



Enhancing Local Tobacco Control: preventing under age sales of tobacco

Commissioned by the
Department of Health
Tobacco Policy Team

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for the
Chartered Trading Standards Institute 2015

Summary and Key findings

- This project was designed and delivered by the Trading Standards Institute ; (now the Chartered Trading Standards Institute) as part of the Department of Health support arrangement for trading standards services in England; this included advice and guidance for participating authorities;
- The aims were to increase knowledge and awareness of the variety of sources of intelligence available to trading standards services to help inform local activity in relation to under age sales of tobacco. In addition, to coordinate a testing programme across England with the resulting data used to recommend future actions;
- 86 trading standards personnel from 69 trading standard services attended bespoke training designed and delivered by expert trainers appointed by the CTSI; the training events were assessed as highly effective by attendees ; the event evaluations are included in this report;
- 48 trading standards services participated in the testing phase of this project; conducting 352 tests of businesses with young people under the age of 18 years attempting to purchase tobacco products;
- Whilst the majority of businesses tested were found to comply with the law, there were 63 illegal sales made representing a percentage illegal sale rate of 18 %. This is higher than the 10% rate recorded in the National Tobacco Control survey of 2013-14 and the 15% recorded in 2012-13; this suggests that a focussed approach to test purchasing based on local intelligence may be a more effective approach for trading standards services and make the best use of limited local resources
- 13% of the illegal sales made by businesses during this project were repeat offenders having previously sold tobacco illegally to a young person.

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1. Introduction

The tobacco control survey of trading standards activity (across England) 2013-14¹ found that eighty eight per cent of all councils had conducted activity in relation to under-age sales (any activity). This was a decrease in the proportion of councils conducting activities in relation to under-age sales in 2012/13 (decreasing from 95 per cent). The percentage of businesses making illegal sales during test purchase operations in 2013-14 was 10%.

In addition, there has been a significant decrease since 2012/13 in the number of councils conducting test purchase operations with volunteer young person's down from 92 per cent to 74 per cent of councils.

Of the councils that stated a reason why that they had not undertaken test purchase operations in 2013-4, the most frequently cited reason was a "lack of intelligence" or credible information about where to focus testing activity. This point is closely associated with cited difficulties in compliance with the Better Regulation Delivery Office (BRDO) Age Restricted Products and Services: A Code of Practice for Regulatory Delivery². The code points to the need for intelligence to support testing operations as well consideration of the need for an authorization for directed surveillance under the Regulation of Investigatory Powers Act 2000. The Code states that:

"Where an enforcing authority is considering conducting a test purchase exercise, consisting of one or more test purchase attempts, it should consider the statutory requirements for authorisation under the Regulation of Investigatory Powers Act 2000, as amended. It is unlikely that authorisations under RIPA for covert methods will be considered proportionate without demonstration that overt methods have been attempted and failed."

Of the other reasons given by Councils for not conducting test purchase operations; a "lack of resources" and "resources directed at other age restricted products" were most frequently cited.

The reduction in activity in this area of tobacco control at a local level prompted the CTSI and DH to support local trading standards services by providing practical advice on sources of intelligence available to assist them in this work and a review of the requirements of the

¹ Tobacco Control Survey of Trading Standards Activity in England 2013-14 available online at : <http://www.tradingstandards.gov.uk/policy/Improvingthehealthofsociety.cfm> [accessed 6th March 2015]

² Better Regulation Delivery Office Age Restricted Products and Services: A Code of Practice for Regulatory Delivery 2014 available online at : https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/299373/13-537-code-of-practice-age-restricted-products.pdf [accessed online 6th March 2015]

Code. The project also sought to gather data on the effectiveness of focused test purchase operations.

2. Context

2.1 Strategies

Healthy People: Healthy Lives a tobacco control plan for England³ was published by the Department of Health in 2011 and runs until the end of 2015, the strategy commits to the following:

“Encourage and support the effective local enforcement of tobacco legislation, particularly on the age of sale of tobacco products and

Support the continuing provision of guidance, education and best practice for the local enforcement of tobacco legislation”

Our Priorities 2013-14: Public Health England⁴ states that the organisation will:

“Accelerate efforts to promote tobacco control and reduce the prevalence of smoking”.

2.2 Young People & uptake of smoking

In a report published by Cancer Research UK in 2013⁵ it was estimated that 207,000 children aged 11-15 years start smoking every year in the UK. It is also widely reported that amongst adult smokers, about two-thirds report that they took up smoking before the age of 18 and over 80% before the age of 20.⁶ Further, the 2011 General Lifestyle Survey of adult smokers revealed that almost two-fifths (40%) had started smoking regularly before the age of 16.⁷

³ Department of Health, 2011. *Healthy Lives, Healthy People: A Tobacco Control Plan for England* 13th http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_124960.pdf [accessed 13th March 2015]

⁴ Public Health England 2013, *Our Priorities 2013:14* https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192676/Our_priorities_final.pdf [accessed 13th March 2015]

