



**STORE OPERATIONS POLICY  
AND  
TILL STEP BY STEP GUIDE  
CHALLENGE 25 LEGISLATION:  
VERSION 6**



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**PLEASE NOTE THAT THE TEXT HIGHLIGHTED IS  
INFORMATION SPECIFIC TO STORE MANAGEMENT**

## Introduction

Heron Foods follow a 'Challenge 25' policy concerning all underage sales. **This means that if a customer is seeking to buy an age-restricted product (of any kind) the staff member serving should ask themselves the question "does the person in front of me look like they may be under the age of 25 years?"** If the answer is yes then they should ask the person for valid proof of age. . If the identification confirms that they are over the legal age of purchase for that product then it can be sold to them, **however without proof of age the sale must be refused. Management do not have the discretion to override the cashier's decision if there is no proof of ID.**

**Failure to comply or if a store fails an audit, may result in disciplinary action being taken as per Heron Foods Disciplinary Procedure as outlined in the Employee Handbook**

These procedures are in place to benefit and protect our employees in respect of Age Restriction Legislation.

## What is Age Restriction Law

There are laws that restrict the sale of certain products and services to underage people. If a staff member or the retailer are found to be selling any of these products to underage people then they could be subject to a variety of penalties. The following products are legally age-restricted:

- Alcohol – 18
- Lighter Fuel/Butane – 18
- Tobacco and Cigarette Papers – 18
- E-cigarettes/Vaping – 18
- Lottery – 16
- Knives – 18
- DVDs and Video Games – 12, 15, 18
- Fireworks – 16, 18
- Aerosol Paint – 16
- Christmas Crackers – 12
- Petrol – 16

As a responsible retailer, we have a duty of care when selling items to our customers. There are other products including psychoactive substances, medicines, tobacco associated products, adult magazines and lads' magazines that are not legally age-restricted, but will still be included in our Challenge 25 Policy.

Heron Foods have also made the decision to restrict High Caffeine and Energy Drinks to those under the age of 16. Eggs, flour and toilet paper may also become restricted at certain times of the year such as Halloween, when we could be asked by local police or other community representatives to limit their sale to under 18s to prevent anti-social behaviour.

## What Should I Do?

### Responsibility of All Heron Foods Staff

If you believe you are serving a customer who looks under the age of 25 and who is attempting to buy an age restricted product then you must follow the steps below:

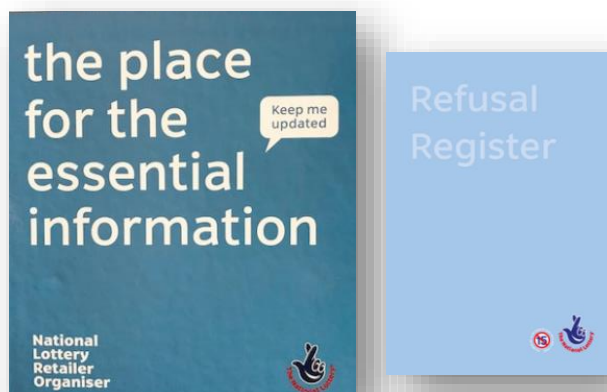
1. Ask for valid proof of age.
2. If the customer does not have satisfactory identification then refuse the sale.
3. Remember, if you have had any doubt about the customer's age then you **MUST** see identification before proceeding with the sale. verbal confirmation IS NOT ACCEPTABLE e.g. 'I'm old enough' or 'My date of birth is .....'
4. If the customer shows valid proof of age, check they are old enough against the products till prompt.
5. If you are refusing a sale then the details must be written down in The Heron Foods Challenge 25 Refusal Register. See example below.

*If you are below the age of the age-restricted product, i.e. aged 16 or 17 then you should always ask an appropriate aged member of staff to authorise and be present to approve the transaction.*

*It is a legal requirement that Heron has to comply with.*

### What does a Refusal Register look like?

Below is the Heron Foods Refusal Register and the Camelot Refusal Register. If you are refusing a sale then the details must be written down in The Heron Foods Challenge 25 Refusal Register, which should be kept at the main till area. Your Heron Foods Challenge 25 Refusal Register must be kept up to date as it may be requested by either the police or trading standards, a completed refusal register is a great way of showing due diligence. It is important to complete an accurate description of the customer, so that this can be matched with CCTV records.



