

**one | stop**

# **Information for Enforcement Officers**

## **Age Restricted Sales Management One Stop's Ways of Working**

**This booklet has been produced  
in Partnership with  
Walsall Metropolitan Borough Council**



**Walsall Council**

# 1. Introduction

One Stop Stores Ltd operates over 500 stores across England and Wales. As a responsible retailer, we are committed at every level of our business, to working in partnership with Responsible Authorities and local communities, to comply with all aspects of the law including the prevention of under age sales. We have developed a robust management system which incorporates a review mechanism, to ensure continuous improvement in our ways of working and our performance. We have an in-house function to check compliance in stores and a training department accredited by the British Institute of Innkeepers to deliver the National Certificate for Personal Licence Holders qualification.

We are a member of the Retail of Alcohol Standards Group (the main aim of which is to promote responsible trading of alcohol), and have a number of stores involved in Community Alcohol Partnerships (working with Trading Standards, Police and Local Schools). We have also formed a partnership with Citizencard to facilitate the use of 'proof of age' cards by young people, and reduced-fee dual-branded application forms are available in our stores.

We have developed a good working relationship with our Home Authority, Walsall Metropolitan Borough Council, and continue to develop our communications through regular meetings.

For your further information, our Management System is described in brief below;-

## 2. Policy

### Look, Think Under 25, Ask

One Stop's Policy is known as 'Look, Think Under 25, Ask', and applies to all age restricted products.

This means that unless the till operator is completely confident the customer looks at least 25, or they *know* the customer is old enough, they must ask for proof of age. If the customer is unable to produce ID then the sale must be refused. The forms of proof of age which are acceptable, are photo-type driving licence, Passport, and Cards carrying the "PASS" hologram.

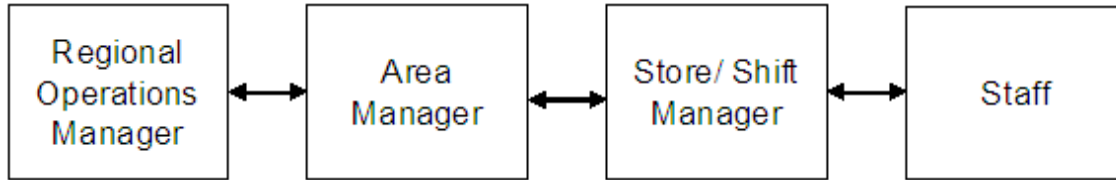
Key messages pertaining to age restricted sales are well promoted in store (i.e. door posters, till area signage, and shelf edge highlighters).

### Proxy Sales

It is our policy to refuse any sale *suspected* of being a proxy sale, and we make it clear to our staff that as a business, we support them in refusing a sale if they are unhappy with it for *any* reason. This issue is included in staff training.

### 3. Organisation

Our business model comprises small format convenience stores, and the management system supporting stores is detailed below:



Stores are split into geographical Regions (each under the remit of a Regional Operations Manager), which are divided into approximately 12 Areas (each under the remit of an Area Manager). There are approximately 12 stores in each Area.

Regional Operations Managers' responsibilities include ensuring Area Managers are following Company Policy and cascading information on key result areas and indicators.

Area Managers' responsibilities include monitoring and supporting the performance of Store Managers.

Store Managers' responsibilities include day-to-day operational management, ensuring all staff have been trained, and Company processes are being fully implemented. Store Managers' are supported by Shift Managers to ensure management is available at all operating times.

The Designated Premises Supervisor (DPS) is accountable for being conversant with any license conditions which apply, and for ensuring that they are fully complied with. The DPS will usually be the Store or Shift Manager.

Each Region is supported by the Regional Support Team which includes Regional Human Resources and Training Managers.

Regional Operations Managers meet every 2 weeks, and this provides a structured forum for the exchange of information with the Trading Law function (including updates on performance, developments and current issues).

