

# Impact Assessment, The Home Office

**Title:** Firearms Act 1968: Section 27A - Conditions for storage etc of certain firearms

**IA No:** HO0411

**RPC Reference No:** N/A

**Other departments or agencies:** N/A

**Date:** 24 May 2022

**Stage:** FINAL

**Intervention:** Domestic

**Measure:** Other

**Enquiries:** Firearms Policy Unit Home Office:  
public.enquiries@homeoffice.gsi.gov.uk

**RPC Opinion:** N/A

**Business Impact Target:** Non qualifying regulatory provision (NQRP)

## Cost of Preferred (or more likely) Option (in 2021/22 prices)

<b>Net Present Social Value NPSV (£m)</b>	-0.39	<b>Business Net Present Value BNPV (£m)</b>	-0.05	<b>Net cost to business per year EANDCB (£m)</b>	0.01
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### What is the problem under consideration? Why is government intervention necessary?

There has been a 16 per cent increase in firearms crime since 2014/15. Crimes involving rifles increased by 8 per cent between 2014/15 and 2020/21. Evidence shows that some rifles used in these crimes have been lost or stolen from licensed individuals. Government intervention is required to increase security and prevent this from occurring. High Muzzle Energy (HME) rifles have been targeted as their power and long-range capability mean they can inflict significant harm.

### What is the strategic objective? What are the main policy objectives and intended effects?

The strategic objective is to reduce crime. The policy objective is to ensure that all rifles are kept in a secure gun cabinet; secure locking systems are fitted on exit doors and all accessible windows; intruder alarms are installed that alert the police in the event of a burglary; and ammunition and easily removable component parts are stored separately to the rifles themselves. The intended effects are to increase public safety by enhancing the levels of security required by firearms certificate holders, to reduce the risk that HME Rifles will be stolen and used to commit violent offences, thereby reducing the number of firearms offences.

### What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

**Option 1:** 'Do nothing' and keep the current arrangements for controlling HME Rifles.

**Option 2:** Legislate to impose stricter controls on the storage and possession of the rifles, ammunition, and critical component parts of HME rifles. Every individual owning an HME Rifle would have to meet the current highest level of security (Level 3) as a minimum. This is **the Government's preferred option**.

<b>Main assumptions/sensitivities and economic/analytical risks</b>	<b>Discount rate (%)</b>	3.5
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It is assumed that all HME rifle holders will familiarise themselves with the new security regulations and attempt to comply, so there will be no increase in prosecutions. As current security levels for HME rifle holders are unknown, an assumption has been made that the average cost faced per individual will be half the largest possible cost.

**Will the policy be reviewed?** It will be reviewed. If applicable, set review date: 01/03/2027

*I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.*

Signed by the responsible Minister:  Date: 2022

# Summary: Analysis & Evidence

## Policy Option 2

**Description:** Firearms Act 1968: Section 27A - Conditions for storage etc of certain firearms

### FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2021/22	PV Base	2021/22	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-0.11	High:	-0.88	Best:	-0.39	Best BNPV	-0.05	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.05	0.06	0.11	0.01	0.02
High	0.36	0.52	0.88	0.1	0.1
Best Estimate	0.16	0.23	0.39	0.04	0.05

#### Description and scale of key monetised costs by 'main affected groups'

Total costs are estimated to be **£0.11 to £0.88 million (PV)**, with a central estimate of **£0.39 million (PV)** over 10 years. The cost to individuals to purchase security equipment lies in a range of **£0.08 to £0.76 million (PV)**, with a central estimate of **£0.33 million (PV)** over 10 years. Familiarisation costs to Registered Firearm Dealers (RFDs) lies in a range of approximately **£0.02 to £0.1 million**, with a central estimate of **£0.05 million** (2021/22 prices) in year 1 only.

#### Other key non-monetised costs by 'main affected groups'

Police and the CPS may incur costs for action against individuals in breach of security conditions. Currently, 128 certificate holders possess these rifles and have previously indicated they were in favour of additional security, therefore very limited police or CPS action is expected. There may be a small cost to the police if individual firearm certificates have to be varied from increasing security.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.0	0.0	0.0	0.0
High	0.0	0.0	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0	0.0	0.0

#### Description and scale of key monetised benefits by 'main affected groups'

No benefits are monetised. The value of a homicide is taken as **£3.7 million** and a robbery as **£13,000<sup>1</sup>**. Using breakeven analysis, either between **9 and 68 robberies**, with a central estimate of **31**, or **one homicide** over 10 years, will need to be prevented to have a net benefit to society.

#### Other key non-monetised benefits by 'main affected groups'

There may be public safety benefits in the form of reduced incidents of serious violence. There may also be a benefit to businesses due to the small increase in the amount of people who want to purchase and install security equipment.

### BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:										
Cost, £m	0.0		Benefit, £m	0.0		Net, £m		0.0		
Score for Business Impact Target (qualifying provisions only) £m:							N/A			
Is this measure likely to impact on trade and investment?							No			
Are any of these organisations in scope?			Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO <sub>2</sub> equivalent change in greenhouse gas emissions? (Million tonnes CO <sub>2</sub> equivalent)					Traded:		N/A	Non-Traded:		N/A

### PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	N
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<sup>1</sup> The economic and social costs of crime ([publishing.service.gov.uk](https://publishing.service.gov.uk)) costs are uprated to 2021/22 prices.

## **Evidence Base**

### **A. Strategic Objective and Overview**

#### **A.1 Strategic Objective**

1. The strategic objective is to reduce crime and increase public safety. This can only be achieved by government intervention to amend legislation.

