

# The display of tobacco products: a rapid review of compliance in business premises



Contents

3	Summary
3	Introduction
3	Background
4	The legislation and requirements
4	Methodology
5	Results and Analysis
6	Large Premises
8	Method of covering the display area
9	Cash & Carry type premises
10	Dealing with non-compliance
10	Conclusions
10	Recommendations
11	Annex 1
12	Annex 2
13	Annex 3
14	Annex 4
16	Annex 5
20	References
20	Acknowledgements
5	Table 1: Visits per region broken down by premise type
5	Table 2: Total Visits per individual business organisation
6	Table 3: Compliance in large premises
9	Table 4: Compliance in cash & carry type premises

## Summary

Implementation of the Tobacco Advertising and Promotion (Display) (England) Regulations 2010 and the Tobacco Advertising and Promotion (Display of Prices) (England) Regulations 2010 has been found to be high in this rapid review of compliance carried out by regulatory officers across nine English regions.

The success may suggest that the approach adopted to implementation by both business and regulatory organisations may be a suitable method for the future implementation of these Regulations in small businesses.

## Introduction

The Government is committed to stopping the promotion of tobacco products to both young people and adults. This is explicitly contained in *Healthy Lives; Healthy People: A Tobacco Control Plan for England* (Department of Health, 2011).

“The Government will: implement the tobacco display provisions in the Health Act 2009 for large shops from April 2012 and for all other shops from April 2015”

This report provides empirical data relating to compliance with the legislation enacted to stop the promotion (through the display) of tobacco products in large business premises. It also provides data relating to the display of prices for tobacco products.

The report contains photographic examples to illustrate the practical issues that have been encountered by enforcement authorities post implementation of the Regulations. Where appropriate, recommendations are made to the Department of Health based upon the findings of the enforcement authorities.

## Background

The Health Act 2009 (National Archives, 2009) made provision in Sections 20 and 21 for amendment to be made to the Tobacco Advertising and Promotion Act 2002 specifically the insertion of Sections 6 (A1), 7A, 7B and 7C (National Archives, 2002) allowing for the prohibition of tobacco displays.

As a result of this amendment, the Tobacco Advertising and Promotion (Display) (England) Regulations 2010 (National Archives, 2010) came into force in England on the 6th April 2012<sup>1</sup>. The purpose of the regulations is to effectively prohibit the display of tobacco products at point of sale in large premises; the display of tobacco in small premises will be similarly controlled from April 2015.

At the same time, The Tobacco Advertising and Promotion (Display of Pricing) (England) Regulations 2010 (National Archives, 2010) came into force controlling the manner in which pricing information is given for tobacco products.

The Regulations form part of a wider regulatory strategy to reduce smoking prevalence and to provide effective tobacco control; they are enforced by Council Trading Standards Services; there are 145 of these in England of various sizes ranging from small Borough and Unitary authorities to large County Council Authorities. There is coordination of a limited range of activities including tobacco control through nine regions.

Training was provided for Trading Standards enforcement officers prior to the implementation of the Regulations. This was supported by the provision of comprehensive Guidance on the display and pricing of tobacco products in England, for tobacco retailers and regulatory officers (Local Government Regulation, 2011).

This guidance was produced by Local Government Regulation<sup>2</sup> and the Department of Health policy team and was the product of a lengthy consultation process involving representatives of tobacco retailers. The guidance was designed for use by both regulatory officers and businesses seeking to secure compliance with the new regulations.

<sup>1</sup> The commencement date was changed from October 2011 to 6th April 2012 by virtue of the Tobacco Advertising and Promotion (Display and Specialist Tobacconists) (England) (Amendment) Regulations 2011 (S.I.2011/1256) April 2012

<sup>2</sup> Local Government Regulation was formerly part of the Local Government Association. It became the Regulatory Support Unit but ceased to exist in any form in March 2012.

