



**SACS**  
UK-WIDE SHOOTING  
& COUNTRY SPORTS  
ADVOCACY

Firearms licensing consultation  
Firearms Policy Unit  
Home Office  
5th floor, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

15 August 2023

Dear Sir.

**Firearms licensing: a consultation on recommendations for changes made to the Home Office**

**The Scottish Association for Country Sports**

The Scottish Association for Country Sports (SACS) is a significant membership organisation, representing members throughout the UK in respect of matters including field sports, firearms use and related matters.

SACS sits on the Home Office Fees Group and has given evidence to parliamentary committees at both Westminster and Holyrood.

The principal firearms licensing adviser, Fraser Lamb, gave evidence to the Scottish Affairs subcommittee in relation to firearms licensing, one of the references leading to this consultation. In addition, Fraser was the head of firearms licensing for the Police Service of Scotland (PSOS) from its formation on 1 April 2013 through to March 2017 when he retired from the PSOS. This period involved wholesale change in how the PSOS dealt with firearms licensing, amalgamating the eight legacy forces into one and setting out a robust, consistent framework for firearms licensing in Scotland. He also engaged with policy officials through the Bill period of the air weapons legislation in Scotland and its subsequent implementation. In addition, on secondment to the Scottish Government, he previously advised Scottish Ministers on operational and policy matters in respects of the Multi Agency Public Protection Arrangements (MAPPA).

We submit the following for consideration.

***Q1. Do you consider that the police should be granted a specific power of entry (without a warrant issued by a magistrate or sheriff) to be able to seize shotguns, firearms and ammunition where there is a risk to public safety or the peace and the certificate holder does not cooperate with the police and agree to voluntary surrender. (In association with this proposal, the police should be given the power to suspend a certificate temporarily).***

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No. The criteria to be granted a firearm or shotgun certificate in GB is clearly set out in this consultation. In coming to a decision in respect of the issue of a certificate, the police will have gained access to the location where the firearms (including shotguns) will be stored and interviewed the applicant, and the referees provided by the applicant. They have, in effect been subject to a curious inquiry process. They will have been compliant with the police.

The Home Office Statutory Guidance in respect of firearms licensing law states at paragraphs 4.7 and 4.8

#### *Unannounced visits*

*4.7 In the case of certificate holders, the police should undertake an unannounced visit or inspection where it is judged necessary to do so, based on specific intelligence in light of a particular threat, or risk of harm. It is not expected that the police will undertake unannounced visits or inspections at an unsocial hour unless there is a justified and specific requirement to do so on the grounds of crime prevention or public safety concerns, and the police judge that this action is both justified and proportionate.*

*4.8 A power of entry, subject to warrant, is available to the police. While this is an important power, it will not be necessary in all cases where an inspection or home visit is required. It is expected that responsible certificate holders will co-operate with reasonable requests to inspect security arrangements or other aspects of suitability, and failure to do so may be taken into account when police consider suitability to possess the firearms. To mitigate any misunderstanding on the part of the certificate holder, the police should provide a clear and reasoned explanation to the certificate holder at the time of the visit.*

When this material was being drafted, SACS highlighted concerns in respect of the fact that the failure to comply with the police to allow access to premises would be viewed negatively, despite a lawful remedy, Section 46 of the Firearms Act 1968, being available. It is unknown how many revocations have taken place where the decision making has been influenced by such a refusal. It would of interest to establish this and also review the comments of the Court in such cases.

You will be aware that Article 8 of the Human Rights Act 1998, sets out the legislation in respect of the right to a private and family life. Article 8 is qualified insofar that there are recognised exemptions which are set out in subsection 2. For the sake of clarity Article 8 states;

#### *Right to respect for private and family life*

*Everyone has the right to respect for his private and family life, his home and his correspondence.*

*There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.*

This Article 8 presumption enshrines the right to a private and family life.

Operationally, should the police require immediate access to a location to seize firearms or ammunition where there is a specific risk to the public safety, they can already do that under common law powers, if it is necessary and proportionate. It is unlikely that in the event of an emergency, and where the actions of the police are necessary and proportionate to overcome that Article 8 right, criticism would be upheld. It is what the public would expect to happen.

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That said, given that these operational decisions are often made by generalist police officers, who have a myriad of other duties to contend with, and who will realistically not have a significant grasp of the provisions of the 1968 Firearms Act, we are in a position to demonstrate cases where decisions have been made which have not been necessary nor proportionate and have caused significant distress to the certificate holder and their families.

