

NATIONAL RIFLE ASSOCIATION

THE GENERAL COUNCIL

Minutes of the General Council Meeting

held by ZOOM

on Saturday 24th February 2024 from 2.00pm

Present:

Chairman

Mr D Lacey (DLa)

Members:

Mr GK Alexander (GA)
Cdr NJW Benstead (NBen)
Mr CM Brooks (CB) Vice Chairman
Mr JPS Bloomfield (JPSB)
Dr AMW Cargill Thompson (ACT)
Mr A Dagger (AD)
Mr Peter Dommatt (PD)
Mr MD Jenvey (MJ)
Mr R Kelvey (RKel)
Mr RS Kenchington (RK)
Mr GAE Larcombe (GL)
Miss SS Lohmann (SL)
Mr D Lowe (DL)
Mr FPR Northam (PN)
Mr CG Perry (CP)
Mrs K Robertson (KR)
Mr R Sayer (RS)
Mr R Stebbings (RSt)
Mr I Thomson (IT)
Dr JD Warburton (JWar)
Mr JGM Webster (JW)
Mr AM Whiffin (AW)

In attendance:

Mr A Mercer (AM)	-	Secretary General
Mrs G Thatcher	-	Secretary to Meeting
Mrs J Hilger-Ellis	-	Vice-Chairman of Council

Apologies for absence:

Mr S Aldhouse, Mr HRM Bailie, Mr N Brasier, Mr G Burns, Wg Cdr DP Calvert, Mr PR Coley, Mr M Cottillard, Ms A Gran, Mr J Harper-Smith, Mr J Harris, Wg Cdr CJ Hockley, Lt. Col. RG Jeffrey, Mr N Macfarlane, Dr J Marsden, Dr J Martin, Brig. M Pountain, Mr A Reynolds, Mr B Ritchie, Mr T Rylands, Mr AJD Saunders, Mr C Steele-Benny, Mr N St Aubyn, Mr D Stimpson, Mr G Trembath, Mr S Wallis, Mr MP Watkins, Mr P Wolpe

INDEX G754 to G768

The Chairman declared the meeting open.

1. G754 – APOLOGIES

- 1.1. Apologies were received as noted above.

2. G755 – STANDING REMINDERS

- 2.1. The Chairman reminded the meeting that, in line with Charity Commission guidance, the meeting should be cognisant of the distinction between the role of the NRA as the charity, and the National Shooting Centre Limited (NSC) as the commercial subsidiary of the Association.
- 2.2. The Chairman requested that all members declare any conflict of interest at the start of the meeting, based on the agenda items. No declarations were made at this time.
- 2.3. The Chairman requested that members declare any conflicts of interest that may arise during the meeting.

3. G756 – MATTERS ARISING FROM MINUTES OF THE LAST MEETING

- 3.1. The Chairman asked if anyone had any matters arising from the minutes of the September meeting.
- 3.2. MJ asked for an update on the outcome of the NSC customer service survey. The Chief Executive informed the meeting the NSC Directors are considering the results of the survey and a summary will be circulated to GC members, and published in the NRA Journal.
- 3.3. MJ asked for an update on the removal of the unauthorised Facebook pages, following the resignation of the Communications Manager who was going to be actioning that. The Secretary General confirmed that will be investigated by the new Communications contractor once appointed.
- 3.4. RK remarked that before the shotgun ranges were built, there used to be a 'Shorts' range providing 200 yard shooting, which he understood could be reopened, and asked if this was being considered. The Secretary General confirmed possible sites are being reviewed on the estate to accommodate a 100 metre indoor range, and that is one of the areas being considered. RK believes an outdoor 200 yard range would be more useful. The Secretary General noted his comments.
- 3.5. MJ asked for an update on the quote and commission of a new video conference system. The Chairman confirmed that would be discussed later in the meeting as current business.
- 3.6. There were no further matters arising.

4. G757 – REVIEW OF ACTIONS

- 4.1. Secretary General informed the meeting that a copy of the Azolve database had been taken at the end of 2023 to provide a base for analysis to provide granular reasons for growth in the membership, including analysis by regions and disciplines. The first report will be prepared at the end of 2024 once the first year of information has been gathered, and annually after that. **Item ONGOING.**
- 4.2. The Chairman repeated the ongoing request for GC members to send any suggestions on how competitors can be encouraged to attend the Imperial Meeting to the Secretary General for consideration for future meetings. **Item ONGOING.**
- 4.3. The Chairman reminded the meeting that any members who wished to be appointed to the Estates Working Group should put themselves forward for consideration. The Secretary General remarked that vacancies on the EWG have been advertised on two separate occasions. **Item ONGOING.**
- 4.4. GT confirmed she had not received any confirmation from the GC members that they are willing to share their email addresses with other GC members. The Chairman reminded the GC members to inform GT if they are willing to do so. **Item ONGOING.**
- 4.5. The Chairman reminded the meeting that any suggestions on the use of Site 103 are still welcome. The Secretary General confirmed he had received an interesting proposal from a member of GC regarding accommodation which will be included in the options put forward to Trustees for the use of Site 103, having regard to the best interests of the charity. KR remarked that she has some ideas she would like to discuss with the Chairman in a face-to-face meeting. The Chairman is happy to meet KR, and any other GC members, and invited KR to contact him after the meeting to arrange this.
- 4.6. The Chairman reminded the meeting that any suggestions to amend the EWG's terms of reference to make it more effective should be put forward to GC for consideration, along with any items GC wished to refer to the EWG. **Item ONGOING.**
- 4.7. The Secretary General informed the meeting that the minutes of the last meeting of the EWG have been drafted and will be finalised for the June GC meeting. The post of EWG Chair remains vacant. **Item CLOSED.**

- 4.8. The Secretary General informed the meeting that the IT Manager had met the Video Conferencing System provider in the last couple of weeks and is now awaiting a proposal from them, having looked at the current equipment held by the NRA. The contractor has also been asked to provide a quote to conduct a 'trial run' using the proposed equipment before purchase to ensure it works as expected. **Item ONGOING.**
- 4.9. The Chairman reported that questions from NRA members for discussion at each GC meeting will be divided between those that relate to NRA matters and those that relate to NSC matters as part of the on-going efforts to highlight the distinction between the two organisations. MJ asked whether the name of the staff member who answers the questions can be added to the document so that GC members can clarify points direct. The Chairman stated that all questions and responses should be referred through the Secretary General to respect the reporting lines between GC and the professional staff. **Item ONGOING**
- 4.10. MJ confirmed that he hadn't received any proposals from the GC members on timelines for circulating GC paperwork to allow more time for review. The meeting agreed to close the item, noting that MJ is happy to receive any proposals. **Item CLOSED.**
- 4.11. The Chairman confirmed that following discussion at the previous meeting, and the invitation to GC members to contact him with any comments or further proposals, he had not received any further updates on Tim Webster's paper on easier access to the ranges. **Item CLOSED.**
- 4.12. The Secretary General confirmed that the Estate Development Plan had been published and will be discussed under the SG's report later in the meeting. **Items CLOSED.**

No further questions were raised.

5. G758 – BUSINESS PLANNING & OPERATIONAL UPDATE

- 5.1. The Secretary General and Chief Executive reports were circulated prior to the meeting. The Chairman asked the meeting if there were any questions.
- 5.2. ACT remarked that the claiming of Gift Aid is important to the charity and noted that it would be very helpful to inform members of the opportunity to donate Gift Aid as part of the renewal process and also through an article in the Journal. The Secretary General confirmed that members who have not provided a Gift Aid declaration are invited to do so as part of their annual membership renewal. GT has also prepared an article for the Spring Journal to inform members of the opportunity to make a Gift Aid declaration. MJ remarked that Gift Aid could be included in a monthly newsletter to members when the new Communication company is appointed.
- 5.3. CB was delighted to note the increase of Relevant People¹ by 6% in 2023, and asked how the 15% requirement had been reached by the Trustees as an acceptable percentage and if that had been approved by the Charity Commission. The Chairman stated the Charity Commission provides guidance, rather than direction, and provided guidance that the charity objects of the NRA would be fulfilled by promoting Efficiency of the Armed Forces, by having competitions in which Relevant People participate. The Trustees took the view that 15% would be a level that would promote that objective. The Trustees have also updated the policy on Determining the Charitable Status of Competitions (the "Policy") to include an aggregate test of 30% following further recent engagement with the Charity Commission. The Trustees have adopted a 10% Relevant Person participation test for overseas teams seeking funding from the Overseas Team Fund.
- 5.4. MJ asked for an update on the review of the key risks around staff retention and noted the NRA now has an HR Manager. The Secretary General confirmed that staff retention is one of the HR Manager's key tasks and one of the NRA's key objectives.
- 5.5. MJ asked what the cost of the GGG ammunition will be for competitors for 2024. The Secretary General responded that he will know the cost once it has been delivered, since the transport costs are not yet known.
- 5.6. PN asked for an update on lead in ammunition, with regards the derogation based on the recovery of lead from the range floor, and the steel shooting from Chobham Ridge which will not reach the stop butt and has any analysis been taken on how that can be recovered. The Secretary General remarked that UK Reach are being asked to accept the proposed methods and procedures being adopted to recover over 90% of the lead on the ranges in totality. RK asked about shotgun ranges. The Sec Gen confirmed the shotgun ranges are cleared of lead shot on an ad hoc basis, and informed the meeting that the shotgun ranges would move to steel shot if a ban on lead shot was introduced.