## The legislation and requirements

From the 6th April 2012 it became illegal to display tobacco products in large shops in England, except in the limited circumstances set out in the regulations and described as a “temporary display” specifically:

- Following a request to buy or see tobacco products made by a customer over the age of 18 years
- Incidental displays whilst staff are actively:
  - Assessing stock levels for the purpose of stock control
  - Restocking
  - Undertaking staff training
  - Cleaning the storage unit
  - Maintaining the storage unit
  - Refurbishing the storage unit
- Following a request made by an enforcement officer

Only in these circumstances is a display of tobacco products permitted; the size of the display must not exceed 1.5 square meters.<sup>1</sup>

For the purposes of the regulations large shop means: a shop which has a relevant floor area exceeding 280 square metres where goods are displayed and customers are served. By way of comparison, a doubles tennis court has an area of 260 square metres.

It also became illegal to display the prices of tobacco products in such businesses in England, except in the formats set out in the legislation namely in a poster style list, a list of products including images and prices available only on request or by price labels on storage units of a regulated size.

The Regulations provide an exemption for bulk tobacconists (as defined) and establish the requirements for such businesses in terms of how they may continue to display tobacco products.

## Methodology

A mixed methods approach has been employed for this study of regulatory compliance in two hundred and seventeen business premises across England.

For the purposes of the coordination of trading standards matters there are nine regions in England. Each region conducted up to twenty five compliance monitoring visits to business premises (of their choice) within their region and collected standard data as required by the study (see pro forma data collection sheets at Annex 1 and Annex 2).

Each region sent the collated results to the Trading Standards Institute for analysis and reporting (see Annex 3 and 4 for standardised collation documents).

Guidance for the completion of the visit was provided in advance to the councils taking part in the study (see Annex 5).

Secondary analysis of data of Trading Standards activity has been carried out.

<sup>1</sup> The size of the display and the permitted activities were introduced by the Tobacco Advertising and Promotion (Display and Specialist Tobacconists) (England) (Amendment) Regulations 2012 (S.I.2012/677)]

## Results and Analysis

The following table provides information of the business types visited by each Region.

Table 1: Visits per region broken down by premise type

Region	Total number large premises	Total number cash & carry or bulk premises
Eastern (EETSA)	21	4
London (LOTSa)	17	8
South East (TSSE)	16	9
East Midlands (TSEM)	19	4
South West (SWERCOTS)	21	4
Midlands (CENTSA)	11	8
North West (TSNW)	18	7
North East (NETSA)	19	6
Yorkshire & Humber (Y&HTS)	14	11
<b>Total = 217</b>	<b>156</b>	<b>61</b>

Each region determined the mix of premise types to be visited; the following table provides aggregated data detailing the number of visits conducted to each of the major business organisations identified .

Table 2: Total Visits per individual business organisation

Business - Large Retailers	Number of premises visited
Tesco	33
Asda	22
Cooperative	20
Sainsbury	24
Morrisons	21
Waitrose	5
Budgens	5
WH Smith	3
Others (regional)	23
Business - Cash & Carry	Number of premises visited
Booker	24
Bateleys	6
BestWay	8
Costco	5
Macro	2
Others (regional)	16

## Large Premises

Each visit was recorded and the data collated for all visits made in each region. This data was then further combined to produce the overall levels of legislative compliance for each dimension. See table 3.

Table 3: Compliance with the main legislative dimensions – large premises

Dimension	Compliance level
The display must be fully covered/closed after a sale is made to a customer	98%
There is no on-going display of tobacco products whether by faulty mechanism or other	98%
Stock must not be left in the open and visible to customers	96%
Size of temporary display	100%
Method of pricing – Poster style	97%
List with pictures	86%
Labels	97%
Statutory “age of sale” notice visible	97%



Image 1

Compliance with the main requirements of the regulations was found to be very high.

Other details recorded at the time of the visit included:

- The number of large stores where staff challenged a young person about their age prior to a display of tobacco being made. This was witnessed on 23 occasions.
- The presence of advertising material on the front of the doors/shutters. This was found to be present in 16% of large premises visited and included advertising material for the following goods:
  - E cigarettes (Image 1)
  - Stamps and Lottery products (Image 2)

In addition to the goods and services detailed; there was also some evidence of material promoting the “Challenge 25” policy and acceptance of Proof of Age cards (*Wine and Spirit Trade Association*). (Image 3)



Image 2



Image 3

Compliance with the tobacco pricing requirements was also high with 75% of large premises opting for the poster style price list form of indication.

