



Norfolk County Council

Community & Environmental Services

Trading Standards Service

Enforcement of Age Restricted Sales
and Illicit Tobacco Products Plan 2017-18



Minor Sales – Major Consequences

A strategy to deter the sale of age restricted products to young people and the sale of illicit tobacco in Norfolk, with the intention of improving community safety and public health.



If you need this report in large print, audio, Braille, alternative format or in a different language please contact Emilee Bradford on 0344 800 8020 or 0344 800 8011 (textphone) and we will do our best to help.

Context

The Children and Young Persons' (Protection from Tobacco) Act 1991 requires a Local Authority to review its enforcement activity relating to the supply of cigarettes and tobacco to persons under the age of 18 on an annual basis. There are similar duties arising from Section 54A of the Anti-Social Behaviour Act 2003. There are responsibilities on Trading Standards to enforce the compulsory health warning requirements on tobacco products and to enforce the age restrictions and composition legal requirements applicable to e-cigarette liquids which contain nicotine. This Plan fulfils these obligations, as part of the overall work by Trading Standards to improve community safety and public health.

Illicit tobacco products, often smuggled from Eastern Europe, are increasingly becoming a problem in the county, particularly in any urban area where Eastern European citizens have settled. These products fail to carry the health warnings of legitimate tobacco products and are often counterfeits of established brands. Their unknown composition presents an additional health hazard to smoking, already the major cause of death in the UK. The Service receives intelligence that sales of illicit cigarettes are being made to young people. The relative cheapness of these products makes them attractive to underage buyers. This plan integrates the Trading Standards Service actions to tackle these products along with the obligations outlined above.

Background

Trading Standards community safety activities are intelligence led and focus on both National and local priorities. Improving community safety and public health by tackling illicit/age restricted products is a key priority for the Service. Trading Standards recognises that effective enforcement of legislation to prevent the sale of age restricted goods requires a multi-agency approach and seeks to work in partnership with a range of agencies and stakeholders to ensure accurate identification of priority and high-risk areas, share best practice and engage in collaborative work (e.g. joint operations and licence reviews).

Trading Standards aligns its service delivery wherever possible to support the priorities of other council services. In order to align its community safety activities with Public Health priorities, the Service will focus activities on:

- Preventing the sale of alcohol to young people
- Taking action through Alcohol Licensing requirements
- Preventing the sale of cigarettes and tobacco to young people
- Disrupting the supply of Illicit tobacco products
- Working with The Norfolk Tobacco Alliance
- Working with Community Alcohol Partnerships (CAPs)
- Preventing the sale of regulated e-cigarette liquids to young people

Public Health has allocated £47,000 to the Trading Standards Service to support delivery of these actions in the 2017-2018 service year. Service delivery will take place across the whole of the county based on the intelligence derived from information about the sale of age restricted products. A scaled approach is adopted with due regard to the Community and Environmental Services Enforcement Policy.

This includes:

- The provision and publicity of advice and support materials
- The delivery of advice and help to new retailers of age restricted products
- The investigation of complaints together with the delivery of advice and assistance to prevent the recurrence of underage sales
- Targeted test purchasing utilising young people and where appropriate, underage volunteers
- Recommendation to adopt a “Challenge 25” type policy
- Working with and supporting national or regional initiatives
- Multiagency/community group/industry partnership working

Where targeted advice and assistance is given following the receipt of information that a retailer has sold to underage purchasers, test purchasing by a person aged between approximately 18 and 20 may be used to ascertain the robustness of the business’ procedures in place to prevent underage sales, including effective implementation of a Challenge 25 type policy.

Test purchases utilising underage volunteers are carried out, usually with assistance from Norfolk Constabulary, at targeted premises where information shows that sales to underage purchasers are taking place. Teams work within agreed procedures and protocols that cover the sharing of information and the recruitment of young persons for test purchase programmes.

Advice to Trading Standards Services by the Office of the Surveillance Commissioner (OSC) is that any test purchase by an underage volunteer requires covert surveillance authorisation in accordance with the Regulation of Investigatory Powers Act 2000 (RIPA) by a service manager which must then be endorsed by a Magistrate. The Office of the Surveillance Commissioner issued guidance in early 2015 that a Magistrate should not issue RIPA authorisation unless the targeted test purchase operation relates to a premises where overt measures have been attempted and failed or are not considered appropriate. Generally this will be premises where:

- Intelligence indicates that underage sales are taking place
- The trader has been advised of their legal responsibilities and warned
- Further intelligence indicates that underage sales continue to take place.