¹ i.e. current and former members of the military (including the reserve forces), police and other emergency services and current members of the cadet force

- 5.7. RSt remarked that the Accessible Facilities Map provided as part of the Sec Gen report shows a number of accessible facilities on caravan sites, and asked how the NRA is classifying accessible facilities as all the facilities marked on the caravan sites have step access. The Secretary General remarked that there are accessible sites for people with limited mobility, but confirmed that there are no wheelchair accessible facilities available on the caravan sites as this was not considered when the ablutions were originally built. The only wheelchair accessible facility is Room 17 in the Pavilion Cottage. All sites will be assessed fully to ensure they are correctly marked on the updated camp map. The Secretary General added that a number of the showers will be fitted with grab rails and fold-down seats over the coming months in preparation for the new shooting season to give provision to members with limited mobility. PN remarked that grab handles on toilets as well as showers should be installed.
- 5.8. KR remarked that Dolphin Lodge had two wheelchair accessible rooms, but noted these are now leased out, and could they be brought back into use. The Secretary General believes a sensible proportion of disabled facilities need to be provided, especially shower facilities and the location of this will need to be carefully considered. IT remarked that the Royal Marines block does have a wheelchair accessible shower facility.
- 5.9. RSt clarified that the current rule for grab handles is 1 in 4 for ambulatory toilets and showers.
- No further questions were raised.

7. G759 – FINANCE

- 7.1. The Chairman noted that the Treasurer's report to 31st December 2023 had been circulated prior to the meeting, and asked for any questions, noting the Treasurer had given his apologies for the meeting.
- 7.2. MJ noted that the CAPEX limits were breached at year end and asked for the reasons for that, including the depreciation for Broom Lodge. The Secretary General informed the meeting that the tenant of Broom Lodge had a right to receive a compensation payment at the end of his lease. The capitalised asset is being depreciated over the standard Useful Economic Life of a Freehold/ Leasehold Asset, so there was a catch up depreciation charge to take account of the elapsed 21 years of the original lease at 2% per annum. The residual carrying value will continue to be depreciated at 2%. The same approach had been taken with the renewals of the Victoria Chalet leases.
- 7.3. IT asked for clarification of the line item for major contracts. The Secretary General confirmed it was transactions with the firearms licensing police for the use of Bisley ranges.

No further questions were raised.

8. G760 – COUNCIL

- 8.1. The Chairman noted that the report from Council had been circulated prior to the meeting.
- 8.2. MJ asked for an update on the allocation of administration costs across business units. The Secretary General confirmed the new accounting software, known as Xero, has been implemented and provides a better facility for business unit apportionment. The Finance team will be reviewing this following the completion of the 2023 audit.
- 8.3. MJ asked for an update on the Young Shooters Fund (YSF) and why there was an issue with the Terms of Reference. The Chairman reported that the YSF Terms of Reference had been reviewed to ensure the NRA was not carrying out regulated financial activity in operating the YSF eg lending money to individuals. The new Terms of Reference have been approved by the Trustees and published on the NRA website, and the YSF is now accepting grant requests in accordance with those Terms of Reference.
- 8.4. MJ asked for an update on the trial of .338 ammunition. The Chairman reminded the meeting that the MoD had expressed concern in the use of .338 Lapua Magnum ammunition, but the Bisley Range Regulations ban all .338 ammunition. The professional staff will be conducting an investigation as to whether the rule can be restricted to .338 Lapua Magnum ammunition only, allowing other .338 ammunition to be used. The Secretary General confirmed a number of .338 range days will be held to ensure the safety of the range is maintained for that calibre of ammunition, noting it will not automatically allow the use of .338 Lapua Magnum at Bisley in the future. The meeting noted this was an NSC matter as it relates to the safe operation of the ranges.
- 8.5. MJ asked for an update on the electricity and broadband upgrades due to an increase in demand. The Chairman noted the demand for both electricity and broadband is increasing and the NRA will be looking at expanding the capacity on camp, and how that can be funded. The Secretary General added that investigation work is being carried on to supply an EV charging station on Camp using the spare capacity at one sub-station.
- 8.6. PN asked for an explanation of the changes made to the School Cadets Imperial Meeting. JPSB remarked that the Cadet meeting will held as before with the same course of fire, but will now be organised by CCRS, so a minor change in name only.

- 8.7. ACT asked for an update on IT security, noting the Government's National Cyber Security Centre encourages a scheme called cyber essentials. The Chairman remarked that they would review that question and respond at a later date. The Chairman confirmed the Trustees are cognisant of cyber security and appreciate the sensitivity of having a robust system in place.
- 8.8. No questions were raised.

9. **G761 – SHOOTING COMMITTEE**

- 9.1. The Chairman noted that the Chairman of Shooting Committee had circulated a report prior to the meeting, but was not in attendance.
- 9.2. There were no questions raised.

10. **G762 – MEMBERSHIP COMMITTEE**

- 10.1. The Chairman of the Membership Committee had circulated a report prior to the meeting, including the minutes of previous meetings, but was not in attendance.
- 10.2. MJ noted the discussions held by the committee reviewing possible changes to the membership subscriptions and affiliation fees and wondered whether any consideration is being given to scaling the fees for smaller clubs and regional members. The Secretary General confirmed this was not currently being considered. The competitions team are looking at the requirement for counties to affiliate to enter the InterCounties match.
- 10.3. ACT remarked that the NRA used to have regional membership fees for those living over 100 miles from Bisley prior to the establishment of the NSC. The membership was of the charity and could only provide limited benefits for members in terms of the journal and insurance, and this did not depend on the distance to Bisley. The Chairman added the membership fee is a charitable donation, which allows the NRA to recover a further 25% of that donation from HM Customs in Gift Aid so long as the member has completed a Gift Aid declaration.
- 10.4. RSt understands the membership fee is a donation, but 80% of the benefits are Bisley based. The Chairman noted the benefits of NRA membership is the NRA Journal, Insurance, and the right to vote at an AGM. ACT remarked that if you are an NRA member you have insurance which meets the requirement as an individual member of the NRA and allows you to book a target at Bisley through the NSC. The Chairman noted the website will be reviewed to ensure the benefits of NRA membership and the option to book rifle ranges through the NSC are separated accordingly.
- 10.5. JPSB remarked that a number of items are a privilege of membership and the others are benefits and that needs to be updated on the website. The benefits are limited by tax rules that restrict benefits to a cash value of 25% of the donation. Booking a target at the NSC is a privilege of membership, as is voting in the AGM². RSt remarked that while the "benefits" of NRA membership, such as the Journal, Insurance and right to vote apply to all members; if 80% of individual NRA members live within 100 miles of Bisley then clearly the "privileges" of membership far outweigh the "benefits" of membership, otherwise the distribution of members would be uniform across the country.
- 10.6. RK remarked that there used to be a 'Country' membership for those members who lived more than 100 miles away from Bisley, and assumes it was removed when the Charity Commission requested the NRA set up the NSC to carry out commercial activities. ACT confirmed that to be the case, in or about 2005³.
- 10.7. The Chairman added that the NRA will be holding a regional meeting in Solihull on 16th March with around 65 members of affiliated clubs, and will be interested to get their insight and views on any issues and suggestions from the regions.

No further questions were raised.

11. **G763 - ESTATE WORKING GROUP**

- 11.1. No questions were raised.

12. **G764 – ELECTION ANNOUNCEMENTS**

- 12.1. For information under Rule 7 (g) (iii) – Elected Members of the General Council who retire in 2022 who have been invited to declare if they wish to stand for re-election.

² RSt reviewed the Second Schedule following JPSB's statement and noted that Section 9, e) 'Voting Qualification' states: "Every Registered Member of the Association..... shall be entitled to one vote". As the second schedule defines voting as an entitlement of membership, it is therefore a 'right' of membership.

³ ACT reviewed old "bibles" after the meeting and confirmed the change happened in 2008, with "country" membership removed, and standard NRA membership fee reduced slightly

Five Ordinary Members

GK Alexander
CM Brooks *
FPR Northam
TG Rylands
R Sayer

Five Regional Members

PR Coley – South Western *
AN Gran – Greater London & South East
RS Kenchington – West Midlands
GAE Larcombe – Southern
MP Watkins – Wales

Three Shooting Discipline Members

JS Harris – Target Shotgun
N St Aubyn – Civilian Service Rifle & Practical Rifle
S Wallis – Sporting Rifle

(* not standing)

13. G765 – ELECTION TO COMMITTEES

13.1. The Chairman announced the results of the following elections:

a) Disciplinary Body

Charles Brooks, Abigail Day, Tim Goodger, Nick Hinchliffe, Richard Jeens, Fergus Ponica

b) Membership Committee

Guy Larcombe, Silke Lohman

c) Shooting Committee

John Bloomfield, Bryden Ritchie, Iain Thomson, John Warburton

d) Eastern Regional Representative

Robert Kelvey

13.2. The Chairman recorded his thanks all candidates for putting themselves forward for election and hope that all candidates find it a rewarding way of contributing to the charity.

13.3. The Secretary General remarked that Rob Kelvey, (RKel) the new Eastern Regional Rep, was in attendance, having replaced the late Harald Dunton. The Chairman welcomed Rob to General Council. The Secretary General added that RKel had asked what guidance could be provided to new candidates to help understand the role. The Chairman asked GC members to provide suggestions for guidance to the Secretary General which could be developed into a welcome pack for new members.

14. G766 – VACANCIES ON COMMITTEES

14.1. The Chairman informed the meeting of the following vacancies which will be advertised and asked GC members to put themselves forward for consideration:

a) Non-Lawyer Members - Disciplinary Body

b) Shooting Committee – Elected Member

c) Membership Committee – Elected Member

14.2. KR remarked that the CVs provided as part of the Mi-Voice electronic ballot are not available once you have voted, and asked whether they could be provided. GT confirmed she would be able to provide PDF copies of any candidate CVs if required.