Should the police be given a specific power to enter premises without a warrant, sadly past experience demonstrates that it is likely such a power would not be used proportionately or necessarily. It will be overridden by the institutional arrogance of the police. Consequently, we are of the strong view that the status quo should remain – if the matter is so urgent, then the police have a common law power. If it is not as urgent, then the judicial oversight and consideration which is brought by the judiciary should be referred to.

### ***The police should be given the power to suspend a certificate temporarily***

In respect of the temporary suspension of certificates, as you are aware there is no legislative provision to temporarily suspend a certificate. It is often the case that an event, either in the control of the certificate holder or not i.e., when they are the victim of domestic abuse or threatening behaviour of another type, or are an unknowing associate of criminality it raises concerns that the possession of a firearm may pose a risk to public safety and it is desirable to remove the firearm temporarily, pending the investigation to ascertain the potential threat, risk or harm. There is often a need to stop, review and consider. This process is reflected in the National Decision Making model.

There are three options for the police – do nothing, remove the firearms with the consent of the owner or remove the firearms under the terms of a warrant. Subsequently, the police will be left with a decision in respect of revocation or otherwise. Our experience as one of the largest firearms licensing advocacy organisations, representing members throughout GB is that certificate holders will hand over their guns to the police willingly and indeed that is usually our advice.

That said, it is often the case that difficulties arise with the police through lack of communication (only eight of the 43 forces in English and Wales (E&W) have a published direct telephone number) and a lack of urgency to resolve particular challenges. It may be that there are pending criminal justice matters and the police wish these to be resolved prior to coming to a decision - we understand that.

It is our experience that whilst the pragmatic action in removing firearms is understandable in most cases, the limbo responsible certificate holders are left in is unacceptable. We are aware of some cases when it may reasonably be considered that the police have breached Part II, Article 1 of the ECHR (protection of property) and consequently have breached Section 6 of the Human Rights Act 1998. Mifecance is not unknown.

We are generally supportive of a mechanism to temporarily suspend certification in that it would bring a structure to a process already in place, That said, this support is qualified. We would support the proposal if the following provisions were included.

- The process would require to be included in legislation.

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- There would be required to be put in place a review system, similar to the review of Regulation of Investigatory Powers Act (RIPA) authorisations, when the temporary suspension would require to be reviewed by a senior officer, not lower than Superintendent level, who would decide whether the continued suspension is necessary, justified and proportionate. Given that legislation, like RIPA or the 2016 Investigatory Powers Act, is designed to overcome ECHR rights it includes significant review processes. The temporary suspension of certificates would require similar review periods, set at four week intervals.
- An appeals process should be legislatively available.
- The review of temporary suspensions would require to be subject to His Majesty's Inspectorate of Constabulary and Fire & Rescue Services review during force inspections.

In short, it would be fair to say that there is little trust in the current system of firearms removal by the police within the wider shooting community. A statutory provision would introduce checks and balances and set out a clear format for the temporary suspension of certification.

**Q2. Do you consider that the prohibition on possessing firearms should be changed from one that is based solely on length of a custodial sentence following conviction, to one based more on the nature of the offence? This would ensure that the prohibition becomes more clearly related to risk rather than, more arbitrarily, to length of sentence.**

No. Given the development of penal policy since 1968, there are many more alternatives to custodial sentences now than 55 years ago. Prohibition is only one of many factors considered when the police are considering a person's suitability to possess firearms, including shotguns and all the circumstances surrounding the individual can, and should be considered in the assessment of risk to possess firearms.

Prohibitions can be appealed and set aside by the Court. In this case we are not minded to support any change to the prohibition periods.

**Q3. Do you consider that the renewal period (currently every five years) for a certificate should be kept under review? If so, is renewal every five years the right period of time or should it be changed to a shorter or longer period of time?**

It is stated view of all the shooting organisations that certification should move towards a ten year certification period.

Given the advances in passive surveillance of individuals in recent years, such as sophisticated police command and control systems and crime recording mechanisms, coupled with the development of the GP process and the acceptance of risk assessed renewal processes, it may be argued that certificate holders will come to the attention of licensing departments should there be concerns raised in respect of conduct or health.

This would reduce the demand on the police in respect of renewal processes, but still allow for a necessary intervention if there are concerns raised.