#### **A.2 Background**

2. Concerns have been expressed about the potential for serious misuse and loss of life if certain High Muzzle Energy (HME) rifles, currently subject to general licensing arrangements under section 1 of the Firearms Act 1968, fall into the hands of criminals or terrorists. In view of the threat assessment received, the Government considered there were good grounds to impose stricter controls on their possession, and- following an earlier public consultation- provision was made in the Offensive Weapons Bill to prohibit all rifles capable of discharging a bullet with kinetic energy of more than 13,600 joules at the muzzle of the weapon.
3. This was extensively debated during the early stages of the Bill when concerns were raised regarding the proportionality of prohibiting HME rifles. After further consideration, the provision in the Bill was subsequently withdrawn on the basis that the Government would test the alternatives further through a public consultation.
4. It was suggested instead that enhanced security around their storage and transportation would sufficiently mitigate the risk of theft and misuse, therefore a new section 27A was inserted into the Firearms Act 1968. This imposes a duty on the Secretary of State to make rules prescribing minimum security conditions for safe storage and transportation of HME rifles, which would be attached to the owners' firearm certificate. Before making the rules, the Secretary of State must consult persons likely to be affected by them.

#### **A.3 Groups Affected**

5. The 128 licence holders (according to the National Firearms Licensing Management System) who own these rifles, and some police forces in England, Wales and Scotland, are likely to be most impacted by any new security requirements. Given their responses to the proposed ban, it is assumed that all owners will wish to continue to shoot with their rifles, although there could be a move to less powerful rifles if the cost of additional security is too high. It is deemed that the Registered Firearms Dealers (RFDs) that stock HME rifles will already have sufficient security and will not therefore incur security costs, though they will incur familiarisation costs. Firearms and Explosives Officers (FEOs) are also likely to be affected as they will have to undertake premise inspections and familiarise themselves with the legislation.

#### **A.4 Consultation**

##### **Within Government**

6. All government departments received the consultation proposals as part of the Home Affairs Committee clearance process.

## Public Consultation

7. There was an initial proposal for HME rifles to be banned under the Offensive Weapons Act (2019). A public consultation was carried out for the Offensive Weapons Bill from 14 October to 9 December 2017 and received 10,712 responses (see Annex A). The consultation received responses from a variety of organisations, including shooting organisations and individuals possessing HME rifles as well as registered firearms dealers. The proposed prohibition of HME firearms was strongly opposed, with 78 per cent of respondents opposed to the introduction of such measures, although the possibility of requiring stricter security provisions was suggested by respondents. Following this, HME firearms were subsequently removed from the Bill and the Government consulted publicly on its proposals for stricter security measures as part of a wider consultation on firearm safety. This took place between 24 November 2020 and 16 February 2021 and was aimed at anyone with an interest in firearms licensing and the regulation of firearms more broadly, as well as those with a particular interest in shooting with HME rifles. They were specifically invited to comment on whether the present Level 3 security requirements (set out in paragraph 21) would, if specified in rules made by the Secretary of State, be sufficient to mitigate the risks posed by high muzzle energy rifles. A majority (83%) of respondents who answered this question agreed or strongly agreed that such requirements would be sufficient to mitigate the risks, while 9 per cent disagreed or strongly disagreed.
8. Respondents were also asked for their views on whether additional security conditions listed in the consultation could be relevant to the safe storage and use of HME rifles. Of those who responded, a majority (ranging from 51 to 93%) disagreed or strongly disagreed that the measures suggested would be relevant, although 60 per cent of respondents agreed or strongly agreed that keeping the bolt or other critical component parts separately would be relevant. Opinion was also more evenly divided on keeping ammunition in a separate cabinet from the gun and allowing only a small amount of ammunition.
9. Having regard to the responses to the consultation, **the Government's preferred option** is to require every individual owning an HME Rifle to meet the current highest level of security (Level 3) as a minimum.

## B. Rationale for intervention

10. Serious violence has increased since 2014/15. This includes firearms crime, which has risen 16 per cent between 2014/15 and 2020/21<sup>1</sup>. There has also been an 8 per cent increase with respect to rifles specifically between 2014/15 to 2020/21<sup>2</sup>.
11. Data collected by National Ballistics Intelligence Service (NABIS) suggest that part of the reason for this increase is that legally purchased firearms have been stolen from legal owners by those without firearms certificates, who wish to use the weapons in criminal activity. The NABIS National Strategy Assessment in 2018 showed that 334 shotguns and rifles were recovered from criminal activity in the period 1 April 2017 to 31 March 2018. Of those, 217 were not traceable because they were obtained by their owners prior to the commencement of the licensing regime in 1988. Of the remaining 117, two-thirds (77) were found to be previously stolen from UK firearm certificate holders. There have been 446 firearms listed on the NABIS database in 2017/18 as either lost or stolen from 167 crime-scene incidents. This is an increase of 26 per cent in the number of items listed as lost or stolen compared with 2016/17<sup>3</sup>.
12. High Muzzle Energy rifles can currently be held by civilians in possession of the correct firearms certificate. While these certificates stipulate various safeguards against theft and misuse, civilian

<sup>1</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmarch2019>

<sup>2</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/offencesinvolvingtheuseofweaponsdatatables>  
Table 2

<sup>3</sup>The National Ballistics Intelligence Service (NABIS).

ownership creates a risk that these weapons could get into the hands of criminals or terrorists. There is a risk that the current legislative controls on HME rifles could be exploited by criminals, and do not do enough to prevent the movement of these guns to the illegal market.

13. The power and long-range firing capabilities of HME rifles mean they would be especially difficult to deal with in the wrong hands and could cause a considerable amount of harm. This risk can only be mitigated by government intervention to increase the security surrounding HME rifles, which will prevent them being lost or stolen. Legislation is needed as the police have concerns that the current framework facilitates transfer of firearms material from the legal to the criminal marketplace.
14. The increased security for HME rifles will make them harder to steal, preventing legally-purchased gun material leaking into the illicit market and fuelling further increases in gun crime. Government intervention aims to lead to a societal benefit of decreased crimes involving HME Rifles.

