

GOOD PRACTICE GUIDE

# TARGET SHOOTING CLUBS



**METROPOLITAN  
POLICE**



## Foreword

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There is a long and proud history of civilian target shooting in the United Kingdom. I am very conscious that two of our Independent Advisory Group members, the National Rifle Association and the National Smallbore Rifle Association were founded in 1859 and 1899 respectively. However, civilian target shooting can trace its roots back to the very earliest days of the use of firearms in the country. Today, target shooting is a growth sport, attracting young and old alike, and cutting across gender and social divides.

I am very clear that the Metropolitan Police Service and our key stakeholders, including the members of our Independent Advisory Group and London's shooting communities, have a shared mission in relation to target shooting. We must do whatever we can reasonably do to support the continued lawful practice of target shooting, whilst protecting public safety. As such, I am delighted to support this good practice guide. I believe that it presents key information to target shooters in London, and elsewhere, in a clear and practical way. This will be of significant practical benefit both to the many shooting clubs in London and to the police.

The fact that this document is a shared enterprise, written by the Metropolitan Police Service's Firearms Enquiry Team, in partnership with our key stakeholders, demonstrates that keeping London safe, whilst supporting target shooting, is a shared responsibility.

Rob Atkin MBE

T. Commander, Armed Policing

## Foreword

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As Secretary of the British Shooting Sports Council (and indeed as a former Hon Secretary of a Home Office Approved Club and a shooter for over fifty years) I have found that membership of the Metropolitan Police Service's Firearms Enquiry Team's Independent Advisory Group has proved a very effective means of addressing issues relating to firearms licensing and club administration. The IAG includes representatives from the National Rifle Association and the National Small-bore Rifle Association, British Association of Shooting and Conservation, the British Deer Society, the Gun Trader Association, and the Historical Breechloading Smallarms Association, who bring wide experience to the group.

Approved club status brings with it obligations regarding record keeping, which must be clear and accurate, and reporting. We have been very aware of the need for a procedure for information exchange between Approved Clubs and the FET that is straightforward, unambiguous and quick and easy to use. The development of such procedures is an iterative process and the publication of this good practice guide is an important contribution which will be of great help to us all.

The IAG members welcomed the opportunity to contribute to the guide and we are most grateful to T/Commander Rob Atkin and T/ Chief Inspector Roger Arditti for their decision to produce it for our mutual benefit.

David Penn

Secretary of the British Shooting Sports Council

## 1. Introduction

To obtain and keep Home Office Approval, target shooting clubs have to meet the criteria specified in the document issued by the Home Office “Firearms – Approval of rifle and muzzle-loading pistol clubs.” This guide has been prepared by the Met Police and its firearms licensing Independent Advisory Group to help clubs to comply with the criteria in this document, a copy of which is included within the appendix of this booklet.

These criteria are effectively law and every club official should make themselves familiar with them, as failing to comply with them will leave the club open to having that approval removed. You can find the criteria online at:

<https://www.gov.uk/government/publications/approval-of-rifle-and-muzzle-loading-pistol-clubs><sup>1</sup>

## 2. What is a Home Office Approved Target Shooting Club?

*Firearms – Approval of rifle and muzzle-loading pistol clubs* explains that:

Under section 44 of the Firearms (Amendment) Act 1997, a person wishing to possess a rifle or muzzle-loading pistol solely for target shooting must be a member of an approved rifle club or, as the case may be, approved muzzle-loading pistol club. Section 44(1)(b) requires an approved club to be specified on the firearm certificate. The certificate should not list all clubs of which the holder is a member.

Any rifle, miniature rifle or muzzle-loading pistol club can apply to the relevant Secretary authority (i.e. the Home Office for clubs in England and Wales or the Scottish Government for clubs in Scotland) for approval. Approval is granted under Section 15(1) of the Firearms (Amendment) Act 1988 (as amended by section 45 of the Firearms (Amendment) Act 1997).

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<sup>1</sup> The approval criteria differ for School Shooting clubs; the most up-to-date criteria can be found in paragraph 18.24 of the Home Office guidance 2016.

When approval has been granted, members of that club can possess firearms and ammunition without holding a personal firearm certificate “when engaged as a member of the club in connection with target shooting” (Section 15(1) of the 1988 Act as amended by section 45 of the 1997 Act).

Approval also allows the police to grant a free firearm certificate to a responsible officer of the club to enable him or her to purchase and acquire firearms and ammunition for members to use for target shooting. Club members may not purchase or acquire firearms or ammunition unless they have been granted a personal firearm certificate by the police.