#### IMPORTANT NOTE:

If you have lottery in your store then the Camelot Refusal Register must be kept in the National Lottery Retailer Organiser folder, normally held next to your Lottery terminal. You do not need to maintain it as all refusals must be logged in the Heron register, but a Camelot representative may request it for audit purposes.

1. When reviewing the record of refusals you should:
  - a. print off the attached PDF report from the auto-email sent to your store weekly (am Sunday)
  - b. The report is for the previous week and highlights the till and cashier who has refused a sale. (See example opposite)
  - c. The report should be reviewed and checked against the Refusal Register. Clearly mark any amendments together with actions taken, sign, and date before placing the completed report in your box file.
2. By using the report, consider whether all staff who have been on a till are registering refusals. If staff are not completing the register, then consider if they need refresher training.
3. By using the report you should look if there are any trends e.g. days or times with no declines or a high number of refusals taking place? For example a local youth club being opened may increase demands
4. Check if refusals are being accurately recorded; is the record sufficient to match with CCTV?

Box/Time	Branch	Terminal	Transaction	Cashier
12/0/18 22:15	4	2	120711	
12/0/18 24:42	4	2	721527	
12/0/18 25:22	4	1	623225	
12/0/18 0:28	4	5	279544	
12/0/18 00:05	4	1	623546	
12/0/18 00:22	4	5	279661	
12/0/18 02:37	4	4	451260	
12/0/18 22:10	4	4	461264	
12/0/18 22:05	4	2	471240	
12/0/18 0:11	4	2	471222	
12/0/18 12:48	4	1	423222	
12/0/18 5:28	4	2	738725	
12/0/18 13:47	4	4	423220	
12/0/18 25:04	4	2	612225	
12/0/18 24:48	4	2	612224	

With BrandName Total 15

### Responsibility of Store Management

- It is the Store Management responsibility to train and brief all new starters on responsibilities and actions to be taken in respect of Challenge 25 legal requirements. Any updates to the policy must be communicated from the Store Management to all members of staff. It is their responsibility to ensure that all staff fully read and understand this policy and that the questions in the assessment completed as confirmation of their understanding.
- It is their responsibility to ensure the assessment and training declaration form is retained in store and used to brief all new starters on the Policy.
- It is their responsibility to check and sign the Refusal Register after every refusal.

### Additional Home Delivery Responsibility

#### Prior to delivery:

- If the home delivery contains age restricted products then the person packing the shopping must clearly identify this on the home delivery slip by circling **Y** or **N** in the **Challenge 25** box
- Age restricted items should be packed in a separate bag and the bag marked **\*C25\***
- The customer should be notified at this point that an appropriately aged adult will need to accept the delivery at the customers home and ID may be requested for those who look under 25 years old.

DELIVERY NUMBER		
TIME SLOT		
I CONSENT TO HERON FOODS USING MY DATA FOR HOME DELIVERY PURPOSES		
SIGNED:		
NAME:		
ADDRESS:		
TOWN:		
POST CODE:		
TELEPHONE:		
AMOUNT : £		
BAGS:	F	C
TOTAL BAGS:		<b>CHALLENGE 25 Y/N</b>
RECEIVED BY (PRINT)		
RECEIVED BY (SIGN)		
DATE:		TIME:

### At Delivery

- The Home Delivery Driver **must** ensure when age restricted products are delivered to the customer's home that the appropriately aged customer accepts the delivery ie do not leave them with an under-age person.
- If an appropriate age person is not present, then the driver cannot deliver the age restricted products in the bags marked **\*C25\***, these must be returned to store and the customer will have to contact the shop to make alternative arrangements.
- When age restricted products cannot be delivered, the driver should write '**No C25**' in the 'received by' box on the delivery slip and ask the customer to sign and print in the box. (see picture opposite)

DELIVERY NUMBER			
TIME SLOT			
I CONSENT TO HERON FOODS USING MY DATA FOR HOME DELIVERY PURPOSES			
SIGNED:			
NAME:			
ADDRESS:			
TOWN:			
POSTCODE:			
TELEPHONE:			
AMOUNT : £			
BAGS:	F	C	D
TOTAL BAGS:	CHALLENGE 25 Y/N		
RECEIVED BY (PRINT)			
RECEIVED BY (SIGN) <span style="border: 1px solid black; border-radius: 50%; padding: 2px;">No C25</span>			
DATE:		TIME:	

### What is the policy for Employees who are 16 – 17 years of age?

- If you have a member of staff who is below the age of the age-restricted product, i.e. aged 16 or 17 then you should inform them that they should ask an appropriate aged member of staff to authorise and be present to approve the transaction.