In exceptional circumstances a premises may be targeted for underage test purchasing immediately, usually this is where a premises has a history of underage sales taking place. The Trading Standards RIPA policy and application procedure requires a scaled approach where intelligence continues to show that sales to underage volunteers is taking place

During the 2015-16 service year the number of complaints received from the public or traders regarding the underage sale of regulated products fell considerably when compared to that of previous years. This trend has continued into the 2016-2017 service year. This includes complaints made to the police and licensing departments of the district councils in the county. As a result and in light of the OSC advice described above the number of underage test purchases utilising young volunteers currently stands at one in the 2016-2017 service year. One other premises received a test purchase utilising an 18 year old volunteer.

In October 2016 Trading Standards further modified its policy of action to include a test of the advice it has given to retailers where information regarding sales to underage purchasers is received; to test the effectiveness of the implementation of that advice. A young adult of approximately 18 - 20 years of age is utilised to test the effectiveness of the implementation of the business' challenge policies. Where such a test purchase goes unchallenged, the Service will then apply for authorisation under RIPA to undertake an underage volunteer operation.

A range of legislation supports this work, setting out controls for the following products:

- Alcohol
- Cigarettes and tobacco products, including electronic cigarette liquids
- Fireworks
- Video, DVD, Blu-ray & gaming products
- Aerosols, petroleum spirit and other intoxicating substances (butane/solvents)
- Lottery and scratch cards
- Knives, blades and crossbows
- Psychoactive substances

Alcohol and tobacco continue to be the main focus of our enforcement activity.

Alcohol

A number of reports have put the cost of alcohol related crime in the UK at between £8 billion and £11 billion per annum. Alcohol-related crime and disorder by young people is currently estimated to cost society £1 billion per year. Despite the success of the Community Alcohol Partnership (CAP) in Great Yarmouth the highest proportion of under-18-year-old admissions to hospital for alcohol related harm in East Anglia is still at the James Paget Hospital in the town.

However, a 2014 Drink Aware survey has found that the proportion of 11-15 year olds who have never had alcohol has increased to 62%. This is the highest proportion since records have been kept and is in line with past surveys which have shown this figure is rising gradually over recent years. This appears to show that safe drinking messages are getting through to young people.

However, young people who are drinking are consuming large amounts. In 2014, the average (mean) alcohol consumption by pupils who had had alcohol in the last week was 9.8 units – albeit a reduction of 3.1 units over the level in 2012. 12% of those young people who drink said that in the last 12 months they had experienced a serious harm (trouble with the police, being a victim of crime, taken to hospital or getting into a fight).

Based on Public Health figures of persons under 18 admitted to hospital for alcohol related conditions the top three areas for underage alcohol consumption in Norfolk are:

- Great Yarmouth
- Norwich, and
- Kings Lynn

Norwich & Great Yarmouth are in the top 10 areas of admissions within the Eastern Region.

In the first three quarters of the 2016-2017 service year, intelligence was received about 6 premises selling alcohol to underage persons. All premises have been visited and advised on their responsibilities in relation to underage sales. One premises was tested by an 18 year old volunteer and identification was requested and no sale was made. Two complaints regarding alcohol sales to minors from off licences have been received in January 2017. Both have been visited and provided with advice and will shortly be tested with an 18-20 year old volunteer.

A premises which sells alcohol to underage purchasers twice in three months is deemed to be 'persistently selling alcohol to under 18s'. All premises found to be selling alcohol to underage persons are retested before the end of 3 months following the date of the first sale.

The Trading Standards Service is a Responsible Authority in licensing matters. Trading Standards continues to work closely with the other Responsible Authorities, in particular Norfolk Constabulary Licensing and Regulation Unit, in order to ensure the licensing objectives are upheld in Norfolk. Where a premises is found to be selling alcohol to underage persons, Trading Standards, in conjunction with Norfolk Constabulary, will apply for a review of the premises licence.