⁵ Cancer Research UK report available online at <http://www.cancerresearchuk.org/about-us/cancer-news/press-release/2013-03-22-more-than-200000-uk-children-start-smoking-every-year> [accessed 13th March 2015]

⁶ Robinson S & Bugler C. Smoking and drinking among adults, 2008. General Lifestyle Survey 2008. ONS, 2010 available online at : file:///C:/Users/Jane/Downloads/glfsmokinganddrinkingamongadults200_tcm77-74228.pdf [accessed 13th March 2015]

⁷ Office for National Statistics. General Lifestyle Survey Overview: A report on the 2011 General Lifestyle Survey. 2013 available online at : <http://www.ons.gov.uk/ons/rel/ghs/general-lifestyle-survey/2011/rpt-chapter-1.html> [accessed 13th March 2015]

The younger the age of uptake of smoking, the greater the harm is likely to be because early uptake is associated with subsequent heavier smoking, higher levels of dependency, a lower chance of quitting, and higher mortality⁸.

2.3 Accessibility of tobacco

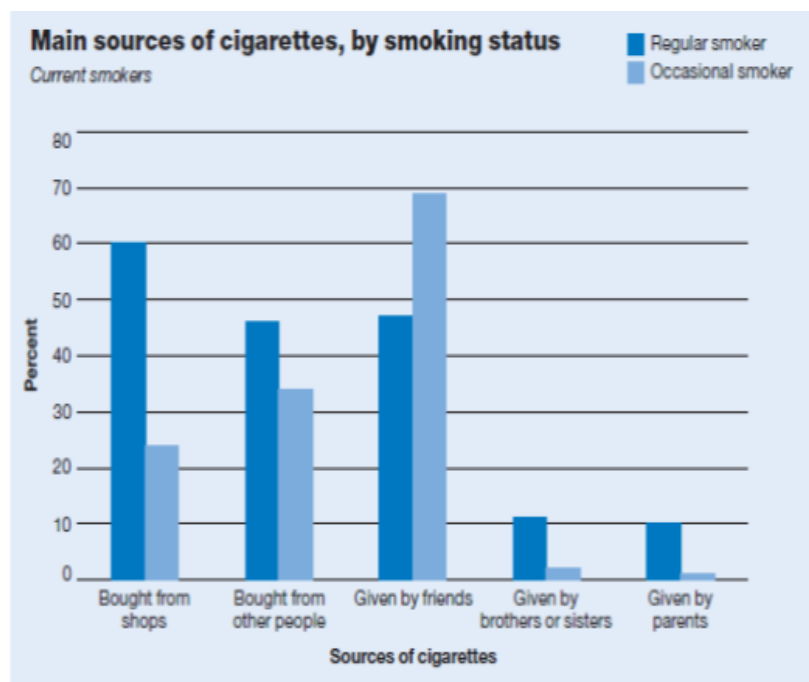


Figure 1: Main sources of cigarettes for young people by smoking status⁹

Sixty per cent of regular young smokers stated that they bought their cigarettes from shops; this suggests that it is important to continue to tackle the supply of tobacco to young people at a local level.

3. Scope

The training element of this project was developed and delivered by the Chartered Trading Standards Institute as part of the DH arrangement for support arrangement for trading standards services in England. The testing element was undertaken by trading standards services in England across nine regions. All tests were carried out between December 2014 and the end of March 2015. The data arising has been included in the National Tobacco Control survey for 2014-15.

⁸ Passive smoking and children. Royal College of Physicians, London, 2010 (pdf) available online at : <https://www.rcplondon.ac.uk/sites/default/files/documents/passive-smoking-and-children.pdf> [accessed 13th March 2015]

⁹ Health and Social Care Information Centre, Smoking Drinking and drug use among young people in England 2012 available online at : <http://www.hscic.gov.uk/catalogue/PUB11334> [accessed 13th March 2015]

4. Purpose & outcomes

The key purpose and outcomes of this project were to:

4.1 Training trading standards personnel

- Increase the understanding of the requirements of the BRDO code related to the conduct of test purchase operations ; reducing the perception held by some trading standards staff of difficulties associated with compliance,
- Enhance the awareness of opportunities for intelligence gathering for tobacco control operations via the use of available tools and data sets and the sharing of good practice,
- Enhance the confidence of trading standards staff in applying for directed surveillance authorisations in compliance with the requirement of the Regulation of Investigatory Powers Act 2000 (RIPA),

4.2 Additional Testing

- Provide the impetus for additional council enforcement activity; specifically test purchase operations for tobacco products across all regions and, to
- Refresh awareness of the business community of this particular enforcement method.

4.3 Shared learning

- Share the learning between services and regions via focus groups and regional reporting

5. Method

The project was divided into two distinct phases:

5.1 Phase 1:

The CTSI to develop and deliver training and to share existing good practice with trading standards personnel in two sessions (1 x York, 1x London). Trading standards services that had previously indicated reduced or limited test purchasing activity via the National Tobacco Control Survey were given preference with the events being opened up more widely thereafter .