## C. Policy objective

15. The policy objective is to ensure that all rifles are kept in a secure gun cabinet; secure locking systems are fitted on exit doors and all accessible windows; intruder alarms are installed that alert the police in the event of a burglary; and that ammunition and easily removable component parts are stored separately.

## D. Options considered and implementation

16. **Option 1:** Do nothing. Make no changes to current arrangements for controlling HME rifles.
17. **Option 2:** To enhance home security and impose stricter controls on the storage and possession of the rifles, ammunition and critical component parts of HME rifles, by making every individual owning an HME rifle meet Level 3 security as a minimum. This would mitigate the potential risk of these rifles falling into the wrong hands. This follows up on the debates which were held during the passage of the Offensive Weapons Act 2019 and would provide the foundation for making rules prescribing the conditions to be attached to any firearm certificate authorising the possession of HME Rifles. This is **the Government's preferred option**.
18. The purpose of this IA is to capture a range of possible outcomes regarding the Government's decision to proceed on the basis of **Option 2** as shown in the summary on the two front pages. Further details for **Option 2** are outlined in the Appraisal section.

## E. Appraisal

### General assumptions and data

19. Costings for the appraisal section are based on data provided by the National Firearms Licensing Management System (NLFMS), national crime statistics, and the NABIS database. These were used to provide figures for the number of individuals who own HME rifles; the number and proportion of firearm related crime; the number and proportion of stolen shotguns and rifles used in crime; and the cost of crimes for homicides and robberies. This policy is appraised over a 10-year period in line with HM Treasury (2022) Green Book<sup>4</sup> guidance. A social discount rate of 3.5 per cent is used to discount future values to give present values (PV) over the appraisal period. All costs and benefits use

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<sup>4</sup> [The Green Book \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

2021/22 as the price base year (PBY) and present value base year (PVBV) to remain consistent with current prices. Transition costs are assumed to occur in year 1 only.

20. The main assumptions used in this IA are listed below and were shared with a number of firearms stakeholders.

- There are currently only 128 target shooters who are authorised to possess HME rifles. Most only own one such rifle but the overall total held is 138. Some may be reluctant to incur any additional expenditure and cease shooting. It is assumed that most will wish to continue, particularly if they already have the highest level of security in place.
- Costs are rounded to the nearest £100 and individuals are rounded to the nearest 100 unless otherwise stated.
- It is assumed that the additional security measures would not impact on the use of these rifles at the small number of rifle ranges that are suitable for firing them.
- The security standards which need to be met for these rifles are set out in the Firearms Security Handbook<sup>5</sup>. It sets out three levels of security which consist of:

#### **Level 1**

- A requirement that the firearms are to be kept in a secure gun cabinet that meets the relevant security standards (that is, BS7558).
- Specialist multi-locking systems for exit doors will be secured by a deadlock. Individuals should seek advice from manufacturers for the appropriate locking system.
- All ground floor windows will have suitable locks installed.

#### **Level 2**

- The multipoint locks and deadlocks for final exit doors will need to be to BS3621 or equivalent.
- Not only ground floor windows but windows accessible from flat roofs will need to have a casement-to-frame self-latching or key operated lock.
- Installation of an audible intruder alarm for the whole premises.

#### **Level 3**

- All of the above, as well as the ammunition and any easily removable component parts being stored in separate cabinets to the firearm itself.
- In some instances, a requirement to store the firearm in a dedicated and secure gun room, if cabinets with individual gun locks do not suffice.
- Installation of an intruder alarm that alerts the police in the event of a burglary.
- Currently there is no single fixed level of security that all HME rifle holders need to meet. The level of security is determined via an inspection, based on a number of factors which are listed below:
  - Repeat victimisation.
  - High-crime location.
  - Building regularly occupied.
  - A substantial number of firearms on the premises.
  - A high crime rate.
  - Certain high-profile certificate holders.
  - Other factors which substantially increase the risk of burglary.
- There is no detailed information available on current levels of security for each HME rifle holder. Therefore, for the purposes of the IA, it is assumed that the 128 HME rifle owners

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<sup>5</sup> Firearms security handbook 2020 - GOV.UK ([www.gov.uk](http://www.gov.uk))

currently have different levels of security, with HME rifle owners having at least Level 1 and with some already being at Level 2 and some already having Level 3. To estimate costs for the proposed measures, the total cost of moving all 128 HME rifle holders from Level 1 to Level 3 security has been calculated. To account for the fact that some individuals may already have higher than Level 1 security, a low, central and high estimate of 25 per cent, 50 per cent and 75 per cent is used to estimate the number of HME rifle holders who need to obtain Level 3 security. This leads to a range of 32 to 96 HME rifle holders, with a central estimate of 64.

- For the purpose of this IA, it is assumed that all individuals wish to continue their shooting activities and retain their HME rifles despite the increased security requirements associated with doing so. This is in line with the consultation received by the department for the Offensive Weapons Bill, in which all individuals expressed the desire to retain their rifle. Both high and low estimates of the likely additional costs are given below, together with a central estimate.

