



POLICE AND CRIME COMMISSIONER FOR CLEVELAND

Firearms Licensing

FINAL Internal Audit Report: 4.25/26

30 September 2025

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CONTENTS

Audit outcome overview 3

Summary of management actions 8

Appendices

Detailed findings and actions 10

Appendix A: Categorisation of findings 13

Appendix B: Internal audit assignment opinions 14

AUDIT OUTCOME OVERVIEW

In line with our scope, the overview of our findings is detailed below.

Background: The objective of the review was to check to ensure that firearms licensing is being undertaken in accordance with Home Office guidelines and with due regard to local procedures. It was also to allow management to take assurance that the Force have adequate and effective processes in place for the safe issue of firearms and shotgun licenses in line with the Firearms Licensing: Statutory Guidance for Chief Officers of Police, February 2023.

Cleveland Police's Firearms Licensing Unit (FLU) are responsible for issuing firearms, shotgun, and explosives certificates in accordance with the Firearms Act 1968, Firearms (Amendment) Act 1997, and the Explosives Regulations 2014.

The Force administers all firearms licensing matters in accordance with the:

- Home Office Statutory Guidance for Chief Officers of police on firearms licensing;
- Home Office guide on firearms licensing law (non-statutory); and
- College of Policing Authorised Professional Practice (APP) on firearms licensing.

The Force utilise the statutory guidance set out by the Home Office, and have created a personalised Firearms Licensing Policy and operational guidance for internal staff to support through the firearms licensing process.

As part of this review, we have considered grants, renewals, variations, revocations, and refusals of firearms and shotgun licenses, and tested a sample of each to confirm compliance with the Home Office Statutory Guidance.

Conclusion: We have verified through testing that the Firearms Licensing and Explosives Team had well designed and effective controls and processes in place to ensure adequate suitability checks are carried out to support firearms licensing applications in compliance with the guidance issued by the College of Policing and the Home Office Statutory Guidance. Our review has identified **one** medium and **one** low category actions. The medium category action relates to the need to ensure greater visibility in the reporting of performance of the 11% of applications received in the past 12 months that are still in consideration.

Internal audit opinion:



Minimal Assurance



Partial Assurance



Reasonable Assurance



Substantial Assurance

Taking account of the issues identified, the board can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).

Audit themes: We found the following control areas to be adequately designed and operating effectively:

Policy and Procedures

The Home Office Firearms Licensing: Statutory Guidance for Chief Officers of Police was first published on 20 October 2021 and came into force on 1 November 2021 to provide clarity and consistency across each Force. The guidance was updated in February 2023 and re-published following a post-implementation review. We reviewed the latest version on the government website which outlines the purpose, suitability checks, assessing suitability, record keeping and duration of certificates and registration. The Force utilise the statutory guidance set out by the Home Office; and have created a personalised Firearms Licensing Policy and operational guidance for internal staff to support through the firearms licensing process. There are procedures in place to support the Firearms Policy detailing current operating practices. The procedures are included in Appendix 6 of the Property Management Guidance and is available to staff via SharePoint.

We did however note that as the Firearms Licensing Policy dated December 2022 was dated before the revised guidance was issued, the policy may be out of date and not compliant with the Statutory Guidance. **(Low)**

There is also a Firearms Licensing Improvement Plan 2025-26 in place which outlines the areas of improvement, the action required alongside the target date for completion and status. The areas of improvement are across the following sections:

- Section 1- Improve the identification, assessment and investigation of incidents involving firearms license holders within non FLU functions;
- Section 2- Improve Firearms Licensing Unit governance, standard operating procedures and performance;
- Section 3- Introduce and embed revised Home Office national Statutory Guidance and associated practice (including exploring opportunities to increase efficiency and effectiveness); and
- Section 4- Improve public engagement.