One Stop's Corporate Governance structure consists of a number of scheduled Board meetings covering Legal Compliance, Operational and People management, and Audit. This facilitates the effective and efficient development and delivery of improved ways of working.

## 4. Planning and Implementation

All stores have CCTV to cover the sales area and entrance of the store. These are Digital Video Recording systems whereby images are recorded, retained and can be made available upon request to Enforcement Officers. The Designated Premises Supervisor authorises only those staff who are over 18 to sell alcohol, and this is documented on the 'Training and Authorisation sheet' in stores. Authorisation for all age restricted products can be removed at any time by the Store Manager/ Area Manager (this is completed on the till system so that when a product is scanned, a till prompt will automatically appear for a supervisor code to be entered in order for the sale to be processed).

### Training and Instruction

Staff training starts on the first day of work and continues throughout employment. The training includes:

- CD-ROM instruction, covering selling alcohol legally, tobacco law, restricted products and dealing with refusals. This must be completed on the first day of employment and before other duties commence.
- Practical Worksheets, which include store specific questions to validate staff understanding.
- A training package known as 'Bronze, Silver, Gold'.  
For Sales Assistants this involves completion of a workbook over a period of 8 months.  
For Store Management this involves completion of a workbook within the first 12 weeks of in-store training, two Silver formal training courses to develop skills (which must be completed within the following 3 months), one Gold formal training course to further develop skills (which must be completed within the following 2 months). This training results in the award of 'The One Stop Diploma in Retail Management'.
- Refresher training - which involves revisiting the CD-ROM and completion of 'refresher' worksheets. This is completed every six months.
- Reviews known as 'How am I Doing?' discussions are also completed on a six monthly basis. These provide a one-to-one opportunity for line management to assess the training needs of their staff in store.

Personal Training Journals record every individual's training.

# Licensing Guide

Every Store has a Licensing Guide in their Licensing Folder, which provides information on age restricted products, our Look, Think Under 25, Ask Policy, how to challenge a sale, what our Management structure looks like, and guidance on how to investigate and remedy any issues. Contact details for our Trading Law team are also provided.

**General Information on Age Restricted Sales 2** responsible trading

Some of the products we sell are age restricted – that means that by law, only people over a certain age may buy them. This guide is here to help you to do the right thing by following the One Stop process.

### Which Products are age restricted?



- 18
- 18
- 18
- 15

**The National Lottery**

Adult Magazines 18	DVD Video 12, 15, 18
Knives/Sharp Objects 18	Liqueur Chocolates 16
Solvents 18	Party Poppers 16

### What is our Policy?

For ALL age restricted products:



- Look at the customer
- Think 'does the person look under 25?'
- If in doubt, Ask for I,D
- No ID, no sale

Proxy Sales - young people may approach adults to buy an age restricted product for them - it is against the law to sell alcohol to such adults too - so be aware of young people spending time outside your store for this reason.