Staff employed at the tobacco kiosk were asked to provide feedback of their experience working with the new regulatory requirements. There was a great deal of feedback, much of which was positive. This correlates well with the correspondingly high levels of compliance.

The following comments are typical of those made by staff and recorded at the time of the compliance visit:

Generally, no major issues, mainly finding stock locations at first

Manager had not noticed any change in level of tobacco sales. Store has not had any problems with complying

The sales [of tobacco] have not dipped at all

Practically, it's not an issue for staff

We are used to them [the doors] and customers are used to them too

Only problem is customers asking 'Why can't I see the cigarettes?'

There were two main areas of concern expressed although these were in a minority of cases:

1 reports of minor issues with the mechanisms used to cover the display notably the sliding doors that occasionally got stuck or came off the runners

Doors are a pain but you just get on with it

Initial teething problems regarding stock locations, doors were coming off the runners

Staff and customers get annoyed with it, especially at busy times, doors break, it's time consuming and inconvenient

2 the reaction of customers

Customers shout at staff, it takes longer to find and fill things up. Customers don't like it people think we are closed

Some customers are confused as to what to ask for as they cannot see the packages

People don't like queuing, to then find out that the store is out of stock of their brand



## Method of covering the display area

The visits revealed a variety of methods employed by large premises to cover the tobacco display area including:

- Vertical opaque plastic strips (Image 4)
- Horizontal flaps for each section of the display (Image 5)
- Sliding doors (Image 6)



Image 4



Image 5



Image 6



## Cash & Carry type premises

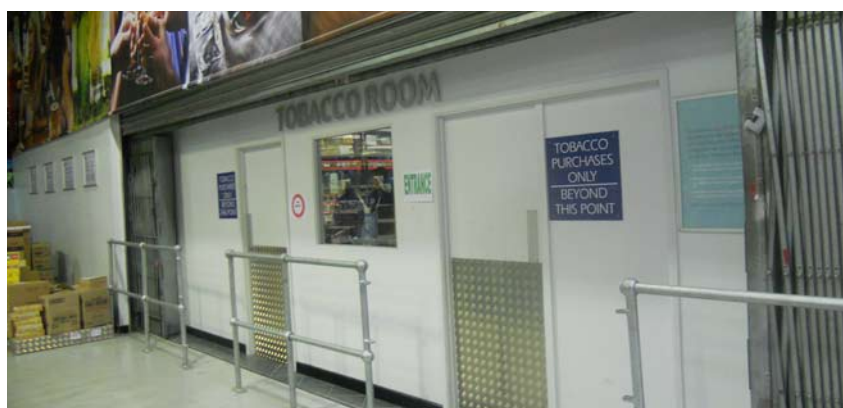
Each visit was recorded and the data collated for all visits made in each region. This data was then further combined to produce the overall levels of legislative compliance. See table 4 below.

Table 4: Compliance with the main legislative criteria – Cash and carry type premises

Criteria	Compliance level
Tobacco products stocked in a separate room	94%
Separate room only contains tobacco products and smoking accessories	83%
Room only accessible to people who are either engaged in, or employed by, the tobacco trade	89%
Access to room is controlled adequately by the business	83%
Tobacco is not conveyed (whilst uncovered) through the main premises	85%

Compliance with the main requirements of the regulations was again found to be high.

The following images reflect examples of how such businesses have sought to comply with the requirements of the regulations particularly that of providing a separate tobacco room with access restricted to those in the tobacco trade.



## Dealing with non-compliance

Compliance has been found to be high in both large premises and cash and carry type businesses; however where a non compliance has been found, this will be addressed locally by the enforcement authority in conjunction with the primary or home authority as appropriate. In addition and where appropriate, information will be shared with the business associations with an interest in large retail premises and cash and carry type businesses respectively.

## Conclusions

Implementation of the Tobacco Advertising and Promotion (Display) (England) Regulations 2010 has been successful and compliance levels across the regulatory requirements is high in both large stores and cash and carry type businesses.