### ID Checklist

REMEMBER young people attempting to deceive you into selling them an age-restricted product can do so by presenting you with:

- A genuine ID that has been tampered with
- A genuine ID that isn't actually theirs
- A fake ID that is an imitation of a genuine ID card type
- A fake ID that is made for the purpose of looking genuine, but is not a real scheme

## Acceptable forms of ID

Below are examples of acceptable forms of identification e.g. Passport, PHOTO Driving Licence, Proof of Age Standards Scheme (PASS) approved proof of age card, Military ID Card



## Unacceptable forms of ID:

Examples of unacceptable forms of identification are:

- ⦿ Bank Card, Credit Card,
- ⦿ Medical Card,
- ⦿ Student ID Card
- ⦿ Lottery receipts etc.
- ⦿ Birth certificates are also unacceptable as they are not photo ID.



## When checking ID follow these steps:

### Step 1 – Check the Photograph

Ensure that the photograph is of the person presenting the card. The photograph must be printed directly onto the plastic of the card NOT stuck on top of the plastic.

### Step 2 – Check the Date of Birth

Calculate the age of the person from the date of birth (It may be useful to keep a note of the birth year for a 16 and 18 year old on the till point). The date of birth must be printed directly onto the plastic – NOT handwritten or stuck on top of the plastic.



**Step 3 – Check the Document**

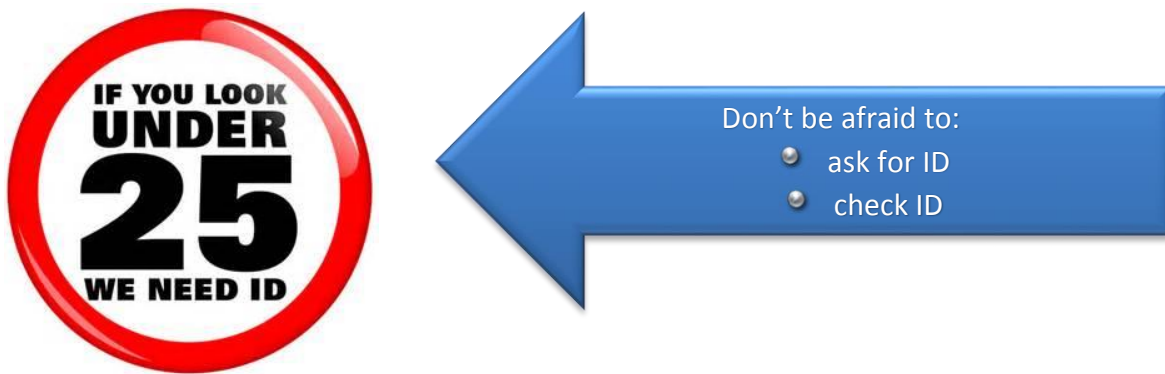
Ensure the card has not been tampered with or altered (e.g. the printed dates have been altered using a pen or marker). Feel the card in order to identify whether anything has been stuck to the card. Look out for official looking cards that are actually fake. There is no such thing as a UK National Identity Card or a Motorcycle Learners Permit. The only official documents you should accept are passports, driving licences and military ID cards.

**Step 4 – Check the PASS Hologram (If not a passport or driving licence or military ID card)**

Look for the 3D effect in the background of the hologram. Make sure it has the characteristic tick on the 'A' in the PASS lettering. The hologram must be flush with the plastic of the card – NOT stuck on top of the plastic.

**Step 5 – Check the Person**

If you are still unsure about a person's age, your legal responsibility is to refuse the sale.



## What Age Restricted items do we sell?

### Fire Lighters/ Cigarette Lighters/ Fire Logs (18)

Heron Foods restricts the age these products can be sold to as they may be used to commit arson and should therefore not be sold to minors.



### Tobacco/ Cigarette Papers (18)

Selling cigarette papers to an **under 18** can lead to a **criminal record** and a **fine of up to £2,500**. The store and/or individual can be banned from selling tobacco under a tobacco banning order.



### E-cigarettes/ Vaping (18)

A person who sells an e cigarette to someone **under 18** commits an offence and can be **fined up to £2,500**. The owner of the business can also be held responsible as well as the member of staff.