### 3. How does a club gain approval?

To apply for the grant or renewal of Home Office Approval, there is now an on-line process which is being trialled at:

<https://www.firearms-licensing.homeoffice.gov.uk/shooting-clubs/activity?hof-cookie-check><sup>2</sup>

or the form 124 can be downloaded at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/659731/Form\\_124\\_-\\_Home\\_Office\\_Club.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/659731/Form_124_-_Home_Office_Club.pdf)

The Home Office will forward the completed application on to police, who will then make contact with the club to arrange a visit to discuss the criteria. The police will then forward their findings back to the Home Office who will liaise with the club to request payment before they issue the approval.

The current fee for approval is £84, which is valid for six years. However, fees can change and readers may wish to check the Home Office website for up-to-date information:

<https://www.gov.uk/guidance/apply-for-or-manage-a-section-5-shooting-club-or-museum-licence>

<sup>2</sup> At the time of writing this, this currently applies ONLY to the Metropolitan, Lincolnshire, and North Yorkshire Police Areas but it is expected to be extended across England and Wales in due course.

When applying for approval, the club must comply with various requirements, among which are:

- The club must have at least ten members at the time of application and at all times whilst approved unless, exceptionally, the Secretary of State or Scottish Government determines that there are special circumstances which justify a lesser number
- It must be a genuine target shooting club with a written constitution
- The club must have regular access to ranges suitable for the classes of firearms it uses

There are three classes of approval – Fullbore rifle, smallbore rifle and muzzle-loading pistol, and the decision about which categories will be listed in the approval will mainly depend on whether suitable ranges are available.<sup>3</sup>

## 4. What requirements does Home Office Approval place upon a club?

There are a number of requirements to be fulfilled by clubs listed in the approval document – known as the “criteria” and all club officials should make themselves aware of them [see appendix 1].

The club should ensure that an officer of the club has responsibility for liaising with the police – the Home Office Criterion E suggests that this person should be named as a police liaison officer.

### Police notifications

The club must notify the police force through whom their approval was granted or last renewed of:

- Any person applying to become a member
- Any member who has not shot with the club for 12 months<sup>4</sup>
- Any person who – for whatever reason – is no longer a member of the club

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<sup>3</sup> Rifles chambered for pistol ammunition above .22 rimfire calibre are regarded as fullbore rifles.

<sup>4</sup> This is a running 12 month period for each member, but once the notification has been made, no further notifications for that member are required.

- Any person who has become a full member of the club – including the date of full membership

The notification must include:

- The full name of the person (and any previous names)
- Their full address
- Their date of birth
- Their place of birth

The frequency of these notifications should be agreed between the club and the firearms licensing department.

For clubs administered by the Metropolitan Police, these notifications can be sent to [rfdclubmailbox@met.police.uk](mailto:rfdclubmailbox@met.police.uk)

### Club Attendance Register

The club must maintain an attendance register. The club must record in relation to each visit made by its firearm certificate holders the date, the member's name, and the details of the firearms on that certificate used – including the make, bore, type and serial number of the gun. The register should be kept for a minimum of six years from the last entry.

### Joining the club

The club must operate a probationary period for new members, which must be a minimum of three months, during which time the probationary member must attend regularly, and have successfully completed a course in the safe-handling and use of firearms before being allowed to shoot other than with one-to-one supervision.

Applicants who have firearm certificates or are already members of another club approved for the same class of firearms as the club they are applying for, need not – at the club's discretion – undergo a probation period.

Anyone applying to join the club must declare:

- If they have ever had a firearm or shotgun certificate revoked
- If they have ever had an application for a firearm certificate refused
- That they are not a prohibited person under Section 21 of the Firearms Act 1968

In practice, this can take the form of a membership application

form which includes these declarations. It is good practice to retain a copy of these signed declarations should the club or police need to refer to these at a later date.

Clubs should also retain members' details/records for six years following the cancellation of membership.