Similarly, implementation of the Tobacco Advertising and Promotion (Display of Prices) (England) Regulations has been successful with high compliance rates.

There has been a consistent approach to implementation of the Regulations by both businesses and enforcement authorities, which - in combination with the high level of compliance - provides suggestive evidence to support the decision to develop comprehensive guidance in advance of the Regulations, and to do so collaboratively with regulators and business organisations.

Despite serious reservations raised by business organisations in advance of the implementation of these regulations, on the evidence of this review, these concerns have in the main either been resolved in the past six months (since implementation) or have not arisen at all.

Where concern has been expressed by staff it relates to faulty mechanisms, and on occasion, customers being unaware of the change to the law and being frustrated in their tobacco purchase experience.

## Recommendations

1. The findings of this report should be published in an appropriate manner. After much discussion and debate prior to the implementation of the regulations; the findings of this report suggest that business organisations have successfully adapted and/or changed their mode of tobacco sale/supply resulting in excellent rates of compliance. This is a success story that, if published, may assist in the future implementation of these regulations with smaller businesses.
2. In preparation for the implementation of the legislation for smaller businesses (2015), it is recommended that a review of the guidance is made and consideration given to tailoring it for the "small business" audience. It is further recommended that this is undertaken in conjunction with the Association of Convenience Stores and the National Federation of Retail Newsagents, Department of Health policy team and regulatory officers.
3. In advance of April 2015, it is recommended that communications are produced targeting members of the public in order to reduce the level of complaints made to staff engaged in the sale of tobacco products. Dealing with difficult customers who did not know about or understand the purpose of the regulations was mentioned by a small number of staff at the time of the compliance assessment visit. To pre-empt this situation, advance information specifically aimed at members of the public may assist in reducing this occurrence experienced by staff in the smaller businesses.

## Annex 1

### Visit record for Rapid Review of implementation of Tobacco Display and Pricing Regulations 2010 – Large premises

*Please read guidance notes prior to completion of visit*

Name of person completing	
Council	
Region	
Email	
Telephone	
Business visited	
Type of business	
Address	
Date	

*Observations: please indicate yes or no (please give additional information where appropriate)*

Is there evidence of a check on the customers age prior to sale (only relevant IF you witness young persons at the tobacco area)?	
Is the statutory "age" notice visible?	
Is the display fully covered/closed after a sale is made to a customer?	
Is the display propped open or are the doors/or other method of covering faulty leading to an on going display of tobacco products?	
Is there any sign of stock being left in the open and visible to customers?	
Is the front of the display area used to "advertise" any other products or services? add notes if required	

Notes:
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What size is the temporary display?	
Does it comply? (yes or no)	
What type of price list is used?	
Does it comply? (yes or no)	

Feedback from staff:
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Photograph taken and referenced as:
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Please return documents and email photographs to your nominated regional collator.  
Thank you

## Annex 2

### Visit record for Rapid Review of implementation of Tobacco Display and Pricing Regulations 2010 – bulk / cash and carry premises

*Please read guidance notes prior to completion of visit*

Name of person completing	
Council	
Region	
Email	
Telephone	
Business visited	
Type of business	
Address	
Date	

*Please indicate yes or no (please give additional information where appropriate)*

Is there a separate room for the tobacco products?	
Does the separate room contain only tobacco products and smoking accessories?	
Is the room only accessible to people who are either engaged in, or employed by, the tobacco trade?	
How is the access controlled by the business? Please add notes below	
Is there evidence of tobacco being conveyed (whilst uncovered) through the main premises on their way to or from the tobacco room, whether by staff or customers?	
<b>OR</b>	
Is there a separate tobacco area for the tobacco products?	
Does the separate tobacco area contain only tobacco products and smoking accessories?	
Is the tobacco visible from outside that area?	
Is the statutory notice displayed?	
Is the area designed such that customers purchasing other goods are not required to pass through the tobacco area?	
Is there evidence of tobacco being conveyed (whilst uncovered) through the main premises on their way to or from the tobacco area whether by staff or customers?	