14.3. SL asked whether the Army Rifle Association can be invited to join GC meetings. JPSB confirmed that the Deputy President and Chairman of the ARA are ex-officio members of General Council under the Second Schedule. The Secretary General will look into why they have not accepted an invitation to attend.

14.4. PN remarked that his ballot request had gone into his spam email and asked whether this could be fixed through Mi-Voice. GT will check to see if there is an option to fix.

14.5. MJ raised the point that previously there used to be short CVs annotated against GC members and Trustees on the website, which would help inform members of the make-up of their committees.

14.6. KR remarked that the last set of TR Captain elections stated that TR members of General Council cannot nominate candidates for TR teams, and wants to express her concern that TR members are being disenfranchised because of that rule and asked why that decision had been made. JPSB confirmed the rule comes out of the revised rules and procedure for the Selection of Team Captains, which applies to all disciplines, which was extensively discussed over a period of three years by the Shooting Committee and sub-committees, and approved by Council in August 2022. The Chairman asked members of GC to put forward a proposal to amend that rule to Shooting Committee for consideration if they wished Shooting Committee to consider the matter further.

No further questions were raised.

15. **G767 – MEMBER QUESTIONS**

- 15.1. The Chairman noted that a list of questions received from the general membership had been circulated prior to the meeting. The Chairman noted that the increase in the number of questions received shows an increased engagement with the membership and recorded his thanks to the members who put the questions forward and to the GC members for replying to them after the meeting.
- 15.2. The Chairman confirmed that GC members should respond to any questions they have received from the membership after the meeting with the relevant answers provided by the professional staff and any further input from the GC members. Any further request for information should be directed to the professional staff through the Secretary General⁴.
- 15.3. The Chairman went through the list of questions provided to the meeting and asked the various GC members if they had any follow up questions to the responses provided by the professional staff.
- 15.4. **MoD Ranges** – RK noted that that since 2017 there has been a Birmingham Bisley held at Kingsbury, but it may not be held in future due to the difficulty of securing bookings on the MoD ranges. The Chairman noted that is a pattern being repeated throughout the MoD estate due to military training taking priority. Access to the MoD ranges depends very much on the operational needs of the Army.
- 15.5. PN asked for an update on the visit to Orston Range. The Secretary General confirmed he had visited the site with the Regional Ranges Manager and BSG Manager, and they are working their way through all the data provided with the potential sale to consider whether it is a viable option for the NRA. The range is a clay range with planning permission for a rifle range and is located just outside Nottingham.
- 15.6. **Rule 150 Question** – RK remarked the Rule 150 issue has been ongoing for a number of years and the point raised by Jeremy Tuck alleges the rifles being used by the Palma team would not be compliant with Rule 150 at Bisley, so what is the NRA doing about it. JPSB responded the answer provided to GC leaves out one vital piece of information, which is the cartridge loaded to an overall length of 2.8 must be with the issued bullet, and the NRA has no jurisdiction to dictate what chamber dimensions people might use in competitions away outside of the NRA. The chamber dimensions of the Palma team rifles for use in South Africa are not Rule 150 compliant, and are being used with hand-loaded ammunition which is not applied to Rule 150. The barrels have been optimised to achieve best accuracy at long range at 4500ft above sea level. The dimensions of the barrels are not optimised for use with issued ammunition and 155gr bullets, so the Palma Team would not gain any advantage trying to use those barrels during the Meeting. The Palma Team have also been made aware that they would need to modify their chambers to use the rifles at Bisley under Rule 150. CB asked if GC are happy with the way the cartridge overall length test is conducted during the Meeting, or should the process be changed. JPSB remarked that rifles must have a sticker on them as evidence that they have passed the overall length test to be used in the Meeting. The professional staff will randomly check rifles during the meeting, and PN reported that RCOs regularly check for stickers throughout the Meeting.
- 15.7. **Electronic Targets Question** – No questions were raised.
- 15.8. **Data Protection Act – Right of Access (SARs)** – The Chairman added his personal apology to those from the Secretary General and professional staff to Richard Stebbings for the unacceptable delay in responding to his SAR requests. The Chairman asked any member who has requested an SAR to get in contact with either the Chairman or Secretary General if no response had been received within 30 days. RSt remarked that he had two responses to the four he submitted. RSt had contacted the Secretary General when the SAR was 114 days overdue and had not had a response; so clearly the email system is not reliable for dealing with regulatory matters like this. It especially cannot be reliant on emails to the Secretary General's inbox, which must regularly have hundreds of emails in the inbox. The Secretary General repeated his apology. RSt also commented that another member had submitted an SAR which was over 200 days overdue. The Secretary General confirmed he had received an email from that member and the matter was being dealt with. The Chairman remarked this highlights that the system for processing SARs isn't working properly and the Secretary General confirmed he is working with the professional staff to ensure this situation doesn't happen again. MJ added that the name of DPO must be made known so that people can make contact directly rather than things getting lost or missed. PN added that he had requested a list of responsibilities and accountabilities of the professional staff to help members contact the relevant person, rather than contacting the Secretary General in the first instance all the time. ACT asked whether any of these issues are captured on a Risk Register, and if not should they be added to the register. The Secretary General confirmed the SAR requirement needs to be properly resourced and communicated. ACT asked for an update to be provided at the next meeting on the status of any SARs and what Information Commissioner's Office processes have been implemented

⁴ A copy of the Membership Questions and responses provided by the professional staff is appended to the end of these minutes.

to deal with SARs. PN remarked that ISO9001 is a good process to put in place, and offered guidance and his expertise to the Secretary General should he wish to consider implementing that. MJ shared the ICO guidelines for dealing with SARs for the Secretary General to consider implementing to ensure it meets those guidelines.

- 15.9. **Service Charges** – RSt remarked that he, as a tenant, had not received the letter of the proposed service charge allocation in June 2022. The Secretary General confirmed that letters had only gone out to tenants who were paying service charges at that time. RSt remarked all tenants should have been made aware of the proposed charges, whether they paid them at that time or not. The Secretary General accepted that point. RSt added that the letter did not request any responses from tenants as stated under answer b. The Secretary General confirmed he will check that. Rst declared an interest as Chairman of BYSA, tenant of SitPet Lodge, and a tenant of a caravan on Site 7. DLa and IT declared an interest as a tenant of Waldegrave Site.
- 15.10. **Average Length of Stay on Camp in NRA owned accommodation.** No points were raised.
- 15.11. **Site 5 Alternatives** – RSt asked the Secretary General whether the architects were correct in stating that you cannot stand upright in a glamping pod, as the photographs provided by RSt from the Glamping Show he attended prove that you can, and he is 6ft4in. RSt remarked they were Shepherd Hut style pods which are taller and wider and cost on average £15k, and believes the NRA architect is not up to date on current options, referring to the original glamping pods available over 10 years ago. MJ believes the new styles should have brought to the attention of the NRA as part of the consultation process. PN added that the pods are very popular and work well and are fitted out well to ensure maximum use of the space, including 'standing space'. PN believes that the architect biased the Trustees' decision in favour of serviced pitches. MJ and PN declared an interest as caravan owners on Site 7.
- 15.12. **Muzzle Brakes** - RK agrees with the comments made by Gavin Moffat who submitted the questions, and believes muzzle brakes should be banned completely. PN remarked that clubs are not always aware if a member is going to turn up with a muzzle brake and there may not be enough targets available to separate the user away from other shooters, and believes they should be managed better on the range, not banned. The Secretary General remarked that the number of complaints for muzzle brakes are minimal and doesn't believe there is a justification to ban muzzle brakes. Members need to be careful about asking the NRA to ban or prohibit certain features of a rifle a justifiable reason for doing so, as it may impact all rifles and disciplines. The Chairman noted the subject was an NSC matter as it related to the operation of the ranges. AW remarked that he wouldn't want muzzle brakes banned, but has shot beside them in a competition and it is an unpleasant experience, and if separation lanes or ranges can be booked for users with muzzle brakes, that would be helpful.
- 15.13. **Club Insurance** – MJ remarked the insurance premiums had increased considerably over the last number of years, and is expensive, for example, 16 of the 19 members of Cambridge Rifle Association (CRA) are full NRA members and therefore insured. MJ has asked the NRA's insurance broker for a separate quotation for CRA which has come in more expensive than the NRA club insurance premium. MJ would like to understand whether the insurance premium for clubs can be reduced for smaller clubs and county associations. MJ declared an interest as Secretary of Cambridgeshire Rifle Association. The Secretary General noted MJ's points.
- 15.14. **Site 5** - The Chairman asked if MJ was content to defer the discussion on Site 5 to the end of the meeting, to give time to review the other questions put forward. MJ concurred.
- 15.15. **RPI Index Increases** – MJ remarked that the response doesn't provide a pointer to members as to why the NRA uses RPI rather than CPI for price increases. The Chairman agreed that neither RPI or CPI were suitable measures for deciding price increases and that Trustees would focus on ensuring the charity remains financially viable. This required sufficient income, combined with sensible cost control. Simply using RPI or CPI would not achieve this goal.
- 15.16. **Any Rifle** – Noting that it had been determined that introducing an Any Rifle category would be unlikely to have any noticeable impact on increasing numbers of participants, and so had been discounted, RSt remarked that in making that decision, it doesn't appear to have been considered whether introducing an Any Rifle category would lead to a decrease in numbers of participants and if it won't lead to a decrease in participants, and introducing it would increase member satisfaction, then it is something that should be explored. The Chairman remarked the proposal could be put to the Shooting Committee again for consideration. KR remarked the subject has been discussed over 20 years, and there could be an opportunity for 'any rifle' competitors to hire their own targets and run a competition alongside the TR event to see what the uptake is and if successful, it could help support the idea with the Shooting Committee. RSt remarked that would be a large financial burden for a competitor(s) to take on, so could consideration be given for the NRA to provide targets for the trial competition. RK wanted to make the point that Target Rifle is tightly defined and intended to make everyone use the same bullet and cartridge combination, and a TR Any Rifle would give those competitors a ballistic advantage so couldn't compete

directly with other TR competitors. In Match Rifle, you can shoot alongside the Hopton using any rifle, so the answer given is pretty sensible, and the same arrangement could be added to the TR Grand Aggregate and anyone wanting to shoot any rifle could enter and be allowed to shoot, but their scores would be listed separately.