## COSTS

### Option 2 - Reaching Level 3 security

#### Set-up costs

##### Individuals

21. The list below describes what is needed for an owner of a HME Rifle to reach Level 3 security from Level 1. The costs of each item are outlined in Table 1. Costs are rounded to nearest £1.
  - **Deadlocks to final exit door** – The addition of deadlocks that meet the BS3621 standard to the final exit door (assuming there will only be one exit door on average). Quotes for locks that meet these standards were obtained from the Locks Online website<sup>6</sup>. The lower quartile, median and upper quartile prices of these locks are used. This results in a range of £28 to £62, with a central estimate of £43.
  - **Multipoint locks to final exit door** – Adding multipoint locks that meet the BS3621 standard to the final exit door (assuming there will only be one exit door on average). Quotes for locks that meet these standards were obtained from the Locks Online website<sup>7</sup>. The lower quartile, median and upper quartile prices of these locks are used. This results in a range of £77 to £126, with a central estimate of £91.
  - **Installation costs of both the locks to final exit door** – Professional installation cost for both above door locks. Quotes for installation were obtained from a locksmith<sup>8</sup> in a range of £73 to £219, with a central estimate of £146 for the installation of both locks.
  - **Window locks** – Adding casement-to-frame self-latching or key operated window locks on the windows accessible from flat roofs and/or ground floors. It is assumed that the average house has two windows that need securing and that a pivot lock is suitable to meet this standard. Quotes for locks that meet these standards were obtained from the Locks Online website<sup>9</sup>. The lower quartile, median and upper quartile prices of these locks are used for the low, central and high estimate. This results in a range of £15 to £44, with a central estimate of £30 for two window locks.
  - **Installation cost of the window lock** – The installation of a pivot lock is by simply screwing it onto the frame of the window. A range of 15 to 45 minutes with a central estimate of 30 minutes is assumed per window to screw on the lock. Multiplying this by the hourly leisure time of £5.05<sup>10</sup> gives a range of £3 to £8, with a central estimate of £5 for two windows.

<sup>6</sup> [Buy BS3621 Dead Locks | Insurance Approved Dead-locks | Locks Online](#)

<sup>7</sup> [Buy Yale uPVC Door Locks | Yale Multipoint Locks | Yale Door Locks | Locks Online](#)

<sup>8</sup> [Locksmith Prices List | Cheap Locksmiths in London \(city-locksmith.co.uk\)](#)

<sup>9</sup> <https://www.locksonline.co.uk/Era-902-Flush-Pivot-Lock.html?search=pivot%20lock&description=true&page=1>

<sup>10</sup> Values of Time (Department for Transport) TAG Data Book – Table A 1.3.2 – Forecast values of time per person for 2022. <https://www.gov.uk/government/publications/tag-data-book>

- **Intruder alarm** – Installing an audible intruder alarm with an alerting mechanism for the whole premises. Quotes for alarms that meet these standards were obtained from the security alarms website<sup>11</sup>. The lower quartile, median and upper quartile prices of these locks are used. This results in a range of £527 to £1,581, with a central estimate of £1,054.
- **Cabinet** – The bolt or other critical component parts should be kept separately. It is assumed that an ammunition cabinet will suffice to fit these component parts. Therefore, costs for ammunition cabinets will be used as a proxy to establish this cost. Due to the assumption that an ammunition cabinet will suffice to store the component parts as explained above, the prices are therefore for ammunition cabinets. A low, central and high estimate of no extra cabinet, one extra cabinet and two extra cabinets to house other parts of the rifle is used. Quotes for these cabinets that meet these standards were obtained from the E Safes website<sup>12</sup>. Multiplying the number of extra cabinets required by the lower quartile, median and upper quartile prices of these cabinets results in a range of £0 to £457, with a central estimate of £229.
- **Gun locks** – Adding individual gun locks per gun, as it is assumed creating a gun room is not necessary to meet the highest form of Level 3 security. It is assumed that the average individual owns 1.1<sup>13</sup> HME rifles and this is used as a multiplier in the calculations. This is because there is a total of 138 HME rifles registered to 128 individuals, therefore the multiplier will be 138 divided by 128. Quotes for gun locks that meet these standards were obtained online<sup>14</sup>. Multiplying the multiplier by the lower quartile, median and upper quartile prices of these gun locks results in a range of £9 to £26, with a central estimate of £17.

22. The unit costs for each of these security measures are outlined in Table 1 for a high, low and central cost scenario.

**Table 1, Unit initial security costs for Option 2, moving from Level 1 to Level 3 security, £, vol, 2021/22.**

	Deadlock to final exit door	Multipoint locks to final exit door	Installation of both door locks	Window locks with installation	Intruder alarm	Cabinet	Gun locks
<b>Low</b>	28	77	73	18	527	0	9
<b>Central</b>	<b>43</b>	<b>91</b>	<b>146</b>	<b>35</b>	<b>1,054</b>	<b>229</b>	<b>17</b>
<b>High</b>	62	126	219	51	1,581	457	26

Source: Home Office Analysis and Insight, own calculations, 2022. All estimates to the nearest £1. All costs accrued in Year 1.

23. Table 2 outlines the total initial security costs per individual in year 1. These are calculated by summing up the unit costs for each component outlined in Table 1. This is then multiplied by the estimated range of 32 to 96 HME rifle holders, with a central estimate of 64, to provide the total set up costs for individuals of reaching Level 3 security. **Table 2, Total security costs of reaching Level 3 security from Level 1, year 1 only (2021/22), £ vol, 2022**

Cost estimate	Per individual (£)	Number of HME rifle holders	Total initial security costs for individuals (£ million)
<b>Low</b>	732	32	0.02
<b>Central</b>	<b>1,615</b>	<b>64</b>	<b>0.1</b>
<b>High</b>	2,523	96	0.24

Source: Home Office own estimates, 2022.

Notes: Estimates based on numbers in Table 1, 2022. All costs accrued in Year 1. Per individual costs are rounded to the nearest £1 whilst total set up costs are rounded to the nearest £100.

24. Total initial security costs to individuals are estimated to lie in a range of **£0.02 to £0.24 million**, with a central estimate of **£0.10 million** (2021/22 prices) in year 1 only.

<sup>11</sup> <https://securityalarms.co.uk/adtpolice/>

<sup>12</sup> [Ammunition Safes & Pistol Storage Boxes – eSafes UK](#)

<sup>13</sup> Rounded to 1 decimal place.