Notes:
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Feedback from staff:
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Photograph taken and referenced as:
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Please return documents and email photographs to your nominated regional collator.  
Thank you

## Annex 3

### Collation record for Rapid Review of implementation of Tobacco Display and Pricing Regulations 2010 – Large premises

Name of person completing	
Region	
Email	
Telephone	
Total Nos. Large Business visited	

Please complete the following compliance table entering figures for compliance and non compliance as appropriate for each dimension. Where a non compliance is recorded please use the notes section to identify which particular record this applies to.

Collation of Compliance Assessments	Yes	No
Is there evidence of a check on the age of customer prior to sale (only relevant IF you witness young persons at the tobacco area)?		
Notes:		
Is the statutory "age" notice visible?		
Notes:		
Is the display fully covered/ closed after a sale is made to a customer?		
Notes:		
Is the display propped open or are the doors/or other method of covering faulty leading to an on going display of tobacco products?		
Notes :		
Is there any sign of stock being left in the open and visible to customers?		
Notes :		
Is the front of the display area used to "advertise" any other products or services? add notes if required		
Notes:		
Size of temporary display – compliant?		
Notes:		
Type of price list is used – poster style list – compliant ? list with pictures – compliant? price labels – compliant?		
Notes:		

Please add any notable comments made by staff regarding the operation of the display and pricing regulations

Feedback from staff:
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Photograph references: Please give the reference used for each photo against each premises
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Thank you for your participation in this review.

Please return your collation documents and USB no later than 10th December 2012 to:

Jane MacGregor  
Trading Standards Institute  
Sylvan Court  
Sylvan Way  
Southfields  
Basildon  
Essex SS15 6TH

## Annex 4

### Collation record for Rapid Review of implementation of Tobacco Display and Pricing Regulations 2010 - Cash & Carry / Bulk premises

Name of person completing	
Region	
Email	
Telephone	
Total Nos. C&C / bulk premises visited	

Please complete the following compliance table entering figures for compliance and non compliance as appropriate for each dimension. Where a non compliance is recorded please use the notes section to identify which particular record this applies to.

Collation of Compliance Assessments	Yes	No
Is there a separate room for the tobacco products?		
Notes:		
Does the separate room contain only tobacco products and smoking accessories?		
Notes:		
Is the room only accessible to people who are either engaged in, or employed by, the tobacco trade?		
Notes:		
Was access controlled adequately by the business?		
Notes :		
Was there evidence of tobacco being conveyed (whilst uncovered) through the main premises on their way to or from the tobacco room, whether by staff or customers?		
Notes :		
<b>OR</b>		
Is there a separate tobacco area for the tobacco products?		
Notes:		
Does the separate tobacco area contain only tobacco products and smoking accessories?		
Notes:		
Is the tobacco visible from outside that area?		
Notes:		
Is the statutory notice displayed?		
Notes:		
Is the area designed such that customers purchasing other goods are not required to pass through the tobacco area?		
Notes:		
Is there evidence of tobacco being conveyed (whilst uncovered) through the main premises on their way to or from the tobacco area whether by staff or customers?		
Notes:		

## Annex 4 continued

Please add any notable comments made by staff regarding the operation of the display and pricing regulations

Feedback from staff:

Photograph references: Please give the reference used for each photo against each premises

Thank you for your participation in this review.

Please return your collation documents and USB no later than 10th December 2012 to:

Jane MacGregor  
Trading Standards Institute  
Sylvan Court  
Sylvan Way  
Southfields  
Basildon  
Essex SS15 6TH



## Annex 5

**Rapid Review of the level of compliance across English Regions with the The Tobacco Advertising and Promotion (Display) (England) Regulations 2010 The Tobacco Advertising and Promotion (Display of Prices) (England) Regulations 2010.**

**Notes for guidance on completion of the assessment visits to large premises and bulk tobacconists**

### You will need to take:

- Copy of the LG Regulation/DH guidance and the Regulations
- Visit sheet /template
- Tape Measure
- Means of taking a photograph

### Introduction

The Tobacco Advertising and Promotion (Display) (England) Regulations 2010 came into force for large premises on the 6th April 2012. This review will provide valuable insight to the Department of Health into the level of compliance with the regulations 6-8 months post implementation. All regions are participating in this review and have been requested to select a range of large premises and cash and carry / wholesale outlets to visit and assess. The final report will be made available in March 2013.

