to public safety.

The SIA has two main functions:

- I. Licensing individuals Anyone working in licensable security roles, such as door supervision, close protection, CCTV monitoring, cash and valuables in transit, and key holding, must hold a valid SIA licence. To get one, applicants undergo identity verification, criminal record checks, and must complete approved training relevant to their sector. The SIA uses these checks to ensure only suitable, properly trained individuals are authorised to work in security.
- 2. Approving businesses Through the Approved Contractor Scheme (ACS), the SIA assesses private security companies against a set of operational and performance standards. ACS accreditation is voluntary but seen as a mark of quality and professionalism in the industry.

As an individual you must have completed SIA approved training courses over a number of days, which includes first aid training. The fee is £184 and it the accreditation lasts for three years. As of March 2024 the SIA licenced approximately 450,000 individuals.

Transport roles, such as HGV, PSV, and taxi driving, are licensed by the Driver and Vehicle Licensing Agency (DVLA) or local councils, involving DBS checks and medical exams, with costs from about £50–£150.

The Civil Aviation Authority licenses pilots and aircrew after criminal record vetting and aviation medicals, typically costing £80-£200 for the medical alone. Maritime professionals certified by the Maritime and Coastguard Agency must pass criminal checks and an ENGI medical (around £II5).

Healthcare professionals regulated by bodies like the General Medical Council (GMC) or Nursing & Midwifery Council (NMC) undergo enhanced DBS checks (about £38 for individuals) and fitness-to-practise health assessments.

Childcare and teaching roles require Ofsted or local authority approval with enhanced DBS and, in some cases, health declarations.

Sensitive nuclear industry roles, licensed by the Office for Nuclear Regulation, involve national security vetting and occupational health clearance, with costs often covered by the employer.

What this shows is that in many areas of significant risk to society, the United Kingdom adopts an approach where a national body takes responsibility for the processes and risk judgements that are required to ensure fairness and consistency are achieved. It does not maintain a county or regional devolution of licensing responsibilities in other areas with similar risk levels to firearms licensing.



The case to change to a National Firearms & Explosives Licensing Agency

The strategic case to re-design the approach for licensing firearms, ammunition and explosives in the UK is based on the premise that the current system is not fit for purpose in the modern world.

It is based on the information, data and knowledge systems that were in place to support policing in the 1960's. This world has changed out of all recognition. This is mirrored by the change in Chief Constable responsibilities and accountability.

"No modern system would be designed in the way the current system operates. This is evidenced by the plethora of other national bodies carrying out the licensing of individuals. None of these areas delegate decisions of such a high risk nature to a patchwork of varied risk tolerances and approaches"

Shootings through the mis-use of legally held firearms remain rare in the United Kingdom, however, there have still been a number since 1968. Although each inquest has made recommendations to improve the current system, the structural foundation remains unchanged.

To illustrate this further it may be more appropriate that the case for change is examined through SWOT (Strengths, Weaknesses, Opportunities and Threats) considerations.

Strengths of the current system

Even in the face of a number of tragedies related to the operation of the current system, the misuse of legally held firearms within the United Kingdom remains exceedingly low when set against international standards.

The current system is mostly well understood by both the police and shooting communities. Given the risks associated with firearms and ammunition in society, it is a key strength that knowledge and understanding of the current system is already embedded.

There are those within policing who argue that the current system gives clarity of accountability by aligning approvals under the authority of a chief constable or equivalent. This is further evidenced in relation to local discretion and understanding the needs of various communities. Especially within certain contexts such as the farming or rural communities.

There is also an argument that by having a number of different departments responsible for firearms licensing decisions across the UK, it reduces the chance of significant global failures that could impact all forces at once. In effect the underperformance of one department is only generally felt locally and does not impact nationally.

This risk mitigation is also reflected in some information technology, and support services as these are delivered locally within forces.

Weaknesses of the current system

The main weaknesses of the current system relate to inefficiencies and ineffectiveness.

All forces must maintain staff and departments to process applications that relate to applicants who reside in their area. This reduces the opportunity to maximise resources where boundaries between forces could be ignored.

