



## Age Restricted Products and Services Consultation

| Consultation Summary  |   |
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| <i>Who should read this document?</i>                               | This consultation is relevant to anyone with an interest in the regulation of age restricted products and services such as alcohol, tobacco, knives, fireworks, gambling, and others. This may include, in particular, those who supply these products and services to consumers; those who are responsible for enforcing the legislation; and those who have an interest in the societal impact of these products and services, for example in relation to health and anti-social behaviour. |
| <i>Making your views heard</i>                                      | We are keen to gather all views on the subject of enforcement of age restricted products and services legislation, and any supporting evidence. You should not feel constrained by the specific questions nor feel obliged to offer responses to all of them. Concentrate on those in which you have the most interest.   |
| <b>Views are requested by Friday 16<sup>th</sup> September 2011</b> |   |
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| <i>Your details</i>   | Representative groups may wish to give a summary of the views of the people and organisations they represent, and, where relevant, how they consulted with them.<br><br>You may wish to include contact details for follow-up.  |
| <i>Confidentiality</i>  | The position regarding the confidentiality of any information provided is set out in Annex D to this document. Unless you state otherwise (and an automatic disclaimer generated by your IT system does not constitute such a statement), we will assume you are happy for us to publish your response and share it with government officials.  |
| <i>Additional copies</i>  | This consultation is available for download from <a href="http://www.lbro.org.uk">www.lbro.org.uk</a>   |

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## Background

The Local Better Regulation Office has had significant involvement in the area of age restricted products and services controls. In 2008, it commissioned an independent evaluation of a number of local authority projects focussed on preventing underage sales of alcohol; improving compliance with the Licensing Act 2003; and, reducing the burdens of alcohol-related harm on society. The review report, 'Protecting Young People from Alcohol-Related Harm' (Research by Design Ltd, 2009), identified much good practice in this area.

Age restricted products controls were a significant focus of the work that LBRO commissioned with RAND Europe in 2009 to examine the contribution that local regulatory services make to delivering key social outcomes around health and addressing anti-social behaviour in local communities. The tools developed through this work (RAND Europe, 2009) have been used extensively by local authority regulatory services to communicate the impact their work has in these areas.

In 2009, LBRO set up a Business Reference Panel made up of representatives of 30 key UK trade associations with an interest in local authority enforcement. At its first meeting, this group was asked to identify the issues falling within the remit of LBRO that were of most concern to businesses. The enforcement of age restricted products legislation was the top issue raised by a number of trade associations. These organisations were invited to prepare an evidence-based report to LBRO, setting out their concerns and proposing potential solutions. Their report, 'Better Regulation of Age Restricted Products: A Retail View' (Local Better Regulation Office, 2010), made a number of recommendations to government, including recommendations around legislative simplification and standardisation; and a recommendation that LBRO should co-ordinate the development of a binding code of practice which should reflect the principles of good enforcement, as set out in the Regulators' Compliance Code (BERR, 2007), and should deal with all aspects of the use, conduct, prompt notification and follow up of test purchasing exercises.

The government's Budget 2011 and Plan for Growth made a commitment to act in the area of age restricted products controls, with announcements on:

- the extension of the scope of the Primary Authority scheme to further age restricted products such as alcohol and knives; and
- simplification of regulations, enforcement regimes, penalties, licences and other procedures.

It is against this backdrop that LBRO is working to develop a new code of guidance in this area, at the request of Business Minister, Mark Prisk MP. During the early part of 2011, we have reviewed evidence in this area and have met with a large number of organisations with an interest in this area and have sought their views. In particular, we worked in partnership with the Trading Standards Institute to deliver a series of seminars around the country, bringing together representatives from business, local authorities, the police and others. A great number of individuals have been generous with their time and expertise and have helped us to shape this consultation.

## Introduction

Legislative age restrictions exist for a wide range of products, from tobacco and solvents to alcohol and knives. Most regulation in this area shares common objectives of protecting children from harm and limiting access to products that can negatively impact on communities. Research tells us that where children and young people do attempt to access restricted products before they are old enough, they use a number of different sources, including family, friends, older siblings, illicit sellers, and high street businesses.

It is important to recognise that the greatest contribution to meeting the objectives of legislative controls can be made by children and young people themselves, and by their parents and others who have responsibility for educating and caring for them. High street businesses are at the frontline of restricting retail access but can not solve the wider problems of young people accessing these products and services.