Given the historically low levels of revocations and refusals and the acceptance that the vast majority of certificate holders are law abiding, with the background of modern, passive surveillance we believe this is readily achievable.

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We understand that this has recently been the position of the National Police Chiefs Council and Ministers. We would commend the introduction of 10 year certificates.

**Q4. Do you consider that people applying for shotgun certificates should provide two referees? (This is relevant to the recommendations to bring shotgun certificate requirements in line with those for firearms.)**

We believe that referees in the application process provide little in the way of the provision of relevant information which may influence decision making. Simply, referees are friends of the applicant. Applicants will not supply the name of a person who they believe will indicate animus of the individual to the police.

It would be better to have the police establish during the enquiry process who a person has regular contact with and in what capacity, be it a shooting associate, friend or professional acquaintance. The police can then decide who they contact to ascertain if they hold information relevant to the application.

**Q5. Do you consider that at least one of the referees should be a person of certain standing in the community (e.g., of a professional background)? This could include public officials (both elected and Civil Servants or Local Government officers), members of a regulated profession (including doctors, nurses, solicitors, barristers, accountants and FCA regulated finance professionals), officers of registered shooting clubs, National Farmers' Union representatives, landlords, land managers, vets or surveyors.**

No. This is a historical throwback and should be discounted immediately. Not every shooting person circulates in such company and realistically what difference does it make if the person is a public official or whatever.

We consider that the police should be well placed to identify the relevant and best referees as part of the application process.

**Q6. Do you consider that referees should be able to demonstrate a good knowledge of the applicant's circumstances, relevant to their suitability to possess a firearm or shotgun?**

Yes. This should include matters such as temperament and acceptance of the responsibility of being a certificate holder.

**Q7. Do you consider that the application form should include a checklist for referees on the information that they should provide to the police, and require referees to provide a written declaration that they have disclosed all relevant facts to the police?**

We answer this question in two parts as that is how it is phrased.

If a decision to made to continue with referees, then we agree that the application form should include a checklist for referees on the information that they should provide to the police. Being a referee is not a straightforward matter. Guidance should be provided in respect of expectation.

In respect of a requirement for referees to provide a written declaration that they have disclosed all relevant facts to the police, we are firmly not supportive of a declaration. Through no fault of the referee this may be subsequently used to discredit them publicly in an adversarial judicial process. Referees are essentially witnesses to the circumstances that they know of on that particular day. It is for the police to elicit information from them in respect of the matter in hand, albeit they will likely be essentially compliant and helpful by definition.

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**Q8. Do you consider that the Statutory Guidance should include more detailed guidance for the police on the information they should be looking to elicit from referees?**

There is a necessity for a national document set to be provided in the statutory guidance. That would align the enquiry processes of the respective forces into a process which is measurable, comparable and consistent throughout GB. Detailed guidance to the police in respect of referees, over and above the extant statutory guidance, would be supported.

**Q9. Do you consider that the police should look at the circumstances when individuals change referees between application and renewal, and between subsequent renewals?**

Yes. This is already established in some forces in GB, including the largest licensing authority, PSOS. There should be questions asked in respect of a change of referee, which in the overwhelming number of cases will be entirely legitimate, and if no adverse information is learned it may be viewed that the knowledge base of the police increases in respect of their overview of the applicant.

**Q10. Do you consider that the sharing of the unique application reference number by the applicant with their referees, would make it easier for referees:**  
**(i) to report concerns they have about applicants to the police;**  
**(ii) to decline to give references; or**  
**(iii) for those who give references but subsequently become concerned that the applicant may no longer be suitable to have access to a firearm or shotgun, to report this later to the police?**

No. What difference would a number make when a person has a name and address. In either circumstances the police should be readily able to identify nominals who have access to firearms and are certificate holders. We see no need for this.

**Q11. Do you consider that the content in the Statutory Guidance should be expanded and made more prescriptive in relation to the suitability checks carried out by the police for firearm and shotgun applicants and certificate holders?**

Yes. We are of the strong view that a national document set should be included in the statutory guidance containing the police forms for enquiry, setting out clearly what questions should be asked of applicants in order to satisfy the criteria set out in the legislation. It should also include the background checks which should be made in respect of criminal history, intelligence, etc.

Not only will this set a level of robustness and professional curiosity, but it will also allow consistent standards to be set, which are especially useful in significant case reviews.

