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Firearms Standards and Training Required by Maritime Security Operatives

A SCEG Paper Reflecting Best Industry Practice

The Security in Complex Environments Group (SCEG) has been asked by the UK government to define what firearms training is required to ensure that Maritime Security Operatives on counter piracy security operations on UK registered ships in the High Risk area (HRA) in the Indian Ocean are competent and safe with their firearms. Private training companies and private maritime security companies who are members of SCEG wish to deliver training that is lawful, safe, appropriate, progressive and with 3rd party certification to individuals who have proven competence in firearms, have been vetted and are physically and mentally fit. SCEG wishes to work with officials in the Home Office, the MOD, the Department of Transport and ACPO to get an agreed Ministerial position on what training regime is to be implemented to train Maritime Security Operatives to the required professional standard. This matter is urgent. Prime Minister David Cameron announced that armed guards would be placed on UK registered ships in October 2011 and to date private training providers have been constrained in their efforts to deliver the vital firearms training they require.

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Issue

1. The UK government has asked the Security in Complex Environments Group (SCEG) to define what firearms training and standards are required by Maritime Security Operatives (MSOs) operating in the High Risk Area on UK Registered Ships.

Recommendation

2. The Home Office, MOD, Department of Transport, and ACPO give serious consideration as to how, within the constraints of existing firearms legislation private training companies and PMSCs are enabled to deliver appropriate, proportionate firearms training in the UK to ensure Maritime Security Operatives protecting shipping in the HRA are properly trained for their duties.

Assumptions

3. The following assumptions underpin this paper:

- There will be no change to primary firearms legislation.
- It should be permissible and desirable for maritime firearms training for MSOs contracted by British Private Maritime Security Companies (PMSCs) to take place in the UK.
- Firearms training and standards would be compliant with the appropriate guidance issued by the Home Office, the Department of Transport.
- Firearms training and standards should be compliant with international standards such as ISO/PAS 28007.
- Assessed full bore shooting is essential to verify the competencies of individuals employed as MSOs.
- It may be possible for MOD, Police and civilian ranges to be used for this training.
- E learning and sub calibre shooting may contribute to the firearms training of the MSO
- It is an aspiration that firearms training courses should be delivered under the framework of an Awarding Organisation.
- MSOs would be required to attend the course annually.
- PMSCs are licensed owners of the weapons in the HRA deployed as Registered Firearms Dealers.

Background

4. Prime Minister David Cameron announced in October 2011 that British armed guards would be deployed on UK Registered Ships. Implicit within this policy statement was that Maritime Security Operatives deployed on such duties would be properly trained to handle their firearms safely and competently, with a comprehensive knowledge of the Rules for the Use of Force and the ability to shoot accurately when appropriate. Since the Prime Minister's policy

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statement further clarity with regards to firearms standards and training has been provided. The Department of Transport Interim Guidance to ‘UK Flagged Shipping on the Use of Armed Guards to Defend Against the Threat of Piracy in Exceptional Circumstances’ has been published. The International Standards Organisation (ISO) has published ISO 28007 ‘Guidelines for Private Maritime Security Companies Providing Privately Contracted Armed Security Personnel on Board Ships’. Within the private security industry there is a determination to ensure that individuals are appropriately trained on the firearms which they will deploy whilst on security operations in the HRA. Training is currently being provided in the UK and abroad. Current ACPO Firearms & Explosives Licensing Working Group direction states “at present there are no provisions for such training to take place in this country”.¹ The interpretation of this letter by Police Firearms and Explosives licensing officers has placed a significant constraint on training in the UK - training has ceased or sub optimal training is being offered. This is not an acceptable situation.

Department of Transport Interim Guidance

5. The Interim Guidance on the Use of Armed Guards issued by the Department of Transport in June 2012 states that it is mandatory for; “training and extensive recent experience of operating the specific firearms and other security related equipment which will be used on the voyage”. Clearly implicit in this statement is the requirement for the individual to have been trained and assessed on his weapon handling skills on the specific weapon prior to boarding.