The role of regulators and enforcers is to promote awareness of the controls in the wider community; to provide support, where it is needed, to those businesses that recognise their responsibilities and are striving for compliance; and, to step in and take firm action where businesses do not act responsibly.

LBRO is consulting on a broad framework of principles which will encourage a view of compliance and enforcement in this area that takes account of the responsibilities of the key parties involved, and, conversely, what their reasonable expectations might be. It is proposed that this broad framework will provide a context for the development of a code of practice that will contain more detailed provisions for regulators and enforcement agencies. This code will be developed in partnership with businesses and regulators and enforcers. It will draw on the expertise of the group that produced the 'Retail View', the Trading Standards Institute and the Association of Chief Police Officers, and will be informed by the responses to this written consultation, and by views sought during the consultation period.

It is proposed that the code should be applicable to:

- all age restricted products and services, and all regulators and enforcers that enforce the legislation governing these products and services;
- all compliance and enforcement activities, but in particular to the practice of 'test purchasing', where regulators and enforcers engage a young person to attempt to access a product or service; and
- England and Wales.

We anticipate publishing the draft code in the autumn and it will then be the subject of a separate consultation. We aim to have the final document ready for publication early in 2012.

### ***Question 1***

**Do you agree with our analysis that the most significant contributions to meeting the objectives of regulation in this area can be made by young people and their parents, and by businesses?**

### ***Question 2***

**Do you agree with the proposition that the role of regulators is to encourage, support and reward responsible approaches to compliance, and to take firm action where businesses do not act responsibly?**

## Age Restricted Products and Services – the Impact on Society

The Government believes that action is needed to promote public health and encourage behaviour change to help people live healthier lives (Department of Health, 2010). The economic performance of the nation is affected by the general health of the population and creating a fairer society is fundamental to improving the health of the whole nation. The diseases that contribute to poor health and dramatically shortened lives are often linked to lifestyle, including alcohol and tobacco, and the misuse of other restricted products, such as the abuse of solvent based products by young people.

In England today, over a fifth of the adult population smokes. Smoking causes the early deaths of half of all long term users, over 80,000 people each year in England alone, and smoking related diseases cost the NHS £2.7 billion each year (Department of Health, 2011). An estimated 200,000 children and young people take up smoking in England each year (Department of Health, 2010) and it is therefore critical to the government's vision of a smoke free future that it stops the inflow of young people recruited as smokers.

It is estimated that the cost of alcohol related harm to the NHS in England from alcohol is £2.7 billion and excessive alcohol consumption is linked to a myriad of diseases including certain types of cancer, brain damage and heart disease. Given the scale of the impact on the economic and social wellbeing of society, it is imperative that holistic strategies are used to tackle the causes and effects of health inequalities and unhealthy lifestyle choices.

Local and national decisions made in schools, at home and in government services all have the potential to help ill health prevention and reduce the negative impact of age restricted products on individuals, communities and businesses. The use of an age restriction on particular products is part of a broad range of tools that the government is using to tackle these issues. However, it recognises that the age restriction alone will not stem demand or tackle the underlying causes that underpin underage or excessive consumption and will not affect illicit sales or other supply sources used by children and young people.

It is clear that regulators and enforcers, working with business and local communities have an important contribution to make through their work on age restricted product controls. It is important that these interventions are well considered and targeted to maximise their impact.

## Young People

The majority of statutory age restrictions have been put in place to provide protection for the children and young people themselves, by restricting the access that they have to products that are inherently harmful, or that present risks when misused.

However, where young people wish to access these products despite the legal restrictions, they use different sources, according to what is available to them. Research with 14 to 17 year olds in the north west of England (Ci Research, 2009) highlighted that the majority (54%) obtained their alcohol from family and friends, whilst just 14% reported purchasing alcohol from off licences, 16% from pubs and clubs, and 13% through proxy purchases. The proportions of young people accessing alcohol from retail outlets had decreased from a comparative study carried out two years earlier.

An annual national survey of 11 to 15 year olds (NHS Information Centre, 2009) confirms that retail outlets are not the major source of alcohol for children, and that access to alcohol through retailers is declining. In 2008 around half of those surveyed who identified themselves as current drinkers did not usually buy alcohol. Where they did buy alcohol they were most likely to buy it from friends or relatives (24% of current drinkers). 15% of current drinkers said they usually bought alcohol from an off licence and 6% from a pub, a substantial reduction from 1996 (27% and 10% respectively). This survey confirmed the most common methods of accessing alcohol as being given it by friends (24%) or parents (22%), with a further 18% reporting that they had asked someone else to buy the alcohol for them.