The training was designed to provide, through the use of examples, a focus on the opportunities that exist for intelligence gathering for the conduct of tobacco test purchasing operations. It was also developed to increase confidence in compliance with the requirements of the BRDO code and, in particular the requirements of RIPA. Each session had approximately 20 delegates.

Such was the success of the training events that a further two sessions were commissioned by the Department of Health and delivered in Birmingham and London.

The learning outcomes of the training session may be found at Annex 1

5.2 Phase 2:

To support each region in the conduct of up to 40 test purchase operations to be carried out (primarily) at high risk business premises¹⁰ as identified by the Tobacco Control survey of 2013-14 with priority for participation given to those councils that had attended the training sessions.

See Annex 2 for participants in this phase matched against attendance at the training sessions and whether an authorisation for directed surveillance was obtained for the conduct of the operation. This information is provided to assist trading standards personnel to identify the approach taken in other authorities .

Each participating service was provided with guidance and a data collection sheet in advance for the purpose of this project. The following points were emphasised:

1. *Participating Local Authorities agree to conduct the tests in accordance with all relevant guidelines and professional practice ; please also note that TSI requests that the tests are conducted with a suitable young person **preferably aged 16 –17 years***
2. *Participating Local Authorities agree to prioritise , where appropriate , **high risk** premises as identified by the Tobacco Control survey 2013-14 i.e. **petrol station kiosks and independent newsagents** .*
3. *Data collection - each participating trading standards service agrees to record their data in a standard format (as provided by TSI) and to provide this data upon completion, to the coordinator within the agreed time frame set by the coordinator.*

The time frame for data collection was given as end of April 2015 for receipt by the TSI.

An indication of the range of data collected may be found at Annex 3

6. Results

6.1 Phase 1: Training events

Four training events were delivered between December 2014 and end of March 2015. These events were very well attended by Trading Standards personnel with 86 individuals from 69 different Local Authorities taking advantage of the funded places supported by the Department of Health.

Delegates were contacted post event and requested to complete an evaluation of the training ; a summary of the feedback received may be found at Annex 4. The events were well received and were assessed as highly effective by attendees.

¹⁰ These were identified as: Independent newsagents , petrol station kiosks

6.2 Phase 2: Testing businesses

A total of 352 businesses were tested in phase 2 of the project; slightly less than the 360 test envisaged at commencement of the project. There were 63 illegal sales made to under age young persons representing an overall sale rate of 18%.

Most illegal sales were made from small retailers; the London region recorded the highest overall failure rate.

6.2.1 Summary of testing and results by Region

Region	Number of tests undertaken	Number of sales made	Number of refusals	% Sale rate
EETSA	45	10	35	22%
TSSE	44	4	40	9%
LOTS	46	11	35	24%
SWERCOTS	41	5	36	12%
CENTSA	45	6	39	13%
TSNW	40	9	31	23%
TSNE	36	8	28	22%
TSEM	15	3	12	20%
Y&H	40	7	33	18%
Total	352	63	289	18%

