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Rt Hon Suella Braverman KC MP
Home Secretary
2 Marsham Street
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5th September 2023

Dear Home Secretary

HMICFRS Report: An inspection of how effective police forces are in the deployment of firearms.

Under Section 55(5) of the Police Act 1996, as Police and Crime Commissioner I am pleased to provide my formal response to the report by HMICFRS entitled 'An inspection of how effective police forces are in the deployment of firearms.'

Both the Chief Constable and I welcome the publication of this report which makes several recommendations for the improvement of effectiveness in deploying firearms. The response provided by the Chief Constable is shown at Appendix 1 and I welcome this response from the Chief Constable to the 12 recommendations which is comprehensive and informative.

Of the 12 recommendations made within this report, I am pleased to read that Cambridgeshire Constabulary have noted the recommendations 1, 4, 9 and 11 that refer to the College of Policing and the potential implications that any changes to

guidance from the College may have on the Constabulary. It is also very reassuring to see the responses to recommendations 6, 8 and 12 that detail how the Constabulary are already compliant with these and therefore need to maintain BAU to continue to deliver effectively in these areas.

It is satisfying that the Constabulary have provided confirmation for how it already addresses recommendation two, through access to 7F Cross Boundary Command MoU (Specialist TFC/SFC), for high threat incidents along with assurance that the 7 Forces regional partnership continues to be able to draw on cross boundary STFC/STFC MoU provision. It provides the necessary assurance that my Police and Crime Plan, developed to tackle crime and keep communities safe, is being delivered for the benefit of the people of Peterborough and Cambridgeshire.

I am reassured that the Constabulary have recognised an area of improvement against recommendation three with regards to the use of AIRBOX needing to be improved. It was pleasing to see an explanation for what has already been done, and proposals for what will be done in future to continue to ensure improvement in this area. In line with recognising improvements, it is also pleasing to see the response to recommendation 10, in which the Constabulary reported that planning is underway to introduce independent audits for the 7F Firearms Training armouries process. I am encouraged that this will enable them to maintain the 'robust' status that was the outcome of recent inspections.

I note the response that the Constabulary have provided for recommendation 5 and find it pleasing that several different assessment mechanisms have been detailed to ensure efficient training is in place. It is also notable good practice that the BCH Collaboration maintains an exercises and learning log for sharing in line with recommendation 7 and that JOPS Multi-Agency have recently reinforced the need to share organisational learning from all deployments for consideration of escalation. I am satisfied that the Constabulary is in a position to share armed policing exercises for further organisational learning without this creating significant additional demand.

I hope this response, and that of the Chief Constable, provides reassurance regarding the commitment of both myself and Cambridgeshire Constabulary to improve effectiveness in the deployment of firearms.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darryl Preston', written over a light grey rectangular background.

Darryl Preston

Police and Crime Commissioner for Cambridgeshire and Peterborough

Enc - Appendix 1 – Cambridgeshire Constabulary's response to HMICFRS report
'An inspection of how effective police forces are in the deployment of firearms.'

Appendix 1

Cambridgeshire Constabulary's response to HMICFRS report 'An inspection of how effective police forces are in the deployment of firearms.'

	Recommendations	BCH response
1.	By 31 July 2024, the College of Policing should introduce new entry criteria for those attending initial training for strategic and tactical firearms commander. The selection process should be similar to the process used to select public order commanders.	<p>This action is for the national criteria to be issued by the College of Policing.</p> <p>This may have implications on each force's selection policies for both SFCs and TFCs, depending on the criteria imposed.</p>
2.	By 31 July 2024, chief constables should make sure there is access to both specialist strategic firearms commanders and specialist tactical firearms commanders, through a 24-hour rota covering their region.	<p>There is a 7F Cross Boundary Command MoU (Specialist TFC/SFC), for high threat incidents. The 7F DCCs sanctioned the MoU in 2022. We are in the process of securing legal agreement across the 7F. This is now being progressed by Alison Ings, Force Solicitor, Norfolk Constabulary as a consensus was reached that a s22a would be the preferable vehicle for the Specialist Firearms Commander Cadre. This will also include a concurrent review of the regional CBRN MoU signed by the CC's in 2019. For assurance, the 7 Forces continue to be able</p>