The Home Office has moved towards reflecting the costs of a firearm or shotgun certificate in new charges, along with an expectation that this money will be retained to improve and deliver services within firearms licensing.

Currently not every force has committed to this approach, and better financial information is required to inform all stakeholders as to the financial benefits that could be derived by maximising resources across force boundaries.

This approach has been utilised in many areas of policing for other business areas such as major crime, traffic, and training, where some forces have come together to deliver services to all members of a consortium to achieve financial and process efficiencies.

In 2025 the British Association of Shooting and Conservation (BASC) produced the most detailed analysis to date of the differences in performance of licensing departments.

The BASC report well evidences the experiences of certificate holders across the UK who are now paying identical costs for what the Home Office calculated to be a full cost recovery for the delivery of an effective and efficient service.

"These weaknesses combine to hard wire structural risk into the current approach that cannot be removed, only mitigated"

Whilst the discretion of chief officers may be a strength in certain situations it is also a weakness in terms of consistency. Different forces take different decisions in relation to resources, training, governance, finance and information technology. This builds inevitable inconsistencies into a system where consistency is the goal.

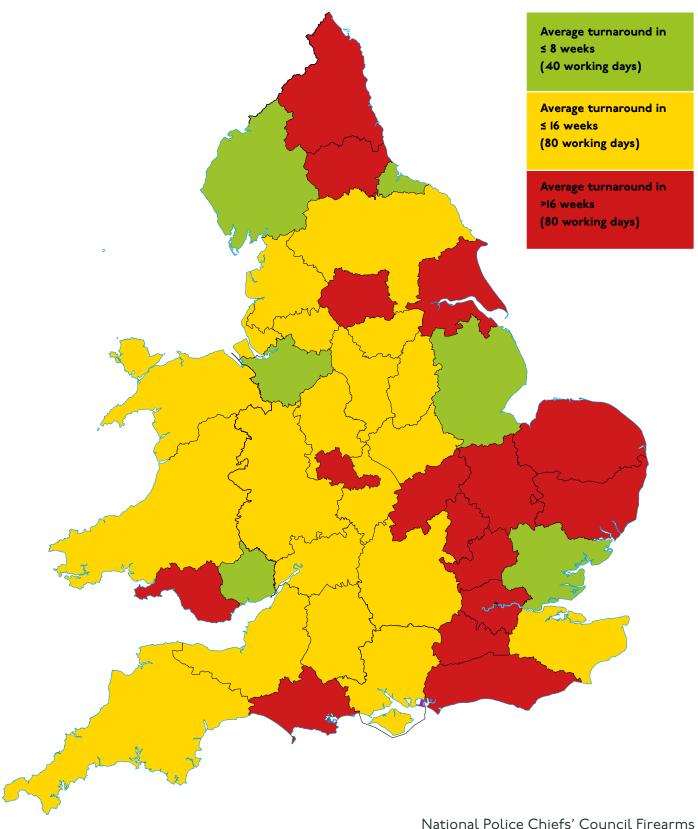
Overview and scrutiny of the current processes is not currently systematic. At various times HMICFRS carry out thematic inspections, however they are not currently inspecting as part of their ongoing routine inspection programme. This makes it more challenging to monitor longitudinal improvements or identify structural risks at an early stage.

This means that it is an inevitable consequence that further scrutiny is often only applied during a coronial examination of the circumstances related to shootings involving licensed firearms as was the case with the Keyham inquest of 2023 related to the shootings in Plymouth in 2021.

In order to process applications effectively, forces operate different record management solutions. Whilst there are centrally held records that can be accessed by all forces, the national system does not deliver a full case management solution.

These weaknesses combine to hard wire structural risk into the current approach that cannot be removed, only mitigated.

Average renewal/grant application turnaround by force area



Threats related to changing to a national agency

Any change of this magnitude would bring commensurate information technology changes. History would say that any changes like these bring significant transition risks. This is always the case with any process reliant on information technology and data sharing.

Local knowledge is a building block of policing in many areas, and there is a threat that using a national agency will remove this aspect of the risk decision process.

Centralising processes also increases the threats related to bottlenecks, and their impact as a problem in this space would impact nationally on all certificate holders.

