



Forensic Science Regulator

Firearms Specialist Group meeting

Note of the meeting held on 30 September 2025 held in Birmingham and online via videoconference.

- 1. Welcome, introductions, review of actions and minutes**
 - 1.1.1. The Chair opened the meeting and welcomed Dr Marc Bailey, the recently appointed Forensic Science Regulator, who was introduced to the group.
 - 1.1.2. The initial part of the meeting was used to provide the Regulator with an oversight of the challenges currently facing the group and the firearms community.
 - 1.1.3. The new Forensic Science Regulator introduced himself, outlining his regulatory background and commitment to practical regulation. He emphasised the importance of making the Code of Practice effective and welcomed the group's expertise and invited feedback on key concerns.
 - 1.1.4. There was a discussion of current challenges in firearms classification and an exploration of where regulation, and the influence of the Regulator can best be used to deliver improvements.
 - 1.1.5. Discussions included:
 - a. risks related to forces using unaccredited processes to produce reports;
 - b. significant capacity issues in firearms forensics within England and Wales;
 - c. the move toward interpretation approaches such as CAI, and the need to promote greater understanding and leadership within policing in relation to this aspect;

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- d. the operational and funding challenges in establishing datasets to inform decision making and concerns that existing data may not be being utilised efficiently;
- e. the need for greater expertise in reporting statistics in casework, and the risks posed by statistics being used incorrectly in court.

1.2. Funding challenges for database projects

- 1.2.1. It was noted that database projects in this area of forensic science tend to fall between research councils, making it harder to secure funding.
- 1.2.2. The representative from PFS noted that ENFSI funding programme supports research related to firearms in various laboratories around Europe. There is potentially a conduit from sourcing funding from that body, of which the UK is still a member.

- 1.3. **ACTION** – Representative from NTU to write up the example of challenges they have encountered in relation to securing funding and share this with the Regulator and members from OFSR.

1.4. Variation in approaches to classification

- 1.4.1. There was discussion regarding the variation in approach being seen in relation to the classification of components and types of weapons across England and Wales at present. Members of the SG highlighted concerns regarding the classification of top venting blank firers.
- 1.4.2. **ACTION** – the Chair to draw together some of the issues from the discussion for the planned future meeting with Regulator, setting out areas where the Regulator may be able to provide further support.
- 1.4.3. The Regulator left the meeting.

1.5. Apologies

- 1.6. Apologies were received from representatives from UKAS (1 of 2), NaBIS (x2), and the CPS (x1).

- 1.6.1. The group discussed the need for greater CPS involvement in the SG.

1.7. Previous Minutes

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- 1.7.1. The minutes of previous Firearms SG meeting (24 June 2025) were discussed and agreed by the group

2. Updates**2.1. UKAS Update**

- 2.1.1. UKAS raised an item regarding the use of ballistic gelatine blocks to establish kinetic energy, rather than a chronograph.
- 2.1.2. During recent UKAS visits to laboratories it has become apparent that penetration testing is being used to evidence whether the 1 joule limit described in law is being exceeded. UKAS have identified issues related to a lack of validation for this approach. Where this technique has not been validated, it therefore falls outside of that laboratories accreditation.
- 2.1.3. The group discussed other techniques being used across industry such as chronographs and high-speed cameras.
- 2.1.4. SPA have been involved in a research project, looking at the validation of ballistic gel production to get consistent values across different laboratories. A paper is currently being written up for this piece of work.

2.2. NaBIS Update

- 2.2.1. There were no specific items raised from NaBIS for this meeting, and neither representative was able to attend in person.
- 2.2.2. One of the representatives did inform the group via email that they will shortly be leaving NaBIS and therefore will no longer be able to represent the organisation on the specialist group.
- 2.2.3. **ACTION** - Chair to contact NaBIS to ask whether they wish to provide an additional representative to replace the outgoing member.

3. Classification by unaccredited forces

- 3.1.1. The Chair will be meeting with the Regulator to discuss the ongoing concerns related to some unaccredited forces who may be using the Regulator's dispensation for urgent firearms classification (as per 62.2.2 of the Code) without fully meeting its requirements.

