



Introduction

WHAT ARE AGE RESTRICTED PRODUCTS?

As a result of the adverse effects they can have on health and well-being, the supply of a wide range of products to young people is prohibited. These goods are often called age-restricted products, and the term 'under-age sales' is commonly used to describe their illegal supply to young persons.

This pack gives guidance on the law relating to the following age restricted products:-

- Cigarettes and Other Tobacco Products
- Fireworks
- Alcohol
- Knives and Similar Offensive Weapons
- Intoxicating Substances
- Cigarette Lighter Refills
- Aerosol Spray Paints
- Videos, DVD's and Computer Games
- Lottery Tickets
- Others - Petroleum, Liqueur Chocolates

WHO SHOULD READ THIS GUIDANCE PACK?

This pack has been produced for anyone whose business involves the sale or other supply of any of the above products, and anyone employed in such a business.

ARE UNDERAGE SALES REALLY SUCH A PROBLEM?

Very much so. A recent all-Wales survey suggests that illegal sales are increasing, with 30% of retailers visited selling alcohol to children, 22% selling cigarettes and 6% selling fireworks.

Apart from the legal consequences for the retailer, underage sales can have a real effect on the health of the nation's children. Bear in mind the following statistics:-

- 450 children start smoking in Great Britain every day
- 22% of 15 year olds are regular smokers.
- 80% of today's smokers took up the habit as teenagers.
- On average, teenagers drink 4 pints of beer a week
- 58% of the people injured by fireworks last year were under the legal age of purchase, of 18 years.

HOW IS THE LAW ENFORCED?

The Trading Standards Service is committed to reducing the number of illegal sales, and seeks to do this by working with businesses, offering advice and guidance, investigating complaints, and by conducting test purchase exercises with young volunteers in order to assess the level of compliance. In such cases, volunteers follow strict national guidelines to ensure fairness.

Trading Standards Officers and the Police enforce jointly the law prohibiting sales of alcohol to children.



Introduction

HOW CAN I PREVENT UNDERAGE SALES BEING MADE?

You should read the information sheets enclosed. This pack provides practical guidance on how businesses can avoid making illegal sales. You should read and follow the advice given in the 'Preventing Underage Sales' section of this pack.

To assist businesses in preventing illegal sales being made, the following are also included in the pack:-

- **Point of Sale Information** gives the minimum legal ages for purchase, it should be displayed at or near the till
- **Refusals Record** - which can be used as the basis of a refusals register
- **Refusals Slips** - providing an explanation for customers you refuse to serve
- **Posters** - for the information of employees and customers
- **Individual Letters for Employees** - explaining their responsibilities
- **Employee Training Log Sheet** - to record training / information given to staff.

WHERE CAN I GET FURTHER INFORMATION OR ADVICE?

If after reading this guidance pack you have any further queries or require any additional guidance, please contact the Trading Standards Service at the address given below :-

- **Caerphilly County Borough Council**
Council Offices
Pontllanfraith
Blackwood
NP12 2YW
- **Tel** 01495 235291
- **Email** tradingstandards@caerphilly.gov.uk

Cigarettes and Other Tobacco Products

WHAT DOES THE LAW SAY ABOUT THE SALE OF TOBACCO PRODUCTS TO CHILDREN?

1. It is an offence for you or a person you employ to sell tobacco or tobacco products to anyone under the age of 18. This includes cigarettes, cigarette papers, products intended to be smoked as a substitute for tobacco and any other product containing tobacco.
 - Note that it is the actual age of the purchaser that is important, not how old they might appear.
2. If you are the owner of a cigarette vending machine, or if one is installed on your premises, you must ensure that it is not used by anyone under the age of 18.
3. Cigarettes must be sold in their original packaging. Selling single cigarettes is an offence.
4. Certain statutory warning notices **must** be displayed (*see below*).

WHAT NOTICES MUST BE DISPLAYED?