- 15.17. **Service Charges** – The Chairman noted that Adam Leech was the Chairman of the North London Rifle Club and expressed his thanks to the North London Rifle Club and all the other tenants of the NRA for the valuable contributions they make through their rent payments, and service charge recoveries. RSt had sent the response to Adam Leech who asked the initial question, and had received a response from Doug Stewart of the London & Middlesex Rifle Association with follow up questions from Adam Leech which would require input from the professional staff. The Chairman asked RSt to ask Doug Stewart to engage direct with the NRA to discuss any tenant matters. The Secretary General confirmed he is already engaged with Doug Stewart on a number of other real estate matters, and his questions will be helpful to guide the discussions.
- 15.18. **Range Fees** - PN remarked that the cost of ranges has increased disproportionately to most members' salaries and it is becoming an affordability issue.
- 15.19. **Questions put to Phil Northam**. PN asked whether a club SCC card can be issued for 4 years to full NRA members, with non-NRA members continuing to receive 1 year cards, to reduce the annual administration burden on clubs. The Secretary General remarked there are operational issues with providing 4-year cards to club members, as it is very difficult to recover SCCs should a club not re-affiliated, or be suspended for any reason. The SCCs are issued by the NRA, who rely on the clubs to assess the competency of their members, with NRA members have their competency validated by NRA RCOs or Instructors through assessments.
- 15.20. **Video Conference System** - PN remarked that the member who provided the contact details for a quote has not received any response. The Secretary General confirmed the IT manager has had a meeting with the contact provided and are awaiting a quote. PN asked that the member be kept in the loop as it is a sister company who is providing the quote. The Secretary General will update the member of the current situation. MJ remarked that the VC system needs to be installed before the AGM meeting to provide greater representation. The Chairman remarked that the decision for the Trustees depends on the balance of the cost of installing and maintaining such a system against the perceived benefits. IT remarked that the main meeting room has appalling acoustics and that needs to be addressed before any system is installed.
- 15.21. **Site 2 Water Quality** - PN asked whether the NRA would consider replacing the pipework on site 2 as it is old and rusty and is providing dirty water. The Secretary General asked if PN had reported that to the professional staff. PN confirmed he hadn't. The Chairman encouraged all members to take photographs of any issues they see around the camp to inform the professional staff so they can take action.
- 15.22. **Dishwash Facilities on Site 1** - PN asked when the dishwasher facility was due to be installed. The Secretary General confirmed it will be installed before the Imperial Meeting.
- 15.23. **Baby Changing Facilities** - The Chairman noted that this question was a positive sign of how far the NRA has come in encouraging younger shooters and their families to Bisley. No questions were raised.
- 15.24. **Disabled Facilities** - No points were raised.
- 15.25. **Fundraising Activities** - KR asked why the NRA does not undertake fundraising activities. The Chairman responded that fundraising is a regulated activity, whereas the NRA gains income from membership donations, land rental and commercial income through the NSC. Fundraising is not something the NRA currently does and there are no plans to start. If anyone has fundraising experience and can provide a suggested plan as to how the NRA could implement fundraising as a source of additional income, the Chairman would be open to receive suggestions for consideration.
- 15.26. **Trustee Information** - RSt believes it is in the interest of transparency of the organisation to share the information asked about the Trustees, as the make-up of the governance of the charity is important for members. The Chairman stated that if the GC members wish for the information of Trustees and GC members to be published on the NRA website, then he will ask the Trustees to consider that request. The GC members in the meeting would be happy to provide their information if all GC members agree.
- 15.27. **Unserviced Caravan Pitches** - MJ remarked that the site licence specifies what has to be provided on an unserviced pitch and therefore the response that there is no statement of what services are provided by the NRA is incorrect, as lighting, toilet blocks etc must be provided. The Chairman believes the answer intended to say there is no statement, other than the site licence. The Chairman remarked that all owners of an unserviced caravan should be aware of the contents of the site licence, which is available in the NRA Reception and Range Office. MJ added there are two clauses in the Letter of Agreement– points 26a and 26b, which state there is no liability for any damage caused including by NRA staff, and MJ doesn't believe that is a clause that can be included in the site licence. The Secretary General will look at those points.

- 15.28. **Questions from SJ Binder Swash - Caravan Income** - MJ believes that it should be easy to produce the income figure generated from caravans over the last 10 years. JPSB remarked that he believes MJ is suggesting that the caravan owners believe they pay too much for their pitches and remarked that if they don't like it they shouldn't pay. The Secretary General remarked that it takes a lot of professional time to provide such a response and they have asked SJBS for more input as to how this information will assist her. It is important to know how much money has been invested in the ablutions over the last 10 years as the lack of disability facilities has already been discussed as a major issue. PN remarked that 250 unserviced caravans, 40 huts, and 60 serviced caravans are disproportionately contributing to the NRA, given the size of the membership, and for JPSB as a Trustee to say 'leave' if you don't like it is not an acceptable response, or a message the membership will be happy to hear. JPSB responded that he is a caravan owner and is therefore in the same position as those making the complaint. The point he would like to highlight is that if the cost of the caravans is reduced, then the income needs to be sourced from elsewhere. RSt wants to see more caravan income allocated to improving the provisions of services on the caravan sites, not reducing the fees.
- 15.29. **Questions from Andrew Grainger** - No follow up points were made.
- 15.30. **Questions from Rob Stirling** - No follow up points were made.
- 15.31. **Questions from Doug Stewart** - The Secretary General confirmed the NRA was in discussion with Doug Stewart.

16. **G768 – ANY OTHER BUSINESS**

- 16.1. **General Council Election Procedures** – RSt raised the point that as part of the last set of Trustee co-options, one of the candidates was allowed to submit a CV with 1780 words, whereas other elections are limited to only 350 words. RSt would like the process to be the same for all elections, regardless of the vacancy, and should be documented accordingly. The Chairman endorses that view, and highlighted the increase in NRA policies which have been growing considerably over the last number of years. Documented policies and procedures benefit the Association. The Secretary General will review the process with the professional staff with a view to publishing a guide to election procedures.
- 16.2. **GC Annual Meeting Attendance Table** – MJ asked that the GC annual meeting attendance table published in the NRA Winter Journal include the dates of the meeting (September – June) so it reflects the correct attendance information, and asked that the ex-officio members be included in the table to show the attendance of all GC members, not just the elected members. The Chairman agreed the table should be completed in full and thanked MJ for highlighting.
- 16.3. **ABC Lines** – AW asked if chairs can be reinstalled in ABC line rooms to provide somewhere to sit when staying in the rooms. The Secretary General will speak to the Accommodation team.
- 16.4. **Meeting Costs** – JPSB wanted to provide a cost comparison to GC members following numerous discussions over the last few meetings. In 1961 the Imperial Meeting entry fee was £10.75 which was more than the average weekly wage, and the MoD paid for the ammunition, ranges, markers and range rigging team. In 2023 the fee was £574, and includes the cost of ammunition, markers and range rigging, which is £74 less than the average weekly wage.
- 16.5. **Precision Rifle Shooting** – PN remarked that the use of artificial grass pinned to the firing points to protect the grass is an extremely good idea, and would like to see that used more.
- 16.6. **Member Questions** – KR remarked that the member questions are taking a long time to answer and the process doesn't seem to be working well and wondered if there was a better way to handle them, such as a forum. The Chairman asked for any suggestions for dealing with the questions be put forward for consideration.
- 16.7. **Site 5 Discussion** - MJ had asked for an update on the cost of groundworks for Site 5, but was told they are commercially confidential, but believes in terms of transparency the membership should be made aware of the cost of the development, especially if there are empty pitches which need to be funded by the association until all the pitches are sold. The Secretary General responded that the income derived from the 5 years upfront rent and lease premiums is slightly more than the total cost of the groundworks and those have been published online. The site cannot be built on an 'as sold' basis, since the groundworks cannot be done piecemeal. Site 5 is being developed following the same model as was used successfully for Spencer and Waldegrave sites. There are timing issues, with 40% of pitches expected to be sold before construction starts, 40% sold during construction, with the final 20% being sold after completion. This was the experience of the last two developments and the current sales of Wharnclyffe are following the same pattern. MJ asked how many contractors had been asked to tender for the work. The Secretary General confirmed 6 contractors had been approached, and 3 had tendered for the business. MJ asked why the NRA was only allowing the purchase of caravans from one supplier for the site. The Secretary General responded that members can purchase their caravans from any supplier, and the NRA is simply providing details of one supplier who has experience of supplying caravans on Camp. MJ asked that the NRA website be updated to reflect the choices for caravans so

members are aware they can purchase from other suppliers. The Secretary General will check the information provided online.

No further questions were raised.

The Chairman thanked everyone for their attendance and closed the meeting at 17.40pm

A handwritten signature in blue ink, appearing to read 'D Lacey', written in a cursive style.