### The Law

Since the 6th April 2012, tobacco products must be stored out of public sight except in the limited circumstances listed below:

- a) following requests to buy or see tobacco products by customers over 18 years old (described as a "requested display" in the legislation)
- b) incidental displays while staff are actively –
  - assessing stock levels for the purposes of stock control
  - restocking
  - undertaking staff training
  - cleaning the storage unit
  - maintaining the storage unit
  - refurbishing the storage unit
- c) in specified circumstances by bulk tobacconists
- d) in specified circumstances by specialist tobacconists
- e) following a request by an enforcement officer

Trading Standards colleagues are requested to complete an assessment visit to each of the identified premises for the region in accordance with the guidance outlined below and to record their findings on the visit sheet provided.

All visit records and photographs are to be returned to the nominated coordinator for the region (date to be agreed within the region).

Please note that there are separate guidelines for visits carried out to cash and carry type premises.

## Annex 5 continued

### Guidance for the completion of the Rapid Review Display Regulations visits - Large premises

*Large shop - means a shop with a relevant floor area exceeding 280 square metres*

1. How does the tobacco “kiosk” operate in practice?

Before identifying yourself to an appropriate staff member, observe the operation of the tobacco counter for a few minutes. Please pay particular attention to the following matters:

Is there evidence of a check on the customers age prior to sale (as appropriate)?

*It is illegal to show, as well as to sell, tobacco products to a customer under the age of 18 years who asks to see or to buy tobacco.*

Is the statutory notice visible?

Is the display fully covered/closed after a sale is made to a customer?

Is the display propped open or are the doors/or other method of covering faulty?

Is there any sign of stock being left in the open and visible to customers?

Is the front of the display area used to “advertise” any other products or services?

Complete the visit sheet as appropriate

Please then assess and record the following information in collaboration with relevant staff member:

2. Measure the size of the temporary tobacco display made when a customer (for example) is served

*The size of each temporary display allowed must not exceed 1.5 square metres.*

3. Identify what type of price list is used? Does it comply with the requirements?

*Since the 6th April 2012 price lists and price labels for tobacco products can only be displayed in the specific formats set out below:*

*a) Poster style lists (up to A3 in size) which can be permanently on show. The law sets out that these must not exceed 1250 square centimetres; A3 sized paper falls within the legal size limit.*

*b) A list including pictures of products, which must not be left on permanent show but which can be shown to any customer aged 18 or over who asks for information about tobacco products sold.*

*c) Price labels, which can be placed on shelving, storage units or tobacco jars. One price label is permitted for each product either on the covered shelf where the product is stored or on the front of the storage unit.*

We are interested to hear of the experiences of staff on the practical operation of the regulations; please try and obtain their views on this.

### Guidance for the completion of the Rapid Review Display Regulations visits - wholesalers/cash and carry premises

The purpose of visiting these premises is to ascertain whether the exemptions are being applied correctly; you must first determine what type of business you are visiting.

There are three possible types of business:

a) those selling only tobacco products to persons in the tobacco trade – the whole premises could qualify for an exemption

## Annex 5 continued

- b) those selling a variety of products but the tobacco display is confined to a separate tobacco room where access to that room is restricted to persons in the tobacco trade
- c) those selling a variety of products with no separate room but which fall within the definition of “bulk tobacconist” – such businesses may have a separate “tobacco area” to limit the display of tobacco products.