		<p>to draw on the cross boundary STFC/STFC MoU provision, under existing formal / informal arrangements.</p> <p>A national workstream is underway to look at a national callout structure to ensure capacity and capability, being supported & progressed through Firearms Governance.</p>
3.	<p>By 31 October 2023, all chief constables should make sure the armed response vehicle asset tracking equipment, as provided by Counter Terrorism Policing, is available and used in their forces. They should train relevant staff in its use.</p>	<p>The 7F currently have Airbox MOSAIC (full system). SSAS (surveillance and AP assets tracking) is the national framework which is delayed and will replace Airbox: Work on going re funding etc. A piece of focused work is underway in respect of the Airbox MOSAIC contract extension with 7F procurement until SSAS becomes live in 2024.</p> <p>Forces need to ensure their force control room staff and commanders know how to use Airbox MOSAIC which should be practised and recorded on a regular basis.</p> <p>The use of AIRBOX needs to improve. Present infrastructure across BCH is fit for purpose with sufficient log ins following the reduction in access, however the system is not being used daily by the FCR's and the APU.</p> <p>Work is required to reinforce AIRBOX across both FCR, APU and Commanders.</p>

		Email guidance circulated to all staff regarding the use of AIRBOX, including TA's Firearms commanders and refresher training to be included within APU command training.
4.	By 31 July 2024, the College of Policing should review the content and extend the length of the strategic firearms commander course. It should make sure candidates have sufficient opportunities to learn and practise the skills of strategic firearms command.	The College of Policing have been tasked with this which may have implications in terms of costing for forces and abstraction/resilience as the course is likely to be extended. This is not a course that 7F can train as only the College are certificated to deliver this.
5.	By 31 December 2023, all chief constables should make sure that all strategic and tactical firearms commanders have observed the firearms tactics and the use of specialist munitions they can authorise, before being operationally deployed.	All TFCs and SFCs are mandated to attend the national annual command refresher and the annual APSTRA refresher. The APSTRA refresher will address any new tactics that have been or likely to be implemented and likewise with any new weapon systems or ammunition/specialist munitions that are going to be introduced. TFCs are also mandated to attend an annual JOPs refresher training session as part of ARV officer's mandatory refresher training. This will include taking an active command role, for example staffing an FCP and observing ARV tactics.

		<p>The recommendation specifically states all SFCs and TFCs must observe the firearms tactics and the use of specialist munitions they can authorise, before being operationally deployed. This is interpreted by the CFI as a recommendation for new commanders and this needs to form part of the operational competence sign off process once they have passed their initial course. This is to be achieved by undertaking a bespoke session with a Firearms Tactical Advisor. This will consist of observing footage of several tactics and discussing the tactics detailed in the 7F Tactical Options menu, of which they will be provided a copy. This must be undertaken prior to being mentored for operational deployment. This is a far more efficient method of achieving the effect as mandatory attendance to observe all the tactics during ARV mandatory refresher training could take up to 12 months.</p> <p>Existing SFCs and TFCs will receive a refresh on tactics on the APSTRA mandatory refresher training in 2023/24 and 2024/25.</p>
6.	By 31 December 2023, chief constables should make sure that the annual accreditation process for strategic and tactical firearms commanders includes familiarisation with any new weapons systems	This is already being achieved. The APSTRA refresher for commanders will address any new tactics that have been or are likely to be implemented and likewise with any new weapon systems or ammunition/specialist munitions that are going to be introduced.

	<p>and observation of any new tactics or specialist munitions the force has introduced or is planning to introduce.</p>	
<p>7.</p>	<p>By 31 October 2023, the regional armed policing lead should share armed policing exercises with the National Armed Policing Portfolio. This would allow opportunities for learning to be identified and shared.</p>	<p>This will be achieved by including such details on the regional updates at the National Armed Policing Portfolio meetings. Moving forwards 7F are extending 7F exercise invites to; British Transport Police, the Civil Nuclear Constabulary and the Ministry of Defence Police as part of the existing exercising programme.</p> <p>These non-Home Office forces are being asked to partake in the forthcoming multi agency JESIP exercises due to take place this September/October and there are plans within APU to exercise with USAF and MoD Police by April 2024.</p> <p>The BCH strategic firearms group now maintains a standing agenda item logging exercises and learning. Relevant points to be shared into the Regional and National governance to extend awareness and learning.</p> <p>Aug 23 JOPS Multi-Agency training reinforces the need to share organisational learning from all deployments and exercising for consideration of escalation.</p>