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- 3.1.2. As agreed at the previous meeting, the Chair will share with the specialist group the summary of this issue that was provided to the Regulator.
- 3.1.3. Additionally, another police force has successfully applied to use the urgent classification dispensation.

4. Classification of Top Venting Blank Firers (TVBFs)

- 4.1.1. The group discussed a recent list published by the NCA detailing a number of Italian TVBFs which the NCA consider to be readily convertible.
- 4.1.2. Concerns were expressed regarding the status of such lists, given that it would be a decision for the court as to whether or not these items are 'readily convertible'.
- 4.1.3. At present there is no standardised or accredited process for testing convertibility, meaning that assessments vary by provider. There is also a lack of guidance for practitioners as to how such testing convertibility should be approached, both in terms tools used, time taken, as well as issues relating to experts with specialist knowledge undertaking such conversions as part of testing, in the context of the wording of the Firearms Act 1982.
- 4.1.4. As per discussions in previous meetings, there was agreement that there should be a new FSA covering conversion, as this would allow approaches to be standardised. While any such new FSA would be dependent on a revision of the Code, there is scope to start development now so that it can be ready for when the Code is next updated.
- 4.1.5. The SG group were in agreement that there are concerns with regards to the published list of TVBFs, in relation to whether the guns are readily convertible within the terms of the 1982 act, in particular in relation to the use of common DIY tools and speciality skills. There were also concerns regarding the final classification of such items, and whether forces are going to specific police providers when other independent providers will not classify items the same way. In addition, the final classification of an unconverted readily-convertible item (as Section 1 or Section 5(1)(aba)) remains un-appealed at present.

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- 4.1.6. The group agreed that these concerns should be raised in planned discussions between the Chair and the Regulator.

5. Firearms Classification (standing item)**5.1.1. Classification of items received in a non-functional state**

- 5.1.2. The group considered a recent referral that highlighted challenges in the classification of firearms when items are received in a non-functional state.
- 5.1.3. Variations in classification of a non-functioning item had been seen across three different providers, which appeared to stem from differences in the time invested in, or expertise in, attempting to make the item fire, rather than differing interpretations of legislation.
- 5.1.4. The group debated whether proof of functionality via test firing is required for classification of component parts, or if other indicators (such as proof marks) are sufficient.
- 5.1.5. Section 57 (1D) of the Firearms Act 1968, defines the items which can be considered as component parts of a firearm, but specifies that this is “only where the item is capable of being used as a part of a lethal barrelled weapon or a prohibited weapon”
- 5.1.6. It was noted that proof marks only indicate the ability of a component to fire at the point of manufacture, and consideration would need to be given to condition of the item at the time of examination.
- 5.2.** Members discussed examples where very rusty items had been made to fire but also discussed situations where this was not the case, and where it might be argued in court that a component had become effectively de-activated due to its condition. As such this would need to be considered on an item-by-item basis, and it would ultimately be for the court to consider whether the requirements of Section 57 (1D) had been demonstrated.
- 5.2.1. The group highlighted that it is important that practitioners communicate the range of considerations, and possible alternative interpretations to the court when classifying an item.

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- 5.3.** Concerns were raised about the suitability of streamlined reporting formats (e.g., SFR1) for complex cases, as they can restrict the practitioners' ability to explain alternative interpretations.
- 5.3.1. It was also noted that in the sequential examination of the item in the referral by three different providers, the condition of the item would have changed between examinations, due to sequential efforts to get the item to fire. Concerns were raised as to whether the practitioners undertaking the later examinations would have been fully aware of the earlier work on the item by other providers.
- 5.4.** The importance of full disclosure was emphasised: both in terms of informing subsequent examiners that previously work had been undertaken and ensuring that the full range of opinions is disclosed to the court.
- 5.4.1. **ACTION** – OSFR to explore the approach to disclosure taken in the case discussed.
- 5.5. Pre-submission triaging**
- 5.5.1. The group discussed the scope of the Forensic Science Activity (FSA) MTP 601 in relation to pre-submission triaging.
- 5.5.2. Clause 66.4.4 of the Code states “this FSA does not cover activity carried out at an incident scene or other related location, such as the proffering of non-technical advice in an operational capacity to: a.) inform an investigation; and b.) prioritise submissions for classification”.
- 5.5.3. There was agreement within the meeting that submission decisions sit outside of accreditation and do not count as the FSA/classification.
- 5.5.4. Similarly, triaging in this context does not fall under the FSA/classification, as this would just be a case of making submission decisions rather than undertaking a classification. A key point was that no reports or statements are being produced in these contexts.
- 6. Terms of Reference for Revision**
- 6.1.1. The group reviewed the updated Terms of Reference for the group to ensure they reflected the purpose of the group.