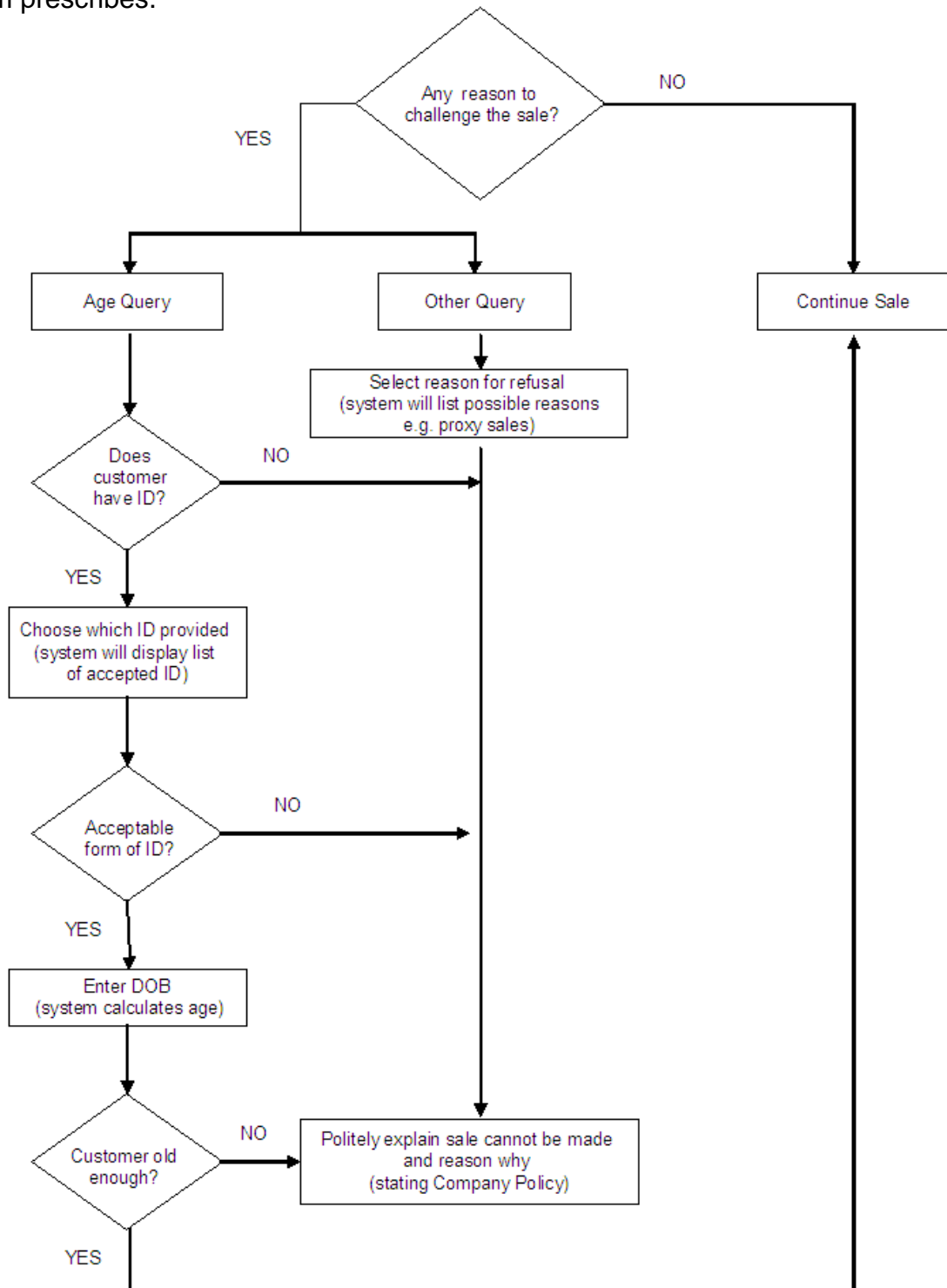
Remember - One Stop supports you 100% in refusing a sale if you are unhappy with it for any reason.

### How to challenge a sale

- 1 Be aware of your customers at all times – make eye contact, greet them, and take your time to assess how old they look.
- 2 Unless you are completely sure the customer looks at least 25, or you know they are old enough, explain that we operate a Look, Think Under 25 policy for age restricted products and that you are required by the Company to ask for I,D in a positive professional way.
- 3 As you scan an age restricted product, till prompts will appear on the screen which remind you of the need to Look, Think Under 25, Ask – always follow the prompts carefully to ensure that all details of the challenge are registered correctly on the system.
- 4 If the customer cannot produce ID, you must politely refuse the sale – again, explain that this is Company Policy to make sure we operate legally, and apologise for any inconvenience.
- 5 Stay calm, polite and friendly throughout, to help the customer understand that this process is necessary and that you are doing the right thing for the business, their community and yourself by trading responsibly.