### Knives (18)

Selling a knife or blade of any kind (e.g. Cutlery) to someone **under 18** is illegal and can lead to an **unlimited fine** and **up to 6 months in prison**.



### Christmas Crackers (12)

Selling this product to someone **under 12** is illegal and can lead to an **unlimited fine** and **up to 3 months in prison**.



### Medicines (16)

Heron Foods restricts the sale of medicines to anyone **under 16**. You must never sell any medicine product in quantities greater than 32 tablets in one transaction to anyone.



### Psychoactive Substances (18)

These are products such as solvent-based glues, correction fluid, anti-freeze and false nails. Heron Foods restricts the sale of these products to anyone **under 18**.



### High Caffeine/ Energy Drinks (16)

Heron Foods restricts the sale of high caffeine/ energy drinks such as Red Bull to anyone **under 16**.



### Alcohol (18)

Selling this product to someone **under 18** is illegal and can lead to an **on the spot fine of £90, a caution that appears on your criminal record, a formal prosecution including an unlimited fine to the individual.**



WINE

BEER

CIDER

### The National Lottery On-line Games & Gamestore Scratchcards (16)

It is an offence for anyone under the age of 16 to SELL A TICKET, BUY A TICKET or CLAIM A PRIZE concerning a National Lottery ticket or Gamestore scratchcard. The penalty is **an unlimited fine and up to two years in prison.**

The National Lottery has a mystery shopper campaign in place called 'Operation Child' to ensure retailers do not sell Lottery products to under 16s.

If you are subject to a Camelot test purchase and fail, you **MUST** immediately inform your Store Management of the failure. This will subsequently be reported to the relevant Area Manager, Regional Manager, HR Business Partner, Regional Trainer and Services Manager.

### What are Proxy Sales?

It is illegal for an adult to buy or attempt to buy an age-restricted product on behalf of someone under age.

You have the right to refuse the sale of an age-restricted product to an adult if a child accompanies them and you think the age-restricted product is being bought for the child.



Just because someone who is clearly underage accompanies a customer, that does not mean you should suspect him or her of being a proxy purchaser.

If you see the adult asking the child what alcohol they want, or if the child's behaviour suggests the alcohol is for them; then you should refuse the sale.

Try, as far as possible, to monitor what is happening outside your store, especially, if young people are hanging around. If you see what looks like an adult being asked to buy a product by a person outside the store, refuse the sale to that person and report it to the police.

## What is a Test Purchase?

A “Test Purchase” is an audit to check that a shop complies with the Law in relation to the sale of age-restricted products. The “Test Purchase” will be conducted either:

- internally using Heron employee/contractor
- by a supplier such as Camelot
- by a government agency e.g. Trading Standards or the Police

Failing a test purchase may result in you (cashier) receiving an on the spot fine or criminal conviction or formal disciplinary action.

## Failing a Test Purchase

If you are approached by Police or a Trading Standards Officer or both, advising that a colleague has failed a test purchase, you should remove the colleague from the till and advise them:

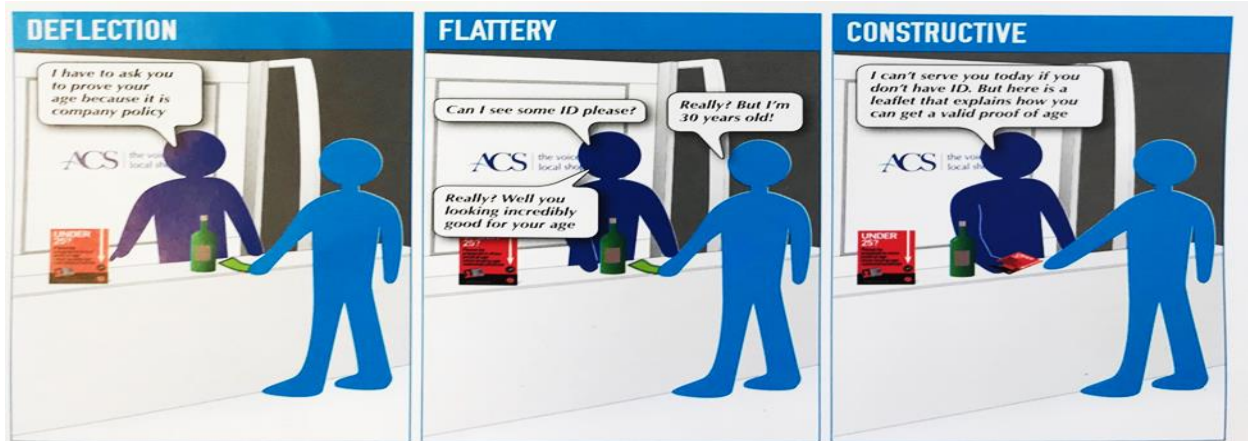
- Not to enter into any debate or dispute as anything said following a caution could be used against them if taken to court
- That they will not be allowed on the checkout until they have been interviewed by the store manager to ascertain the events surrounding the failed test purchase. Only after re-training and being re-signed off can the colleague operate a checkout.