At each retail premises selling tobacco etc, a notice (*copy included in this pack*) must be prominently displayed at the point of sale stating:-

**IT IS ILLEGAL TO
SELL TOBACCO
PRODUCTS TO
ANYONE UNDER
THE AGE OF 18**

- (Notice to be at least **297mm x 420mm** with **lettering at least 36mm high**)

All tobacco vending machines must display a notice stating:-

**THIS MACHINE IS
ONLY FOR THE USE
OF PEOPLE AGED
18 OR OVER**

- (Notice to be at least **60mm x 100mm** with **lettering at least 6mm high**)

Your tobacco wholesaler or vending machine provider should be able to provide you with a copy of this notice, alternatively you can obtain one on request from the Trading Standards Service.

HOW CAN I ENSURE THAT NO ILLEGAL SALES ARE MADE FROM A TOBACCO VENDING MACHINE?

The location of tobacco vending machines needs careful consideration. You should ensure that any vending machine on your premises is in such a position that staff are easily able to monitor its use. Having a vending machine in the front porch, corridor or awkward corner of a pub will make it impossible to monitor, and could easily result in offences being committed.

Cigarettes and Other Tobacco Products

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

A person found guilty of selling cigarettes or other tobacco products to children faces a fine of up to £2,500. A court can also order removal of a tobacco vending machine. Failure to display the relevant statutory notice can lead to a fine of up to £1000, and the maximum penalty for selling single cigarettes is also £1000.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is reasonable to prevent you or a member of your staff selling cigarettes and similar products to a child. You should now read the **'Preventing Underage Sales'** section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

Alcohol

WHAT DOES THE LAW SAY ABOUT THE SALE OF ALCOHOL TO YOUNG PEOPLE?

1. It is an offence for anyone to sell alcohol to a person under the age of 18.
2. A store manager or person in charge of the premises where a sale has been made to a person under the age of 18 can be held responsible if he knowingly lets the sale go ahead.
3. A person who buys or attempts to buy alcohol on behalf of a person under the age of 18 commits an offence.

WHO ENFORCES THE LAW?

The Trading Standards Service and the Police work together to enforce the law on sales of alcohol to young people.

SHOULD I DISPLAY ANY NOTICES FOR CUSTOMERS?

There is no legal requirement to display a warning notice, however, you may want to consider displaying them conspicuously as part of your system for avoiding illegal sales. A suitable form of wording might be:

**IT IS ILLEGAL TO
SELL ALCOHOL TO
ANYONE UNDER
THE AGE OF 18**

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

If an illegal sale is made, you could be prosecuted and face a fine of up to £5000. If a member of staff makes an illegal sale of alcohol they could be served with a £80 penalty notice for disorder (on the spot fine). Additionally licence holders could face prosecution, and if found guilty a fine of up to £5000. Depending on the circumstances, you may also find that the licence is called for review / revocation.

WHAT SHOULD I DO NOW?

The licence holder has overall responsibility for **all** sales of alcohol that take place on the premises, regardless of whether he, an employee, a family member or any other person makes the sale. You should set up a system to ensure that you have done all you can to prevent an illegal sale of alcohol to a young person. You should now read the '**Preventing Underage Sales**' section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

Fireworks

WHAT DOES THE LAW SAY ABOUT THE SALE OF FIREWORKS TO YOUNG PEOPLE?

1. It is an offence to sell any firework (*including sparklers*) to anyone apparently under the age of 18.
2. In the case of caps, cracker snaps, novelty matches, party poppers, serpents and throwdowns, it is an offence to sell to anyone apparently under the age of 16.

ARE THERE ANY OTHER RULES GOVERNING THE SALE OF FIREWORKS?

1. Fireworks intended for sale to the public must comply with BS 7114, and be labelled accordingly.
2. The following fireworks **must not** be supplied to members of the general public, **regardless of their age**:-
 - Fireworks intended for professional use
 - Bangers (*including batteries containing bangers, for example Chinese crackers*)
 - Aerial shells and maroons, shells in mortar and maroons in mortar
 - Mini rockets
 - Fireworks with erratic flight (*eg jumping jacks, ground spinners*)
3. Fireworks must not be sold separately if they are intended to be sold together as a pack.
4. Sparklers must be labelled '**Warning - not to be given to children under 5 years of age**'.

Note : Premises storing fireworks for sale must be registered to do so. Strict rules govern the storage of fireworks, and you should seek detailed advice from the Trading Standards Service on how to do this safely.