**Q12. Do you consider that the balance of probabilities test is the correct test to apply in the Statutory Guidance to information about a person's suitability to hold a certificate? This is the test that the police have been using for many years and is applied in weighing the evidence and information in any individual case.**

Yes. The balance of probabilities test is the legal test applied to almost all cases in GB not involving criminal breaches of the law. As firearms licensing matters are not criminal, the civil level of proof should remain.

The decision to issue a certificate is risk based, and in the vast majority of cases this risk is negligible. The decision should be anchored by a professionally curious review of an applicant's suitability. It is too often the case that the police fail in this respect and therefore their balance is skewed and defensible decisions are unable to be made.

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The police deal with risk daily and this includes wider risk based matters such as MAPPA. The assessment should be risk based.

Future police training should include risk training.

**Q13. Do you consider that neurodevelopmental disorders should be added to the list of relevant medical conditions in the Statutory Guidance (and application form)?**

Form 201 states in guidance in respect of the medical declaration, 'Any other mental or physical condition, or combination of conditions, which you think may be relevant.' Form 201 further states, 'If in doubt, consult your doctor or contact the police firearms licensing department'. The addition of neurodevelopmental conditions would likely fall into this definition however there is scope for confusion. The specification does not automatically mean that people will be refused a certificate – it merely means that some extra enquiry will lie with the police. It is clear from the number of refusals and revocations in respect of certificates, that very few people are refused for the declaration of a medical form.

That said, we understand that neurodevelopmental conditions are not in themselves mental health conditions and not every person with a neurodevelopmental disorder will have mental health difficulties. Given that, we would strongly suggest that this requires further consideration by the Home Office in respect of engagement with medical experts in this discipline.

**Q14. Do you consider that GPs' engagement with the firearms licensing process should be made mandatory?**

Yes. The GP process has been in effect for over seven years in Scotland and we are aware that the Scottish membership organisations receive very few calls in respect of GP matters. The advent of third party organisations such as MedCert have dampened down concerns.

That said, we are aware that members in E&W suffer a wide variety of service provision from GPs. This would be significantly reduced if it became a mandatory requirement, however we accept that this is not a straightforward matter with many implications for all.

**Q15. Do you consider that interim medical checks should be made on licensed firearms holders between the grant of the certificate and any application to renew?**

No. Given that the medical markers are being significantly rolled out through GB it would be expected for GPs to notify the police should they have any concerns about the welfare of a certificate holder. There would be then no need for an interim check. Given the strains on GP practices we consider this is an unnecessary additional burden on staff time within practices.

**Q16. Do you consider that the digital marker for use by GPs on the medical records of licensed firearms holders should be visible to other health professionals?**

Yes. We fully understand the rationale set out in Paragraph 5.8 and it is illogical to consider that the medical marker should not be available to mental health professionals who may be dealing with a person in crisis and be blind to the fact that they have access to firearms. We understand that there will be concerns about the sharing of such information, however given that the NHS is practised in dealing with matters of a sensitive nature, we judge these concerns to be outweighed by the safety of the public, including the safety of certificate holders, in such matters.

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**Q17. Do you consider there should be more mental health advice and support for licensed firearms holders through, for example, advice leaflets and other such support?**

Yes. The recent publication of the mental health leaflet in Scotland, produced by the members of the Scottish Firearms Licensing Practitioners Group, has been welcomed. It is widely available in Scotland and is being sent to members via membership organisations. It is also being sent out by PSOS with certificates renewals, variations etc. It is available on all the shooting organisations websites. We are aware of work which is ongoing to have this leaflet updated and produced nationally. We welcome this effort to debunk myths held within the shooting communities and also to set out clear advice in respect of certification and mental health.

That said, we agree with the views of the Scottish Affairs Committee in that this work should be contributed to by the respective devolved Governments. The Scottish leaflet was funded by the shooting organisations with help from PSOS.

A final point is that any future communications should include the shooting organisations. It is important that membership organisations can represent the views of their member – it should not be seen as a diktat from the authorities.

**18. Do you consider a specific phonenumber should be introduced in addition to the services already available to report concerns about a licensed firearms holder?**

No. There are many ways to contact the police and we do not consider there is a need for any other means of communication. It is of note however that only eight of the 43 E&W forces have a number available on their websites which allows direct contact with firearms licensing department. Email contacts can be made however given the complex nature of firearm licensing, from certificate holders perspectives, it is unacceptable that firearms licensing departments wish to be unavailable for a direct telephone conversation given that the advice being sought can perhaps stop people inadvertently breaking the law or reporting softer concerns directly to firearms licensing.