Risk Assessment

All applications are subject to a risk assessment, which considers the individuals suitability, medical background, and storage facilities in line with the statutory guidance before a decision can be made. Throughout our sample testing, we confirmed for grants, renewals, variations, revocations, and refusals there was a clear trail available to support the decision and authorisation.

Grant of New Licences

Grant applications can be made via the Single Online Home platform. All new applications are required to undertake an assessment of suitability, medical records, references, a home visit and additional checks, if required, before a decision is made. For a sample of 20 grants of new licences we confirmed that a number of different background checks were taking place including:

- Review of the presence of a flag on the Niche system for license holders;
- Suitability checks set out within the Home Office statutory guidance were completed including the Police National Database (PND), Police National Computer (PNC), National Firearms Licensing Management System (NFLMS), Niche, Medical records, referees;
- GP medical report was present and had been received before the license had been granted and that the GP had been notified that the license was granted; and
- In each case a home visit was conducted.

Renewals

For renewals, the process is to reapply on the Single Online Home platform with payment of the new licence and medical records so the individuals suitability can be checked before a new license is granted.

We confirmed from a sample of 20 renewals of new licenses that there were procedures in place to ensure effective suitability assessments and review, and that these had taken place.

Variations

Variations are supported with a completed variation application form if they are purchasing additional firearms or shot guns or amending the current possessions they hold. The variation fee, if buying a new firearms or shotgun must be paid with the application and a good reason should exist for an additional firearm. Where there is a like for like variation then a fee is not required.

We tested a sample of 10 variations and confirmed for each a variation form had been completed. In five cases where a fee was required to be paid this had been received; in the remaining five cases the variation related to a like for like variation therefore a fee was not required to be paid. In each case we confirmed good reason was evidenced for the variation to be processed.

Revocations & Refusals

Individuals whose licenses are being revoked are required to receive formal notification in writing and they must surrender their certificate within 21 days of the letter and any firearms or ammunition in their possession must be surrendered to a firearms licence holder or the police. If the individual is unwilling to surrender the possessions they will be seized by the police. The individual has 21 days after receipt of the letter to appeal the decision.

Testing of a sample of revocations and refusals confirmed that in each case formal notification had been issued and evidence retained to confirm that the certificate and firearms were surrendered.

Return of Firearms

Any firearms returned to a license holder are authorised by the Detective Chief Inspector and evidence is retained to confirm that the firearm had been returned.

We tested a sample of five cases and in each case we confirmed that the Firearms Licensing Manager had undertaken a suitability review for which the outcome was reported to the Detective Chief Inspector for review and approval before the firearms were returned to a license holder. We also confirmed that NFLMS had been updated to reflect the return of the firearms.

Appeals

In line with the Firearms Act, an applicant must be notified of the specific reasons for the refusal of a firearms licence.

This is managed and produced by Legal Services on behalf of the Force. Discussions with the Firearms Licensing Manager identified that there had been no appeals in over one year following notification of a refusal of a firearm's licence. In the case where an appeal is received then in the first instance the Firearms Licensing Manager would call the appellant to discuss the appeal before a formal letter is sent out with the decision by the legal team.

Continuous assessment

Continuous assessment is completed on the basis of indication of reporting, incidents, or crimes through the Niche notification. As part of the continuous assessment process notifications received of any changes to the licence holders records via the 'Notify If' process received via the firearms licensing inbox are reviewed and addressed by the team on a daily basis.

We sample tested five recent notifications checking to confirm, the reason for notification, if additional enquiries or checks were required and if so, what additional checks were completed. The Firearms Licensing Manager confirmed that all reports on Niche require additional enquiries if the report is an act of violence or crime. All notifications are live on Niche, it is the supervisors responsibility to check throughout the day, and assess whether further enquiries need to be made.

In each of the five cases we tested additional enquiries were undertaken to assess the situation, three of which had their licenses revoked and the remaining two resulted in refused renewals.