It is apparent that retail access to these products has become significantly more difficult for young people with the introduction by retailers of initiatives such as Challenge 21 and Challenge 25. These schemes require prospective purchasers who appear to be below a certain age to produce valid proof of age.

The government and others have endorsed the use of proof of age cards issued by PASS accredited schemes, such as Citizencard, Validate UK, and YoungScot. However, young people who obtain these cards can often feel frustrated when businesses refuse to accept them, insisting that only passports or driving licences will be accepted as proof of age.

### Young People: Responsibilities

- A1. To show valid proof of age when asked to do so**
- A2. Not to use 'fake' proof of age, or proof of age that they are not entitled to use and to be aware that by doing so they would commit a criminal offence**
- A3. Not to commit a criminal offence by purchasing or attempting to purchase alcohol**
- A4. Not to encourage the commission of a criminal offence by a business or employee by purchasing age restricted products**
- A5. Not to encourage the commission of a criminal offence by an adult by asking them to purchase alcohol on their behalf**
- A6. To have regard to information on the risks associated with age restricted products and services and to take responsibility for their own health and wellbeing**
- A7. To be good role models to their peers and to younger children in relation to age restricted products and services**

### Young People: Can Reasonably Expect

- B1. To be provided with clear information on the reasons for age restrictions that seek to protect young people**
- B2. To have valid proof of age accepted by retailers, service providers, licensed premises and doorstaff**
- B3. To be refused products that should not be available to them**
- B4. That enforcement agencies will carry out test purchasing in accordance with the code with regards to the welfare of child volunteers**

#### ***Question 3***

**Do you agree that these points reflect the responsibilities of young people or are reasonable expectations for them to have in relation to age restricted products and services? (Please use the numbering above if you want to comment on specific points.)**

## Parents

Research in the areas of alcohol and tobacco has confirmed that family and friendship groups are key in influencing young people's behaviour and attitudes to consumption of these products.

Young people are much more likely to smoke if they live with smokers, and the perpetuation of tobacco use through the generations is recognised to be a key factor in tobacco-related health inequalities. National research with 11-15 year olds (NHS Information Centre, 2009) has explored the issue of parental influence on child smokers and also identified that parents are one of the most common sources of helpful information about smoking (72% of children).

The same research considered parental influence on children in relation to alcohol and highlighted that those who lived with three or more people who drank alcohol were six times more likely to have drunk alcohol in the past week than those who lived in non-drinking households. Children were most likely to cite parents as a source of helpful information about drinking alcohol and over half said that their parents didn't mind them drinking as long as they didn't drink too much.

A brief scan of sources such as the online forum Mumsnet illustrates the confusion that exists amongst responsible parents as to the best way of controlling the access that their young teenage children have to alcohol, and the wide range of views that are held on issues such as purchasing alcohol for teenage children to consume at house parties.

### Parents: Responsibilities

- C1. To be aware of the legal restrictions on access to certain products and services by young people**
- C2. To educate their children about the risks associated with age restricted products and services and the reasons for legal restrictions on access to them**
- C3. To ensure that their children understand that they may commit a criminal offence if they use 'fake' proof of age or proof of age belonging to someone else**
- C4. Not to commit a criminal offence by purchasing alcohol on behalf of a young person<sup>1</sup>**

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<sup>1</sup> Adults may buy wine, beer or cider **for** 16 or 17 year olds, to consume with a meal on licensed premises, but may not purchase alcohol **on behalf of** anyone who is under-age.

### Parents: Can Reasonably Expect

- D1. That clear information should be available on the risks associated with age restricted products and services, and on the legal restrictions**
- D2. That retailers and suppliers will comply with age restricted products and services legislation**
- D3. That other adults will refuse to purchase alcohol on behalf of young people**
- D4. That information should be available on how to report concerns about young people's sources of age restricted products and services**
- D5. That regulators and enforcers will deal firmly with businesses that deliberately or persistently allow young people to access age restricted products and services that they are not entitled to access**
- D6. That regulators and enforcers will carry out test purchasing to a high standard with regards to the welfare of child volunteers**

#### ***Question 4***

**Do you agree that these points reflect the responsibilities of parents or are reasonable expectations for them to have in relation to age restricted products and services?**  
(Please use the numbering above if you want to comment on specific points.)