The lack of available direct contact can reflect an attitude of isolation and a lack of customer understanding. It can also send out, perhaps inadvertently, a message of 'can you just stop troubling us because we're really busy and you just don't understand how hard it is for us'.

**19. How in principle should any specific phonenumber be funded?**

I refer to the answer to question 18.

**20. Do you consider that it would be better to raise awareness of existing avenues open to raise concerns about a licensed firearms holder (999, 101, Crimestoppers, force firearms licensing contacts) than create a new phonenumber service?**

Yes. Again, I would refer to the answer to question 18.

The consultation also offers the opportunity to comment further. We offer the following.

It is apparent that the practice in respect of firearms licensing in GB is inconsistent and parochial, despite national guidance, some of which has a statutory basis.

On 1 April 2013, the eight legacy forces of Scotland were merged into one force, namely the Police Service of Scotland. Firearms licensing was completely reorganised. The eight legacy forces firearms licensing practices, which reflected the current variations in outlook and

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operation of the current E&W forces were reconstructed into a three distinct processing centres, who deal with the administration, and oversee the enquiry processes, which are dealt with locally by the territorial divisions.

The primary reason for the formation of the PSOS was cost saving and any subsequent processes had to save money. Given the peaks and troughs of the demand of firearms licensing, it was found that dedicated FEOs were either too busy in the busy years and underemployed in the quieter two years. It was recognised that there required to be flexibility in the resources dealing with the enquiry process and this was introduced after significant political consultation and oversight by the Scottish Police Authority. Some ten years later it is recognised that the model in Scotland is more effective and efficient.

It is of note that they also manage the licensing of air weapons.

When compared to members who reside in E&W, the number of complaints from Scottish members from all the shooting organisations in respect to firearms licensing process is minimal.

Given that the process in Scotland is now ten years old and has been subject to continuous development, and where for example 99.35% of certificates are renewed before expiry, it is believed to be the right time for the Home Office to review the firearms licensing processes in E&W in a similar manner to that completed in Scotland.

We have little confidence in the NPCC having the necessary drive or vision to implement change. The NPCC represents senior officers in respect of rank and service, and it is recognised that the strategic leads of silos, such as firearms licensing, do not have the authority to tell individual chief officers how to run their firearms licensing processes.

However, we believe that a wholesale top to bottom review of firearms licensing processes with the examination of the potential introduction of four regional processing centres with the enquiry process being delivered locally, which is evidenced as being achievable, efficient and effective should be undertaken. This will not only likely lead to a better service for certificate holders, but it will also likely provide for a more robust and professionally curious process, with knowledgeable and experienced centrally located managers being able to advise Chief Constables in respect of matters of refusal or revocation. We are aware that senior officers likely responsible for these matters in provincial forces are often double or triple hatted, without either the demand to necessitate a full time role and likely diverted by other operational demands. This is not uncommon.

In short, given this consultation is about public safety, we consider that the greatest threat to public safety is the organisational structures of the E&W forces. We would commend a full review and comparison of processes between E&W and the PSOS. It's too difficult is not an option.

We would also highlight the concerns regarding the licensing of sound moderators. These are currently regarded as component parts. We see no need for this. They are not inherently dangerous in themselves and Ministers have undertaken to remove the need for certification. Should a legislative vehicle be identified, we would commend the removal of these items from certification.

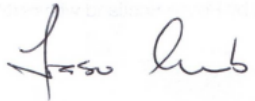
The Home Office guidance should be reviewed with the widening of the statutory sections to include conditions and the introductions of a national document set covering the enquiry process. This would bring greater consistency of practice throughout GB.

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Work should be undertaken to examine the necessity and effectiveness of land checks. What evidence exists to suggest that they are imposed effectively and how many breaches occur yearly? The criminal law understands fully the personal responsibility of individuals and in the case of the firearms licensing, the person using a firearm is wholly responsible for the discharge of the firearm in a safe manner. To do otherwise should be dealt with criminally. We consider that land checks are an inefficient and unnecessary use of valuable firearms licensing resources.

I trust this is in order. Should you have any queries in respect of this submission, please do not hesitate to contact me directly on the contact details noted below.

Your sincerely,

  
James Lub

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