SHOULD I DISPLAY ANY NOTICES FOR CUSTOMERS?

If you sell fireworks, a notice must be prominently displayed stating

**IT IS ILLEGAL TO SELL ADULT
FIREWORKS AND SPARKLERS TO
ANYONE UNDER THE AGE OF 18,**

and

**IT IS ILLEGAL FOR ANYONE
UNDER THE AGE OF 18 TO
POSSESS ADULT FIREWORKS IN
A PUBLIC PLACE.**

What are the penalties for breaking the law?

Failure to comply with these requirements can result in prosecution and a fine of up to £5,000, or a prison sentence of up to 6 months, or both.

What should I do now?

You should set up a system to ensure that you have done all that is reasonable to prevent you or a member of your staff selling fireworks and similar goods to young people. You should now read the '**Preventing Underage Sales**' section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

Knives and Similar Offensive Weapons

WHAT DOES THE LAW SAY ABOUT THE SALE OF KNIVES AND SIMILAR SHARP OBJECTS TO YOUNG PEOPLE?

It is an offence for anyone to sell to a person who is under the age of 18 any

- Axe
- Knife
- Knife blade
- Razor blade
- Other article having a blade or which is sharply pointed and which is made or adapted for causing injury

ARE THERE ANY EXEMPTIONS?

The only exemptions from the above are for:-

- Folding pocket knives having a cutting edge less than 7.62cm (3") long
- Razor blades that are permanently enclosed in a cartridge or housing

Should I display any notices for customers?

There is no legal requirement to display a warning notice, however, you may want to consider displaying them conspicuously as part of your system for avoiding illegal sales. A suitable form of wording might be:

**IT IS ILLEGAL TO SELL
KNIVES AND SIMILAR
SHARP OBJECTS TO
ANYONE UNDER THE
AGE OF 18**

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

If an illegal sale is made, you could be prosecuted and face a fine of up to £5000, or a prison term of up to 6 months, or both.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is reasonable to prevent you or a member of your staff selling knives and similar items to young people. You should now read the 'Preventing Underage Sales' section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

Knives and Similar Offensive Weapons

ADDITIONAL INFORMATION

The following bladed and pointed items have already been prohibited from sale (*regardless of the age of the purchaser*):-

- Flick-knives, gravity knives, belt buckle knives
- Swordsticks containing a blade
- Push daggers, butterfly knives
- Kyotetsu shoge (*a rope, cord or chain fastened to a hooked knife*)
- Hand and foot claws, hollow kybatan with spikes, shuriken or death star
- Kusari gamă (*a rope, cord, wire or chain fastened at one end to a sickle*)

Intoxicating Substances

WHAT DOES THE LAW SAY ABOUT THE SALE OF INTOXICATING SUBSTANCES TO YOUNG PEOPLE?

- It is an offence for anyone to supply or offer to supply an intoxicating substance to a person they know or have reasonable cause to believe is under the age of 18, if they **know**, or **have reasonable cause to believe** that the substance is likely to be inhaled by the person under 18 for the purpose of intoxication.
- It is also an offence to supply or offer to supply such a product to a person who is acting on behalf of a person under the age of 18, where the trader knows or has reasonable cause to believe that the purchaser is so acting.

WHAT TYPE OF PRODUCTS SHOULD I BE AWARE OF?

Anything that can be inhaled to cause intoxication, the most common examples being:-

- Glue (*containing contact adhesives*)
- Aerosols (*for example paints, air freshener, deodorant, hair spray, pain relief spray*)
- Domestic cleaning fluids
- Dry cleaning fluids
- Office correction fluids and thinners
- Paint stripper
- Paint thinners
- Nail polish remover
- Anti freeze

See also the separate advice sheet on Cigarette Lighter Refills

SHOULD I DISPLAY ANY NOTICES FOR CUSTOMERS?