Table 1 : Tests by Region

6.2.2 Summary of results by business type tested

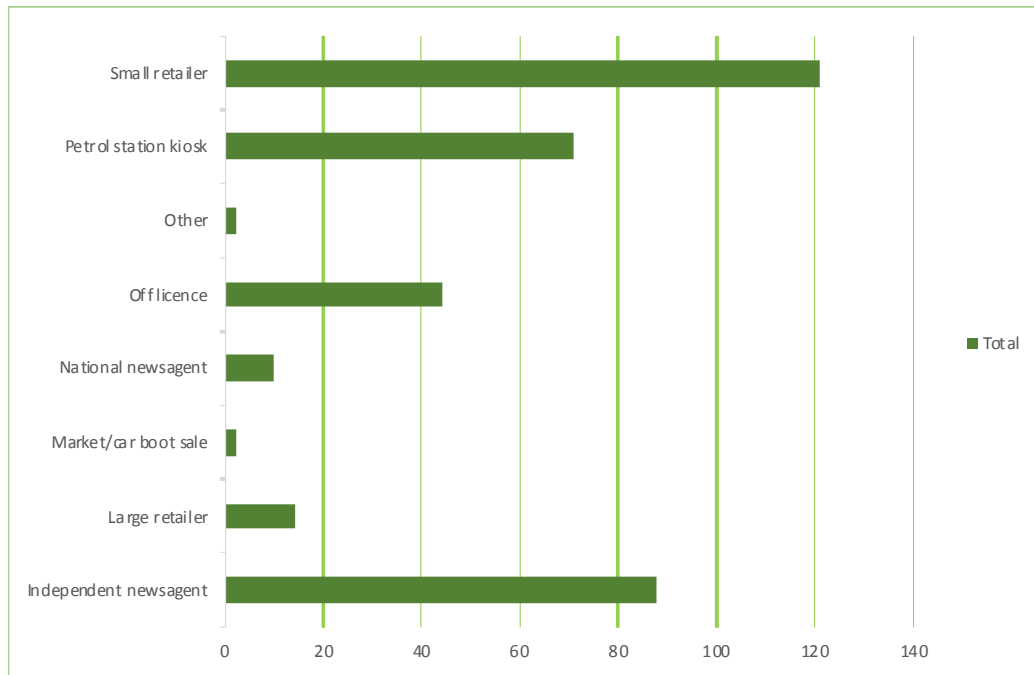


Figure 2: Number of tests undertaken by business type

Type of business	Number of tests undertaken	Number of sales made	% Sale rate
Small retailer	121	29	24%
Off License	44	4	9%
Independent Newsagent	88	14	16%
Large retailer	14	0	0
Pub/ club	0	0	0
Petrol station kiosk	71	14	20%
National Newsagent	10	2	20%
Market / car boot sale	2	0	0
Private homes	0	0	0
Other	2	0	0

Table 2: Percentage illegal sale rate by business type (see Annex 5 for descriptions of business types)

6.2.3 Tests by age and gender of young person

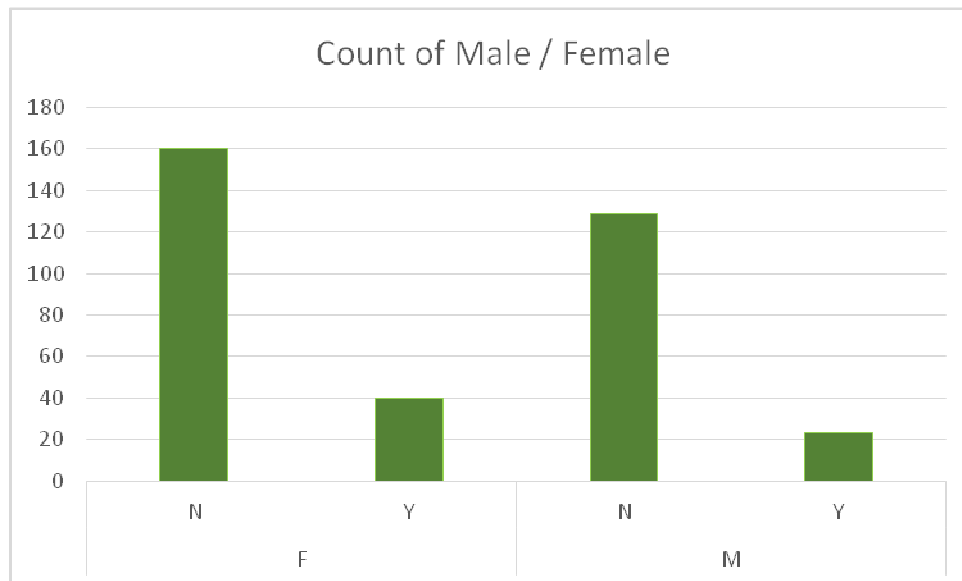


Figure 3 : Chart showing total attempts to purchase made by test purchasers (by gender F / M) and the number of occasions where a sale was made (N = no sale , Y = Sale)

There were 200 attempts to purchase made by female test purchasers with 40 attempts resulting in sales. Male test purchasers made 152 attempts to purchase. Sales were made on 23 occasions.



Figure 4 : Chart showing attempts to purchase by gender , age and number of occasions where purchases were made

There was a variation of sale rate by age and sex, with some samples too small to draw conclusions from (for example male, 17 years). Tobacco was sold to female test purchasers on 20% of occasions across all ages; whereas a lower rate of 15% was found for male test purchasers.

6.2.4 Repeat offenders

Of the businesses that sold tobacco products during phase 2 of this project; 13% had made illegal sales previously.

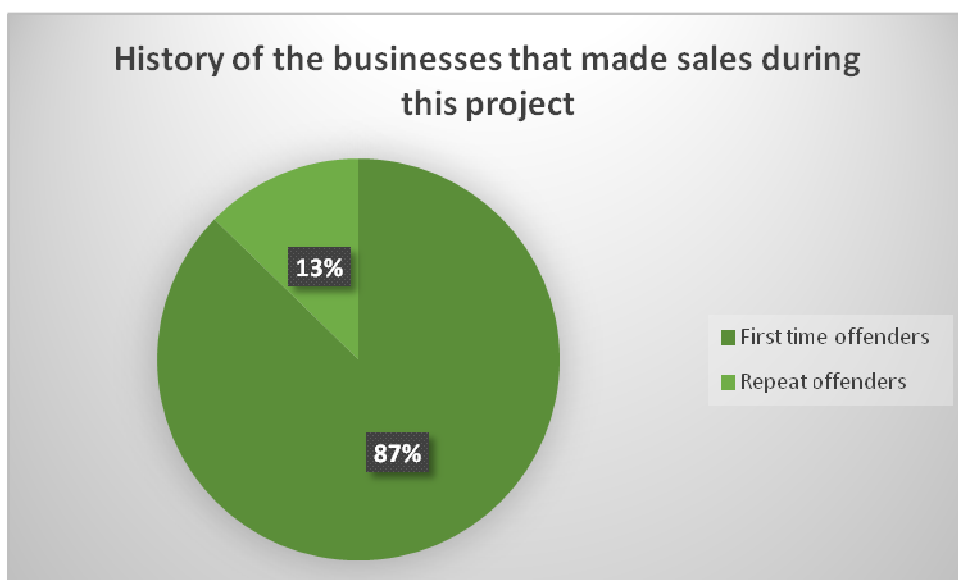


Figure 5: Chart showing the history of businesses that made sales during this project