D Lacey
Chairman

Date of next meeting: Friday 7th June 2024 from 3.00pm in the Webley Room, NRA Pavilion

MEMBER QUESTIONS – FEBRUARY 2024

RESPONSES IN BOLD ITALIC TYPEFACE

1. QUESTION FROM NIGEL SCOTT (MoD Ranges)

We have been asked to contact the council to voice our concerns/opinions about matters which affect the membership. I appreciate your efforts regarding the issue of regional ranges amongst which MoD ranges are included. My point in all of this is the enormous cost associated with accessing these ranges which in effect prohibits smaller clubs from using these facilities. Is there nothing that can be done to reduce costs and make access for smaller clubs easier?

ANSWER

There is continued demand for MoD ranges from military users including the delivery of training for the Ukrainian Army. This is expected to continue in 2024. Weekend bookings are restricted in some locations depending on availability of MoD staff and the need to carry out maintenance.

The cost of MoD range bookings is set by MoD and the NRA is not involved in that process. The most significant element of the cost is the hourly charge for the Range Operative (an MoD member of staff who supervises the ranges). This cost is higher on weekends than on weekdays.

There are some things Clubs can do to make best use of the limited range capacity:-

- *Engage in constructive dialogue with local Landmarc Event Co-Ordinators and DIO Training Safety Officer colleagues to identify range availability.*
- *Co-ordinate bookings with other Affiliated Clubs to share the costs across more people, especially at weekends.*
- *Consider weekday and, where available, evening range bookings*
- *When invited, attend DIO Range Allocation/briefings*

Clubs can also seek further advice and information from Nic Couldrey, the NRA Regional Ranges Manager at nicholas.couldrey@nra.org.uk

2. QUESTION FROM JEREMY TUCK (Rule 150)

Like many others I have been following the training of the PALMA Team with interest on their website. The scores they have been achieving are quite simply remarkable and we obviously hope that they maintain these fantastic scores when it comes to the Match itself in March.

The scores achieved are testament not only to amazing shooting and coaching skills but also to excellent equipment. It is believed that the barrels they are using have been chambered in a specific way that is not Rule 150 compliant.

On the return of the, hopefully victorious, PALMA Team a question arises in relation to use of their rifles during NRA Competitions under which compliance with Rule 150 is mandatory. If the team's barrels are currently Rule 150 non-compliant and are not rechambered prior to taking part in NRA competitions, then it raises the question as to whether there is a 'level playing field' in terms of equipment being used by competitors.

As the team is large, and obviously comprised of the very best shots in the country, it would seem that a proactive process should be put in place to ensure that any rifle to be used in NRA competitions by members of the team is compliant with the rules that all competitors are required to meet. In this way any suspicion of 'equipment advantage' will be avoided.

Council is therefore requested to direct that any rifles used by the PALMA Team must be inspected as a precursor to being allowed to shoot in NRA Competitions this year (the Rule 150 Green/Orange sticker check).

ANSWER

Rule 150 allows the use of “Any bolt-action rifle which, in the opinion of the Shooting Committee, is of conventional design and safe” that also conforms to the other requirements of that Rule including minimum bore and chamber dimensions. Each competitor is responsible for ensuring that the rifle used by that competitor complies with Rule 150. Competitor rifles are randomly tested to check that the bullet in a cartridge loaded to Cartridge Overall Length of 2.800” does not touch the lands of the rifle. A sticker is applied to the rifle once this test is passed. The procedure does not provide a mechanism to discriminate between competitors eg on the basis of their participation in other competitions. It is open to General Council to ask the Shooting Committee to review that procedure with a view to including such a mechanism if it thinks it is appropriate.

3. QUESTION FROM ROB NEEDHAM (Electronic Target Terminals)

Are there plans to improve the usability of the electronic target terminals, for example to make it easier for two shooters to share the same electronic target and shoot alternately? If so, when could this be expected?

ANSWER

Some electronic target systems allow for two shooters to share the same target by shooting alternately. The systems installed by the NRA (Intarso, Shot Marker and Konsberg) do not have that functionality. The functionality would need to be developed by the supplier and is not something the NRA can implement independently. We will pass on the suggestion to the suppliers so they are aware of the interest of members in having this functionality.

4. QUESTIONS FROM RICHARD STEBBINGS (Various topics)

1. Service Charges

In your letter dated 11th June regarding Service Charges for leaseholders, you state the following.

“Our intention is to replace the current process with one recommended by the RICS professional, based on open-book accounting. We intend to implement the new charging process for service charges April 2022 / March 2023, after consultations planned in autumn this year.

I have learnt that managing change at Bisley can be challenging, but am confident that consultation, robust debate and reflection will yield service charges that are transparent and fair.”

- a. When was this consultation carried out? **Tenants were informed of the proposed new basis of service charge allocation and invited to respond in June 2022**
- b. Who was invited to participate? **All tenants with service charge provisions in their lease**
- c. What was the outcome of the consultation? **Some Tenants requested clarification on the proposals and the NRA provided information to them direct in response to those requests**
- d. Where was it published? **Tenants were informed direct of the new service charges in June 2023. The NRA does not publish information sent to tenants in relation to their leases**

2. What is the average length of stay on camp in NRA owned accommodation?

ANSWER

Accommodation is owned by the NRA and operated by the National Shooting Centre Limited (NSC) as a commercial activity – see table below

NSC Accommodation 2023 - Average Duration of Stay by Type			
Accommodation Type	Booking Duration (days)	Number of Bookings	Average duration (days)
A, B, C Lines / Crawford - Sleeps 1	175	77	2.3
A, B, C Lines / Crawford - Twin Room	1,956	642	3.0
Sub Total	2,131	719	3.0

Bunkabins: Twin Room with en-suite	511	109	4.7
Council: 4 Bedded Rooms	504	128	3.9
Large Tent (6 Man Tent)	242	35	6.9
Medium Tent (4 Man Tent)	388	126	3.1
Small Tent (2 Man Tent)	449	88	5.1
Touring site with Electric	551	158	3.5
Touring site without Electric	183	48	3.8
Sub Total	1,813	455	4.0
The Pavilion: 1 Double + 1 single bed - sleeps 3 people with en-suite	182	44	4.1
The Pavilion: 1 Double + 2 single beds - sleeps 4 with en-suite	118	37	3.2
The Pavilion: Accessible Room - 2 single beds	71	26	2.7
The Pavilion: Double Room with en-suite	509	205	2.5
The Pavilion: Single Bedroom with en-suite	288	119	2.4
The Pavilion: Twin Room with en-suite	258	88	2.9
Sub Total	1,426	519	2.7
Total	6,385	1,930	3.3

3. Data Protection Act – Right of Access (SARs)

Individuals have the right to access and receive a copy of their personal data, and other supplementary information. This is commonly referred to as a subject access request or ‘SAR’. Further information can be found on the website of the Information Commissioner’s Officer here <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-of-access/>

Under the DPA “You must comply with a SAR without undue delay and at the latest within one month of receiving the request”.

I submitted two SARs relating to myself on 25th November 2022 and 6th January 2023, full details below. Both of these SARs are now a year overdue. Both SARs were initially submitted to the NRAs Data Protection Officer email address dataprotectionofficer@nra.org.uk ... I have never received a reply from the NRAs Data Protection Officer email address.

SAR 2 – Ref 20221125-001 – Submission date 25th November 2022 – **403 days overdue**

SAR 4 – Ref 20230106-001 – Submission date 6th January 2022 – **361 days overdue**

a. What is the NRAs Data Protection Procedure? **The procedure is published on-line here:**

<https://nra.org.uk/nra-data-privacy-notice-gdpr/>

b. Where is it published? **On the NRA Website**

c. Why is the NRAs Data Protection Officer email addressed not monitored? **The Secretary General allocates responsibility for monitoring the Data Protection Officer email box to a member of the professional staff. The NRA uses a “generic” email address to centralise requests and to allow for staff absences and changes. The NRA processed two Data Subject Access Requests in 2023. That monitoring process failed in relation to the two requests made by Richard Stebbings.**

d. Is it acceptable for the NRA to not be adhering to a regulatory requirement? **No, it is not acceptable. We unreservedly apologise for the unacceptable delay, which was caused by the member of staff overlooking the requests. Both requests have now been completed. Anyone who does not receive a reply to an SAR within 30 days should not feel that they need to wait, and are encouraged to contact the Secretary General or the Chairman direct.**

4. Site 5 Alternatives

For the Site 5 development I offered an alternative proposal for Glamping Pods, for discussion. This proposal was largely discounted based on advice received from the NRA's architects, ARA Architects. One of the reasons given was that Glamping Pods are too short and you could 'only walk down the centre line'.

So, on the 15th September 2023 I went to the Glamping Show at Stoneleigh, Kenilworth, to test if this was true from a full range of manufacturers and models available. Photos are available in Annex A below.

I am 6'4" tall which makes me in 99th percentile for height in the UK i.e. 99% of the UK population are shorter than me.

Given the photos attached (Appendix 1);

- a. Can you explain the advice you received? ***The advice was received from our architectural adviser – see <https://www.ara-architecture.co.uk/index.html>***
- b. Who was responsible for doing the due diligence on this? ***Secretary General***
- c. As it is glaringly obvious that this piece of advice from the NRAs architects is wrong, what else have they advised that is incorrect, and who is checking that? ***We appreciate that views on this topic vary, but the height of a glamping pod was a very small factor in the overall design decision. The Trustees considered alternative accommodation proposals as part of reaching a decision on the plans for Site 5 and engaged with people who put forward other proposals. The architect is proving to be very competent and proactive with the Wharncliffe development and we have confidence in the work being done on the development.***

5. QUESTION FROM GAVIN MOFFATT (muzzle brakes)

Reg 67 of the NSC Range Regulations requires all shooters to wear hearing protection. But sometimes it's not enough. I don't know if you've ever shot next to someone using a muzzle brake, or have been in the vicinity of anyone using a muzzle brake, but on those occasions when I have, I've found it painful on the ears, and when I say painful I do mean that literally, and despite wearing a good pair of ear defenders. I have been left with a headache and ringing in the ears from the concussive force of the muzzle brake. Even if the required one firing point's width is left between a muzzle-brake user and the next adjacent firer, which isn't always adhered to, ordinary ear protection is simply not adequate to safeguard against injury. Several others have mentioned equally unpleasant experiences to me, which has now prompted me to write to the General Council as I know I am not alone.