There is no legal requirement to display a warning notice, however, you may want to consider displaying them conspicuously as part of your system for avoiding illegal sales. A suitable form of wording might be:

**IT IS ILLEGAL
TO SELL INTOXICATING
SUBSTANCES TO
ANYONE UNDER THE
AGE OF 18**

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

If an illegal sale is made, you could be prosecuted and face a fine of up to £5000, or a prison term of up to 6 months, or both.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is reasonable to prevent you or a member of your staff selling intoxicating substances to young people. You should now read the **'Preventing Underage Sales'** section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

Cigarette Lighter Refills

WHAT DOES THE LAW SAY ABOUT THE SALE OF BUTANE GAS LIGHTER REFILLS TO YOUNG PEOPLE?

It is an offence for anyone to sell butane gas lighter refills to anyone under the age of 18.

WHY IS THIS THE CASE?

Substance abuse statistics have shown that cigarette lighter refills containing butane gas are the category of product associated with most deaths.

SHOULD I DISPLAY ANY NOTICES FOR CUSTOMERS?

There is no legal requirement to display a warning notice, however, you may want to consider displaying them conspicuously as part of your system for avoiding illegal sales. A suitable form of wording might be:

**IT IS ILLEGAL TO SELL
BUTANE GAS LIGHTER
REFILLS TO ANYONE
UNDER THE AGE OF 18**

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

If an illegal sale is made, you could be prosecuted and face a fine of up to £5000, or a prison term of up to 6 months, or both.

WHAT ABOUT OTHER PRODUCTS THAT CAN BE ABUSED?

You should read the separate advice sheet on sales of intoxicating substances.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is reasonable to prevent you or a member of your staff selling butane gas cigarette lighter refills to young people. You should now read the **'Preventing Underage Sales'** section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

Spray Paints

WHAT DOES THE LAW SAY ABOUT THE SALE OF SPRAY PAINTS TO YOUNG PEOPLE?

It is an offence to sell an aerosol spray paint to anyone under the age of 16.

WHY IS THIS THE CASE?

Aerosol spray paint is commonly used in graffiti vandalism. It is hoped that by banning the sale of spray paint to the under 16's, the incidence of graffiti will be reduced.

SHOULD I DISPLAY ANY NOTICES FOR CUSTOMERS?

There is no legal requirement to display a warning notice, however, you may want to consider displaying them conspicuously as part of your system for avoiding illegal sales. A suitable form of wording might be:-

**IT IS ILLEGAL TO SELL
AEROSOL SPRAY
PAINTS TO ANYONE
UNDER THE AGE OF 16**

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

If an illegal sale is made, you could be prosecuted and face a fine of up to £2,500. The owner of the business as well as the actual seller can be liable.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is reasonable to prevent you or a member of your staff selling aerosol spray paints to young people. You should now read the **'Preventing Underage Sales'** section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.



Videos, DVD's and Computer Games

WHAT DOES THE LAW SAY ABOUT THE SUPPLY OF VIDEOS, DVD'S AND COMPUTER GAMES TO YOUNG PEOPLE?

It is an offence for anyone to sell or hire out any work classified with a '12', '15' or '18' age rating, to any person who has not attained the age of 12, 15 or 18 as appropriate.

A work classified as 'Restricted 18' can only be sold to someone over the age of 18 through a licensed sex shop.

WHAT ABOUT THE OTHER CLASSIFICATIONS?

- Works labelled 'Uc', 'U' or 'PG' can be sold to anyone
- Those which are exempt from classification (*may be marked with 'E'*) can also be sold to anyone, on the grounds that they are:
 - Designed to inform, educate or instruct,
 - Concerned with sport, religion or music,
 - Video games

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

If an illegal sale is made, you could be prosecuted and face a fine of up to £5000, or a prison term of up to 6 months, or both.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is possible to prevent you or a member of your staff supplying videos, DVD's and computer games to young people. You should now read the '**Preventing Underage Sales**' section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

National Lottery Tickets

WHAT DOES THE LAW SAY ABOUT THE SALE OF LOTTERY TICKETS TO YOUNG PEOPLE?

- It is an offence for anyone to sell a National Lottery ticket to a person who is under the age of 16.
- It is an offence for a person under the age of 16 to sell a National Lottery ticket.

This includes the instant scratch cards as well as tickets for the various Saturday and midweek National Lottery draws.

SHOULD I DISPLAY ANY WARNING NOTICES FOR CUSTOMERS?

