

8<sup>th</sup> July 2019

Mr David Hughes  
Head of Firearms and Import/Export Drugs Licensing  
Home Office  
Crime, Policing and Fire Group  
Drugs & Firearms Licensing Unit  
Firearms Section  
5<sup>th</sup> Floor, Fry Building  
2 Marsham Street  
London SW1P 4DF

Dear Mr Hughes,

**Aintree Pistol Club – Application 152890**

1. Further to your letter of the 4 July revoking our Home Office Approval. Please accept my apologies for the length of this letter but there has obviously been a serious misunderstanding and I wanted to address your concerns fully and ask you to restore our Approval. We have some 280 members spread far and wide and the removal has caused great disruption and distress.
2. In addition, Merseyside Police have told us that FAC holding members may not use their own guns on our premises, nor even shoot air guns. I believe this to be incorrect and would welcome clarification.
3. The Police are already contacting members and advising them that we will not be re-opening and to join other clubs if they wish to retain their FACs. However, there are not many clubs in the area and we believe most of them are full.
4. To be frank, I was very disappointed at the way Merseyside Police conducted their visit to our premises, involving, as it did, over twelve Police Officers and staff, whose presence intimidated and upset both our own staff and the members, most of whom were FAC holders and, by definition, law-abiding. We have been here for almost 50 years and had excellent relations with the police and this was quite unprecedented. Nothing had changed since their quieter, but no less thorough inspection in January, but had any concerns arisen subsequently I would have welcomed an opportunity to discuss them with you before a summary revocation of our Approval.
5. May I give you a brief overview of the club?  
Our building is an 1855 cotton warehouse, it is very robust and has a high degree of physical security. It also has a monitored alarm system which will be activated if anyone gains entrance either through the roof or by extreme violence against the steel doors at the front. It was effectively abandoned when we took it over in 1970 and it has been turned into a useful building and a first class shooting facility by the members working voluntarily. It has helped keep alive what was a derelict part of Liverpool's dockland.  
The members are a community, rather than casual users as in say, a gym. This is a consequence of the way we have grown but is also essential for maintaining the ethos we have developed based on solid education into the habits of situational awareness

and personal responsibility that alone can ensure safe gun handling, our dominant concern.

Everything that we do is in accordance with the HO Criteria as agreed with the police when they were first introduced but, Criteria or no, I can say categorically that at no time have any of our activities posed a threat to the public or anything been accessible to unauthorized individuals.

6. Record Keeping

I appreciate that some of our members' signatures are not as clear as they might be, but that is a point which we can easily address and needed no heavy-handedness. That said, poor writing or no, it remains an effective register as members can still be identified – I have a system for checking attendances each month and have no difficulty. For the occasional signature that is indeed illegible, tracking down the member takes a little more effort and it is invariably a regular attender, typically without a gun, signing in without thinking. However, as I said, this can easily be addressed simply by ensuring that members write legibly.

7. Concerning ammunition, this is predominantly .22 rimfire – a target round – and probationers are advised on their Introductory Course of the serious legal consequences of removing it from the premises. We have an arrangement for storing any unshot rounds for them. In my experience they routinely volunteer it on leaving - as I said above, personal responsibility is fundamental to what we do. In any event, staff equally routinely ask about it. We sell only a few centrefire rounds (357 and 44) and these are for use only with the club guns. Empty cases are returned with the gun.

8. Administration of new members

I cannot account for the discrepancy between our membership list and the police's. I can state quite unequivocally that our records are complete and accurate. Part of my weekly work, as the Police will confirm, is to advise them of members applying to join, members being elected and members leaving. We started doing this as a courtesy to Liverpool and other local forces long before the Criteria came into force (see page 4). I can only assume that the problem lies somewhere in the Police's record system – there has been quite a lot of upheaval and staff change at the Registry over recent years and other clubs have noted that police records can be unreliable.

Regarding the character of new members. Most are introduced by existing members and where that is not the case we obtain references. In addition, as mentioned, I notify the police of anyone applying for membership and if they express concerns appropriate action is taken.

9. Physical security of firearms

As I understand it, a FAC holders' obligation is to keep their firearms in a secure place when not in use. Occasionally, as explained to the Police, rather than travel home with the pistol, my wife will leave it in the club cabinet – a secure safe within a secure building – so that myself or my daughter – who have joint FACs with her and can thus use her guns - can use it the following day. This is done at times when only we have access to the cabinet. The suggestion that members have general access to the club cabinets is not correct and never has been.

The shotguns referred to have been kept in the cabinet since they were bought in 2004 and no issue has been raised about them during the various Approval and RFD inspections we have had since. Again they are held in a secure safe in a secure building. They are kept there so that when a shotgun competition is being held, if

necessary they can be loaned to Shotgun Certificate holders. As with the club guns they are not accessible to the members nor ever have been. They were bought from a Registered Dealer, Centrevine, and, as I understand it, dealer to dealer transactions will not appear on the NFLMS.

10. The club gun kept in a slip was allocated for use by one member as small thanks for his work for the club. Many members have a preferred club gun. I knew that he had had difficulties with applications shortly after joining in 2015. He will probably be applying again in the near future but has been occupied for some time with a change of address and building up a small business. He is 62 years old, and partially disabled. He is personable and popular and an enthusiastic shooter, his conduct has been exemplary and his work for the club extremely valuable. He has offered to resign if that will facilitate the renewal of our Approval.

### Conclusion

I am a chartered civil and structural engineer and do not disregard or neglect any duties or obligations that I undertake, including those as an RFD and officer of a Home Office Approved Club. The club is a fine achievement and a credit to its members. It is well run and provides a safe and pleasant facility for members to pursue a legal sport safely. It has frequently been praised by the Merseyside Police's Firearms Registry staff to me personally and to others. It is quite possible that RFD and club items may be stored in the 'wrong' safe on occasions but at no time – I emphasise, at no time - have club or RFD firearms been accessible to unauthorised people, or have presented a threat to the public, nor have we defaulted on any of the Approval Criteria. Should you have further doubts about this, you are most welcome to visit and judge for yourself.

I would be extremely grateful for your expedition in this as the disruption to the running of the club and the alarm and anxiety being caused to our members is considerable. I have submitted an online application for a new Approval – no 285420

Yours sincerely

Roger Taylor