Any agency will require set up costs and a failure to invest would be a threat to the successful implementation of the processes and a failure to realise benefits.

There are political threats to change, in that this is an area of public safety that is often ignored unless something goes wrong. To take a proactive approach to implement improvements is a risk itself.

Were there to be tragedies during this process then it would be a challenge to remain objective in the face of inevitable questions that could attribute the failures to the decision to change.

This also features in relation to the political requirements for legislation changes and the drive to push these through Parliament.

Opportunities in forming a national agency

The opportunities a national firearms licensing agency could exploit are numerous.

Many policing functions have been brigaded at regional and national level where the business model for the service enabled a capability that could be delivered in a more efficient way. This has been seen in support functions such as training and forensic science, through to more operational functions such as traffic policing or major crime.

The business cases for these services consistently referenced the inefficiencies of delivering services solely within the geographical borders of forces, where the processes involved were very similar to those across neighbouring borders.

Opportunities exist to make efficiencies and improvements in terms of

- Staffing
- Information technology
- Training and continuous development
- Consistency
- Fairness
- Public safety
- Costs

The National Firearms Licensing Management System (NFLMS) is due for replacement, and it would make operational sense for this to provide a consistent case management solution to forces.

Staff would not only be able to be trained in a consistent way, but risk tolerances for decision making could also be better managed. Lessons from appeals could be implemented in a more consistent way to the benefit of all stakeholders.

Financing firearms licensing

In the UK, firearms licensing is primarily financed through a system of applicant fees, which are set nationally by the Home Office and paid to the local police force processing the application.

These fees cover certificates for shotguns, firearms, and related permissions, but they may not fully offset the administrative and staffing costs incurred by police forces. Any remainder is funded from general policing budgets.

This funding structure has long been a point of debate, with shooting organisations often arguing that fees should remain affordable to avoid penalising legitimate users, while police representatives and some policymakers contend that the licensing system should be more self-sustaining to relieve pressure on frontline policing resources.

In 2025, the key change in how firearms licensing is financed in the UK was the introduction of significantly increased licensing fees, implemented to achieve full cost recovery for police forces administering the system. This reform was enacted via the Firearms (Variation of Fees) Order 2025, which came into effect on 5 February 2025.

Under the new fee structure:

- A new firearms certificate grant rose to £198, up from £88 in 2015.
- Renewals jumped to £131, compared to £62 previously.
- Shotgun certificate grants increased to £194 (from £80), while renewals climbed to £126 (from £49).
- Coterminous (combined firearm and shotgun) certificates now cost £202 for grants and £155 for renewals.
- Other fees, such as firearm certificate variations, replacement certificates, dealer registrations, and visitor permits, were also raised substantially.

The Home Office is yet to release the detailed methodology as to how the fees were calculated. There remains some concern that police forces may still be funding parts of firearms licensing functions from other budgets which reduces the funding for frontline services.

There are other financial challenges in this space that may not be fully realised. The BASC analysis of only 32 forces disclosed budgets showed their declared expenditure to be £26M, against a calculated income of £18M using the new fee structure. Extrapolating this to all forces would leave an income gap estimate well in excess of £10M, and this is before other costs such as national information technology, and the Home Office are added.

A National Firearms Licensing Agency would introduce absolute clarity in this space and give more detailed accountability to both government and certificate holders.

For example, the annual expenditure of the Security Industry Authority is approximately £35M. Obtaining a SIA licence costs £184 and is valid for three years. This fee has reduced from £220, with the Government confirming it has adopted a full cost recovery model.

There are approximately 500,000 licences overseen by the SIA, with a requirement for applicants to pass courses and enhanced criminal record checks.

The purpose of mentioning the SIA is not to draw an exact comparison between the duties and tests applied to SIA licences compared to firearm certificates. It is purely to illustrate the scale of budgets allocated to other national licensing functions.

Legislation and governance

As mentioned, the foundation for firearms licensing is the Firearms Act of 1968 and comparable legislation for Northern Ireland. Over this time, the borders of police forces have changed, and in some cases they have even amalgamated as seen in Police Scotland. Procedurally this has had minimal impact due to the role the Chief Constable plays within firearms licensing governance.