<sup>14</sup> <https://www.bing.com/shop?q=gun+locks&FORM=SHOPTB>



## Inspection costs

### Firearms and Explosives officers (FEOs)

25. It is assumed that the premises of all individuals with a HME rifle will have to be inspected by an FEO to ensure they meet Level 3 security requirements. It is assumed that all inspections occur in year 1 and so all the inspection costs are accrued in the first year. The average hourly rate of £40<sup>15</sup> (in 2021/22 prices) for the modelled Police Officer is used. The time taken for inspection is estimated to lie in a range of one to three hours, with a central estimate of two hours<sup>16</sup>. Total inspection costs are calculated by multiplying the average hourly rate by the number of inspections required (128) and the time taken for inspection. Total inspection costs are estimated to lie in a range of **£5,200 to £15,500**, with a central estimate of **£10,300** (all 2021/22 prices) in year 1 only.

## Familiarisation costs

### Firearms and Explosives officers (FEOs)

26. The FEOs will already be familiar with level 3 security for other scenarios so will not face familiarisation costs.

## Individuals

27. It is assumed that every HME rifle holder will read the new guidance outlined in the Firearms Security Handbook in year 1, which is 51 pages long and consists of about 19,200 words. A range of reading speeds of 200 to 700 words per minute, with central estimate 400, is used<sup>17</sup>. A range of reading comprehension between 50 to 80 per cent, with a central 60 per cent is also used. This results in a range of 30 minutes to 2 hour 20 minutes, with central estimate of 1 hour 10 minutes<sup>18</sup> for familiarisation reading times. Multiplying the average hourly value of leisure time of £5.05<sup>19</sup> by the number of individuals (128) estimates a familiarisation cost in the range of **£300 to £1,500**, with a central estimate of **£700** (see table 3).

**Table 3, Familiarisation costs to HME rifle holders, year 1 only, vol, £, 2021/22 prices, 2022.**

Estimate	Number of individuals	No. words read	Reading speed (wpm)	Average time familiarisation (hrs)	Hourly cost (£)	Total cost (£)
Low	128	18,200	700	0.48	5.05	300
Central	128	19,200	400	1.13	5.05	700
High	128	20,200	200	2.29	5.05	1,500

Source: Readingsoft.com, Values of time (Department for Transport) TAG Data Book – Table A 1.3.2 – Forecast values of time per person in 2022 prices. <https://www.gov.uk/government/publications/tag-data-book>.

Note: wpm = words per minute

## Registered Firearm Dealers (RFDs)

<sup>15</sup> Home Office internal estimates on police hourly costs. Hourly cost for Sergeant and below, includes salary, expenses, regional allowance, training and employer contributions to pension and national insurance. The estimates were calculated using the Annualised Survey of Hours Earnings (ASHE), Chartered Institute of Public Finance and Accounting (CIPFA) Police Actuals and The National Police Chiefs Council (NPCC) Mutual Aid Rates. Estimates use the latest figures available for the various inputs.

<sup>16</sup> Estimates provided by the police.

<sup>17</sup> [Speed Reading Test Online \(readingsoft.com\)](https://www.readingsoft.com)

<sup>18</sup> Rounded to the nearest five minutes. It is assumed they do not re-read it if comprehension is between 80 to 85 per cent as they understand it.

<sup>19</sup> Values of time (Department for Transport) TAG Data Book – Table A 1.3.2 – Forecast values of time per person in 2022 prices. <https://www.gov.uk/government/publications/tag-data-book>

28. The hourly wage for sales related occupations (n.e.c.) of £11.72<sup>20</sup> (in 2021/22 prices) is used as a proxy for the hourly wage of RFDs. Multiplying this average hourly wage for RFDs by the range of familiarisation times and the number of RFDs (3007<sup>21</sup>) estimates a familiarisation cost in the range of **£20,600 to £98,400**, with a central estimate of **£48,600**.

**Table 3, Familiarisation costs to RFDs, year 1 only, vol, £ 2021/22 prices, 2022.**

Estimate	Number of RFDs	No. words to be read	Reading speed (wpm)	Average time familiarisation (hrs)	Hourly cost (£)	Total cost (£)
Low	3,007	18,200	700	0.48	14.28	20,600
Central	3,007	19,200	400	1.13	14.28	48,600
High	3,007	20,200	200	2.29	14.28	98,400

Source: Readingsoft.com, ASHE 2020, Table 14.5a, SOC 4159 uprated to 2021/22 prices.

Note: wpm = words per minute.

## Ongoing costs

### Individuals

29. Individuals who require the signalling mechanism with the burglar alarm will need to pay a monthly contract fee for the service. Prices for this monthly subscription are based on an offer for the service that lasts for less than the appraisal period. For the purposes of this IA, it is assumed that this is the standard rate and it has been extended for the entire appraisal period. Prices range between £17 and £52 with a central estimate of £35<sup>22</sup>. It is estimated that this will apply to a range of 32 to 96 HME rifle holders, with a central estimate of 64. Each HME rifle holder will require the subscription for a period of 120 months<sup>23</sup>. Multiplying these together gives an estimate of total ongoing costs that lie in a range of **£0.06 to £0.52 million**, with a central estimate of **£0.23 million (PV over 10 years)**.

### Police

30. Given that there are only 128 certificate holders who possess these rifles, and they have previously indicated that they were in favour of additional security (from the consultation for the Offensive Weapons Bill), there is no expectation of increased police or CPS action. **Option 2** is not expected to lead to any increase in offences or prosecutions, and therefore there is no expected increase in police time required aside from the inspection costs outlined in paragraph 25.

## Total costs

31. Table 3 outlines total costs, which are estimated to be between **£0.11 and £0.85 million (PV)**, with a central estimate of **£0.38 million (PV)** over 10 years.

<sup>20</sup> Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14.5 - Office for National Statistics (ons.gov.uk) 2020 SOC code: 7129 and in 2021/22 prices. Uprated further by 21.8 per cent to include non-wage share of labour cost for the UK. See Eurostat (2019): [https://ec.europa.eu/eurostat/databrowser/view/lc\\_lci\\_lev/default/table?lang=en](https://ec.europa.eu/eurostat/databrowser/view/lc_lci_lev/default/table?lang=en) Calculation is  $0.179/0.821 = 21.8$  per cent.