6.2.5 Authorisations for Directed Surveillance

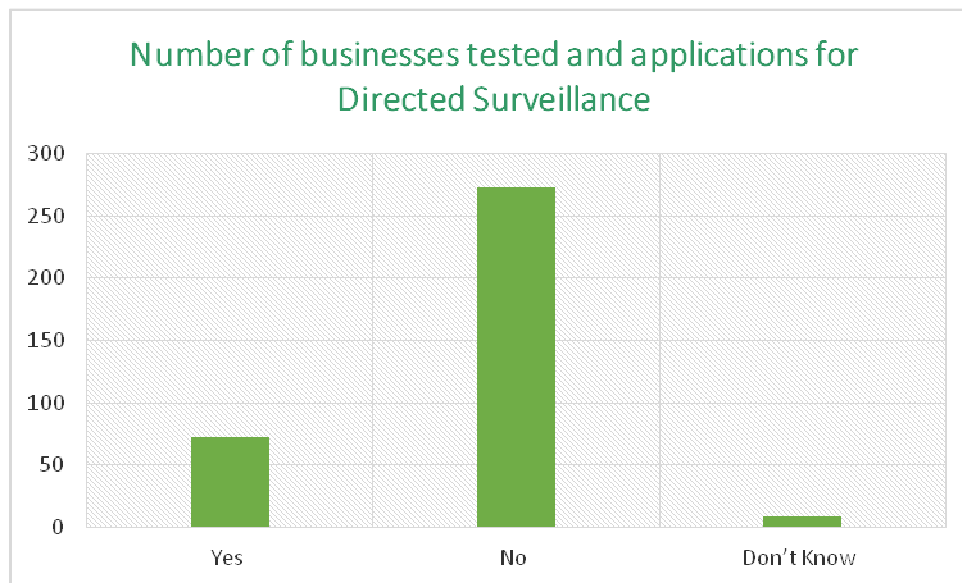


Figure 6: Number of businesses tested and applications for Directed Surveillance

Applications were made for operations that totalled 72 businesses; no authorisations were sought in respect of 273 businesses (there were 7 responses of DK). Fourteen Local Authorities applied for authorisations for their test purchasing operations; of these eleven had attended the training events.

7. Discussion & Conclusions

The majority of businesses tested during this focussed project refused to sell tobacco to the young test purchaser thus demonstrating a responsible approach to protecting children and young people from harm. This must be seen as a positive outcome. The role of retailers in regulatory compliance is addressed by Berrick in his paper “A Tobacco – Free generation proposal” (2013)¹¹.

Berrick explores the issue of business compliance with legislation to control tobacco sales and acknowledges that retailers are themselves integral to reducing youth access to tobacco. This project has identified however that there are still businesses that fail to comply with the law and that for some this is not the first occasion that have sold tobacco illegally. Berrick proposes that the following strategies need to be in place in order to move towards a tobacco free generation:

- Licensing of tobacco retailers
- Training for retailers

¹¹ Berrick. A 2013 The Tobacco-free Generation. Tobacco Control 22 pp22-26

- *Compliance tests conducted regularly*¹²
- *Heavy penalties for contraventions*¹³ ; revocation of licence

There is no statutory requirement for trading standards services to undertake testing activities however, it is clear that there is a need to ensure that this particular aspect of tobacco control is prioritised. The declining activity rate as shown by the National Survey must continue to be monitored by CTSI and the DH and, if appropriate, further steps taken, as in this case, to support future activity.

One of the key objectives of this project was to address the concerns expressed by some trading standards services about a “lack of intelligence” and “difficulties in compliance with the Better Regulation Delivery Office (BRDO) Age Restricted Products and Services: A Code of Practice for Regulatory Delivery “.

On this basis, the training events were designed to specifically address these concerns by the inclusion of two learning objectives:

- *Refresh the understanding of the requirements of the BRDO code*
- *Explore sources of intelligence relevant to reducing the illegal sale of tobacco to young people*

The post training event evaluations show that 97% of attendees scored the events 4-5 (with 5 being excellent) when asked to what extent the event had met the stated learning objectives. A resource directory was produced for the training events and provided to each delegate, this is included at Annex 6 to this report.