The Community Alcohol Partnership (CAP) launched in Great Yarmouth continues to take a multi-agency/organisation approach to reducing underage access to alcohol. The partnership includes the Police, Youth Services, the Matthew Project, schools, and retailers. The partnership has proved to be successful in reducing the prevalence of underage and street drinking which has continued to decrease in 2016. Alcohol users get support from local agencies. The service will continue to support this initiative during 2017/2018 to ensure its continued success. Part of the CAP initiative is that retailers will implement a Challenge 25 policy and this is tested utilising volunteers aged approximately 18-20. The next round of testing will be carried out in early March 2017. Retailers who fail the testing will be offered free of charge training on age restricted sales by CAP.

We continue to support the development of joint strategies for Alcohol Harm Reduction with partners. This includes additional support for the night time economy via local initiatives led by the Police in Norwich, Great Yarmouth and Kings Lynn.

Tobacco Control

The Government's Tobacco Control Strategy is key to the Trading Standards Service's response in enforcing legislation in relation to both the supply of illicit tobacco and underage sales. During 2017/2018 it will remain a priority to gather and then act upon any intelligence received, including that received from our partners. Norfolk Trading Standards is an active member of the Norfolk Tobacco Alliance and will be striving to help achieve CLearR (Challenge, Leadership and Results) status in tobacco control for Local Government specifically for Norfolk County Council.

Smoking remains the single greatest cause of premature death and disease in Norfolk and the UK. Smoking is an addiction which is still taken up by a large number of young people. Two thirds of smokers start before the age of 18. It is of concern that the illicit trade in tobacco makes cheap, poor quality tobacco available to many young people. It is known that the illicit tobacco trade funds the activities of organised criminal gangs.

About 1 in 10 young people aged 15 years smoke. The 2015 England average for children and young people smoking is 10.1% and in Norfolk this is 8.7%. Public Health Tobacco Control Strategy aims at reducing this to 5% by 2020 and Trading Standards has an important role to play in this reduction.

In England, the average percentage of 11-15 year olds who regularly smoke is 3.1%. Unfortunately within the East of England, Norfolk holds the two highest percentages. The top three areas for 11-15 year old smokers are:

- Norwich (4.8%)
- Great Yarmouth (4%), and
- Kings Lynn (3.6%)

In the first three quarters of the 2016-2017 service year, we received 8 complaints about premises selling cigarettes or hand rolling tobacco to persons aged under 18. All premises were visited and offered advice. Due to its sales history, one premises was tested utilising two 16 year old girls but no sale was made. In January 2017 three complaints have been received about the sale of cigarettes to young people under the age of 18. Due to the changes to our procedures in October 2016, all three premises will shortly be tested using an 18-20 year old volunteer.

The Chartered Trading Standards Institute Tobacco Control Survey England for 2015 to 2016 states that the sale rate to volunteers under 18 was 10% during this period.

Trading Standards Officers have the power to advise business and enforce legislation in respect of age-restricted goods and illicit tobacco and therefore have a vitally important role to play in supporting health improvement by reducing access to these products. We recognise that the most effective way of doing this is by working in partnership with a range of agencies and stakeholders, including the tobacco industry. Our approach in doing so relies on intelligence, such that we take appropriate action against suppliers of a range of illicit/counterfeit products, and ensures that we always limit our engagement with industry for the purposes of enforcement of the relevant legislation.

Illicit tobacco continues to be an area of great concern; not only in terms of the associated (additional) health risks but also in the potential for extending illegal sales of tobacco products to under 18's. Illicit tobacco is being sold by unscrupulous businesses from under the counter in most cases. It follows that this makes it more accessible to young people as it is more affordable (for example, £4-5 for a pouch of hand rolling tobacco as opposed to £17).

In addition to counterfeit tobacco, there is an increasing amount of illegally imported tobacco which bears only foreign labelling. Not only is this tobacco being sold without UK duty being paid, but the mandatory health risks labelling on the packaging is missing. Illicit tobacco is mainly sold in our market towns which have a high ethnic minority population, particularly Eastern Europeans. Young people having ready access to illicit tobacco poses a significant problem in Norfolk, particularly in Great Yarmouth.

Trading Standards has instigated a number of unannounced inspections of retailers where intelligence has shown that illicit tobacco is being sold. The amount of illegal tobacco products seized in the first three quarters of the 2016-2017 Service year has been much higher than in the past with nearly 130,000 illegal cigarettes and over 31kg of hand rolling

tobacco seized. Two more enforcement days using tobacco detection dogs are planned before the end of the service year.