### a) Tobacco Trade Exemption

*If the cash and carry is a wholesale business catering solely for those engaged in the tobacco trade, and the premises are only open to people who are either engaged in, or employed by, the tobacco trade, then the cash and carry is exempt from the display law. Tobacco products and tobacco prices may be freely displayed within the premises, provided the tobacco prices cannot be seen from outside the premises.*

### b) Tobacco Room for Tobacco Trade

*If the cash and carry sells other products as well as tobacco, then they may have a separate tobacco room to which only those engaged in the tobacco trade have access. Only those in the tobacco trade may have access to the room. The business **MUST ENSURE** that the tobacco room is only accessible to people who are either engaged in, or employed by, the tobacco trade, for the exemption to apply to that room where tobacco products may be openly displayed in that room.*

**This will be a matter of fact to be proved by the business; you may find for example that the tobacco room may be accessed only on production of an appropriate trade card or the business may have a register of permissible businesses/persons permitted in the tobacco room**

### c) “Bulk tobacconist” separate tobacco area

*If the cash and carry premises is open to people outside the tobacco trade and does not have a completely separate room for the tobacco trade, then the law on displaying tobacco products and prices applies.*

A cash and carry type business **may however** meet the definition of a “**bulk tobacconist**” if this is so then the business will be permitted to display products in a separate **tobacco area**.

#### Note:

*‘bulk tobacconist’ means a shop selling tobacco products in quantities that meet the definition in the regulations. The conditions are that at least 90% of cigarette sales are in pre-packed quantities of 200 or more cigarettes with the remainder in pre-packed quantities of 100 or more cigarettes (in their original packaging) and that at least 90% of hand-rolling tobacco sales are in pre-packed quantities of 250 grams or more, with the remainder in pre-packed quantities of 125 grams or more (in their original packaging).*

### Separate tobacco area

- The separate “tobacco area” may only contain tobacco products and smoking accessories and
- must not be visible for outside the separate area and
- must have the statutory age notice displayed at the entrance and
- must be so designed such that customers purchasing other products are not encouraged or required to pass through the separate area

Where there is a separate tobacco area or tobacco room, the business must bear in mind that the display law will apply to the rest of the cash and carry premises outside of the separate tobacco area or room. This means that all tobacco products being conveyed through the main premises on their way to or from the tobacco area/room, whether by staff or customers, must be covered.

Similarly, if the till point is outside the tobacco area/room, tobacco products must be covered while being conveyed through the main premises to the till point (whether carried by staff or customer).

## Annex 5 continued

Please pay particular attention to the following matters:

- What type of business is it? Trade only/cash and carry with “bulk tobacconist” ?
- Is there a separate room or separate area for the tobacco products?
- Is the room only accessible to people who are either engaged in, or employed by, the tobacco trade? How is this controlled by the business?
- Does the separate “tobacco area” contain only tobacco products and smoking accessories?
- Is the tobacco visible from outside that room or area (it should not be)?
- Is there a notice displayed at the entrance to the tobacco area stating “It is illegal to sell tobacco products to anyone under the age of 18”?
- Is the area designed such that customers purchasing other goods are not required to pass through the tobacco area?
- Is there evidence of tobacco being conveyed (whilst uncovered) through the main premises on their way to or from the tobacco area/room, whether by staff or customers? (Products must be covered)

## References

Health Act 2009 available at

<http://www.legislation.gov.uk/ukpga/2009/21/section/21>

accessed online 8th February 2013

Local Government Regulation: Guidance available at

<http://www.lacors.gov.uk/lacors/ContentDetails.aspx?id=25295>

accessed 4th December 2012

Tobacco Control Plan for England available at

[http://www.dh.gov.uk/prod\\_consum\\_dh/groups/dh\\_digitalassets/documents/digitalasset/dh\\_124960.pdf](http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_124960.pdf)

accessed online 4th December 2012

The Tobacco Advertising and Promotion (Display) (England) Regulations 2010 available at

<http://www.legislation.gov.uk/uksi/2010/445/contents/made>

accessed online 4th December 2012

The Tobacco Advertising and Promotion (Display of Prices) (England) Regulations 2010 available at

<http://www.legislation.gov.uk/2010?title=tobacco%20prices%20>

accessed online 4th December 2012

Tobacco Advertising and Promotion Act 2002 available at

<http://www.legislation.gov.uk/ukpga/2002/36/contents>

accessed online 8th February 2013

Wine and Spirit Trade Association: Challenge 25 available at

<http://www.wsta.co.uk/challenge-25.html>

accessed online 15th February 2013

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