There is no legal requirement to display a warning notice, but you may display one if you so wish. A suitable form of words might be:-

**IT IS ILLEGAL TO
SELL NATIONAL
LOTTERY TICKETS
TO ANYONE UNDER
THE AGE OF 16**

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

The maximum fine on prosecution is £5000. You could also have the lottery terminal removed from your premises.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is possible to prevent you or a member of your staff selling National Lottery tickets to young people. You should now read the 'Preventing Underage Sales' section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.

Other Age Restricted Products

PETROLEUM

WHAT DOES THE LAW SAY ABOUT THE SUPPLY OF PETROL TO YOUNG PEOPLE?

Petrol is an extremely flammable and therefore potentially dangerous fuel that should never be sold to anyone under the age of 16. Similarly, no-one under the age of 16 should be allowed to dispense petrol from the pump.

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is possible to prevent you or a member of your staff selling petrol to young people. Before authorising the use of a petrol pump, petrol filling station staff must ensure that the customer is over the age of 16, and that the fuel will be dispensed into the fuel tank of a vehicle or other approved container.

You should now read the 'Preventing Underage Sales' section of this pack for further practical guidance.

If you require advice on any aspect of the storage of petrol, you should contact your local authority Petroleum Officer.

LIQUEUR CHOCOLATES

WHAT DOES THE LAW SAY ABOUT THE SALE OF LIQUEUR CHOCOLATES TO YOUNG PEOPLE?

It is an offence to sell confectionery containing intoxicating liqueur to a person under the age of 16.

WHAT ARE THE PENALTIES FOR BREAKING THE LAW?

The maximum fine on prosecution is £500

WHAT SHOULD I DO NOW?

You should set up a system to ensure that you have done all that is possible to prevent you or a member of your staff selling liqueur chocolates and similar items to young people. You should now read the '**Preventing Underage Sales**' section of this pack for practical guidance on how best to do this.

If you are unsure how old a person is, ask for proof of age. If any doubt remains, always refuse the sale.



Preventing Underage Sales

HOW CAN I BE SURE OF A PURCHASER'S AGE?

It can be very difficult to assess a person's age from their appearance. This is why you should always ask for proof of age in cases where there is any doubt over the age of the purchaser. Acceptable forms of proof would be a passport or new photo-driving licence. Documents such as birth certificates and National Insurance cards should not be relied upon, as they do not include a photograph of the holder.

A number of proof of age schemes exist whereby young persons can obtain a card which includes their photograph, and the dates on which they became 16 and 18. Such cards can assist traders greatly, however, you should always read them carefully, ensuring that the photograph is in fact of the holder, and that the purchaser is at least the minimum required age to purchase the product in question. If any doubt remains about the age of the purchaser, the sale must be refused. In Caerphilly County Borough all 16 -18 year olds in secondary education are offered, free of charge a "Validate" proof of age card.

WON'T CUSTOMERS GET ANNOYED IF I REFUSE TO SERVE THEM?

Always remember that you are not obliged to sell anything to anyone if you do not wish to. If there is any doubt about the age of the purchaser, politely decline the sale, and provide the young person with one of the Refusals Slips included with this pack.

WHAT CAN I DO TO PREVENT THOSE INVOLVED IN MY BUSINESS BREAKING THE LAW?

The law generally provides a retailer with a defence if he can demonstrate that he took all reasonable precautions and exercised all due diligence to prevent an offence being committed.

'Reasonable precautions' means setting up a suitable system and 'due diligence' means ensuring that the system is working effectively. Remember that the defence is only available if you have taken **all** reasonable precautions and exercised **all** due diligence, however, what is reasonable will depend on the size and nature of the business. A large multiple retailer would be expected to have a far more sophisticated system in place than say a small corner shop.

WHAT MIGHT BE EXPECTED OF ME?

The essential elements of a system to prevent underage sales being made are as follows :-

- Staff training
- Warning notices
- Till prompts
- Records of occasions when sales have been refused - the 'Refusals Register'
- Monitoring and control by management / owner of the business

As outlined above, how this is achieved will depend on the size and nature of the business. As a basic guide, the following standards might reasonably be expected. Remember however that ultimately only the courts can decide what is reasonable, taking into account all of the circumstances.