If there were some improvement in accuracy to be gained from the use of a muzzle brake, I might possibly understand why someone would want one, but as far as I'm aware there is none—the bullet has already left the barrel before any effect the brake has can come into play. It's therefore time to discuss a prohibition on the use of muzzle brakes for casual shooting at Bisley. Muzzle brakes could still be used with the prior permission of the Secretary General or where the rules of an NRA-sanctioned competition permit, but I think it's time to consider amending Bisley range regulations to prohibit the general use of muzzle brakes on fullbore rifles.

Muzzle brakes are already banned from NRA guest days. They're prohibited on target rifles (Rule 150 of the NRA Handbook); they're prohibited on F Class rifles (Rule 164); prohibited on match rifles (Rule 156); and prohibited in sporting rifle competitions (page 267 of the Handbook). We should take the next logical step and stop them being used in everyday casual shooting on the ranges. It's a noxious practice that adds nothing to accuracy and exposes us to an unnecessary health and safety risk. In the one discipline where they are allowed, civilian service rifle, the CSR-PR Handbook effectively recognises the deleterious effects of muzzle brakes by requiring competitors to accept the fact that they may be in use (Rule A2.1.1a). We can continue to permit the use of muzzle brakes in NRA-run CSR competitions, but even that might be worth re-examining to see if any benefits outweigh the health and safety concerns for those competitors.

In short, given that muzzle brakes, with one exception, can't be used in competition, given they do nothing for accuracy, and accepting there's a risk to health, I would ask that the necessary actions be taken to prohibit muzzle brakes on fullbore rifles from Bisley ranges.

ANSWER

The purpose of a muzzle brake is to reduce the perceived recoil of a firearm. The mechanism by which a muzzle brake operates means that the shot generates more noise for people either side of the shooter. Of course, the perceived sound produced by any rifle shot will be affected by environmental factors and depend on the cartridge for which the firearm is chambered.

The reduction in perceived recoil can be helpful for people who may be suffering injury or disability to their shoulder or upper arms. It also makes the firearm more comfortable to shoot and can encourage new shooters to participate.

The NSC does not ban muzzle brakes and does not mandate the use of moderators. The Range Regulations contain rules on the use of muzzle brakes to balance the interests of those who use muzzle brakes and those who do not. A person who wishes to use a muzzle brake must declare it when making a booking and the Range Office will leave a clear target between the muzzle brake user and the next shooter. Also, muzzle brakes cannot be used at any time under the canopy at Short Siberia. Anyone who is on a target next to a muzzle brake user should contact the Range Office for assistance.

6. QUESTIONS PUT ANONYMOUSLY TO MIKE JENVEY (Various topics)

NRA INSURANCE

The cost of NRA insurance to counties / clubs has increased significantly over the last few years (2024 = £348, 2019 = £210). On inflation alone, £210 in 2019 would equate to about £257 in 2023.

<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>

This is not affordable to some counties / clubs (Cams in particular).

1. What is the cost of the overall insurance premium to the NRA? **£369k in 2023**
2. How much was the cost of the insurance premium in 2019? **£176k in 2019**
3. What is the "pro-rata" allocation of insurance cost to each individual member against their individual membership fee? ***The membership fee is a donation to help support the charitable work of the NRA. That is why we encourage members to complete Gift Aid forms, as it enables the charity to recover Gift Aid which provides valuable additional revenue at no cost to the member. To encourage membership donations, the NRA is allowed to provide certain benefits to members but the market value of that benefit cannot exceed 25% of the membership fee. The benefits to members include becoming an insured on the NRA's insurance policy, a copy of each Journal, the right to vote at meetings of Members and the right to book targets at Bisley. We allocate a value of £11.00 in relation to insurance when carrying out this calculation. This is not a pro-rata allocation but is done for the purposes of complying with HMRC limits on the benefits that may be provided to a person who makes a donation.***
4. What is the overall income generated from NRA individual membership towards insurance? ***The membership fee is a donation to the charity. The NRA does not hypothecate membership fees to particular expenses.***
5. How many counties / clubs affiliate to the NRA & use the NRA insurance. ***The total number of Affiliates as at December 2023 was 758 . Of those, 584 elected to be covered by the NRA's insurance in 2023.***
6. What is the overall income generated from counties / clubs specifically from insurance payments? ***The NRA does not allocate part of the affiliation fee towards insurance because the affiliation fee does not constitute a donation. That is why the membership fees of individual members qualify for Gift Aid but affiliation fees do not.***
7. What option can be investigated for counties / clubs to pay the "pro-rata" rate (i.e. against NRA non-members) to minimise their costs? ***As set out above, there is no "pro-rata" rate for insurance that can be applied to Affiliated Clubs. It is up to individual clubs whether they wish to elect to be covered under the NRA insurance or to obtain insurance from other sources.***

SITE 5 DEVELOPMENT

1. What is the overall cost of Groundworks? ***The costs are set out in the contract for works between the NRA and the contractor and are commercially confidential; the project costs will be accounted for as CAPEX and published in the Annual Report***
2. How many pitches have been sold to date? ***Eleven (11)***

3. What are the costs of groundworks (i.e. unsold pitches) to be paid by NRA until pitches all sold? ***We expect to see a similar sales pattern that we had with Spencer and Waldegrave sites ie approximately 30-40% of pitches sold before construction (giving those people the first pick of the sites), a similar number sold during construction (to people who may have been uncertain whether the development was going ahead) and the balance post-construction (to those who are especially cautious about completion). It would be unrealistic to expect to sell the entire site before any construction had begun.***
4. This project has been consistently referred to as self-funding so with the as expected (very poor) take up, this will not be the case for an unknown period - why did the project go ahead? ***See answer to previous question. The take-up at the early stages was also likely to have been affected to a certain extent by social media posts casting doubt as to whether the project would go ahead. (MJ expressed the view that the take-up was also affected by the cost of the pitches, which he considered to be excessive.)***
5. There has never been a detailed business case presented for the project - why not? ***The business case remains the same. In short, it is better for the NRA to have 28 plots generating £3,200 per year (with upward RPI adjustments every year) committed for up to 20 years rather than plots on annual licences. In addition serviced sites do not incur the cost of maintaining and servicing ablution blocks. (MJ expressed the view that the net income should be viewed as £3,000 per year over 15 years since the first 5 years * rent is applied towards the cost of the groundworks and the figure of £3200 is the rent for the largest plot, with the average being closer to £3000)***
6. What is projected income for this site over the next 10 yrs? ***Annual income for Wharnccliffe Site is projected to be £89,800 rent (ignoring the effect of RPI adjustments as these cannot be forecast with any precision) plus £15,000 lease premium***
7. Why does the NRA insist on using an archaic method of calculating inflationary costs, namely RPI? This has not been in use by the Bank of England for a considerable time (2003) & is seen as out of date / not representative when compared to the CPI: <https://www.investopedia.com/terms/r/rpi.asp> and <https://www.alanboswell.com/news/rpi-vs-cpi/#:~:text=Like%20RPI%2C%20the%20CPI%20is,rather%20than%20an%20arithmetic%20mean>. Moreover, in 2013, the Office of National Statistics reclassified the RPI as "not a national statistic." Most importantly, many of the elements within the RPI are irrelevant to NRA operations / charges, quote from second link: "*The goods and services in the RPI basket are changed annually, but they are very broad ranging. For example, the 2022 RPI includes hundreds of food items, as well as services that range from mobile phone contracts and playgroup fees to car servicing and online gaming subscriptions. RPI is also heavily influenced by housing costs. This is because it includes items such as private and social rents, along with mortgage interest payments. This is one reason why RPI tends to overstate inflation when compared to other measures such as CPI (see below). This is particularly true when house prices and interest rates increase rapidly.*"

It would seem that the only reasoning for the NRA to continue to use this index is to artificially increase the annual "inflationary" charges to maximise income at the expense of the membership. The NRA should move to the CPI for such purposes; there is no logical reason why RPI is used.

ANSWER

The NRA sets membership fees for its members, and the NSC sets prices for its customers, at a level that promotes a sustainable financial footing for the charity. That involves looking at the cost of running the NRA and NSC and making sure that the total income of the group meets its needs. A charity with a precarious financial position risks making decisions based on short-term financial necessity, not long-term best interests.

Indexes, both RPI and CPI, are a proxy for a representative basket of goods and services. Historically, and by pure coincidence, adjusting prices and membership fees by an amount not exceeding RPI has produced a revised income consistent with the needs of the charity.

A simple index adjustment (whether RPI or CPI) is not appropriate in the current economic climate. For example, salaries are up 12% year-on-year reflecting the restoration of staffing numbers back to Pre-Covid levels as well as wage price inflation. Utility costs are up 61% year-on-year, mainly as a result of the Government's response to the Russian invasion of Ukraine.

With key cost drivers increasing well in excess of RPI or CPI, the Trustees implemented significant increases to ensure the charity remained financially sound. Capping our increases to CPI of 9.1% would have reduced our actual 2023 and our forecasted 2024 surplus and quite possibly resulted in a deficit in both years. That is not a sustainable way to operate any organisation.