Forty eight trading standards services participated in the testing phase of this project, 36 of these authorities had individual officers attend the training events. The number of services participating in the testing phase suggests that there is intelligence available to support the delivery of test purchase operations across England. Furthermore, this particular project has now provided additional evidence that identifies small and independent businesses and petrol station kiosks as requiring further examination as a result of high failure rates.

Perhaps surprisingly, large retail newsagents were also found to have failed to comply with the legislation although it should be noted that only a small number of businesses were tested. This might point to the intelligence for these particular premises being of high quality as typically such premises are not subject to complaint and therefore testing.

Although the BRDO code and, specifically the requirement for authorisations for directed surveillance, was identified as an concern, during this operation only 14 of the participating 48 authorities sought such authorisations.

It is a matter for each trading standards service to determine whether it is appropriate to obtain authorisations. The training events included a session devoted to this issue. Delivered

¹² Highlighted by the Author of this report

¹³ As above

by a Barrister experienced in Trading Standards enforcement activities, the low number of authorities seeking authorisations may indicate that the matter was not of such great significance after all in preventing the conduct of test purchase operations.

The overall sale rate of 18% is higher than that recorded by the National survey in the past two years being 15% and 10% respectively. This suggests that the more focused approach and, in some locations, the additional testing provided for by this project has resulted in a higher failure rate. In London for example, almost a quarter of all businesses visited sold tobacco to underage young people. Furthermore where there are high rates of smoking prevalence amongst young people trading standards services should be encouraged to carry out testing on a regular basis, it is still a valuable and important tool in identifying where problems exist.

Thirteen per cent of the businesses that made an illegal sale during this project had done so previously. The purpose of this project was not to identify the sanctions that had been applied previously to these businesses however, it does suggest that the sanctions, if sought, were not sufficient to prevent a recurrence of the offence. The application for a restricted sale and / or premises order may be suitable for those that have made a repeat sale on this occasion.

Against this backdrop, mention must be made of the impact that the on-going cuts to public services have had on trading standards services across the country¹⁴. A lack of resources was also mentioned as a reason for not having undertaken work in this area by some respondents to the survey in 2013-14. Sharing the learning points from this project is therefore critical. Information provided at Annex 2 is included to help point services to others across the country that participated in the project and the inclusion of the resource directory at Annex 6 is designed to assist those that did not attend the training events to access materials.

8. Recommendations

8.1 Trading standards services

- The highly focussed approach to the performance of test purchase operations has proved to be effective in identifying high risk business sectors; it is recommended that services employ a range of National and local intelligence sources to assist in the identification of such businesses when planning testing operations.
- Where the illegal sale made during this project was made by a “repeat offender” it is recommended that consideration is given to the application at the Magistrates court for a restricted sale or premises order provided that the requirements for such are met.

¹⁴ The impact of Local Authority Trading Standards in challenging times (2015) available on line at: http://www.tradingstandards.uk/policy/Inlogov_research.cfm [accessed 31st May 2015]

8.2 CTSI

- CTSI to raise the issue of sanctions for illegal under age sales with the Magistrates Association. Illegal sales of tobacco to young people must be recognised as highly detrimental to the health and wellbeing of young people and appropriate sanctions imposed on those that commit offences.
- CTSI to share this report with Public Health England (PHE) and to encourage dissemination by PHE to regional centres with a view to highlighting the findings to Directors of Public Health locally.
- CTSI to share the results of this project with the BRDO.
- CTSI to share the results with the relevant trade associations and explore opportunities to promote best practice with retailers for example “Challenge 25”.

8.3 Department of Health

- The Department of Health to note the scope for further work in this area, for example additional testing activity to assess the following factors:
 - the difference if any between business compliance in rural and urban locations
 - test purchasing of illicit tobacco by young people
 - the offence of displaying a tobacco product to a young person under 18 years during a test purchase operation (additional offence).

9. Acknowledgements

The author is grateful to colleagues at the DH, CTSI particularly the events team, Trading Standards coordinators, members of the Tobacco Focus Group and the numerous trading standards professionals who participated in this project.

Grateful thanks also to Mike MacGregor, Hertfordshire County Council Trading Standards and Andrew Johnson, Barrister, 5 Paper Buildings for the development and delivery of the training events in Phase 1.

Annex 1 Learning Outcomes of training events

- Understand why tackling under age sales of tobacco is still important
- Identify the current status of underage sales in trading standards priorities
- Refresh understanding of the legal requirements when conducting test purchase operations
- Refresh understanding of the requirements of the BRDO code
- Explore sources of intelligence relevant to reducing the illegal sale of tobacco to young people
- Applying these principles to your local setting / region