### Changes of circumstance

The Home Office must be notified if the club changes:

- The Secretary
- The Secretary's details (i.e. change of name or address)
- The club's name

or

- Loses the use of a range or gains other ranges,
- Wants to change its approval classification

## 5. What is expected of club members?

The Home Office Approval document specifies that:

- Club officers must be responsible people who can be entrusted with the administration of the club
- The club must appoint a "police liaison officer"
- Members must be "of good character"

- Section 15 of the 1988 Act, as expanded upon at paragraph 18.22 of the Home Office Guide on Firearms Licensing Law 2016, states that members may transport, use, repair, clean etc. firearms and ammunition without a certificate **ONLY** "*when engaged as a member of the club in connection with target shooting,*" but those firearms/ammunition must be of a type the club is approved for IE: Fullbore rifle /smallbore rifle/muzzle-loading pistol. If a club member is to transport guns and ammunition away from the club range(s), it is good practice for the member to be provided with a letter of authority from the club and a copy of the club's firearm certificate. (See appendix 2 for an example letter)

If a club member possesses a personal firearm certificate (FAC), they must ensure that they update their licensing team with any changes to their primary Home Office approved club entered onto the conditions on their FAC. Home Office Guidance suggests that members should use each of the guns on their certificates at least three times per year to evidence their continued 'good reason' at the next renewal of their FAC. Exceptions to this include



personal circumstances such as ill health or working away, or older firearms which may undergo excessive wear and tear if used this often.

## 6. Club firearm certificate

A responsible officer of the club can hold a club certificate, which can cover firearms for which the club is approved. There is no fee for the grant, renewal or variation of this certificate.

The application form 201 can be downloaded from our website [www.met.police.uk](http://www.met.police.uk) Click on 'Apply or register' and then 'Firearm or shotgun certificate' and the website will lead you to the form.

The certificate cannot apply to guns outside the Home Office Approval, so Section 1 Shotguns and long barrelled pistols/revolvers cannot be held on those certificates. As such, other members may NOT use them, transport them etc or benefit in any way from Section 15(1) of the 1988 Act as amended by Section 45 of the 1997 Act). Shotgun certificates must be held by an individual, who must pay for the grant and renewal, even if the guns may be for club use.

It will help the police process your application correctly if you write across the top of the form. "APPLICATION FOR A FREE CLUB FIREARMS CERTIFICATE ON BEHALF OF ..... CLUB."

If a club nominates a member who is not the club Secretary to apply for the club FAC and the Secretary and club FAC holder live within different police force areas they will be managed by the different forces. The Home Office approval enquiries are sent by the Home Office to the force in which the Secretary lives and the FAC is issued by the force in which the FAC holder resides.

## 7. Guest Days

The criteria allow a club to have up to 12 guest days a year, where non-members may shoot while supervised on a one-to-one basis. The invitees must be members of a "recognised organisation" such as a scout group or similar. The police must be notified by the secretary **at least 48 hours** before such an event, but more notice is of course preferable. The force to be notified of the guest day is the force where the event is to be held.

## 8. Ranges

There must be sufficient financial arrangements in place to meet any injury or damage claim – generally regarded as having insurance cover of £5M or greater. The national shooting organisations can provide this cover.

The club should ensure that any range for which it is responsible is safe and should inspect it regularly. The NRA & NSRA can provide guidance to clubs on the construction and maintenance of ranges. However, it is good practice for clubs to conduct regular inspections and maintenance of their range infrastructure and document this process.

Whilst range safety certificates are not a legal requirement, if a club has a current certificate it should be displayed. If they do

not have a current range safety certificate, the club insurance certificate should be displayed.

## 9. Security

Exactly the same security conditions on personal firearm certificates apply to club certificates, in particular that when not in use, reasonable precautions must be taken to prevent access by unauthorised persons.<sup>5</sup> This means that the club and its members must place a high emphasis upon physical security of any armoury, buildings, and infrastructure where firearms are used or stored. CCTV and a monitored alarm system are relatively cheap investments which can pay significant dividends in deterring intruders. The police will be more than happy to provide expert advice to any club who has concerns or simply wishes to review its security periodically.



Care must be taken by club members when leaving the club with their guns as there have been isolated cases where people have been followed from the club by criminals who have subsequently broken into their homes and stolen their guns.

## 10. Welfare concerns

Although figures are incomplete, we are aware that some people sadly chose to use their licensed firearm to take their own life. A survey conducted by the charity *Mind* reports that one in four people in the UK will experience a mental health problem each year. Whilst most people seek help and are able to manage their illness, unfortunately statistics show 6.7% of people will attempt suicide in their lifetime. We encourage you all to look out for your fellow club members and speak to someone if you notice any significant or sudden changes to someone's appearance, behaviour, communication capacity, become aware of any threat of danger to them or anyone else, or any unusual changes to their environment. If you become aware of any of these factors, it might be useful to seek advice from the police as the welfare and safety of the individual and other club members is our paramount concern.

All club members should be aware of the potential for members to be radicalised,

blackmailed or of those members struggling to cope with significant changes in their personal circumstances. If any club member has any such concerns or suspicions, they should contact their firearms licensing department for help and advice.