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- 6.1.2. Several adjustments were made to the draft wording to ensure the remit and composition of the specialist group was accurately reflected.

There was discussion around possible membership changes, including the possibility of adding representation from a police armourer.

7. Firearms Evidence Evaluation

- 7.1.1. Firearms Interpretation working group. A summary of the Interpretation workshop has been circulated. The latest draft of Firearms Interpretation document has also been circulated to the group.

- 7.1.2. There was discussion of the approach taken so far in the drafting of the interpretation document. It was emphasised that the approach to the document should be a focus on what works for practitioners, to ensure the document is meaningful to the users. The importance of worked examples within the document was also discussed.

- 7.1.3. The overarching interpretation document is awaiting feedback from the President of the Kings Bench Division, and the Interpretation SG are aiming to undertake a targeted consultation in the coming months, followed by publication early next year.

8. Chair's Update

- 8.1.1. In relation to the export license question raised at the previous meeting, the Chair confirmed that his understanding is that for fired cartridge cases or bullets an export licence is not required for fired evidence coming into or out of the UK.

- 8.1.2. Potential Firearm Legislation: No changes from last meeting. A consultation on section 2 to section 1 is due in the Autumn. The only other changes are relating to aspects which are not relevant to forensic science.

9. Workplan Review

- 9.1.1. The Specialist Group reviewed the workplan document.

- 9.1.2. It was agreed that further discussions around kinetic energy testing would be helpful, and that this should be added to the agenda for the next meeting.

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- 9.2.** Similarly, further discussions in regard to databases should also be included in the agenda for the next meeting.
- 9.2.1. **ACTION** – OFSR to add Kinetic Energy Testing, and Databases to the agenda for the next meeting.
- 10. AOB**
- 10.1. England and Wales capacity challenges.**
- 10.1.1. NPCC Silver Command are currently directing resources to call outs, due to lack of seniors/scene going staff within FSPs. This issue not just impacting scene work, but all complex casework. There are significant risks due to lack of capacity in the system.
- 10.1.2. The group expressed concerns regarding general health of the forensic system in Firearms area, and the lack of joined up, cohesive, approach.
- 10.1.3. **ACTION** – Chair to look into the background of the FCC Firearms Consultative Committee and at what point this was abolished.
- 10.2.** There was a wide-ranging discussion on approaches to testing, including discussions of the previous MFE approach.
- 10.2.1. Representative from the SPA reported from the national CUF meeting, summarising proposals for legislative changes that are being put forward by the Home Office. These include automatic fire switches, 3D templates for ammunition components, a systematic regime for testing top venting blank firers, and a change to prohibited person rules to include imitation firearms.
- 10.3. Date of next meeting**
- 10.3.1. Chair to liaise with OFSR, but 12th February proposed as a potential date.

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Annex A

Representatives present in person:

Chair

The Association of Forensic Science Providers (AFSP)

Nottingham Trent University (NTU)

United Kingdom Accreditation Service (UKAS) x1

Office of the Forensic Science Regulator (OFSR)

Representatives present online:

The Forensic Science Regulator

Scottish Police Association (SPA)

Principal Forensic Services (PFS)

Apologies received from:

UKAS x1

Crown Prosecution Service

Metropolitan Police Service Forensic Firearms Unit (MPSFFU)

The National Ballistics Intelligence Service (NaBIS) x2