8. QUESTION FROM GRIFF MORGAN (Any Rifle (TR))

1. I put a proposal to the TR Sub Committee last year to allow in Any Rifle (TR) in the same vein as Any Rifle (MR). With the exception of 300Mtr only there is currently no route for a NRA member who shoots a calibre other than 308 to participate in the Imperial Meeting without it being the F-Class element which requires a scope to be mounted, not open sights.
TR chair was due to come back to me with reasons why my proposal for Any Rifle (TR) was rejected but I have heard nothing to date. Why can there not be a class for Any Rifle with personal ammunition, separate to 308 with Issued Ammunition, to be more inclusive and encourage more entries into the Meeting?
The NRA Journal reporting on the 2023 meeting specifically commented on decreasing numbers entering the meeting.
2. F-Open allows shooters to shoot regardless of calibre (up to a maximum calibre). Why can we not have TR-Open when the current Imperial TR format is restricted in a similar way as F-TR with 308 / 223 only?

ANSWER

This proposal - albeit in slightly different forms - has been considered by Shooting Committee on a number of occasions in recent years, the most recent of which was in the second half of last year. On each occasion it has been rejected by Shooting Committee on the advice of the TR Discipline Sub-Committee.

The most recent proposal was received in August 2023. The Shooting Committee referred it to the TR Discipline Sub Committee (TRSC) for consideration as it related to a TR-specific matter. The TRSC considered the matter with the benefit of consulting the Head of Shooting Division and advised the Shooting Committee that the proposal should be rejected.

The main reasons for this were that there is no evidence that this proposal will produce a meaningful increase in numbers entering the TR meeting and that a similar proposal adopted for Match Rifle has not produced a meaningful increase in numbers competing in Match Rifle.

Those who wish to shoot an Any Calibre/Ammo TR Class are able to enter the F-Class Imperial, for both of which classes any sights are permitted (see Rule 164).

9. QUESTION FROM ADAM LEECH (Service Charge)

Service Charges

In the NRA's letter regarding the new service charge procedure, dated 21 June 2023, it is stated that the NRA have "sought specialist professional advice from a RICS surveyor in 2021".

Chapter 2 (Mandatory requirements) of the RICS Professional Standard for service charges in commercial property, available at the link below, details at pages 15-16 that "Professionals involved in the management of service charge accounts must act in accordance with the following principles" namely:

1. All expenditure that the owner and manager seek to recover must be in accordance with the terms of the lease. ***Agreed***
2. Subject to section 4.2.7, owners and managers must seek to recover no more than 100% of the proper and actual costs of the provision or supply of the services. ***This is the correct starting point. It is subject to the terms of lease and other agreements with tenants. In the case of utilities, the actual costs will include a contribution towards the infrastructure through which those utilities are delivered. A landlord may also receive discounts from its suppliers for bulk buying and quarterly payment that do not apply to a commercial tenant who is not purchasing in bulk and pays annually in arrears***
3. Owners and managers must ensure that service charge budgets, including appropriate explanatory commentary, are issued annually to all tenants. ***The NRA does not publish a budget as it does not collect service charges in advance. The NRA recovers the service charges in arrear based on actual costs.***

4. Owners and managers must ensure that an approved set of service charge accounts showing a true and accurate record of the actual expenditure constituting the service charge are provided annually to all tenants. ***We notify tenants of this each year by letter***
5. Owners and managers must ensure that a service charge apportionment matrix for their property is provided annually to all tenants. ***We notify tenants of this each year by letter***
6. Service charge monies (including reserve and sinking funds) must be held in one or more discrete (or virtual) bank accounts. ***This is not applicable as we recover service charges annually in arrears. We do not collect or hold monies in advance.***
7. Interest earned on service charge accounts – or where separate accounts per property are not operated, a proper and reasonable amount of interest calculated on normal commercial rates – must be credited to the service charge account after appropriate deductions have been made. ***This is not applicable as we recover service charges annually in arrears. We do not collect or hold monies in advance and so there is no amount on which interest could accrue.***
8. Where acting on behalf of a tenant, practitioners must advise their clients that if a dispute exists any service charge payment withheld by the tenant should reflect only the actual sums in dispute. ***The NRA is a landlord, not a practitioner***
9. When acting on behalf of a landlord, practitioners must advise their clients that following resolution of a dispute, any service charge that has been raised incorrectly should be adjusted to reflect the error without undue delay. ***The NRA is a landlord, not a practitioner***

So far, the leaseholders have not been provided with a service charge budget with explanatory commentary (point 3, above), an approved set of service charge accounts (point 4, above), or an apportionment matrix (point 5, above) which are mandatory requirements under the RICS Professional Standard.

1. Why have leaseholders not been provided with these mandatory requirements? - ***See responses above***
2. Why are the NRA not following the RICS Code of Practice? ***The NRA follows RICS practice to the extent it is relevant or applicable to it***
3. What interest was earned on the Service Charge account (point 7, above)? ***The NRA does not collect service charge in advance and so there is no Service Charge account and therefore no amount on which interest could accrue.***

(Reference:

https://www.rics.org/content/dam/ricsglobal/documents/standards/January_2022_Service_Charges_In_Commercial_Property_1st_Edition.pdf

The NRA, as a charity, is required to recover service charges from its tenants in the same way as any other landlord. If it did not, the shortfall would have to be made up from charitable funds and that would constitute a private benefit to those tenants, which the NRA is not allowed to provide. The Charity Commission has provided clear guidance that the NRA must let its properties on market terms, which includes recovering service charges.

10. QUESTION FROM MAX BROWN (Range Fees)

Regarding the upcoming meeting. A number of our club and individual members are concerned with the rise in range fees being excessive this year. It is putting many off hiring ranges as it's just too expensive. Can this be raised please.

ANSWER

The fees paid by range users to National Shooting Centre Limited (NSC) make a valuable contribution to funding the charitable work of the NRA. NSC sets those fees on a commercial basis, taking into account the costs of providing the ranges including maintenance and upkeep, the need to invest in new equipment, the depreciation cost of existing equipment and the cost of staff and utilities, especially electricity. NSC also takes into account the need to make sure facilities are available for future shooters. For example, costs could be reduced by not carrying out maintenance but this would provide cheaper shooting today at the cost of future shooters. NSC does provide pricing incentives for customers including lower charges in the Winter season, lower charges midweek and midweek packages with accommodation to assist shooters travelling long distances.

11. QUESTIONS PUT ANONYMOUSLY TO PHIL NORTHAM (Various Topics)

From various in clubs

Why can't an SSC be valid a year from its date of issue vs expire 31st Dec? If the issuing/sponsoring clubs renews affiliation, then they are covered etc. Why do they need to be end of year & so create a mad rush to get them then vs a continual reissue. Some refuse to 'buy' them after say Aug & wait till Jan. Its counter productive. If there are no changes in scope why not have a continuous card?

What is the actual cost per member to; manage, print, post an SSC?

The validity of an SCC issued by the NRA via an affiliated club runs concurrently with the year of club affiliation. Also, many clubs choose to issue SCCs to their members on payment of annual subscriptions. An SCC issued direct by the NRA runs for 4 calendar years The Membership Team manage the SCC process as part of their role. We do not keep records to allocate staff time costs specifically to the SCC process. Each blank card and printing costs 30p and postage of a single card costs 68p.

From Phil Northam & on behalf of the member who provided the quote

At the last AGM/BGM I offered to get one of my network to quote for a cost effective Video Conferencing System for NRA to use to engage in a modern way on line. A quote was provided, no reply has been received. What is the status of NRA obtaining & implementing a modern VC system by the next AGM? ie a year since the issue was raised.

A meeting has been held with the supplier to discuss the proposal in more detail. The current proposal covers the cost of the equipment, but Trustees need information on the cost of installing and commissioning the equipment, maintaining it and training staff to use it. This information will enable the Trustees to decide whether the total cost is justified in light of the benefit it may be expected to provide. The Secretary General expects to table this proposal at the Council meeting in April.

From Caravan owners on Site 2 – when was the water quality on site last tested & can you publish the results please. ***We test for Legionella in the water supply each year in accordance with the HSE Publication HSG274 Legionnaires' disease: Technical Guidance" regulations***

From Caravan owners on Site 1 – when will we get a dish wash facility? ***There are currently plans to install dish washing facilities at Site 1 in 2024.***

12. QUESTIONS FROM BOB SAMPTON

Answers are set out next to each question for ease of reference

1. How many baby-changing facilities does the NRA provide (not in clubhouses) and where are they? ***There is a unisex baby-changing facility in the Pavilion. There is no specific legal requirement for anyone to provide these facilities and it is not part of our Estates Development Plan. The British Toilet Association recommends that there be one unisex baby-changing facility for every 10,000 people using an area***

[\(http://www.btaloos.co.uk/\)](http://www.btaloos.co.uk/)

2. How many Doc M-compliant disabled toilets does the NRA provide (not in leased clubhouses) at Bisley and where are they? ***We have not assessed our facilities for Doc M compliance as we understand this relates to works regulated by Building Control*** How many Doc M-compliant disabled showers does the NRA provide (not in leased clubhouses) at Bisley and where are they? ***We have not yet assessed this provision.*** How many step-free disabled access toilets does the NRA provide on the caravan sites (not those in leased clubhouses) and where are they? ***We have not yet assessed this provision.*** How many step-free disabled access showers does the NRA provide on the caravan sites (not those in leased clubhouses) and where are they? ***We have not yet assessed this provision.*** Where Doc M compliance isn't possible, what 'reasonable adjustments' have been made to the toilets and showers facilities to accommodate disabled and less able-bodied members? ***We have undertaken a review of accessible facilities on Camp; see attached site plan showing 13 accessible toilets, 8 accessible showers (with grab rails and foldable seats, to be installed by 1 April 24), and one redesigned Pavilion room (wheelchair accessible).***