## 11. What can clubs expect from the police?

The role of the police, normally via their Firearms Enquiry Teams, in relation to clubs is to support the safe and lawful practice of target shooting whilst ensuring public safety is not jeopardised. The approach taken by the Met's FET is based, in the first instance, upon partnership and co-operation.

You can expect us to:

- respond to requests and communications politely, quickly and effectively.
- complete probationary members checks in a timely manner.
- not breach the Data Protection Act (or the provisions of the forthcoming

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<sup>5</sup> Section 15(1) of the 1988 Firearms (Amendment) Act allows club members, when acting in connection with target shooting to have access to firearms and ammunition, and in this case they are not *unauthorised* persons.

## Good Practice Guide Target Shooting Clubs

Data Protection Bill) in relation to probationary members checks but to give the club a clear assessment as to an applicant's suitability.

- provide expert advice regarding personal and physical security.
- be objective and understanding about any concerns raised by the club regarding a member or prospective member.

You can also expect the police to visit your club. This may be prearranged, or it may also be unannounced. Section 15(7) of the 1988 Firearms Act allows a constable or civilian officer authorised in writing to enter premises occupied or used by the club to inspect those premises and anything on them to ascertain if the provisions of Section 15 and any limitations or conditions in the approval are being complied with.

S. 45 of the Firearms (Amendment) Act 1997 (which amends Section 15 of the 1988 Firearms Act) details that a constable or civilian officer exercising their power under Section 15(7), can require any information which is kept by means of a computer and is accessible from the premises to

be made available for inspection in a visible and legible form. It is an offence for a person to obstruct the exercising of the powers under s. 15(7). That said, the tone taken by the Met's FET will always be one of co-operation and partnership in the first instance.

Police will normally show you their 'Green card' (Form 112) and Police ID which will verify their identity and complies with Section 15(7) of the 1988 Act. The exception to this may be in an urgent situation, being managed by non-FET staff, who will not necessarily possess a 'Green card'. If you have any concerns about the identity of anyone arriving for an unannounced inspection, please call the Firearms Enquiry Team on 020 7161 4750 or (out of hours) 101.

The purpose of these visits is simply to ensure the police are fulfilling their primary responsibilities in relation to clubs – that we are supporting the lawful practice of target shooting, whilst ensuring public safety.

Among other things, the police may wish to:

- Review the club's physical security

- Confirm their understanding of the club's security practices including range safety procedures and the storage of private guns and ammunition on club premises
- Conduct an audit/inspection of club guns and ammunition
- Confirm details of the club officials
- Discuss the range maintenance regime
- Discuss the conditions on the club certificate
- Review the club's membership (including probationary members)
- Review the club's attendance records
- Review the club's written constitution
- Have a general chat (and perhaps a cuppa!) with club members

If circumstances require it, the police have the power to revoke the club's firearm certificate issued to the 'responsible person' and/or recommend to the Home Office that approval is withdrawn. In the most extreme circumstances, the police may use either common power or statutory powers to cause the

closure of a club. However, it must be stressed that such circumstances, thankfully, are very rare indeed.

## 12. What can cause problems?

The Home Office no longer sends reminders to clubs when their approval is due for renewal. On occasions this has resulted in the approval lapsing. The club should put in place a reminder of the date by which application to renew its approval should be made.

If approval does lapse, members of the club may shoot at the club, but using only those firearms held on their personal certificates.

In this case, a club which is only approved for small-bore rifles could operate under the exemption in Section 11(4) of the Firearms Act 1968, but they should take advice from the police or their shooting organisation before doing so.

If an applicant for membership is found by the police to be unsuitable for any reason, the police will notify the club as soon as practicable, but due to data protection legislation they may not be able to provide any fine detail.

# Appendix 1 – Home Office Criteria for Approval<sup>6</sup>

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Clubs will not be granted approval unless they meet the criteria set out below. These criteria translate into conditions of the approval, if granted. Approved clubs which fail to meet these conditions can expect approval to be withdrawn.