ISO 28007

6. ISO 28007 was published on 15 December 2012. This publication represents a sea change for the industry. It includes the requirements to ensure that ‘all personnel who are employed to carry and use firearms are trained and competent on the specific firearms they are intended to use and are assessed to be competent in their use prior to embarkation onboard the ship and are updated on the applicable Rules for the Use of Force (RUF) prior to deployment’. This places a mandatory responsibility on the PMSC to conduct weapon handling tests and RUF training immediately prior to, or when practical immediately after, embarkation.

7. ISO 28007 includes the requirement to have ‘systems in place to verify that personnel have been trained in the use of the specific firearms and other security associated equipment specified in the contract, and that they only use those firearms specified and for which they are qualified; the organization should provide live fire training and evaluation for all personnel authorized to carry firearms and security related equipment in the performance of their duties. A documented level of competence should be demonstrated with the specific firearms authorized for use as specified by the organization, or to a higher level as required by law or contractual obligations. Those authorised to carry firearms should undergo refresher training at least once per year on the specific firearms authorized’. This places a mandatory responsibility on PMSCs to ensure MSOs conduct assessed live firing training annually.

¹ Maritime Security letter signed by DCC Andy Marsh 13 July 2012

8. ISO 28007 includes the requirement for the individual to have ‘a thorough understanding of the Rules for the Use of Force in general and as they apply for the specific transit being undertaken, in accordance with international law and the law of the flag state’. In the view of the industry RUF training should be part of the firearms training course and pre embarkation training.

Industry Standard.

9. To comply with UK government guidelines, ISO 28007 and reflecting professional judgement an industry standard has been defined. An individual deployed as an MSO in the HRA will be able to handle his weapon system safely and competently by day and night. The competencies for weapon handling will include; Normal Safety Procedures, Load, Unload, Make Safe, Firing Drills and Stoppage Drills. In addition, the individual will be able to fire the weapons from the standing, kneeling, sitting, and prone positions in a maritime environment including firing from an elevated position. The individual will be expected to achieve a level of accuracy as follows; at a range of 300m with a margin of error less than 0.5 metres and at a range of 100m with a margin of error of less than 0.1metres. The individual must demonstrate that they are familiar with and competent with the implementation of Rules for Use of Force.

The Training Regime

10. To achieve the required standards it is recommended that an individual completes an Annual Assessment course which would comprise the following elements:

- Pre-entry standards, screening and vetting
- Pre Course Training
- Supervised Training and Assessment
- Certification and Training Records
- Documentation
- Pre deployment training

Pre-entry standards Screening and Vetting

11. An individual applying to undergo MSO firearms training would be vetted. UK citizens would require an enhanced Disclosure and Barring Service (DBS) certificate. The individual would have proven relevant military or other firearms experience preferably in an operational environment. The individual would hold an ENGI Med Certificate and have a medical certificate stating that he is “fit for work in a hostile environment”.

Pre Course Training

12. There are several products in the market that would support e learning prior to an individual enrolling on a course. These products include presentations on the “theory of small arms and application of fire” marksmanship principles and familiarisation on specific weapons. Pre learning might include information on effective ranges, characteristics and parts of the weapon.

Supervised Training and Assessment

13. PMSCs have a key contractual requirement to ensure that their contracted operators/employees are considered competent and safe in the handling and use of company owned firearms deployed in the use of protection of shipping within the HRA. Firearms training, where possible should be conducted using the specific type of firearm employed by the PMSC afloat, or if unavailable, operate under the same type of mechanical action. However it is accepted within the industry that safe firearms handling and marksmanship skills are transferable to other firearms systems. With regard to live firing the industry believe that MSOs must during the training course fire full calibre 7.62mm and 5.56mm to experience the recoil and the effect on the firing position. Furthermore firing practices beyond 100m will allow the individual to experience the effects of wind and trajectory on the fall of shot. An individual who has an accidental or negligent discharge with a serviceable firearm during the course, which is not caused by a malfunction of the weapon, would automatically fail.

Weapon Handling Tests (WHT)

14. During the course the individual would require formal instruction (both theory and practical) on weapon handling. When de-activated weapons are used it is essential that all parts and mechanisms are fully functional and the weapon can be disassembled as required for daily cleaning and maintenance checks. After instruction the individual would conduct a supervised WHT. This test would assess the individual’s competence to carry out the following drills:

- Functional Test
- Normal Safety Precautions. (NSPs)
- Stripping and assembling (including maintenance in a maritime environment)
- Load
- Unload
- Make safe
- Make ready
- Immediate Action Drills
- Bore sighting

Application of Marksmanship Principles

15. The course must include formal instruction on the application of marksmanship principles these would form the basis for all firing applications. The ‘Theory of Small Arms’ would be crucial.