Increasingly it appears that sophisticated concealment is being used to store the bulk of these products both on and away from the retailing premises. The Service is heavily reliant on specialist tobacco detection dogs to discover stashes of illicit tobacco.

The service has continued to adopt a multi-agency approach during 2016 to tackle this problem. Partners include Norfolk Constabulary and HMRC. Action by the Service alone is not stemming the supply even when the perpetrators are prosecuted. Other deterrents are being used, including seeking a review of premises licences where the store also sells alcohol. Four premises licences have been through the review process as a result of illegal tobacco being found in September 2016 and January 2017. One premises had its licence voluntarily surrendered, one had its licence suspended for 3 months and two premises had their licences revoked. One further hearing was suspended to be heard at a later date.

A Public Health funded project jointly carried out in Norfolk, Suffolk, Cambridgeshire and Peterborough began in September 2016. This involves a number of areas of work including raising awareness of illegal tobacco by carrying out a roadshow (in Norfolk for 5 days in September and October 2016), focusing on intelligence received (particularly cross border premises/individuals) and enforcement visits (including subsequent legal action where required). This project is due to complete at the end of the 2016-2017 service year.

A similar Public Health funded project is planned for the 2017-2018 Service year with another week long roadshow booked in for the school Summer holidays.

Other areas of focus

Alcohol and tobacco sales to under 18's remain a priority area because of the problems identified at both local and national level. However compliance visits target all age restricted products.

Fireworks

The levels of antisocial incidents reported to Norfolk Police and Trading Standards during the Guy Fawkes period had shown a steady reduction over the past 5 years. In view of the reduced level of incidents, targeted activities were only conducted in the Breckland area (Watton & Thetford) in relation to firework sales in the run up to November the 5th 2016.

It is regrettable that reports of anti-social behaviour have risen significantly in 2016, particularly in Kings Lynn, Great Yarmouth and Norwich. These reports show that instances involving juvenile misuse of fireworks were highest in Great Yarmouth, Kings Lynn, Thetford and Norwich.

Therefore consideration will be given to multi-agency proactive visits in these areas in 2017, particularly where there is intelligence of underage sales from a premises. These will include provision of advice and test purchasing where necessary. Consideration will also be given to targeted advice through schools.

Aerosols, solvents & DVDs

Intelligence regarding the sale of aerosols, solvents or age rated DVDs is rare. Where this is received the premises will be visited and offered advice. An underage test purchase will be carried out where necessary.

In 2015 and the first three quarters of the 2016-2017 service year no complaints have been received about underage sales of aerosols or DVDs. Two complaints have been received about the underage sale of solvents. Both of the premises involved received an advice visit and no further intelligence has been received.

Knives

Norfolk Trading Standards will continue to work with the Police and other agencies in support of local and National initiatives to reduce knife crime. Analysis of crime data does not highlight Norfolk as having a particularly high level of knife related crime, and Trading Standards has received no complaints relating to illegal sales of knives to under 18's in the past 12 months.

However national intelligence continues to identify knife crime as a serious concern and one which the government is keen to see effectively tackled. Major retailers, including Amazon UK and eBay, have been encouraged to sign up to a voluntary agreement with the Government to reduce underage sales. Trading Standards has a role to play in preventing the sale of knives to young people under the age of 18 and so will, on an intelligence-led basis, conduct test purchase operations and provide advice and education to businesses. Where necessary, formal action including prosecutions will be taken, in accordance with the CES enforcement policy.

In 2016, 13 police forces undertook coordinated action against knife crime, with further weeks of action planned. The coordinated response by police resulted in 401 arrests, 2,111 weapons taken off the street, and involved targeting habitual knife carriers, weapon sweeps, test purchases of knives from identified retailers and use of surrender bins. Trading Standards has offered support to Norfolk Constabulary with this project. Sales have been made to young people in Cambridgeshire and Peterborough during the project.

In addition, in August 2016, new laws banned the sale, manufacture, rental or importation of knives often referred to as 'zombie knives', 'zombie killer knives' and 'zombie slayer knives'. The knives can have cutting blades of up to 25 inches, have a serrated edge and include images or words that glamorise violence.

New Psychoactive Substances (NPS)

Synthetic drugs designed to mimic illegal drugs like cocaine, cannabis and ecstasy were increasingly and extensively available through the internet. Throughout the UK the sales of these substances through retailers known as 'Head Shops', particularly to young adults, was a major cause of anti-social behaviour and admission to A&E services. These substances were sometimes referred to incorrectly as 'Legal Highs'. In previous years Trading Standards had to deal with these 'Head Shops' using safety legislation and this involved very costly analysis of the ingredients.