## Till Prompts

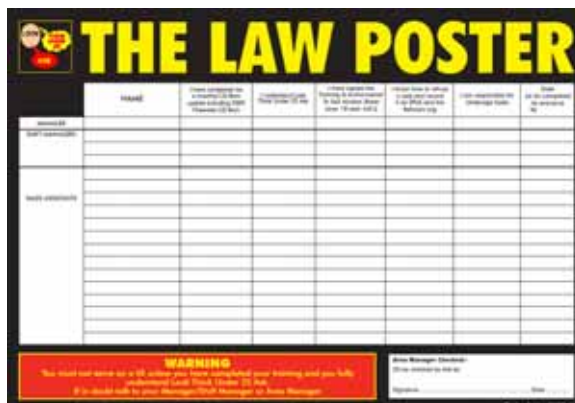
When an age restricted product is scanned through the till, a message will appear on the screen with our 'Look, Think Under 25, Ask' Policy. A series of prompts then appear, to instruct the till operator to check the purchaser is old enough to purchase the product. The flow chart below demonstrates the prompts and the order of play the system prescribes.



In the context of the application of our Policy, the system precludes the operator from selling a product to someone underage due to the data entry of the customer responses.

## Law Posters

Posters are issued to stores every three months and are used to confirm and evidence employees' understanding of our Policy and Procedures. The Store Manager is accountable for this record.



## Investigation Guide

An Investigation Guide has been provided to support Area Managers in investigating any failed test purchase. The Guide refers the user to the recordings on the stores CCTV system and advises examination of the sale (e.g. to establish whether the seller made eye contact with the purchaser), prompts the user to review the refusals log to assess the frequency and regularity of challenges and refusals, etc.

The Guide also includes a list of potential solutions to be incorporated at the store to help further reduce the risk of underage sales (e.g. coaching by working alongside more experienced members of staff, etc).

## 5. Monitoring

### Refusals Log

Every day Store Managers are sent an automatic 'End of Day report' with the number of refusals recorded on the till for the previous day and week to date, so that this element of store performance may be monitored.

In addition, a summary of all the challenges and refusals actioned by the store, known as the 'Age Authorisation Report', may be generated at any time. This enables line management to assess the adequacy of the number of challenges, in terms of both the individual and the store as a whole. The Report is checked by the Area Manager on planned visits to the store and documented in their Visit Book.



## Internal Test Purchasing

Our Internal Test Purchase programme is conducted by a third party, and is designed to raise the profile of age-restricted sales and drive performance in our stores. Stores receive regular visits throughout the year, and Area Managers are informed of each of their stores' test purchase results by email (within 48 hours). A weekly report enables them to further monitor performance and identify any trends. Failed test purchases are investigated by the Area Manager.

Regional Operations Managers receive a Company, Regional and Area breakdown of internal test purchase performance. This facilitates effective monitoring of all stores on a continuous basis, further support being provided where necessary, and the identification of the need for any remedial action to be taken.

## Store Steering Wheel

The Store Steering Wheel provides stores with a visual representation of their current performance status for Company KPIs (key performance indicators) including internal test purchasing results. This is reported on a monthly basis providing the store with a RAG rating.

## ROM Notification Form

The ROM Notification Form must be completed by Area Managers following an external test purchase failure, and forwarded to the relevant Regional Operations Manager. This process is designed to monitor the quality of investigation and remedial action.

## 6. Review and Audit

Our Board Directors and Chief Executive Officer meet every two weeks through Corporate Governance Groups. They are provided with performance updates (in addition to monthly written reports), and the opportunity to discuss the further development of our management systems. This completes the provision of robust links between the Corporate Body, Head Office, and Field Operations.

Governance Groups are provided with formal reviews by the Trading Law Team on a regular basis throughout the year.

### Audit

Our Internal Audit Team visits every store on an annual planned frequency and check key compliance areas for age restricted sales management. This information is also reported to the Board.

## 7. Conclusion

We hope this has provided you with useful information on our Policy and Procedures. Should you require any additional information or have any suggestions to support the continuous improvement of our management system, please do not hesitate to contact the **Trading Law Team on 01543 363195**.