When a failed test purchase has taken place, the Store Manager must inform the Area Manager, Regional Manager and the HRBP immediately and confirm that the colleague has been removed from the checkout. The manager must also outline the event leading up to the failed test purchase, this would include:

- The Colleague’s name
- Length of service
- When last trained
- Time of test purchase
- What checkout was the colleague on
- Name of manager or duty manager on duty at the time of the incident
- Who carried out the test purchase
- What item was being test purchased (BWS)
- What action is being taken
- The fine does not have to be accepted and paid immediately (the fine is the responsibility of the colleague to resolve and they have 21 days to decide whether to accept the fine).

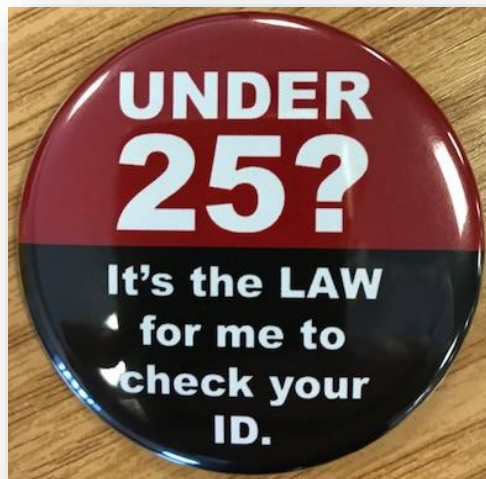
## Common refusal approaches

It is normal for retailers and staff to feel apprehensive or awkward about asking people to prove their age, below are 3 useful strategies. It is also useful to remember that young people are used to being asked for ID.



## Challenge 25 Badges

You will have a supply of Challenge 25 Badges – please ensure that you and your colleagues wear this whilst serving on the Till at all times. Please keep these in your Challenge 25 box file number 11 so that they can be re-used.



## Alcohol Sales

### Area Manager Responsibility

It is the Area Manager's responsibility to ensure continuity of the stores Designated Premises Supervisor (DPS). This means that if the Store's DPS leaves the Company or moves stores the Area Manager must:

- **Ensure that it is escalated to Store Support Centre within 24 hours of notification i.e. do not wait until the individual has left the Company or moved store**

Area Manager then becomes the temporary DPS of that store until such time a new DPS is recruited and or trained.

### Store Management Responsibility

By law, each Heron shop has had to apply for an individual premises licence to sell alcohol, this means that store managers have had to complete accredited training to become a Designated Premises Supervisor and hold a Personal Alcohol Licence.

**Store Manager** – It is the Store Manager i.e. the Designated Premises Supervisor responsibility to:

- Ensure that all staff have completed this training and assessment document and have signed the training declaration form.
- Ensure all staff complete refresher training every 3 months.
- Ensure that staff are not allowed to sell alcohol until this training has been completed.
- Carry out Challenge 25 training and assessment for all new starters.
- Get to know your appointed a licencing officer i.e. make them welcome in your shop, a cup of tea or coffee goes a long way and will help build a successful working relationship.
- Store Managers should check the refusal register on a weekly basis and countersign the refusal.
- Ensure all Store Management understand how to review footage on the CCTV, e.g. review, record and change the time. (View documents on Sharepoint/Retail/Loss Prevention/CCTV)
- Ensure that the licence displayed in the store in the prescribed place and has the duplicate copy in the safe.
- Ensure that the licence is laminated and displayed on the wall by the checkouts or in the area that may be specifically identified on the licence.
- Ensure that the terms and conditions of the license are checked that the store is trading within these terms and conditions.