The Psychoactive Substances Act 2016 came into force in May 2016. This Act introduced both criminal and civil sanctions relating to the manufacture and commercial supply of any

substance that can have a psychoactive effect. The Act gives a wide range of powers to the Police and HRMC. Powers are also given to the police and local authorities (including district and county councils) to tackle individuals and premises used in the manufacture or commercial supply of psychoactive substances.

Norfolk Constabulary, like all other police forces in the UK, now take the lead on these substances being sold and Trading Standards will support them where necessary. Early indications are that, since the legislation came into force, 'legal highs' are no longer readily available in the County. Unfortunately it appears that users have returned/switched to other illegal drugs instead.

Nicotine inhalation products (Electronic Cigarettes)

The use of electronic cigarettes has considerably increased during the past few years. The fluids used in these products are now subject to the same age restrictions as cigarettes and tobacco.

A National project was carried out in the early part of 2016 using young volunteers to test retailer compliance with the age restriction on nicotine inhalation products. During the project 246 visits were carried out and sales were made to the volunteers at 39% of the premises. A second round of testing was carried out to 260 premises (the same premises and a few new ones) and this time there was a 25% sale rate which is a large improvement.

Trading Standards has received two reports alleging their sale to young people in 2016-17 which were dealt with by way of advice visits to the business. No further intelligence has been received about the premises.

There is some debate amongst health professionals in that some believe e-cigarettes are a safer alternative to tobacco, whilst others do not. Public Health England appears to endorse their use as a tool to wean tobacco users away from nicotine. Trading Standards does not have a particular view on this but feels that the long term health impacts of inhaling the substances used to create the vaporising fluids is unknown at present. Recent reports suggest that some flavoured e-cigarettes may use the chemical diacetyl, which has been linked to the incurable disease, popcorn lung, when inhaled over prolonged periods.

In addition fire safety concerns have been raised where e-cigarettes left charging, often with cheap chargers, have exploded resulting in house fires. Some authorities have also found nicotine inhalation products being sold which have the appearance of food products such as sweets and ice cream cones. This makes them attractive to young people and increases the danger of children consuming them because they believe they are edible.

A project is currently underway to ensure retailers selling nicotine inhalation products are aware of the legislation surrounding the products, focusing on areas such as imitation foods and electrical safety as well as the age limits for sales.

Looking ahead to 2017/2018

Enforcement Activity (including test purchasing programmes)

Trading Standards will continue to focus its limited resources on alcohol and tobacco (including nicotine inhalation products). We will also respond to intelligence related to other products as detailed earlier in this plan, where there is an identified need. The Service, working with our police partners, will take a robust stand regarding anyone found to be purchasing alcohol or tobacco products on behalf of a young person.

The Service will continue to take a graduated approach to information which indicates that underage sales are taking place at particular off licence premises or in an identified area. This approach will usually begin with the delivery of targeted advice and support, including the provision of refusal books. Following the provision of advice and support the Service will test the business' underage sale policies. Where information continues to indicate that underage sales are taking place, test purchasing by underage volunteers will be undertaken with support from Norfolk Police.

We will also continue to provide Officers and utilise Trading Standards young volunteers to support Norfolk Police in relation to their lead role for 'on licence' premises.

The recruitment, selection and utilisation of young persons for test purchasing will only be in accordance with the protocols, systematic procedures and risk assessments adopted and developed in line with the Home Office and other guidelines. These protocols and procedures are maintained in the Service's Policies and Guidance System and are thus subject to rigorous internal audit. All Officers involved in the test purchase programme have been subject to police vetting procedures.

The Service is recruiting young adults from the Police Cadets force and from Further Education establishments. These 18-20 year old volunteers are utilised to test the effectiveness of the underage sales policies of retailers who have received advice and assistance.

Enforcement activity will also be carried out at premises where intelligence is received regarding the sale of illegal tobacco. Much of the intelligence Norfolk Trading Standards receives around illegal tobacco also alleges sales to young persons. This activity will include visits with specialist tobacco detection dogs to find concealed illegal tobacco. Formal action will be taken against businesses where it is found, as appropriate.