## Businesses

The wide range of products and services for which age controls are in place, from knives to sunbeds, means that this is an issue for a significant proportion of retail businesses operating in diverse sectors. These controls have been developed piecemeal over a long period of time and lack consistency in the way that they are framed.

Responsible businesses share the desire of the communities within which they operate to have safe and attractive places to live and work. Where communities suffer the effects of anti-social behaviour, these impact equally on the business community and their employees. Businesses have responded to the challenges presented to them by the controls through a range of industry led initiatives, most notably: the Retail of Alcohol Standards Group's work on challenge schemes, and support for Community Alcohol Partnerships; the Proof of Age Standards Scheme; and, award schemes such as Best Bar None, which audit age verification procedures. Businesses in a range of sectors are also investing significantly in staff training and in third party 'mystery shopping' which tests their compliance with the challenge schemes that they operate.

Enforcing authorities should engage businesses in shaping and delivering local outcomes, drawing on internal corporate systems and established partnership initiatives. In the 'Retail View' (Local Better Regulation Office, 2010), business expressed significant concern that regulators and enforcers are not working in accordance with the principles of good regulation, both in respect of their targeting of enforcement activities, and in respect of the proportionality of their approach to sanctioning where test purchases are failed. Businesses express a strong desire for more meaningful partnerships with regulators and enforcers. There are particular examples of these for businesses at the local level such as Community Alcohol Partnerships and Business Crime Partnerships and arrangements operating at a national level through schemes such as Primary Authority and Home Authority.

A growing number of retail businesses are choosing to strengthen their partnerships with local authorities under the statutory Primary Authority scheme, and are working collaboratively to strengthen their compliance systems; streamline their interactions with local regulators; and, share data on compliance. These businesses express frustration that, whilst they are able to share third party auditing data with local authorities, they have no clear view of the results of local tests on their compliance as the results of checks are not routinely notified to them. One partnership is proactively seeking to address this problem, and to gain a fuller picture of compliance across the business's operations, through the use of a Primary Authority Inspection Plan to establish a national strategy for test purchasing.

The 'Retail View' highlighted business concerns that regulators and enforcers rely too heavily on the use of test purchasing as a means of assessing compliance with controls, and do not pay sufficient regard to the business's own management of compliance in this area. Businesses accept the importance of test purchasing as one of the tools to assess compliance but lack faith in the way that it is being used by some regulators and enforcers. They express a desire for a code of practice that fully reflects the principles of good regulation<sup>2</sup> and that takes a wider approach, in particular at the stage of planning and targeting compliance and enforcement activities.

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<sup>2</sup> [Legislative and Regulatory Reform Act 2006](#), section 21 requires local authorities to have regard to the principles in the exercise of specified regulatory functions, ensuring that they regulate in a way that is proportionate, consistent, accountable, transparent and targeted at cases where action is needed.

### **Retailers / Suppliers: Responsibilities**

- E1. To promote a clear message in relation to asking for valid proof of age, to employees and customers**
- E2. To promote a clear message on what forms of proof of age are acceptable, to employees and customers**
- E3. To put in place adequate procedures and systems to prevent breaches of age restrictions**
- E4. To provide effective training to their employees**
- E5. To support their employees so that they feel able to check proof of age and to refuse sales**
- E6. To mutually share information with regulators and enforcers on local problems with age restricted products and services, within the context of collaborative working arrangements**
- E7. To have particular regard to the welfare of young employees who may need additional support in checking proof of age and refusing sales**
- E8. To implement their policy on dealing with 'false'<sup>3</sup> proof of age**

### **Retailers / Suppliers: Can Reasonably Expect**

- F1. That regulators and enforcers should be accountable and transparent in their approaches**
- F2. To have access to clear guidance on legislation**
- F3. To receive compliance support from regulators and enforcers that is appropriate to their needs and resources**
- F4. To be given an opportunity by enforcers to address issues using their own compliance management systems, where those systems have been demonstrated to be effective.**
- F5. To be informed in a timely manner of the outcome of a check on their compliance, for example by test purchase, other than in exceptional circumstances**
- F6. To be treated in a consistent manner by different enforcement agencies dealing with similar provisions**
- F7. To be dealt with in an appropriate and proportionate manner by regulators and enforcers where they breach age restrictions**
- F8. An approach to sanctions and penalties that is consistent with the principles set out in the Regulators' Compliance Code (BERR, 2007).**