Annex 2 Participants in phase 2 of the project

Trading Standards Region	Trading Standards Service	Attempts made	Training attended	Authorisation for directed Surveillance sought
TSSE	Brighton & Hove	6	Yes	Yes
	West Berkshire	14	Yes	No
	Slough	24	Yes	No
LOTSAs	Wandsworth	7	Yes	Yes
	Redbridge	9	No	No
	Brent	8	No	No
	Royal Greenwich	3	Yes	No
	Southwark	3	No	No
	Lewisham	5	No	No
	Bexley	3	Yes	No
	Islington	8	No	No
EETSA	Bedford	4	Yes	No
	Central Bedfordshire	4	No	No
	Essex	9	Yes	No
	Luton	4	No	No
	Norfolk	4	Yes	Yes
	Peterborough	5	Yes	Yes
	Southend	5	Yes	No
	Suffolk	5	Yes	Yes
	Thurrock	5	Yes	Yes
TSEM	Leicester	10	Yes	No
	Nottingham City	5	Yes	Yes
CENTSA	Herefordshire	4	Yes	No
	Sandwell	8	No	No
	Shropshire	4	Yes	No

ENHANCING LOCAL TOBACCO CONTROL: PREVENTING UNDER AGE SALES OF TOBACCO

CENTSA	Solihull	4	Yes	No
	Staffordshire	4	Yes	No
	Stoke	9	Yes	Yes
	Telford	4	Yes	No
	Walsall	4	Yes	Yes
	Wolverhampton	4	Yes	Yes
SWERCOTS	Dorset	11	Yes	No
	Plymouth	30	No	No
TSNW	Wigan	10	Yes	No
	Salford	10	Yes	No
	Trafford	10	Yes	No
	St Helens	10	Yes	No
TSNE	Middlesbrough	8	Yes	No
	Durham	8	Yes	Yes
	Gateshead	7	Yes	No
	Redcar & Cleveland	13	Yes	No
Y&HTS	Barnsley	5	Yes	No
	Hull	6	Yes	No
	Sheffield	3	No	Yes
	West Yorkshire JS	14	Yes	No
	York	3	Yes	Yes
	Doncaster	3	No	Yes
	North Lincolnshire	6	No	Yes

This information has been included to assist trading standards services identify with whom they could consider sharing good practice .

Annex 3 Data collected by trading standards services

Local Authority Contact details
Date of test purchase operation
Type of premise
Age of purchaser
Male / Female
Sale or no sale
Sale price
Age of sale indication at POS
Proof of age requested
Advice given previously
Has an illegal sale made previously
Was an authorisation for directed surveillance sought

Annex 4 Feedback from training events

York December 2014

	Excellent	5	5	4	4	3	3	2	2	1	1	Very poor
<u>Course Content</u>												
To what extent do you feel the learning objectives have been achieved		14	74%	5	26%		0%		0%		0%	100%
To what extent has your understanding of the subject improved or increased as a result of the programme		4	21%	13	68%	2	11%		0%		0%	100%
<u>How would you rate the programme overall:</u>												
Very useful		8	42%	9	47%	1	5%		0%		0%	95%
Very interesting		10	53%	8	42%		0%		0%		0%	95%
												0%
<u>Trainer Evaluation</u>												
		Very Effective		Good		Average		Not Effective				
Knowledge of subject		19	100%		0%		0%		0%			
Organisation of sessions		14	74%	6	32%		0%		0%			
Preparation		16	84%	3	16%		0%		0%			
Style and delivery		16	84%	2	11%		0%		0%			
Responsiveness to group		17	89%	2	11%		0%		0%			
Use of equipment		14	74%	5	26%		0%		0%			
Quality of handouts		13	68%	6	32%		0%		0%			
	Excellent	5	5	4	4	3	3	2	2	1	1	Very poor
How do you rate the programme overall		7	37%	10	53%		0%		0%		0%	89%
How do you rate the trainer overall		19	100%		0%		0%		0%		0%	100%

London December 2014

	Excellent	5	5	4	4	3	3	2	2	1	1	Very poor
<u>Course Content</u>												
To what extent do you feel the learning objectives have been achieved		17	81%	4	19%		0%		0%		0%	100%
To what extent has your understanding of the subject improved or increased as a result of the programme		7	33%	11	52%	3	14%		0%		0%	100%
<u>How would you rate the programme overall:</u>												
Very useful		10	48%	10	48%	1	5%		0%		0%	100%
Very interesting		13	62%	8	38%		0%		0%		0%	100%
												0%
<u>Trainer Evaluation</u>												
		Very Effective		Good		Average		Not Effective				
Knowledge of subject		20	95%		0%		0%		0%			
Organisation of sessions		19	90%	1	5%		0%		0%			
Preparation		19	90%	1	5%		0%		0%			
Style and delivery		19	90%	1	5%		0%		0%			
Responsiveness to group		19	90%	1	5%		0%		0%			
Use of equipment			0%		0%		0%		0%			
Quality of handouts		17	81%	1	5%	2	10%		0%			
	Excellent	5	5	4	4	3	3	2	2	1	1	Very poor
How do you rate the trainer overall		18	86%	2	10%		0%		0%		0%	95%