Tackling Anti-social Behaviour

The link between anti-social behaviour and the consumption of alcohol and substance abuse is established. The strategy of preventing the upstream supply of a number of restricted products to underage persons and thus reducing the level of anti-social behaviour associated with the use of these products will continue to be supported.

This plan will contribute to community objectives and those arising from Government strategy for community safety and public health. Alcohol and associated anti-social behaviour will continue to be a particular focus.

Proof of Age Schemes

The Trading Standards Service does not promote any specific proof of age scheme but supports those schemes that conform to the PASS Scheme criteria. Many retailers have adopted the “Challenge 25” policies in relation to all age restricted products. Trading Standards will continue in 2017/2018 to encourage all premises involved in the sale of any age restricted products to adopt a policy which achieves the aims of “Challenge 25”. Our ‘Minor Sales Major Consequences’ pack includes a section on adopting a Challenge 25 type policy.

The Trading Standards Service will also encourage and promote the use of a ‘Refusals Log’ by traders to provide evidence that proof of age is being sought and sales refused in appropriate circumstances.

Education Programmes

Businesses

The Minor Sales: Major Consequences Information Pack was reviewed in 2016. It will continue to be distributed to new sellers of age restricted goods in the county, on request and, where appropriate, when an inspection visit to a business is undertaken. The pack is to be further reviewed to allow for an electronic refusals log so businesses can download the complete pack online.

Publicity will also be used to raise trader awareness about specific issues and this will include the reporting of enforcement action outcomes.

One topic requiring publicity is The Standardised Packaging of Tobacco Products Regulations 2015. These regulations introduced requirements for plain packaging of cigarettes and hand rolling tobacco as well as minimum pack sizes in the UK (20 cigarettes and 30g of hand rolling tobacco). The transitional periods in this legislation come to an end in May 2017 and from then on only compliant products can be sold. The Trading Standards Service is awaiting guidance on a consistent National approach to non-compliant products still on sale (for example, voluntary surrender). The Service will ensure that retailers are aware of these requirements and that they are followed.

Using data from Public Health, the top three ‘hotspots’ for underage persons using alcohol and tobacco have been identified as Great Yarmouth, Norwich and King’s Lynn and business advice visits will be carried out in these areas to ensure retailers are aware of their obligations. These will be followed up with test purchases (either with underage or 18-20 year old volunteers where required).

Young Persons

The Trading Standards Service Underage Sales Education Pack has previously been distributed to schools. The Alcohol Education Trust has a large amount of materials that are being used within the schools in the CAP area in Great Yarmouth. The Service will continue to support this work.

All volunteers who participate in test purchasing programmes receive training primarily designed to equip them with the knowledge and skill to undertake the task.

Publicity and media campaigns

The Trading Standards Service will produce a number of articles to raise awareness through the press, social media and radio. This will include the results of test purchase operations, both positive and negative. Our approach will be to advise businesses and the public of the legal requirements and health risks associated with underage sales and to encourage intelligence reports in relation to them.

As stated previously, reports of underage sales of alcohol in the Great Yarmouth CAP area have continued to decrease significantly. However, young people are still accessing alcohol. The likely supply chain is from adults purchasing on behalf of young people. Where appropriate, enforcement action will be reported through local media outlets.

Multi-agency work will be actively promoted and reported, including regional or national coverage where relevant.

Trading Standards will also be carrying out a second 5 day illegal tobacco roadshow around the County. The roadshow will highlight to communities the dangers of illegal tobacco, particularly focusing on the ease of supply to children. This is planned for the school summer holidays in 2017.

Community Involvement

Support and publicity will be sought for new initiatives launched during 2017/2018. Where possible local members and/or community representatives will be invited to support or attend relevant activities.

Where possible, the Trading Standards Service will participate in or support community based projects that develop resources to assist in reducing underage drinking, including where there are links with the supply coming from an adult. As part of a wider review of its work the Service has strengthened its response to locality issues, working with key partners to ensure that local needs are addressed. We will work with local communities to understand if this might be one solution to issues of anti-social behaviour associated with underage drinking.

The Trading Standards Service will continue to promote underage sales work through presentations at community group meetings and diversify its activity according to requirements emerging from the localism agenda.

Where resources allow, the Service will undertake to tackle specific problems identified by a community group regarding underage sales. A community group will need to provide sufficient evidence of a credible nature in support of the request before the Service will undertake any activity.