<sup>21</sup> Statistics on firearm and shotgun certificates, England and Wales: April 2020 to March 2021 - GOV.UK (www.gov.uk), accompanying data tables, table 6.

<sup>22</sup> <https://securityalarms.co.uk/adt/police/>. Rounded to the nearest £1.

<sup>23</sup> The total appraisal period (10 years x 12 months).

**Table 3, Summary of costs over 10 years for Option 2, reaching Level 3 security from Level 1, £ million (PV), 2021/22.**

<b>Cost (£)</b>	<b>Low</b>	<b>Central</b>	<b>High</b>
<b>Set-up costs (year 1 only)</b>			
Individuals- increasing security set up costs	0.02	0.1	0.24
Familiarisation – FEOs	0	0	0
Familiarisation – Individuals	0	0	0
Familiarisation- RFDs	0.02	0.05	0.1
FEOs inspections	0.01	0.01	0.02
<b>Ongoing costs (PV)</b>			
Individuals – increasing security ongoing costs	0.06	0.23	0.52
<b>Total costs (PV)</b>	<b>0.11</b>	<b>0.39</b>	<b>0.88</b>

Source: Home Office own estimates, 2021/22.

Note: All values rounded to the nearest £100.

## BENEFITS

32. Individuals owning HME rifles will be able to continue to use them, but subject to the rifles being stored and transported in a way which reduces the risk of their being stolen and used to commit acts of violence.
33. Having everyone reach Level 3 security – the highest level – may have a public safety benefit by reducing the risk of HME rifles being stolen and used in violent crime. These benefits cannot be quantified due to the uncertainty of how many incidents may be prevented. For context, there were 3,093 firearm-related robberies per year between 2004/2005 and 2014/2015<sup>24</sup>. The cost to society per robbery is estimated to be **£13,000** and the value of a homicide is taken as **£3.7 million**<sup>25</sup>. Using breakeven analysis and given the total costs calculated, between **9 and 68 robberies**, with a central estimate of **31**, or **one homicide over 10 years**, will need to be prevented to have a net benefit to society.

## NPSV, BNPV, EANDCB

34. Net Present Social Value (NPSV) is estimated as the total discounted benefits minus the total discounted costs. The **NPSV of Option 2** is estimated to lie in a range of **-£0.11 to -£0.88 million**, with a central estimate of **-£0.39 million** (PV over 10 years).
35. The estimated Business Net Present Value (BNPV) lies in a range of **-£0.02 to -£0.1 million**, with a central estimate of **-£0.05 million** (PV over 10 years).
36. The net direct cost to business per year (EANDCB<sup>26</sup>) of these measures lies in a range of **£0.00 to £0.01 million**, with a central estimate of **£0.01 million** (see Table 4 for summary of NPSV, BNPV and EANDCB).

<sup>24</sup> <https://cy.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/offencesinvolvingtheuseofweaponsdatatables> Table 8,

<sup>25</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/732110/the-economic-and-social-costs-of-crime-horr99.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732110/the-economic-and-social-costs-of-crime-horr99.pdf) - Figures all in 2015/16 prices so updated to 2021/22 prices.

<sup>26</sup> This is defined as the Equivalent Annual Net Direct Cost to business (EANDCB) and used by the Regulatory Policy Committee (RPC) to compare the administrative burdens on business across policies.

**Table 4, Summary of NPSV, BNPV, and EANDCB for Option 2, reaching Level 3 security from Level 1, £ million, 2021/22**

	Low	Central	High
<b>Total costs</b>	0.11	<b>0.39</b>	0.88
<b>Total benefits</b>	0	<b>0</b>	0
<b>NPSV</b>	-0.11	<b>-0.39</b>	-0.88
<b>BNPV</b>	-0.02	<b>-0.05</b>	-0.1
<b>EANDCB</b>	0	<b>0.01</b>	0.01

Source: Home Office own estimates, 2022.

Note: All values rounded to the nearest £100.

### Value for money (VfM)

37. The measures in **Option 2** are strengthening regulations around how firearms should be handled and kept. It is likely that these measures will achieve the policy objective, because storing firearms more securely will make them more difficult to illicitly procure. This should result in a decrease in the incidences of violent crime involving firearms. This also means that **Option 2** is likely to meet the strategic objectives of reducing crime and increasing public safety. If these objectives are achieved then this would mean value for money for the taxpayer.

### Impact on small and micro-businesses

#### Small and micro-business assessment (SaMBA)

38. It is expected that apart from the familiarisation costs RFDs will need to face (outlined in the Appraisal section), there will not be additional costs incurred to businesses to increase their security. A large proportion of the 3,007 RFDs in England and Wales are small and micro businesses<sup>27</sup>. The Gun Trade Association<sup>28</sup> estimates that 86 per cent of RFDs have under 4 employees, 11 per cent have 4-10 employees and 3 per cent have 11+ employees. Therefore, between 97 to 100 per cent of RFDs are small and micro businesses, with a central estimate of 98.5 per cent. This implies that the cost of this policy to small and micro-businesses lies in a range of **£20,000 to £98,400**, with a central estimate of **£47,900** in year 1 only.

## F. Proportionality

39. This IA has identified the main costs and benefits that are likely to result from the proposed changes. These have been quantified where data is available, and breakeven analysis has been applied where there is a lack of data. The analysis is proportionate to the policy.

## G. Risks

40. There is uncertainty surrounding the set-up and ongoing costs to HME Rifle holders for increasing their security. This impacts the estimates for the total economic cost.
41. The uncertainty exists for several reasons. Firstly, the owners of HME rifles all have different premises which vary in size and layout. Secondly, their existing security arrangements vary

<sup>27</sup> Defined as having between 0 and 49 employees.