#### **Question 5**

**Do you agree that these points reflect the responsibilities of businesses or are reasonable expectations for them to have in relation to age restricted products and services? (Please use the numbering above if you want to comment on specific points.)**

<sup>3</sup> 'False' is used here to encompass proof of age that is counterfeit or fake; id that has been tampered with; and, id that does not belong to the person presenting it. The guide, 'False ID' (Home Office, 2011), aimed at licensed premises, doorstaff and police officers, includes advice on the law regarding false id; acceptable forms of id; identifying counterfeit or fake proof of age; and, seizures of false id.

LBRO recognises that some regulators and enforcers have concerns about notifying results of test purchasing exercises to businesses in certain situations and proposes to address these through the development of the code of practice. This should consider issues relating to child protection, on-going operations and practical issues surrounding the notification process including timescales.

***Question 6***

**What requirements should the code of practice make in respect to notifications following a test purchase?**

## Employees

Employees play a pivotal role at the point of sale between young people attempting to access age restricted products or services and the businesses that supply the products or services. The businesses that contributed to the 'Retail View' report were unanimously of the view that the offence and defence provisions for certain age restricted products are unreasonably harsh in respect of individual employees.

Research by Union of Shop, Distribution and Allied Workers (USDAW, 2011), has highlighted the significant issues for shopworkers around age restricted products and services. Their members report abuse and violence from customers when they challenge or refuse sales, with 50% of abuse suffered by shopworkers being triggered by age-related sales and asking for proof of age. Shopworkers also report stress induced by the fear of failing test purchases and mystery shopping exercises. Employees failing a test purchase not only face potential enforcement action in the form of a Fixed Penalty Notice or prosecution, but may also face disciplinary action including dismissal, particularly in sectors where operators are concerned by the threat to their licence to operate.

USDAW's 'Freedom From Fear' campaign is working to improve awareness of the issues faced by shopworkers amongst businesses, regulators and enforcers and policymakers.

### Employees: Responsibilities

- G1. To recognise the key role that they play in restricting the access that young people have to age restricted products and services**
- G2. To be aware of the law and the age restrictions for the products/ services for which they are responsible**
- G3. Not to commit an offence in relation to these restrictions**
- G4. To follow their employer's instructions on age restricted products and services**
- G5. To support a culture where young people expect to be challenged and to have to show valid proof of age whenever they attempt to access age restricted products or services**

### Employees: Can Reasonably Expect

- H1. To be safe at work**
- H2. To be properly trained on age restricted products and services by their employer**
- H3. To be properly supported by their employer and colleagues so that they feel able to refuse access to age restricted products**
- H4. To be dealt with in a fair and reasonable manner by their employer where they breach age restrictions, with regard to the circumstances**
- H5. That information should be available on how to report concerns about young people's sources of age restricted products and services**
- H6. To be dealt with in a proportionate and timely manner by enforcers where they breach age restrictions, with regard to the circumstances**
- H7. To be treated in a consistent manner by different enforcement agencies dealing with similar provisions**

**Question 7**

**Do you agree that these points reflect the responsibilities of employees or are reasonable expectations for them to have in relation to age restricted products and services?** (Please use the numbering above if you want to comment on specific points.)

## Regulators and Enforcers

Regulators and enforcers have a role to play in ensuring that there is a good level of compliance with the legislative controls, thereby restricting the access that young people have to age restricted products and services, and tackling what can be serious issues in their local communities.

Research in many areas indicates that, other than in cases of deliberate non-compliance, the most effective outcomes appear to be generated by activities around advice, support and partnership working. An effective approach to compliance and enforcement requires a broad range of interventions that are well targeted and proportionate – working with the grain of the efforts being made by businesses, and the strategies that are in place to encourage young people to make responsible decisions.