Internationally, where there are national licensing models this is addressed by in effect having a delegated signatory in law who has the authority to issue certificates to individuals.

For example, in Canada it is the "Chief Firearms Officer" for a region, who applies national law. In some states this is a Royal Canadian Mounted Police officer, but there is no requirement in law for this to be the case. For some states, they have appointed an official.

The consequence for the UK is that any national firearms licensing agency will require an amendment to current legislation in order to ensure effective oversight, scrutiny and governance. But there are comparable models working effectively in other similar jurisdictions in the world.

Stakeholder landscape

In the United Kingdom, stakeholders hold differing views on the current state of firearms licensing. One consistent message from all stakeholders including all certificate holders is that they place public safety as their top priority. However those stakeholders who are not owners of the processes equally have a lack of faith that the current structure is fit for purpose.

"Stakeholders who are not owners of the processes equally have a lack of faith that the current structure is fit for purpose"

The Home Office, responding to tragedies such as the 2021 Plymouth shooting, has introduced guidance for national training for Firearms Enquiry Officers, and introduced full cost-recovery fees.

Parliamentarians have criticised the system as a "postcode lottery" and called for independent oversight by HMICFRS, while the Scottish Government and HMICS argue the laws are outdated and in need of modernisation to reflect Scotland's rural realities.

The British Medical Association supports licensing as a privilege tied to public safety, clarifying that GPs provide factual medical reports rather than opinions, and has worked to introduce digital firearm markers in patient records.

Advocates for more restricted gun ownership, including the Gun Control Network, urge shorter renewal periods, access to medical records, and hotlines to report concerns.

Taken together, these perspectives show broad agreement on the need for reform, but debate over whether the priority should be stricter regulation for public safety or streamlined systems to protect the interests of lawful firearm users.

"Parliamentarians have criticised the system as a "postcode lottery"

Options for consideration

At a structural level the approach to firearms licensing in the United Kingdom has not changed for over 100 years. Legislation has changed the type of firearms that can be possessed by civilians, and information to inform decisions has improved. However, the structural accountability through the office of the chief constable remains unchanged.

Without substantial structural change, it is reasonable to assume that the fundamental weaknesses related to inconsistencies will remain, even in the face of mitigating actions related to guidance, training, and inspection.

Option one - No change

There is significant historical evidence that remaining with the current structure will not significantly reduce the risk to society as it is highly reliant on the efficiency and effectiveness of individual police forces.

"Information from HMICFRS shows that this effectiveness varies over time, combined with significant variations in chief officer tenure who set the risk tolerance for individual forces"

Whilst there have been substantial improvements in guidance to forces and available information, there is no current mechanism in place that regularly and consistently validates force capability and capacity in firearms licensing other than accountability through local Police and Crime Commissioners.

Retaining the current structural position is not an appropriate solution that maximises public safety given the changes to policing since 1968.

Option two - Centralisation of firearms licensing

Grant authority to issue firearm, shotgun and explosives certificates to a body other than police forces. Such an agency could cover any, or all of the following.

- The United Kingdom
- Great Britain
- England and Wales

The agency could be police lead. The Countryside Alliance also notes the high number of non-warranted police staff who currently carry out licensing functions and would welcome a wider debate as to the governance that is best placed for our society.

The rationale for applying different solutions that differentiate England & Wales, Scotland and Northern Ireland, is that there is an argument that strategic solutions are operating currently within the latter two locations.

Even if Scotland and Northern Ireland retained their current autonomy, the scale of change within England & Wales would be significant to realise massive benefits. There may also be political and legislative reasons as to why a nuanced approach would be desirable.

Terms of reference and scope

This discussion document has been prepared by the Countryside Alliance to stimulate discussion and debate to drive meaningful reform within the firearms and explosives licensing landscape of the United Kingdom. The document will focus predominantly on the issues pertaining to firearms and shotgun licensing.

The document is not intended as a white paper or business case for any recommendations. Questions may remain; however the Countryside Alliance believes that without the ambition to challenge and debate the current approach to firearms licensing in the United Kingdom, we continue to live with a level of risk to the public that could be reduced whilst also failing to improve the service to certificate holders.

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