### Store Staff Responsibility

It is your individual responsibility to:

- Adhere to the policy at all times. You should complete the assessment and the refresher training at regular intervals i.e. Jan, April, July, and September as instructed by your Store Manager.
- If you are under 18 years of age and a member of staff you should not sell alcohol. You will need to ask an appropriate aged member of staff to supervise you.
- Know the licensing hours for the store.

- Be made aware of “proxy sales” these are purchases made by someone of legal age who then passes the alcohol to someone under the legal age.
- Not sell alcohol to customers they believe and it is clear that the alcohol is going to be passed to a person that is under age.
- Refuse the sale of alcohol to an adult if they are accompanied by a child and you think the alcohol is being bought for the child.
- Refuse the sale to any member of the public who is attempting to purchase alcohol and is under the influence of drink or drugs.
- Be aware that it is an offence for a person under 18 to attempt to buy alcohol if this takes place refuse the sale.
- Know where the refusal log is kept.
- Know how to enter refusals and complete the refusal log.
- Advise the store manager of customers who are under age repeatedly trying to purchase alcohol.

## Alcohol

To prevent anti-social behaviour, Alcohol sales are heavily restricted by law and cannot be sold:

- To customers who look under age 25 and cannot provide ID
- To customers who are drunk
- To customers who are buying alcohol on behalf of someone under 18

Certain shops will have restrictions on their licence meaning single bottles of beers and ciders cannot be sold, we will restrict your ability to order these on the tablet. However, in the event of your order being incorrectly picked, you should inform the Area Manager and box the product with 'Not for Resale' tape. Area Managers will transfer the stock to another alcohol store.

## Penalties

Both Store Management and Till Operators are responsible by law for making sure customers are old enough to buy age-restricted products. There are significant penalties for selling alcohol to a person under the age of 18 for both staff and retailers. These include:

- A fine of up to £5,000 if a member of staff makes an underage sale unless they can show they have taken all measures including asking for identification that would convince a reasonable person that they were over 18
- Disciplinary action from Heron Foods which could result in termination of employment
- An on the spot fine of £90 for any shop worker selling to a person underage
- A fine of up to £20,000 for a premises that persistently sells to people underage, defined as happening on 2 or more occasions in a 3 month period
- Closure orders for a maximum of 14 days following persistent underage sales
- A fine of up to £5,000 for proxy sales, for a person who purchases alcohol on behalf of a minor
- Loss of alcohol licence for shops offending repeatedly



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**In addition to the above penalties, Heron Foods could also face:**

- Bad publicity causing damage to our excellent reputation
- Loss of sales
- Attraction of more underage customers as we are seen as an easy option
- Closure of the Beers, Wines and Cider section

**During the first 3 months of selling Alcohol, frequent test purchases are common until Police and Trading Standards establish that acceptable precautions are being taken to prevent underage sales, whilst it's important to remain vigilant at all times, it's especially important during the first 3 months of selling alcohol.**

**IMPORTANT: A PERSISTENT OFFENDER IS A SHOP WHO MAKES 2 UNDER AGE SALES OF ALCOHOL WITHIN A 3 MONTH PERIOD, REMAIN VIGILANT AT ALL TIMES**

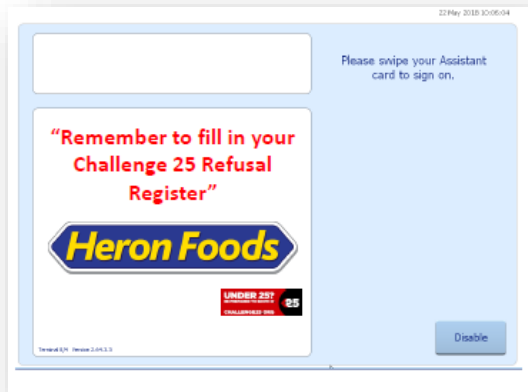
## STEP BY STEP GUIDE FOR THE TILL PROCEDURE

Products that we sell that have an age restriction have been identified and have been activated on the till system. Therefore, two prompt screens will be displayed when you sign in and when an item is scanned.

**All individuals who look under the age of 25 must be asked to show valid photographic ID.**

### Stage 1: Sign-on Screen

When a colleague signs in on the till for the first time they will see this screen. It is a reminder to remember to fill in the Challenge 25 Refusal Register.