8.	<p>With immediate effect, each assistant chief constable regional firearms lead should attend all National Armed Policing Portfolio meetings. If they are unable to attend, they should make sure another assistant chief constable armed policing lead from a force in their region attends on their behalf.</p>	<p>This is being achieved and is BAU. If the 7F Chief Officer lead is unavailable an agreement is in place that another ACC Operational Lead will attend in their absence. It has been agreed to share this across the 4 forces/operational collaborations ACC leads.</p>
9.	<p>By 31 December 2023, the College of Policing should issue updated armoury guidance.</p>	<p>The College of Policing have been tasked with this and we await their guidance. A significant amount of their learning has been gained from the 7F due to recent IOPC and College of Policing inspections and reviews within the 7F. BCH already have a specific armoury audit scheduled with HMICFRS as part of the Bedfordshire PEEL inspection.</p> <p>Armoury Audits are conducted by respective Armourers, Base sergeants and Chief/Inspector (HOD) inline with the SOPs, Armoury review 2021 and associated recommendations. (Appendix B)</p> <p>We have:</p> <ol style="list-style-type: none"> 1. Reviewed and retitled SOPs relating to both North and south Armoury / Issues and return. 2. Changed the single access policy.

		<ol style="list-style-type: none"> 3. Chronicle access is included this within managers meetings. 4. Armoury modifications North and South to standardise the approach between bases. 5. Reviewed and amended the “chronicle failure” fallback position in terms of key access. <p>Separate ICT audits have been completed at each base.</p> <ol style="list-style-type: none"> 1. CCTV Camera for viewing by O1’s. 2. Additional ICT equipment for viewing Chronicle and refining the issue / return process. <p>Re-modification work continues at the north base with a variety of contractors, likely to be complete by end of August 2023. Armoury at the new Luton base will be configured to fall in line with current SOP’s and the recommendations within the COP report. Estimated completion by Q4 2023 in line with the base move.</p>
10.	With immediate effect, chief constables should improve senior officer oversight of their armouries, including an independent annual audit.	<p>7F Firearms Training armouries were found to have a robust process in place following the recent IOPC and College of Policing inspections.</p> <p>BCH operational armouries processes have improved since Operation Garforth and are subject to their own operational SOP’s.</p>

		<p>Subsequent 7 Force CFI Forum meetings which involve all Specialist Operations Chief Inspectors has resulted in shared good practice as a result of lessons learnt.</p> <p>Examples of this are a more robust system for denying access to armouries for officers who are 'offline', an improved notification system informing all officers to deny access to named officers who are offline, more robust systems for gaining access to override keys should there be a power failure or fault with electronic access and a cleansing of the Chronicle Armoury system resulting in fewer persons with high level access.</p> <p>Chronicle issues are reviewed daily with assurance through management governance.</p> <p>Within BCH, all audit requirements are detailed in the operational SOPs and are audited up to CI level. This does not currently include an annual independent audit.</p> <p>Plans are underway to map out an annual independent audit process with our partner forces across the eastern region namely, Essex, Norfolk, Suffolk and Kent. This work is being progressed through the eastern region 7F Armed Policing Tactical Meeting scheduled for 4th Sept 2023.</p>
11.	By 31 December 2023, the National Armed Policing Portfolio and the College of	A TFC Command Log produced by Kent which incorporates all the new national recommendations of the content of a

	<p>Policing should issue minimum standard guidance for the completion of records in relation to armed policing operations. That guidance, in support of the authorised professional practice – armed policing, should include the requirement for the retention, recovery and audit of those records.</p>	<p>command log was circulated at the CFI forum involving all the 7F Specialist Operations Chief Inspectors on 18.07.23. Insp Smith has aligned this to BCH for our use and this is on the agenda for the next Firearms Steering Group.</p> <p>All Firearms command logs are stored on Chronicle.</p> <p>CTFC – refusals are recorded on Chronicle through NDM spins / Single sheet forms.</p> <p>OFC requests and / or iTFC refusals are recorded on the regional armed deployment form and through a prescribed tagging process within each force FCR. The details of which are recorded on a spreadsheet and retained by the Chronicle administrator.</p> <p>The APP directs commanders to keep records / logs and they are their own records. Chronicle Admin hold copies of all of the logs. Often there is some chasing required from Chronicle administration to ensure all relevant documentation is completed and recorded through each commander.</p> <p>There is a compliance function that exists to account for the completion and presence of the documents.</p>
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12.	With immediate effect, chief constables, through their armed policing governance structure, should make sure that all armed deployment records are stored and auditable.	In relation to the storage and audit of these records, this is completed by the Chronicle Administrator within the FTC and recorded on Chronicle.