The criteria as set out below should be observed:

- a) the club is a genuine target shooting club with a written constitution;
- b) the principal officers of the club are responsible people who can be entrusted with the proper administration of the club;
- c) the club has at least ten members at the time of application and at all times whilst approved unless, exceptionally, the Secretary of State or Scottish Government determines that there are special circumstances which justify a lesser number;
- d) members are of good character;
- e) the club must appoint a member to act as a liaison officer with the police, and the chief officer of police must have confidence that this person is providing the police with such information as they require to ensure that the activities of the club and its members are conducted properly and safely in accordance with the criteria and give no cause for concern;
- f) the club will maintain a register of the attendance of all members together with details for each visit of the firearms which they used;
- g) the club will inform the police of any person, other than a guest member, who has ceased to be a member for whatever reason;
- h) the club will inform the police of any member, other than a guest member, who has not shot with the club for a period of 12 months;
- i) the club will inform the police of any application for membership, giving the applicant's full name and address, date and place of birth, and the date on which they become a full member;
- j) no application for full or probationary membership will be granted unless the applicant has informed the club of whether he or she has ever had an application for a firearm or shotgun certificate refused by the police, or had a certificate revoked;
- k) members, prospective members and guest members must sign a declaration that they are not prohibited from possessing a firearm or ammunition by virtue of Section 21, as amended, of the Firearms Act 1968 (which applies to persons who have served a term of imprisonment or been given a suspended sentence of three months or longer);
- l) the club has regular use of ranges for the categories of firearm in respect of which approval is being sought or given, as the case may be. Adequate financial arrangements must be in place to meet any injury or damage claim;
- m) the security arrangements for the storage of club firearms and ammunition are satisfactory;
- n) the club does not run a day or temporary membership scheme, other than for guest members within the constraints of paragraphs o and p below;
- o) Guest members must be: members of a recognised outside organisation; people who are known personally to at least one full member of the club; members of another approved club visiting as members of that club; or, visitors possessing firearms that fall within the terms of the club's approval and that are held on their personal FAC or visitor's permit or permit under Section 7 of the 1968 Firearms Act

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<sup>6</sup> Please see the following website of the criteria and accompanying notes:

<https://www.gov.uk/government/publications/approval-of-rifle-and-muzzle-loading-pistol-clubs>

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- p) the club does not have more than 12 guest days a year. Guest members, (other than members of another approved club or visitors with a firearm certificate, visitor's permit or permit under Section 7 of the 1968 Firearms Act as above,) may only shoot during a guest day, and must be supervised on a one-to-one basis at all times when handling firearms and ammunition by either a full club member or someone who is a coach recognised by the governing bodies. The club secretary must notify each guest day to the police firearms licensing department of the area in which the guest day is to take place at least 48 hours in advance;
- q) anyone who applies for membership must be sponsored by at least one full club member;
- r) before becoming a full member, individuals must have a probationary period of at least three months during which time they must attend and shoot regularly. The probationary member must be given a course in the safe handling and use of firearms on a one-to-one basis by someone who is either a full member of the club or who is a coach with a qualification recognised by the governing bodies;
- s) until a probationary member has satisfactorily completed a course in the safe handling and use of firearms, he/she must be supervised at all times when in possession of firearms or ammunition by either the range officer, a full member of the club, or someone who is a coach with a qualification recognised by the governing bodies;
- t) the probationary period may be waived, at the club's discretion, for someone who is already a full member of another club which has been approved by the Secretary of State or Scottish Government in respect of the same type or types of firearm; or holds a firearm certificate; or has handled firearms in the course of his/her duty in the police or the armed services, and has a statement from his/her existing or former senior commanding officer saying that he/she is fully trained in handling the type of firearms in respect of which the club has obtained approval and is able to use them safely without supervision;
- u) the club never has more probationary members than full members unless the Secretary of State determines that there are special circumstances which justify a greater number of probationary members; and
- v) there is nothing else that would make the club unsuitable for approval.

If approval is granted, the approval will be subject to a set of standard conditions which will reflect the approval criteria listed above. In certain cases, the Secretary of State may attach further specific conditions to a club's approval.

## Appendix 2

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Sample letter of permission to authorise a member to transport club guns and ammunition

Secretary's Name/Address/ Telephone Number

Club name

Section 15(1) of the Firearms (Amendment) Act 1988

I have authorised the below named person to carry firearms and ammunition under the above Act and Section, only while acting in connection with target shooting as a member of the above named club.

This authority runs from [date] to [date] or earlier, should the person named below cease to be a member of the club for any reason.

Name of member

Member's DOB/Address

Signed,

Club Secretary.

## **How to contact us:**

**Metropolitan Police Firearms Enquiry Team  
8th Floor  
Empress State Building  
Lillie Road  
London  
SW6 1TR**

**Office telephone: 020 7161 4750**

**Direct email for the clubs team:  
[rfdclubmailbox@met.pnn.police.uk](mailto:rfdclubmailbox@met.pnn.police.uk)**