Dip Sampling

We reviewed the dip sampling records for the most recent quarter ending June 2025, which confirmed that the checks had taken place by the Firearms Licensing Manager of a sample of granted, renewed and refused certificates. Review of the results confirmed that details of the documents reviewed had been noted and comments made on whether the rationale had been noted and was adequate; and if suitability factors had been assessed. In each case it was noted that the rationale had been provided and necessary suitability checks had been evidenced to support compliance with the regulatory requirements.

Sale of Firearms

A form 11 is completed following a notice of sale request made via the Single Online Home portal. The form is signed after which checks are undertaken on the buyer and seller before the NFLMS/Niche is updated with the sale.

For a sample of five sale of firearms we confirmed that the following controls were in place:

- A Notice of Sales had been completed;
- A Form 11 had been completed and signed by the customer;
- A purchase record had been completed on Niche;
- Niche had been recorded with the checks completed on the buyer and seller; and
- NFLMS and Niche had been updated to record the sale.

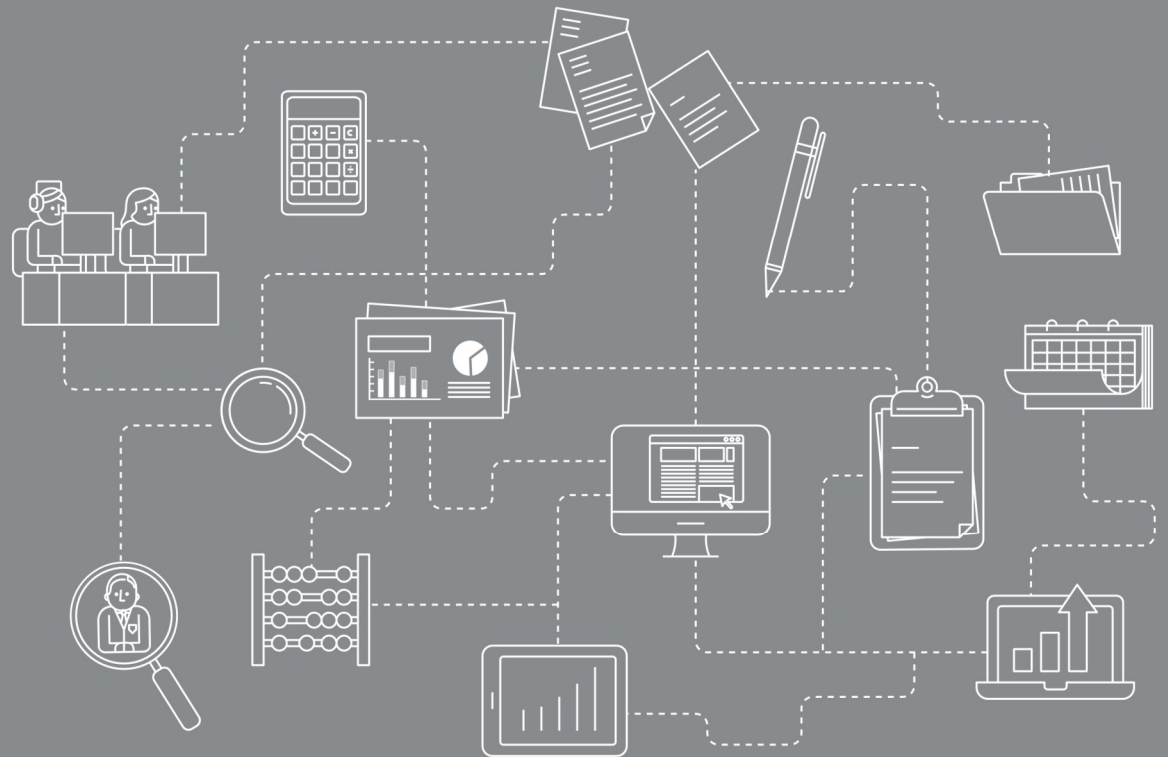
Performance Indicators

The National performance measure for licensing of the 4 week turnaround is monitored by the Force and reported to the NPCC. We reviewed the monthly performance reports produced in 2025/26 for the months of April and May 2025 to confirm they included the activity and results in the past month including particular work of interest, feedback and successes. As at May 2025 there had been a total of 101 total applications received.

