

# A. Entity responses

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As mandated in Section 64 of the *Auditor-General Act 2009*, the Queensland Audit Office gave a copy of this report with a request for comments to Queensland Police Service.

This appendix contains its detailed responses to our audit recommendations.



# Comments received from Commissioner, Queensland Police Service



## QUEENSLAND POLICE SERVICE

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Our Ref:

Your Ref:

8 October 2020

Mr Brendan Worrall  
Auditor-General  
Queensland Audit Office  
PO Box 15396  
CITY EAST QLD 4002

Dear Mr Worrall

Thank you for your correspondence of 23 September 2020 regarding the *Performance Audit on Regulating Firearms* and invitation to provide comment on the proposed report to parliament.

As previously advised, the Queensland Police Service (QPS) is committed to implementing efficiencies in all areas of service delivery, particularly those which promote the safe and effective regulation of firearms in Queensland.

The audit undertaken by the Queensland Audit Office (QAO) regarding the regulation of firearms is welcomed by the QPS, particularly the identification of the need for improved systems and the recommendation to revise the role of Weapons Licensing from a largely administrative unit to one that provides the necessary management, coordination and oversight of firearm compliance in Queensland.

I note there are three key themes arising from the report with implications for the QPS -

- Deciding who can access firearms;
- Monitoring firearm licence holders; and
- Regulating dealers and firearm movements.

Finding the necessary balance between these three themes and the rights of applicants and licence holders will continue to be the focus of the QPS as action items are implemented and assessed into the future.

I can advise the findings and recommendations have been reviewed and the QPS accepts all recommendations. The annexure to this letter outlines the identified action items and timeframes in response to the report.

QUEENSLAND POLICE SERVICE

As you have been advised, I requested the establishment of a Firearms Oversight Committee, chaired by a Deputy Commissioner, to coordinate the implementation of recommendations across our organisation. I am pleased to advise this committee has already commenced the implementation of a number of recommendations.

It is important for me to acknowledge the commitment and proficiency displayed by the individual members of Weapons Licensing. Despite the challenges of significant system and procedural barriers that are now evident, our members have continued to perform their role with utmost professionalism.

Thank you for the opportunity to review the proposed report to parliament and for assisting QPS with identifying improvement opportunities to enable the continued safety of the Queensland community.

Yours sincerely



**KATARINA CARROLL APM  
COMMISSIONER**



## Responses to recommendations

### Queensland Police Service

#### Regulating firearms

Response to recommendations provided by Acting Assistant Commissioner Brian Connors, Operations Support Command.

Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and year)	Additional comments
<p>We recommend that the Queensland Police Service:</p> <p>1. evaluates system options to provide a fit-for-purpose Weapons Licensing Management System (firearm register) to ensure timely and accurate recording and transfer of all firearms and licence holders' information.</p>	Agree	Fourth quarter 2023 pending budget, resources and process changes.	<p>QPS has completed a business case for a future state registry system.</p> <p>QPS are developing need identification and liaising with Government to commence the procurement process.</p>
<p>We recommend that the Queensland Police Service:</p> <p>2. implements appropriate controls to ensure firearm licence decisions are consistent and made in accordance with relevant standards.</p>	Agree	<p>System options (recommendation 1) fourth quarter 2023</p> <p>Other controls fourth quarter 2021</p>	<p>QPS has commenced development of guidelines to provide a more rigid framework to the decision-making process.</p> <p>Business rules will be incorporated into a future state registry system.</p> <p>QPS has reintroduced the Quality Assurance role within Weapons Licensing and is also assessing dedicated intelligence officers.</p> <p>Continuous training on decision making will also be provided to WL staff.</p>
<p>We recommend that the Queensland Police Service:</p> <p>3. reviews the Weapons Act 1990 to identify opportunities for improvement and provide greater focus on public safety.</p>	Agree	Third quarter 2022	<p>Relevant sections of the Act and regulations will be reviewed to identify opportunities for improvement.</p>
<p>We recommend that the Queensland Police Service:</p> <p>4. develops clear policy on the role firearm regulation plays in balancing community safety with the rights of applicants and licence holders, particularly regarding public interest. The policy should define risk thresholds and be supported by guidelines that assist staff to assess public interest when assessing applications.</p>	Agree	<p>Fourth quarter 2021</p> <p>System options (recommendation 1) fourth quarter 2023</p>	<p>Refer to the development of guidelines referenced in recommendation 2.</p> <p>WL have commenced the development of associated policy around risk thresholds and public interest.</p> <p>Future state registry system will incorporate business rules and quality assurance reporting to ensure timely identification of issues.</p>

Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and year)	Additional comments
<p>We recommend that the Queensland Police Service:</p> <p>5. enhances integration of its weapons licensing system with its Queensland Police Reporting Information Management Exchange System to enable it to monitor firearm licence holders more effectively</p>	Agree	Fourth quarter 2023	<p>QPS will enhance integration between QPRIME and the future state registry system (see recommendation 1).</p> <p>Investment into enhancing integration with the current system, which has been identified as not fit for purpose, would be an inappropriate use of resources.</p>
<p>We recommend that the Queensland Police Service:</p> <p>6. supplements its random firearm inspections with targeted risk-based inspections</p>	Agree	Second quarter 2022	<p>QPS will shortly commence a trial of a 'self-reporting' element within the safe-storage of firearms inspection program with license holders selected based on a risk-based information assessment.</p> <p>QPS has also commenced work to develop a QPRIME algorithm to enable an enhanced intelligence based and comprehensive inspection program.</p> <p>QPS has commenced development of instructional guides for officers completing storage inspection audits.</p>
<p>We recommend that the Queensland Police Service:</p> <p>7. expands the focus of its compliance monitoring program to include a more comprehensive assessment of firearm owners and their ongoing suitability to possess firearms</p>	Agree	<p>Third quarter 2022</p> <p>System options (recommendation 1) fourth quarter 2023</p>	<p>Refer to the actions in recommendation 6.</p> <p>QPS will develop additional training for officers conducting inspections throughout the State to include a more comprehensive awareness of requirements.</p> <p>Proposed action within recommendations 1 and 2 will also deliver an outcome for this recommendation by assessing ongoing suitability throughout the period of a weapons licence holder possessing a licence.</p>

Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and year)	Additional comments
<p>We recommend that the Queensland Police Service:</p> <p>8. establishes processes to ensure all identified non-compliance and licence holder suitability is monitored, reported, and actioned within a reasonable timeframe.</p>	Agree	Third quarter 2022	<p>Refer to the actions within recommendation 7.</p> <p>QPS will review training, policy and processes around task management within QPRIME to ensure matters requiring action are addressed within a reasonable timeframe.</p> <p>QPS is reviewing the occurrence types that are identified and reported on via the QPRIME IA report.</p> <p>QPS is reviewing the resources and business needs of Weapons Licensing via the Service Alignment Program.</p>
<p>We recommend that the Queensland Police Service:</p> <p>9. proactively inspects shooting ranges to ensure compliance with relevant standards. This should include creating an electronic register of persons that use firearms at shooting ranges to ensure they are appropriately vetted.</p>	Agree	Fourth quarter 2023	<p>QPS will include the electronic register and auto-vetting feature as a desired function of a future state registry system.</p> <p>QPS is reviewing the inspection of shooting ranges as part of the Service Alignment Program.</p>
<p>We recommend that the Queensland Police Service:</p> <p>10. Ensure that it is immediately notified electronically of the sale, transfer, and disposal of firearms by amending the Weapons Regulation 2016 to:</p> <ul style="list-style-type: none"> <li>• allow electronic notification of ownership and disposal transactions</li> <li>• require all dealers to implement electronic systems to facilitate the electronic transfer of firearms sales, transfers, acquisitions, and disposals.</li> </ul>	Agree	Fourth quarter 2023	<p>QPS will include the electronic notification of all firearm transactions as a required function of a future state registry system.</p> <p>QPS will review relevant sections of the Act and regulations to ensure the electronic transfer is permitted.</p> <p>QPS will engage with stakeholders regarding this requirement.</p>
<p>We recommend that the Queensland Police Service:</p> <p>11. Develops a proactive compliance program for audits and inspections to ensure it regulates dealers effectively</p>	Agree	<p>Second quarter 2022</p> <p>System options (recommendation 1) fourth quarter 2023</p>	<p>QPS will review policy and legislation to ensure audits and inspections of dealers are regulated effectively.</p> <p>QPS will review training and the development of guidelines to assist with audit completion.</p> <p>A Weapons Licensing supervisor (Authorised Officer at the rank of Sergeant) will be responsible for developing and managing this program.</p> <p>A future state registry will also enable enhanced dealer regulation.</p>

Recommendation	Agree/ Disagree	Timeframe for implementation (Quarter and year)	Additional comments
<p>We recommend that the Queensland Police Service:</p> <p>12. Monitors the transfer of interstate firearms to ensure the location and ownership of firearms in Queensland is accurately captured in the firearm register</p>	Agree	Fourth quarter 2021	<p>QPS has completed necessary changes for National Firearm Identification Database (NFID) templates to assist with improved timeframes for recording interstate transfer movements.</p> <p>QPS will have full integration (data provision) with the Australian Firearms Information Network (AFIN) in October 2020.</p> <p>QPS has commenced a project in partnership with NSWPF and VICPOL for a digital solution to enable the automatic exchange of cross-border firearm transfer information.</p>
<p>We recommend that the Queensland Police Service:</p> <p>13. Eliminates the backlog of firearm transfer forms to ensure the location of firearms in the firearm register is up to date and accurate.</p>	Agree	Fourth quarter 2023	<p>A future state registry system will remove the reliance on paper-based processing.</p> <p>QPS is reviewing the resourcing of Weapons Licensing as part of the Service Alignment Program.</p>