



Brent & Harrow Trading Standards Service

WORKING IN PARTNERSHIP



# Age Restricted Products Responsible Trader Scheme

## MODEL DUE DILIGENCE SYSTEM

### 1. IMPLEMENT A COMPANY POLICY

A company policy to detail to whom and in what circumstances a customer will/will not be served e.g. only on production of specified identification/proof of age.

### 2. COMPANY PROCEDURES

This should include the procedures to be followed when selling age restricted product e.g. reference to other/senior staff.

### 3. STAFF TRAINING

- Training must cover the following points
- Knowledge of the law
- Awareness of company policies and procedures
- Guidance on how to assess age
- Customer handling training to enable staff to effectively but tactfully refuse sales
- Training should be included for new staff and periodic refresher training provided for existing personnel. It must also take account of changes in legislation and new developments e.g. the introduction of a local proof of age scheme.

### 4. STATUTORY / VOLUNTARY NOTICES

Statutory notices must always be clearly displayed. Additional notices may also be displayed to deter potential underage purchasers and to act as a reminder to staff.

### 5. REFUSALS LOG

This enables a trader to demonstrate to an enforcement body that refusals do occur. It also enables management/an owner to ensure staff are refusing to serve customers. Individual staff can also be identified as not refusing if they are not entering details in the log. A history of refusals can be built acting as a reference document where fake identification is suspected.

## 6. OVERSTICKERING

A label is placed over the product bar code to identify it as an age restricted product. This acts as a reminder to staff and is particularly useful for volatile substances, which may not be readily identified as such.

## 7. TILL PROMPT

Similar to overstickering, but using sales till software to indicate an age restricted product. More advanced systems may provide instructions to the operator e.g. 'Ask for identification'. More advanced prompts require intervention by the member of staff in response such as the input of the purchaser's age, date of birth or a 'yes' to a question, before the transaction can be processed.

## 8. STAFF AUDITS

Staff should be audited to ensure continual compliance with procedures. This may simply be observation of staff or by asking relevant questions to ensure understanding. Larger companies may also conduct their own test purchase exercises.

In accordance with the principles of a good due diligence system policies, procedures and records of staff training need to be recorded in writing.