<sup>28</sup> [The Firearms \(Amendment\) Rules 2019 \(legislation.gov.uk\)](https://legislation.gov.uk)

according to their location, with some already having stringent security measures in place. Thirdly, in relation to the unit cost for security items, different sources suggested different prices (see the ranges in Table 1). Lastly, **Option 2** has been appraised assuming a central estimate that costs will be half the cost of moving all HME rifle owners to the relevant security standard from Level 1. This is to account for the fact that some individuals will already have a level of security above Level 1.

## **H. Direct costs and benefits to business calculations**

42. This policy is exempt from the Business Impact Target (BIT), as the costs to business are below the threshold. Businesses will however experience familiarisation costs, as RFDs will need to read the new requirements made around securing HME as a result of this policy. Registered Firearm Dealers will therefore have a small cost between **£0.02 and £0.1 million**, with a central estimate of **£0.05 million** (2021/22 prices) in year 1 only. The net direct cost to business per year is estimated to be in a range of **£0.00 to £0.01 million (PV)**, with a central estimate of **£0.01 million (PV)**.

## **I. Wider impacts**

43. There are no wider impacts from this policy.

## **J. Trade Impact**

44. This policy does not have any impact on trade or investment.

## **K. Monitoring and evaluation (PIR if necessary)**

45. The intention is to make rules prescribing the conditions to be attached to any firearm certificate authorising the possession of HME rifles. The Home Office keeps all firearms policy under review through ongoing discussion and feedback from stakeholders and will specifically review the measures four years after the implementation to establish whether there have been any incidents of concern. Any additional security requirements are unlikely to require significant enforcement action over and above that currently undertaken in checking that all firearms certificate holders comply with the conditions on their licence. Therefore, an informal review of the policy will be carried out after one year, which will be followed by a Post-Implementation Review (PIR) three years later.

## L. Annexes

### Impact Assessment Checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p><b>Statutory Equalities Duties</b></p> <p>The public sector equality duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations in the course of developing policies and delivering services. [<a href="#">Equality Duty Toolkit</a>]</p> <p>In evaluating the impact of the introduction of the new policies set out in this IA, due consideration has been undertaken to assess any discriminatory impacts on groups with protected characteristics including: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.</p> <p>After careful assessment of the discriminatory impact, this policy is likely to indirectly discriminate against men as holders of firearms are disproportionately held by men. However, it is also likely that the benefits will accrue disproportionately to this group.</p> <p>The public sector equality duty has been considered and the Equality Impact Assessment will be published.</p> <p><b>The Senior Responsible Owner has agreed these findings from the Equality Impact Assessment.</b></p>	<p><b>Yes</b></p>

### Economic Impact Tests

<p><b>Small and Micro-business Assessment (SaMBA)</b></p> <p>The SaMBA is a Better Regulation requirement intended to ensure that all new regulatory proposals are designed and implemented so as to mitigate disproportionate burdens. The SaMBA must be applied to all domestic measures that regulate business and civil society organisations, unless they qualify for the fast track. [<a href="#">Better Regulation Framework Manual</a>] or [Check with the Home Office Better Regulation Unit]</p> <p>See <b>section E: Appraisal</b> (paragraph 38, Small and micro-business assessment) for details</p>	<p><b>Yes</b></p>
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## **ANNEX A: FIREARMS SAFETY CONSULTATION: FINDINGS**

### **List of organisations that responded to the Consultation**

- British Association for Shooting and Conservation.
- BIAZA (British and Irish Association of Zoos and Aquariums).
- British Shooting Sports Council.
- Cats Protection.
- Deactivated Weapons Association.
- Department for Environment, Food and Rural Affairs.
- Essex Police.
- Family members of the victims of air weapons shootings and their MPs.
- Fifty Calibre Shooters Association.
- Gun Control Network.
- Gun Trade Association.
- Historical Breechloading Smallarms Association.
- Metropolitan Police, Wildlife Crime Unit.
- NABIS (National Ballistics Intelligence Service).
- National Farmers' Union.
- National Rifle Association.
- National Small-bore Rifle Association.
- Northamptonshire Police.
- NPCC lead on the Criminal Use of Firearms.
- NPCC lead on Firearms Licensing.
- RSPCA.
- Scottish Association for Country Sports.
- Showmen's Guild of Great Britain.
- Society of Independent Roundabout Proprietors.
- Vintage Arms, Scotland.

The remaining responses were from individuals or from respondents who provided no identifying information.

## HIGH MUZZLE ENERGY RIFLES

**Q1. To what extent do you consider that the present level 3 security requirements, if specified in rules made by the Secretary of State, would be sufficient to mitigate the risks posed by high muzzle energy rifles?**

	Responses	Percentage (%)
Strongly agree	8,608	69
Agree	1,759	14
Neither agree nor	865	7
Disagree	396	3
Strongly disagree	799	6
<b>Total</b>	<b>12,427</b>	<b>99</b>

A majority (83%) of respondents who answered this question agreed or strongly agreed that current level 3 security requirements would be sufficient to mitigate the risks posed by high muzzle energy rifles.

Nine per cent of respondents who answered this question disagreed or strongly disagreed that level 3 security requirements would be sufficient.

There were no meaningful differences in response between categories of respondents for this question.

**Q2. If you do not consider level 3 security would adequately address the risks, to what extent do you consider that the following additional security conditions could be relevant to the safe storage and use of these rifles?**

Please note that this question was available to all respondents regardless of their answer to the previous question. This was on the basis that even if a respondent answered previously that level 3 security was sufficient, the respondent given the opportunity to voice their opinion on the following measures.

**A. *Fitting shutters and grilles on all doors and windows?***

	Responses	Percentage (%)
Strongly agree	130	2
Agree	201	3
Neither agree nor	646	11
Disagree	1,389	23
Strongly disagree	3,546	60
<b>Total</b>	<b>5,912</b>	<b>99</b>

A majority (83%) of respondents who answered this question disagreed or strongly disagreed that fitting shutters or grilles on doors and windows would be relevant to storing and using high muzzle energy rifles safely. There was a particularly high percentage (90%) of disagreeing or strongly disagreeing with this measure from respondents who were categorised as Firearms Dealers.