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Rules for Use of Force

16. Comprehensive training would be conducted to ensure individuals understand the theory of the RUF and the practical implementation. The RUF training would be a core aspect of the course.

Qualification Shoots

17. The course would include a qualification shoot. Prior to the shoot an individual would be instructed and coached to fire a basic grouping practice at 100 metres (a minimum of 20 rounds) followed by a zeroing confirmation (a minimum of 5 rounds). A qualification shoot would be required to assess that the individual has gained the necessary competence using a firearm. The qualification shoot would be conducted using a set amount of rounds, from set distances from different firing positions under a specific time frame without coaching. Only single shot mode will be used to fire aimed shots at a deliberate rate, from stable and recognised firing positions. Automatic rates of fire would not be part of the qualification shoot or any range practices. Semi automatic shoots using .22 rim fire calibre may be used in application shoots. The qualification would operate on a pass or fail basis and a policy would be in place for re-shoots.

Certification

18. There is no certification Awarding Body for the purpose of firearms training in the UK. Currently firearms training providers self certify. This is unsatisfactory it is hoped with government support a suitable awarding body can be established.

Documentation

19. A comprehensive written report on the individual's performance on the course including WHT result and scores on qualification shoots would be sent to the individual, the PMSCs and retained on file by the training company. Log books and Maritime Aide Memoires should be an integral part of an individual's proof to training. Log books should be stamped and signed by the instructors. They would not only prove to companies that an individual is in date they can be shown to the ships Master and or any foreign authorities should certain questions be posed and proof of courses attended be called for.

Pre Deployment Training

20. Immediately prior to or immediately after embarkation PMSCs would be responsible to ensure MSOs conduct weapon handling training and tests on the specific firearm to be deployed. They would ensure the MSO are trained and competent to bore sight the weapons and to verify the zero using a laser bore-sighting tool/collimator. Whenever practicable a test fire of weapons should be conducted.

Future Options

Capacity

21. It is anticipated that between 1,500 and 2,000 individuals would need firearms training each calendar year reducing to a steady state of about 1,000.

MOD Ranges

22. Many of the instructors within the private training companies are ex military with military firearms qualifications. Equally many of the MSOs conducting firearms training are ex military and several are reservists or serving with the TA. The MOD planned reductions in the size of the armed forces may lead to capacity on MOD Ranges. The Armed Forces Act 1996 has a provision that allows 'a person under the supervision of a member of the armed forces mayhave in his possession a firearm and ammunition on service premises'. Using this provision it may be possible on a wholly commercial basis for private training companies to rent ranges from the MOD for the sole purpose of training MSOs deploying on UK flagged ships. Clearly this would be a matter for Defence ministers to decide.

Police Ranges

23. Several constabularies have range facilities which would be ideal for MSO firearms training the North Wales Police range at Rhewl is an excellent example. If these facilities can be used on a wholly commercial basis for private training companies to train MSOs this would offer a potential solution. Clearly this would be a matter for Home Office Ministers and ACPO.

Civilian Ranges

24. Several SCEG companies offer training abroad. The extent to which MSO firearms training can take place in the UK has been the subject of considerable scrutiny. Most firearms training given to non-certificate holders is carried out under Section 16/1 and Section 11/4 of the Firearms Act amendment 1988. In addition firearms of 22 rim fire calibre can be used. Currently all firearms training within the UK is carried out under the above legal framework. This requires no change in current legislation, however clarity in this area from the Home Office to firearms licensing offices to enable MSO firearms training is essential.

Summary

25. SCEG companies involved in the provision of firearms training and those companies employing armed guards on UK registered ships in the HRA are determined to comply fully with firearms legislation, government guidelines and international standards whilst ensuring a high standard of firearms training for the MSOs. SCEG would welcome the opportunity to engage with government officials to develop a coherent policy to deliver a training regime in the UK that meets the operational need and gains Ministerial endorsement.

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