### Regulators and Enforcers: Responsibilities

- I1. To promote a clear and consistent message in relation to asking for valid proof of age, to businesses, employees and customers**
- I2. To promote the message that acceptable forms of proof of age are: PASS cards; passports; and photocard driving licences.**
- I3. To take a transparent approach to compliance and enforcement, being clear in their published policies and procedures as to their compliance and enforcement approach in relation to age restricted products and services legislation**
- I4. To take a risk based approach that recognises business's compliance systems and work with them, including through the Primary Authority scheme**
- I5. To prioritise their resource allocation on appropriate activities beyond test purchasing that encourage businesses to improve and maintain their compliance and share good practice that has been evaluated and found to be effective**
- I6. To work in partnership with businesses and local communities to tackle issues of access to age restricted products and target enforcement activities on those businesses that pose a significant risk to regulatory outcomes**
- I7. To seek the appropriate authorisations and approvals before using surveillance or test purchasing techniques that trigger these requirements**
- I8. To communicate the results of all test purchase attempts to businesses in a timely manner other than in exceptional circumstances**
- I9. To work collaboratively with other enforcement agencies that have overlapping areas of responsibility, to ensure that the overall approach is consistent and well-targeted**
- I10. To share good practice and innovation with other enforcers/ regulators**

#### **Question 8**

**Do you agree that these points reflect the responsibilities of regulators and enforcers in relation to age restricted products and services? (Please use the numbering above if you want to comment on specific points.)**

## Test Purchasing – Appropriate Use of a Valuable Tool

In the area of age restricted products enforcement, there has been an unprecedented level of test purchasing activity by local authorities and the police in the last ten years, much of it driven by national funding streams and projects such as the Alcohol Misuse Enforcement Campaigns, Tackling Underage Sales of Alcohol Campaign and London's Operation Blunt.

As test purchasing exercises are usually accompanied by education, community outreach and other initiatives it is difficult to assess their individual impact on improving or maintaining compliance. In developing this consultation document, LBRO has listened to many views in this area and recognises the importance of co-producing a code which will provide reassurance to both regulators and enforcers and businesses that test purchasing is being used in appropriate ways. It is apparent that, at present, regulators and enforcers are using test purchasing at different times for quite different reasons, but that these reasons are not clear to businesses, who tend to conclude that there is a lack of transparency around all aspects of test purchasing.

Analysis of the different things that regulators and enforcers have said about their use of test purchasing reveals that there are two distinct situations in which test purchasing is used, but that there is sometimes a failure to distinguish between these two. It is notable that the Gambling Commission's approach distinguishes clearly between these two methods and the way that they will be used (Gambling Commission, 2011).

Firstly, test purchasing is used to gather information in order to diagnose whether there is a problem or to assess the extent of a problem. In these cases, the data is used to inform decisions on resource allocation; to evidence the need for an education initiative; or to monitor the effectiveness of an initiative.

Secondly, test purchasing is used to gather evidence in response to complaints or intelligence, with the intention that this will result in immediate sanctions or be used in enforcement action, or to inform licence reviews.

### ***Question 9***

**Do you agree that it would be helpful to structure the code around the different considerations that apply in these two scenarios? What would be the key characteristics of each approach in terms of planning, conduct and outcomes?**

### ***Question 10***

**If test purchasing is being used only to gather information how should businesses be engaged as part of the process?**

### ***Question 11***

**Where test purchasing is used as an evidence gathering tool, should its use always be intelligence-led? If so, is there a need for guidance on what constitutes 'sufficient' intelligence, both in terms of quality and quantity?**

### ***Question 12***

**In what circumstances do you think it would be acceptable for young people conducting test purchases to lie about their age? Should this practice be specifically authorised?**

***Question 13***

**Do you think that the use of 'false' id by young people conducting test purchases is ever a legitimate practice? Should this practice be specifically authorised?**

***Question 14***

**Do you feel that there are circumstances in which a single sale or test purchase provides sufficient evidence to warrant enforcement action? If so, what are these circumstances?**

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## Annex C: Acknowledgements

We wish to thank all our partners and colleagues who have worked with us in developing this consultation on enforcement of age restricted products legislation, and have shared with us their experience and expertise.

In particular, we wish to acknowledge those who attended events that we held in partnership with the Trading Standards Institute, and those who have taken the time to meet with us; to talk to us; and to make written submissions. They include representatives of:

|   |  |
|---|--|
| Alliance Boots                                  | Flintshire Council                       |
| Asda Stores Ltd                                 | Gambling Commission                      |
| Association of British Bookmakers               | Gateshead Council                        |
| Association of Business Crime Partnerships      | Greene King                              |
| Association of Chief Police Officers            | Halfords Ltd                             |
| Association of Convenience Stores               | Hampshire County Council                 |
| B&Q Plc   | Heart of Mersey                          |
| Barnsley Council                                | Herefordshire County Council             |
| Best Bar None                                   | Hertfordshire County Council             |
| Birmingham City Council                         | Home Retail Group                        |
| Blackpool Council                               | Hydes Brewery Ltd                        |
| Blaenau Gwent Council                           | Iceland Ltd                              |
| Bournemouth Borough Council                     | JD Wetherspoon                           |
| Bridgend  | JG Banfield Sons Ltd                     |
| Bristol City Council                            | J W Lees                                 |
| British Beer & Pub Association                  | John Lewis Partnership                   |
| British Hospitality Association                 | Knowsley Council                         |
| British Independent Retailers Association       | Ladbrokes Betting & Gaming Ltd           |
| British Institute of Innkeeping                 | Lancashire County Council                |
| British Retail Consortium                       | LBA International Consultancy Ltd        |
| Buckinghamshire County Council                  | Legal Impactt                            |
| Bury Metropolitan Borough Council               | Leicester City Council                   |
| Caerphilly Council                              | Liverpool City Council                   |
| Cambridgeshire County Council                   | London Borough of Croydon                |
| Cardiff City Council                            | London Borough of Hackney                |
| Chartered Institute of Environmental Health     | London Borough of Hammersmith & Fulham   |
| Cheshire East Council                           | London Borough of Hillingdon             |
| Cheshire West and Chester Council               | London Borough of Newham                 |
| CitizenCard                                     | London Borough of Redbridge              |
| City and County of Swansea                      | London Borough of Southwark              |
| City of Edinburgh Council                       | London Borough of Wandsworth             |
| Co-operative Group Limited                      | Manchester City Council                  |
| Cornwall Council                                | Marstons Pub Company                     |
| Cumbria and Lancashire Public Health Network    | Merthyr Tydfil CBC                       |
| Derby City Council                              | Milton Keynes Council                    |
| Derbyshire County Council                       | Mitchells and Butlers                    |
| Devon County Council                            | Monmouthshire County Council             |
| Doncaster Metropolitan Borough Council          | Moto Hospitality Ltd                     |
| Drinkaware                                      | MRH Retail Group                         |
| East Riding of Yorkshire Council                | National Federation of Retail Newsagents |
| Exova   | National Pubwatch                        |
| Federation of Licensed Victuallers Associations | Neath Port Talbot CBC                    |
| Federation of Small Businesses in Wales         | Netto Foodstores Ltd                     |

## Age Restricted Products and Services Consultation

North East Trading Standards Authorities

Noctis

Norfolk County Council

Northamptonshire County Council

North Somerset Council

North Tyneside Council

North Yorkshire County Council

Nottinghamshire County Council

NSF-CMi

Oxfordshire County Council

Pembrokeshire County Council

Plymouth City Council

Poole Borough Council

Powys County Council

Proof of Age Standards Scheme

Reading Borough Council

Rhondda Cynon Taff CBC

RMTA Ltd

Rochdale Metropolitan Borough Council

Royal Borough of Kingston upon Thames

Rural Shops Alliance

SA Brains

Sainsburys Supermarkets Ltd

Saint Gobain

Salford Metropolitan Borough Council

Sandwell Metropolitan Borough Council

Serve Legal

Sheffield City Council

Shropshire Council

Solihull Metropolitan Borough Council

Somerset County Council

South Gloucestershire Council

South Tyneside Council

South Wales Police

South West Regional Co-ordinators of Trading Standards

Staffordshire County Council

Stoke on Trent City Council

Suffolk County Council

Surrey County Council

Swansea City Council

Talarius Ltd

Tesco Stores Ltd

TJX UK

Total UK Ltd

Torbay Council

Torfaen CBC

Trading Standards Institute

Trafford Council

Union of Shop, Distribution and Allied Workers

Vale of Glamorgan Council

Validate UK Ltd

Walsall Council

Warrington Borough Council

West Midlands Police

Westminster City Council

West Yorkshire Joint Services

Wigan Council

Wilkinsons Hardware Stores Ltd

Wiltshire Council

Wine and Spirit Trade Association

Wirral Council

Wm Morrisons Supermarkets Plc

Worcestershire County Council

## Annex D: About this Consultation

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes. If you want the information that you provide to be treated as confidential, please be aware that, under the Freedom of Information Act, there is a statutory code of practice to which public authorities must comply. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

### **Comments or complaints**

If you wish to comment on the conduct of this consultation or make a complaint about the way this consultation has been conducted, please write to:

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