Birmingham February 2015

	Excellent	5	5	4	4	3	3	2	2	1	1	Very poor
Course Content												
To what extent do you feel the learning objectives have been achieved		11	69%	3	19%	2	13%		0%		0%	100%
To what extent has your understanding of the subject improved or increased as a result of the programme		6	38%	7	44%	3	19%		0%		0%	100%
How would you rate the programme overall:												
Very useful		12	75%	2	13%	1	6%	1	6%		0%	100%
Very interesting		12	75%	2	13%	1	6%	1	6%		0%	100%
												0%
Trainer Evaluation												
Knowledge of subject	Very Effective	14	88%	1	6%	1	6%		0%			100%
Organisation of sessions	Good	13	81%	3	19%		0%		0%			100%
Preparation	Average	14	88%	2	13%		0%		0%			100%
Style and delivery	Not Effective	14	88%	2	13%		0%		0%			100%
Responsiveness to group		14	88%	2	13%		0%		0%			100%
Use of equipment		13	81%	3	19%		0%		0%			100%
Quality of handouts		11	69%	4	25%	1	6%		0%			100%
	Excellent	5	5	4	4	3	3	2	2	1	1	Very poor
How do you rate the trainer overall		14	88%	2	13%	1	6%		0%		0%	106%

London March 2015

Enhancing Local Tobacco Control Training

Date: 25.03.15

Venue: TSI London office, London

Actual Attendees: 24

Amount of Attendee Feedback:

16

Course Content

To what extent do you feel the learning objectives have been achieved

To what extent has your understanding of the subject improved or increased as a result of the programme

How would you rate the programme overall:

Very useful

Very interesting

Trainer Evaluation

Knowledge of subject

Organisation of sessions

Preparation

Style and delivery

Responsiveness to group

Use of equipment

Quality of handouts

Excellent 5 5 4 4 3 3 2 2 1 1 Very poor

9	56%	7	44%	0%	0%	0%	100%
6	38%	8	50%	2	13%	0%	100%
11	69%	5	31%	0%	0%	0%	100%
12	75%	4	25%	0%	0%	0%	100%
0%							
Very Effective		Good		Average		Not Effective	
13	81%	3	19%	0%	0%		100%
8	50%	8	50%	0%	0%		100%
9	56%	7	44%	0%	0%		100%
11	69%	5	31%	0%	0%		100%
11	69%	5	31%	0%	0%		100%
7	44%	9	56%	0%	0%		100%
8	50%	8	50%	0%	0%		100%

Excellent 5 5 4 4 3 3 2 2 1 1 Very poor

How do you rate the trainer overall

12	75%	4	25%	0%	0%	0%	100%
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Excellent 5 5 4 4 3 3 2 2 1 1 Very poor

Venue Facilities

How do you rate the venue's facilities

How do you rate the service

How do you rate the location of the venue

How do you rate the training establishment overall

6	38%	10	63%	0%	0%	0%	100%		
6	38%	7	44%	2	13%	1	6%	100%	
6	38%	10	63%	0%	0%	0%	100%		
6	38%	9	56%	1	6%	0%	0%	100%	
8	50%	5	31%	2	13%	0%	1	6%	100%

Course Administration

Was the material provided to you prior to the course relevant to the course programme and was it provided within a suitable time scale

Annex 5 Descriptions of business types

Premises	Guidance / Examples
Large retailer	National – e.g. Tesco , Sainsbury , Waitrose , Asda
Small retailer	Lo Cost , NISA , SPA could be members of the ACS
National newsagent	Martin McColl , WH Smith
Independent newsagent	Not part of a chain as above; could be members of NFRN
Off licence	Any sale or supply of tobacco made from an off licence regardless of being national / local
Petrol station kiosk	Any sale made from the shop attached to the petrol site whether as part of a "large national" or not
Market/car boot sale	Self-explanatory
Pub/club	On-licensed premise
Private homes	Domestic dwellings
Other	Café , leisure facility

Annex 6 Resource Directory for trading standards carrying out test purchase operations

- *Source : Department of Health, 2011. Healthy Lives, Healthy People: A Tobacco Control Plan for England*
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213757/dh_124960.pdf
- *Source : Public Health England 2013, Our Priorities 2013:14*
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192676/Our_priorities_final.pdf
- *Source: Health and Social Care Information Centre, Smoking Drinking and drug use among young people in England 2012*
- *Source : Trading Standards Institute Tobacco Control Survey England 2013-14 (2014)*
<http://www.tradingstandards.gov.uk/policy/Improvingthehealthofsociety.cfm>
- *Source :The RIPA Codes*
<https://www.gov.uk/government/collections/ripa-codes>
- *Source :The Home Office Guidance : Covert surveillance and property interference*
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97960/code-of-practice-covert.pdf
- *LGA Health and Wellbeing priorities*
http://www.local.gov.uk/web/guest/health-and-wellbeing-boards/-/journal_content/56/10180/6111055/ARTICLE
- *Local Tobacco Control Profiles for England*
<http://www.tobaccoprofiles.info/>
- *Public Health England Maps*
<http://www.localhealth.org.uk/>
- *OSC Guidance can be obtained via the RIPA lead in your authority, this is not a public facing document.*