We also reviewed an extract of the NPCC performance data where we confirmed that the Force were the 5th from the top in the performance table for the highest percentage of applications completed in four months at 99%. In addition, the Force were showing to have completed 89% of applications in the last rolling 12 months. We therefore confirmed that there are clear lines of reporting and monitoring within the force to effectively manage performance and budgets, however the outstanding 11% of applications should be reviewed and reported upon to ensure that the Force is not exposed to any risk of non-compliance with statutory guidance due to delays/ slippage. **(Medium)**

Summary of Actions for Management

01



SUMMARY OF MANAGEMENT ACTIONS

The action priorities are defined as*:

High

Immediate management attention is necessary.

Medium

Timely management attention is necessary.

Low

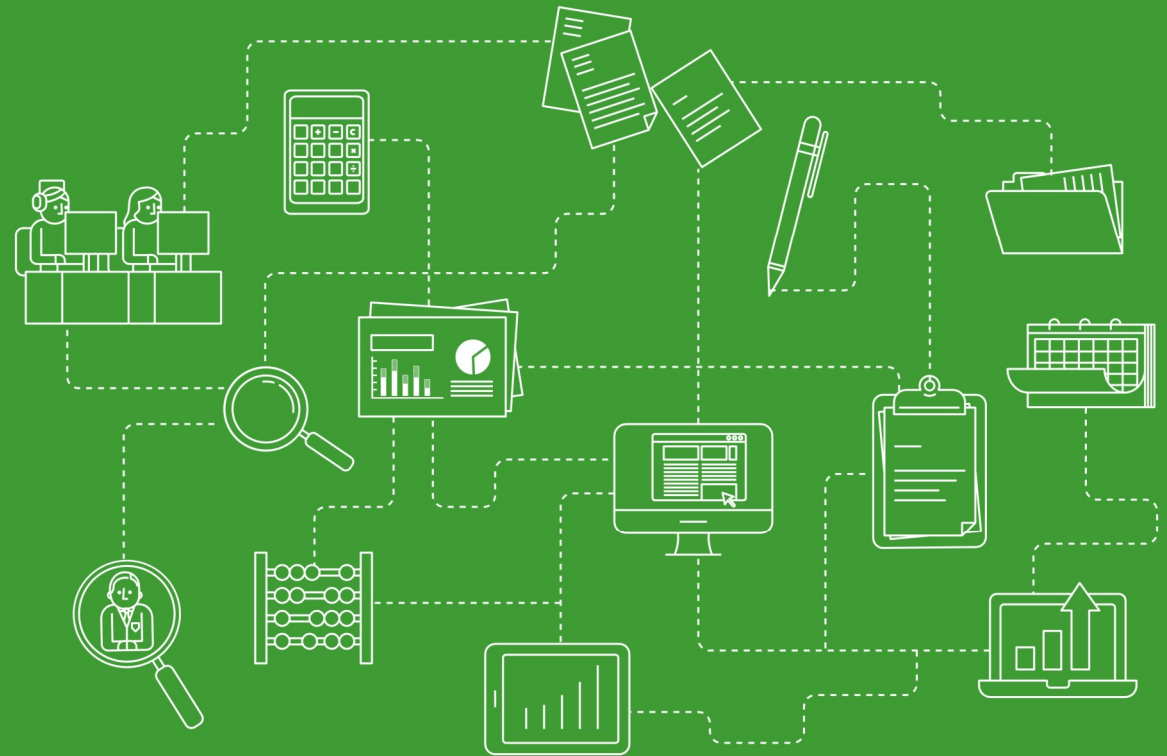
There is scope for enhancing control or improving efficiency.