Five per cent of respondents who answered this question agreed or strongly agreed that shutters or grilles would be relevant.



*B. Installing CCTV*

	Responses	Percentage (%)
Strongly agree	436	%
Agree	1,081	18
Neither agree nor	1,143	19
Disagree	1,051	18
Strongly disagree	2,277	38
<b>Total</b>	<b>5,988</b>	<b>100</b>

Over half (56%) of respondents who answered this question disagreed or strongly disagreed that installing CCTV would be relevant to safe storage and use of high muzzle energy rifles.

One quarter (25%) of respondents who answered this question agreed or strongly agreed that installing CCTV would be relevant. This rises to half (50%) for respondents who were categorised as Law Enforcement, although only a small number (28) of respondents from Law Enforcement answered this question.

*C. Panic alarms available where the rifle is stored?*

	Responses	Percentage (%)
Strongly agree	222	4
Agree	561	9
Neither agree nor	1,088	18
Disagree	1,376	23
Strongly disagree	2,694	45
<b>Total</b>	<b>5,941</b>	<b>99</b>

Over two thirds (68%) of respondents who answered this question disagreed or strongly disagreed that panic alarms where the rifle is stored were relevant to safe storage and use of high muzzle energy rifles.

Thirteen per cent of respondents who answered this question agreed or strongly agreed that panic alarms were relevant to where the rifle is stored.

There were no meaningful differences in response between categories of respondents for this question.

*D. Panic alarms available when the rifle is in use on a range?*

	Responses	Percentage (%)
Strongly agree	140	2
Agree	359	6
Neither agree nor	866	15
Disagree	1,444	25
Strongly disagree	3,082	52
<b>Total</b>	<b>5,891</b>	<b>100</b>

Over three quarters (77%) of respondents who answered this question disagreed or strongly disagreed that panic alarms available when a rifle is in use on a range would be relevant to safe

storage and usage. 81 per cent of respondents categorised as Shooting Organisations disagreed or strongly disagreed with this measure.

Eight per cent of respondents who answered this question agreed or strongly agreed that panic alarms when a rifle is in use on a range would be relevant.

*E. The bolt or other critical component parts be kept separately.*

	<b>Responses</b>	<b>Percentage</b>
Strongly agree	1,569	26
Agree	2,089	34
Neither agree nor	727	12
Disagree	485	8
Strongly disagree	1,214	20
<b>Total</b>	<b>6,084</b>	<b>100</b>

Sixty per cent of respondents who answered this question agreed or strongly agreed that keeping the bolt or other critical component parts separately would be relevant to safe storage and use of high muzzle energy rifles.

Over one quarter (28%) of respondents who answered this question disagreed or strongly disagreed that this would be relevant to safe use and storage.

There were no meaningful differences in response between categories of respondents for this question.

*F. If viable, and with a change in the law or certificate conditions, other members of the holder's shooting club to look after critical components on behalf of each other?*

	<b>Responses</b>	<b>Percentage (%)</b>
Strongly agree	198	3
Agree	403	7
Neither agree nor	769	13
Disagree	1,212	20
Strongly disagree	3,440	57
<b>Total</b>	<b>6,022</b>	<b>100</b>

Over three quarters (77%) of respondents who answered this question either disagreed or strongly disagreed that other members of the shooting club looking after critical components for each other would be relevant to safe use and storage of the rifles.

Ten per cent of respondents who answered this question agreed or strongly agreed that this would be relevant.

There were no meaningful differences in response between categories of respondents for this question.

- G. *Ammunition to be kept separate from the gun in a separate cabinet and only a small number of rounds of ammunition allowed?*

	Responses	Percentage (%)
Strongly agree	634	10
Agree	1,415	23
Neither agree nor	910	15
Disagree	1,160	19
Strongly disagree	1,952	32
<b>Total</b>	<b>6,071</b>	<b>99</b>

Over half (51%) of respondents who answered this question disagreed or strongly disagreed that keeping ammunition in a separate cabinet from the gun and allowing only a small amount of ammunition would be relevant to safe use and storage of the rifles.

One third (33%) of respondents who answered this question agreed or strongly agreed that this measure would be relevant. Agreeing or strongly agreeing with this measure was higher for respondents categorised as Law Enforcement (50%) and Shooting Organisations (42%).

**Q3. To what extent would it be preferable/viable to require these rifles to be stored only at a gun club?**

	Responses	Percentage (%)
Strongly agree	381	3
Agree	130	1
Neither agree nor	365	3
Disagree	1,416	11
Strongly disagree	10,114	82
<b>Total</b>	<b>12,406</b>	<b>100</b>

A majority (93%) of respondents who answered this question strongly disagreed or disagreed that it would be preferable or viable to require High Muzzle Energy rifles to be stored only at a gun club.

Four per cent of respondents who answered this question agreed or strongly agreed that this measure would be preferable or viable.

There were no meaningful differences in response between categories of respondents for this question.

**Q4. To what extent would it be preferable/viable to require these rifles to be stored only by a registered firearms dealer?**

	Responses	Percentage (%)
Strongly agree	330	3
Agree	76	1
Neither agree nor	275	2
Disagree	1,135	9
Strongly disagree	10,588	85
<b>Total</b>	<b>12,404</b>	<b>100</b>

A majority (94%) of respondents who answered this question strongly disagreed or disagreed that it would be preferable or viable for High Muzzle Energy rifles to be stored only by a registered firearms dealer. 96 per cent of respondents categorised as a Firearms Dealer strongly disagreed or disagreed with this measure.

Four per cent of respondents who answered this question strongly agreed or agreed that this measure would be preferable or viable.