### Stage 2: Till Screen Prompt

- A. Once a product is scanned through the till that has an age restriction assigned to it, the following screen prompt will appear:

The age limit will change depending on the age-restricted product scanned. However, ID must be requested from all customers who look under 25 years old

**Customer Age Check**

Customer must be at least 18.

Is the customer old enough to purchase these items?

Enter Date of Birth to perform an optional check  Perform Check

(DDMMYYYY)

Yes No

### Stage 3: Ask the Customer for a valid photographic ID

Ask the customer for a valid photographic ID as referenced in the Heron Foods Age Restriction Policy.

### Stage 4: Perform a Customer Age Check

- A. After you have asked the customer to show you a valid photographic ID and you are still unsure if the Customer appears to be under 25, the system will allow you to perform a Date of Birth Check.

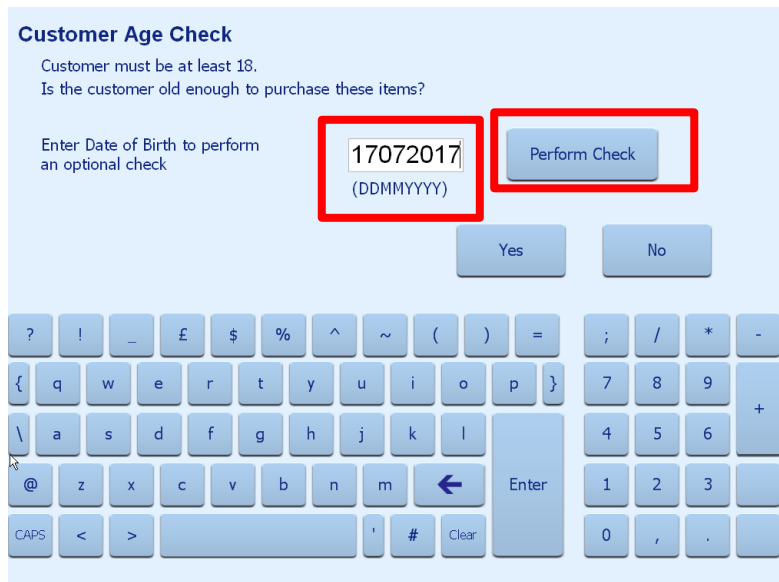
**Customer Age Check**  
Customer must be at least 18.  
Is the customer old enough to purchase these items?

Enter Date of Birth to perform an optional check

17072017  
(DDMMYYYY)

Perform Check

Yes No



Enter the Customers Date of Birth in the (DDMMYYYY) check field on the screen then press the "Perform Check" button

- B. The following Warning Message will appear, advising that the Customer is not old enough to purchase the item. Click "OK".

**Customer Age Check**  
Customer must be at least 18.  
Is the customer old enough to purchase these items?

Enter Date of Birth to perform an optional check

perform Check

No

**Warning**

Age check failed for this item.

OK



- C. In the “Sales Transaction” window the product will appear confirming it has been refused

No of Items	0
TOTAL	£0.00
PROMOTION	£0.00
TO PAY	£0.00
<b>Age Refusal: 88Vape Classic P £5.99</b>	
<input type="text" value="Enter PLU"/>	

- D. If the Customer shopping basket contains multiple age restricted items, the till will automatically allow/refuse these based on the date of birth entered e.g. for a 17 year old customer, items in the basket with a minimum age of 16 will be allowed and items with a minimum age of 18 will be refused.

### Customers who look Over 25

Use your common sense when serving customers who clearly look over 25. If you are in any doubt do not assume use the Customer Age Check to calculate and confirm if they are over 25.

- Press “Yes” to proceed with the sale without entering the Date of Birth if the customer looks over 25.
- Once you have confirmed that the Customer is over 25 any other items in the shopping basket that are age restricted will be processed without having to re-confirm the Customer age.

### Customer Age Check

Customer must be at least 18.  
Is the customer old enough to purchase these items?

Enter Date of Birth to perform an optional check

(DDMMYYYY)

Perform Check

Yes No




**Important Point:** It is always advisable to watch your till screen for prompts as you may miss the age restriction pop up screen. Therefore, complete the Yes/No input before continuing to scan other products.

### Stage 5: What to do with the product

If the sale has been refused, the product should not be given to the customer and you should return the item back into stock, using the normal store procedure.

### Further Support

- If you require further guidance and support, please contact your Area Manager.
- If there is a technical fault/issue, please contact the IT Support Help Desk on extension 3818.