Preventing Underage Sales

THE SMALL INDEPENDENT RETAILER

To safeguard against underage sales, there are a number of simple steps that even the smallest business can put in place, for example you should:-

1. Ensure that staff (and anyone else serving in the store) understand:-
 - The different age restrictions on the products you sell
 - That they should look closely at prospective purchasers, even at busy times
 - That if they doubt a person's age they should ask for proof of age
 - The proof of age scheme operating locally, and the other types of proof which are acceptable (see '**How can I be sure of a purchaser's age?**' above)
 - That if doubt remains, the sale should be refused
 - What to do in the event of a refusal (see 4 below)

Ideally you should keep a record of the training given to staff, and ensure that any new employees also receive the necessary training. Any new additions to the age restricted goods on sale should be reflected in staff training.

2. Make good use of warning notices on the premises. Although the only warning notices required by law are in respect of sales of tobacco to minors, you may wish to draw up others for different products, along the lines suggested in this guidance pack. Such notices should jog the memory of staff as well as acting as a deterrent for underage purchasers.
3. Use a prompt for staff at the point of sale. The minimum age notice included with this pack can be attached to the till, or close to it, to act as a final reminder before a sale is made.
4. Keep a record of occasions when sales have been refused. For convenience you may wish to use the '**Refusals Record**' sheet included with this pack. The manager or owner of the business should check to see that the records are kept up to date.
5. The manager or owner of the business should check regularly that the system put in place to prevent underage sales is being followed by staff and is working.

THE MEDIUM SIZED RETAILER

It is reasonable to expect a larger scale business to have a more sophisticated system in place than the small retailer.

1. Staff training should be formal and written, again covering
 - The different age restrictions and other legal requirements relating to the products on sale
 - The proof of age scheme operating locally, and the other types of proof which are acceptable (see '**How can I be sure of a purchaser's age?**' above)
 - What to do in the event of a refusal
2. If the store has an EPOS system at the till, it may be possible for till prompts to be electronic. This would allow a message to be displayed querying the purchaser's age every time an age restricted product is scanned.
3. While the only warning notices required by law are in respect of sales of tobacco to minors, you may wish to draw up others for different products, along the lines suggested in this guidance pack. Such notices should jog the memory of staff as well as acting as a deterrent for underage purchasers.

Preventing Underage Sales

4. Keep a record of occasions when sales have been refused. For convenience you may wish to use the **'Refusals Register'** sheet included with this pack. Details of each refused sale should be given to the store management.
5. The store manager / area manager should monitor the effectiveness of the system in place to prevent underage sales. If CCTV is in operation, this may be a useful tool for example in monitoring the decisions of staff, and of checking whether the refusals register is complete.

THE LARGE MULTIPLE RETAILER

While the elements of the system will be the same as outlined above, the large retailer will generally have quite extensive safeguards and systems in place.

1. There should be a clearly defined line of communication, e.g., staff member to supervisor / departmental manager / store manager / area manager / trading standards manager etc. The company should be able to demonstrate that any problem areas highlighted within the organisation have been investigated and acted upon as appropriate.
2. Staff training should be formal and written, possibly with some form of written assessment, with regular monitoring of competency in relation to underage sales.
3. This type of retailer will invariably have an EPOS system in each store, so that till prompts can be displayed electronically each time an age restricted product is scanned.
4. Similarly, stores will normally have a CCTV system in place which can be used effectively by management for monitoring and training purposes.
5. A Refusals Register should be maintained and signed off by the appropriate manager.
6. The systems in place should be subject to regular review to ensure their continued effectiveness throughout the organisation.



Age Restricted Products Refusals Log - 'No Proof - No Sale'

Date	Time	Description of Young Person	Proof of Age Requested Y/N	Product	Staff Initials	Manager's Initials	Comments



Employee Training Log - 'No Proof - No Sale'

Business name & Address	Underage Sales Training / Information Pack Given To:	Date	Signature of Recipient
Name and Title of Person Completing Log			I have received and understand the training on underage sales
			I have received and understand the training on underage sales
			I have received and understand the training on underage sales
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