Ref	Action	Priority	Responsible Owner	Date
1	The Firearms Licensing Policy will be reviewed to ensure that it is still compliant with the updated Statutory Guidance.	Low	Firearms Licensing Unit Manager	5 December 2025
2	The 11% of applications received in the past 12 months that are still in consideration will be reviewed to identify any immediate action that needs to take place and expedite this- delivery date of three months. Reporting on the outstanding applications will be incorporated into monthly performance reporting processes.	Medium	Firearms Licensing Unit Manager	30 November 2025

* Refer to Appendix B for more detail

Detailed Findings and Actions

02



DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all audit testing undertaken.

Area: Policy				
Control	The Force use the Firearms Licensing: Statutory Guidance for Chief Officers of Police as well as their own internal firearms policy, which is subject to a review every three years. The Policy is available to staff via SharePoint.	Assessment: Design ✓ Compliance ×		
Findings / Implications	The Home Office Firearms Licensing: Statutory Guidance for Chief Officers of Police was first published on 20 October 2021 and came into force on 1 November 2021 to provide clarity and consistency across each Force. The guidance was updated in February 2023 and re-published following a post-implementation review. The Force utilise the statutory guidance set out by the Home Office and have created a personalised Firearms Licensing Policy and operational guidance for internal staff to support through the firearms licensing process. We noted that as the Firearms Licensing Policy dated December 2022 was dated before the revised guidance was issued, the policy may be out of date and not compliant with the Statutory Guidance. We were informed that the update was postponed as they were anticipating further revisions to the Home Office Statutory Guidance in 2025.			
Management Action 1	The Firearms Licensing Policy will be reviewed to ensure that it is still compliant with the updated Statutory Guidance.	Responsible Owner: Firearms Licensing Unit Manager	Date: 5 December 2025	Priority: Low

Area: Performance Indicators			
Control	The National performance measure for licensing of the 4 week turnaround is monitored by the Force and reported to the NCP.	Assessment:	
		Design	✓
		Compliance	×
Findings / Implications	The Firearms Licensing Manager confirmed he has a monthly meeting with the Detective Chief Inspector where he presents the Force Intelligence Function monthly performance reporting which outlines the operational activity on licensing, staff performance, quality assurance and any comments. We reviewed the monthly performance reports produced in 2025/26 for the months of April and May 2025 to confirm they included the activity and results in the past month including particular work of interest, feedback and successes. As at May 2025 there had been a total of 101 total applications received.		