3. How many disabled parking bays are there on camp (not the ranges) and where are they? ***All the dedicated disabled parking bays are at the ranges. There are no dedicated disabled parking bays away from the ranges.***

4. Given the percentage of members who suffer from hearing problems (either from age, disability or by birth from military service), what is being done to support shooters who can't hear the hooters and commands, especially when wearing single, or even double layers, of hearing protection? **Shooters who do not hear the hooter will usually be alerted to the fact the hooter has sounded by the RCO. A shooter on his own will have a radio and can call to confirm that the hooter has sounded to commence shooting. A shooter on his own who does not hear the hooter to cease firing in a Range emergency will be alerted by Range Staff. The NRA would be interested in costed proposals for any alternative to the hooter system, which has been in use for at least 50 years.**

12. QUESTIONS FROM ALEKSANDR RADKOVSKI

Answers are set out next to each question for ease of reference

1. What is the current price of NRA life membership?

Age at 1 Jan	UK Lump Sum	UK 7 years @	O'sea Lump Sum
40 or under	£5,000	£750.00	£3,000
41 to 50	£4,000	£600.00	£2,400
51 to 60	£3,000	£450.00	£1,800
61 to 70	£1,500	£250.00	£900.00
Over 70	£750.00	£140.00	£450.00

Published on page 24 of the Bible/Handbook.

2. Why are the NRAs Club Affiliation forms not digitised? **A digital affiliation process would have benefits for clubs and for the NRA. The NRA would need to have the necessary IT infrastructure in place to offer this, which it does not currently have. There are no plans to offer this in the near future. The priority IT project is an on-line range booking system.**

3. What is the average annual income of an NRA member? **We do not collect this information and have no plans to do so.**

4. It states on the NRA website that discounts are offered to relevant members, but it does not specify what these are. What discounts does the NRA offer relevant members? **We offer 40% discount for training and competition entry fees for those aged under 25, which is applied upon booking of the event. All Competition discounts are detailed within the accompanying event notes document on the booking page, and on the event page itself where possible.**

5. How many of the Trustees live within 100 miles of Bisley? **We do not publish this information. Trustees are recruited on the basis of skill, competency and experience, not their geographical location.**

6. How many of the Trustees live within 50 miles of Bisley? **We do not publish this information. Trustees are recruited on the basis of skill, competency and experience, not their geographical location.**

7. What range of professions do our Trustees represent? **We do not publish this information. Trustees are recruited on the basis of skill, competency and experience, not their profession.**

8. How many Trustees are relevant members? **We do not publish this information. Trustees are recruited on the basis of skill, competency and experience, not on whether they fall within the category of Relevant People¹**

9. What are the NRAs KPIs? **The Trustees' primary measurements are (a) the level of participation in NRA marksmanship events by Relevant Persons; b. growth in membership; and c. number of people participating in NRA training activities** How do the Trustees determine if the year has been 'a success'? **The primary measurement is a comparison of current year with prior year performance**

10. What fundraising targets does the NRA have? **The NRA does not engage in fundraising activities and so is not registered with the Fundraising Regulator**

11. How much fundraising has been done by the NRA in the past 10 years (not technical 'donations' such as memberships, or legacies) ... how much money has been raised by genuine fundraising? **The NRA does not engage in fundraising activities**

12. What fundraising programmes does the NRA currently have? **The NRA does not engage in fundraising activities**

13. QUESTIONS FROM SARAH-JANE BINDER SWASH (Caravans)

1. Why are the serviced caravans offered on commercial leases and not a 'park home' or 'residential' lease? ***The NRA uses a commercial lease because the caravan sites at Bisley are not operated under a "residential" site licence. There is a copy of the site licence on display at the Range Office and Reception. We use a standard NRA lease amended to comply with the terms of the site licence.***
2. Unserviced caravans - The members have a set of written terms and conditions that they agree to abide by when they take on an unserviced pitch on an annual licence? Why does the NRA not supply a similar counterpart agreement stating what services they will supply in return for the Annual Licence? ***There is no statement of what services are provided by the NRA because the pitches are offered on an un-serviced basis.***
4. How much income has the NRA had from the caravan sites in the last 10 years (excluding Waldegrave) ***This information is not readily available and would require a disproportionate effort to extract from historical records. If you can let us know how this information would assist you we may be able to provide other information that will be of help.***
5. How much has the NRA invested in the NRA ablutions on the caravan sites in the last 10 years (excluding ranges) ***We do not record expenditure at the level of detail needed to answer this question with any accuracy***
6. How much CAPEX has the NRA invested outside of the NSC in the past 10 years, where and what on? ***Most of the capital expenditure of the NRA and NSC is incurred at Bisley as this is the centre of NSC's commercial activities and a core asset of the NRA. We have investigated opportunities for expenditure away from Bisley but have been unsuccessful so far in purchasing other range complexes. We welcome suggestions from members for projects away from Bisley.***

15. QUESTIONS FROM ANDREW GRAINGER (Various topics)

1. How does the NRA support its charitable objectives? How is this measured annually?

ANSWER

The key charitable objective as recognised by the Charity Commission is the participation of Relevant People in competitions organised by the NRA. We ask each participant to declare whether they are a Relevant Person when entering a competition and the Trustees review participation at the end of each year. There is more information on this in our policy on Determining the Charitable Status of Competitions held in the UK which is available here: <https://nra.org.uk/nra-policy/> In addition to this the NRA pursues its charitable objectives by facilitating use of ranges by the Armed Forces and emergency services, providing training for shooters, operating the Museum, liaising with police services on firearms licensing, providing information to Members of Parliament to guide development of law and to regulatory authorities such as the HSE in relation to the use of lead. There is more detail on this in the Annual Report published each year.

2. What is the NRAs overall strategy for the next 10 years?

ANSWER

Council shared a Strategic Framework with General Council in 2022 and it was published for consultation in May 2022. You can read further details here: <https://nra.org.uk/nra-strategic-framework-consultation/> It is fair to say that dealing with day-to-day issues can make implementing a long-term strategy quite challenging, especially given the other demands on the time of the professional staff.

3. 'GC Meeting - 16th Sept 2023 - 3.18. JPSB responded that 5% gross profit on an entry is only £25 for an average £500 entry fee meaning competitions operate on a net loss. Also, more shooters would require more overheads such as butt markers, targets, range staff etc.' This is true for variable overheads, but not fixed overheads. What proportion/% of the Imperial meeting costs are 'fixed costs/overheads'. JPSB is implying that EVERY cost associated with the imperial is a variable cost, and this simply cannot be true.

ANSWER

In 2023, competitions organised by the NRA produced income of £996,000. The cost of sales for those competitions was £1,121,000. This resulted in a gross loss of £125,000. Once we take into account overhead allocated to the competition of £253,000, the result is a net loss of £378,000. Allocating overhead is not a specific science and arguments can be made as to how the allocation should be done, but the figure used is considered to be a reasonable one.

16. QUESTION FROM ROB STIRLING (Midweek range fees)

I shoot regularly during the week, usually on the short Siberia. I can't help noticing that the ranges are almost empty Tues to Fri. It seems such a waste of the resource. May I suggest that a drastically reduced rate of charges is introduced, for weekday shooting to encourage more old members to dust off the bandook. Unused ranges are bleeding money!

ANSWER

Shooters who have retired from active employment are a key target market for mid-week shooting. Midweek range hire fees are up to 35% lower than weekend rates. There is an additional 25% discount available for Tuesday bookings. Members can also book place on the new "Member Days" – see <https://nationalshootingcentre.co.uk/member-days>

17. QUESTION FROM DOUG STUART (Service Charge Apportionment)

I sit on the LMRA general council/management committees). My question is about the huge hike in service charges that the NRA are now seeking to impose on estate tenants, in our case something approaching a 500% uplift. This is way in excess of an inflationary uplift. Having recently renewed leases at hugely increased rents we are already losing money and this extra burden will threaten our continued existence and from others I've spoken to on camp we are not alone in this position. What is clear to me as a qualified surveyor and FRICS is that the RICS code of conduct for service charges is not being followed. Proper budgets are not being issued before each service charge year, audited accounts of past years are never issued and there seems to be no apportionment matrix being used which factors in that not all tenants benefit from and should not be charged for, all service charge items. ie security given most clubhouses have security at their individual properties. Essentially the new regime being proposed is not fair and reasonable which is the underlying tenet behind service charge accounting. The switch to a regime based on gross floor area rather than rateable value does not factor in all of the different property uses at Bisley. For example what benefit does an armoury get from waste collection/road repairs and suchlike. None in my contention so why is armoury space having to pay the same as accommodation/bar /office uses? To me basing service charges on gross floor area is fundamentally flawed and we should stick with the existing system based on RV's. What is clear is that the cumulative impact of rent rises/range hire costs/ammunition costs/general inflation and now abnormally high service charges will push some tenants at Bisley to the point of extinction which I why I think you will get a lot of pushback on the NRAs suggested changes to the service charge regime.

ANSWER

Apportioning Service charges by gross floor area was recommended by our surveyor who is a specialist in this matter; applying weighting for different uses was considered and rejected. Determining both use categories and weighting would be a subjective assessment; the current system is easy to explain and understand. Tenants whose service charges have increased have had these increases phased over 5 years; tenants whose service charges have decreased have had these reductions in full from year 1.

Appendix 1 – photographs from Richard Stebbings to support his questions on page 13