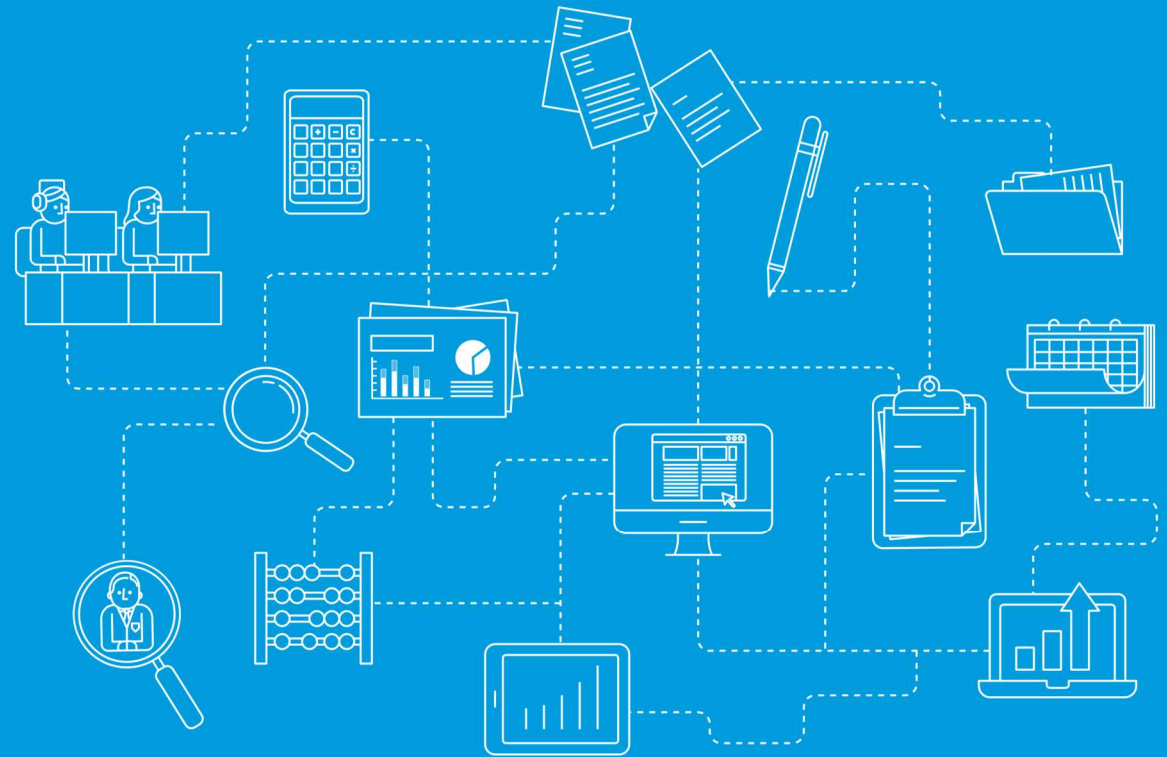
Area: Performance Indicators

We also reviewed an extract of the NPCC performance data where we confirmed that the Force were the 5th from the top in the performance table for the highest percentage of applications completed in four months at 99%. 89% is the percentage of applications completed in the last rolling 12 months. Given that there are 11% of applications that are still in consideration, greater visibility through the reporting on these should be provided to ensure that the Force is not exposed to any risk of non-compliance with statutory guidance.

Management Action 2	The 11% of applications received in the past 12 months that are still in consideration will be reviewed to identify any immediate action that needs to take place and expedite this- delivery date of three months. Reporting on the outstanding applications will be incorporated into monthly performance reporting processes.	Responsible Owner: Firearms Licensing Unit Manager	Date: 30 November 2025	Priority: Medium
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Appendices

03



APPENDIX A: CATEGORISATION OF FINDINGS

Categorisation of internal audit findings

Low
 There is scope for enhancing control or improving efficiency.

Medium
 Timely management attention is necessary. This is an internal control risk management issue that could lead to: Financial losses which could affect the effective function of a department, loss of controls or process being audited or possible reputational damage, negative publicity in local or regional media.

High
 Immediate management attention is necessary. This is a serious internal control or risk management issue that may lead to: Substantial losses, violation of corporate strategies, policies or values, reputational damage, negative publicity in national or international media or adverse regulatory impact, such as loss of operating licences or material fines.

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*	Non-compliance with controls*	Agreed actions		
			Low	Medium	High
Firearms Licensing	0 (13)	2 (13)	1	1	0
Total			1	1	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: INTERNAL AUDIT ASSIGNMENT OPINIONS



Minimal Assurance

Taking account of the issues identified, the board cannot take assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Urgent action is needed to strengthen the control framework to manage the identified risk(s).



Reasonable Assurance

Taking account of the issues identified, the board can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).



Partial Assurance

Taking account of the issues identified, the board can take partial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective.

Action is needed to strengthen the control framework to manage the identified risk(s).



Substantial Assurance

Taking account of the issues identified, the board can take substantial assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

Debrief held	25 July 2025
Updated debrief sent	6 August 2025
Draft report issued	8 August 2025
Responses received	30 September 2025
Final report issued	30 September 2025

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