



LICENSING AND GAMBLING SUB COMMITTEE

MINUTES OF THE DIGITAL MEETING HELD VIA MICROSOFT TEAMS ON
FRIDAY 13TH AUGUST 2021 AT 10.00 A.M.

PRESENT

Councillor W. Williams – Vice-Chair (Presiding)

Councillors:

D. Cushing, D.W.R. Preece

Together with:

L. Morgan (Licensing Manager), T. Helps (Licensing Officer), T. Rawson (Solicitor), R. Barrett (Committee Services Officer)

Representing the Applicant

Mr N. Piratheepan (Rhymney Garage), Mr N. Rajesh (Licensing Consultant)

Representing Responsible Authorities

L. Wilson (Trading Standards), A. Dicks (Licensing Authority as a Responsible Authority), Inspector L. Thompson and PC D. Allen (Gwent Police)

INTRODUCTION AND RECORDING ARRANGEMENTS

The Chair welcomed all those in attendance and introductions were made. The Chair reminded those present that the meeting was being recorded and would be made available following the meeting via the Council's website – [Click Here to View](#)

1 APOLOGIES FOR ABSENCE

There were no apologies for absence received.

2 DECLARATIONS OF INTEREST

There were no declarations of interest made at the beginning or during the course of the meeting.

3 DETERMINATION OF PREMISES LICENCE APPLICATION - RHYMNEY GARAGE, VICTORIA ROAD, RHYMNEY, NP22 5NU

The Legal Advisor to the Sub Committee outlined the procedure for the meeting, including the order of representations and the opportunities for all parties to ask questions.

Mr Lee Morgan (Licensing Manager) presented his report and outlined the application for a new premises licence at Rhymney Garage, Victoria Road, Rhymney. Members were advised that the application initially sought to permit the sale of alcohol via off sales, 24 hours a day, Monday to Sunday. The applicant subsequently amended his application to reflect the sale of alcohol via off sales, between the hours of 05:00 until 02:00 Monday to Sunday. The applicant had also volunteered a number of steps as part of the Operating Schedule to promote the Licensing Objectives, which were set out in Section 1.3.1 of the report.

During the 28-day consultation period, representations were received from Trading Standards who advocated conditions in relation to the application. Representations were also received from the Gwent Police and Licensing Authority in their role as Responsible Authority, and Gwent Police, who both raised objections in relation to the extent of the hours applied for and suggested revised hours of 07:30 – 23:00 to be appropriate for a premise of this type in the Rhymney area. Further details were set out in Section 1.6 of the report. No representations were received from local residents. The applicant's response was summarised in Section 1.7 of the report, with the applicant agreeing to the conditions proposed by Trading Standards but indicated they did not agree with the Gwent Police and Licensing Authority position in relation to the hours proposed by them.

Attention was drawn to the local policy considerations as set out in the report and to the way in which the Sub-Committee would deal with the application. The Sub Committee were referred to the recommendation set out in the Licensing Manager's report, which considered the position of the Responsible Authorities and recommended that the application for a Premises Licence to permit the retail sale of alcohol be granted between the hours of 07:30 to 23:00 Monday to Sunday, subject to the conditions as set out at Appendix 8 of the report.

All parties present were afforded the opportunity to ask questions of the Licensing Manager and none were received.

Representations were then invited from the applicant, Rhymney Garage.

Mr Rajesh (Licensing Consultant) addressed the Sub Committee on behalf of his client, Mr Piratheepan (applicant). Mr Rajesh explained that the premises would be run as a convenience store and not a wine shop, with his client being a personal license holder with an excellent track record and several years of experience in the licensing trade, and who already runs another 24-hour business nearby. He explained that his client was fully aware of the expectations that will be placed on him regarding licensing conditions and understood that these need to be complied with.

Mr Rajesh summarised the history of the application, explaining that his client initially applied for 24 hours and accepted the conditions proposed by Trading Standards. Following a conversation with Gwent Police and the Licensing Authority RA, the applicant reduced the terminal hour to 02:00 and also accepted the proposed conditions in full.

It was emphasised to the Sub Committee that the applicant was willing to take additional measures to promote the Licensing Objectives, including no single-can sales and all purchases to be made through a serving hatch after 23:00 to control the sale of alcohol. The premises would keep a list of customers causing problems and refuse future sales, and staff would be reminded of the importance of preventing underage sales. The applicant would also be willing to enrol in the local Neighbourhood Watch Scheme. Mr Rajesh outlined the willingness of the applicant to add these measures and emphasised that there was no chance of the premises undermining the Licensing Objectives.

Mr Rajesh then referred to the existing anti-social behaviour issues in Rhymney that were highlighted in the Responsible Authority representations, and explained that in his view, this was a decades-old problem driven by multiple factors. He did not believe that the premises licence if granted would contribute to these problems or undermine the Licensing Objectives, due to the strict controls and standards that would be put in place by the applicant. He stated

that there were no issues connected to the premises when it was licensed under previous management.

Mr Rajesh suggested that the crime statistics in Rhymney related to a number of factors, not just alcohol, and cited the lack of evidence linking this to the existing Rhymney Garage business. He reminded Members that the Responsible Authorities objections were in relation to 24-hour sales and the applicant had revised the terminal hour to 02:00, which was only an extra three hours of trading compared to what the Responsible Authorities had suggested. He also referred to the mechanisms under the Licensing Act for a premises review to be brought to the Sub Committee if needed. In closing, Mr Rajesh highlighted the lack of objections from local residents and other Responsible Authorities and asked for the application to be granted as applied for.

All parties present were afforded the opportunity to ask questions. In response to a Member's query, Mr Rajesh confirmed that there are other licensed premises in the area and stated that his client was proposing a greater number of conditions and measures compared to these other establishments. The Member also asked why the applicant had applied for an alcohol licence for this particular area of Rhymney. Mr Rajesh explained that the premises had previously been licensed but the licence was surrendered and then re-applied for. He explained that his client had invested heavily in extra facilities to provide convenience to its customers, and that people working early or late shifts might appreciate the convenience of being able to buy alcohol at the same time as purchasing groceries and petrol.

Mr Todd Rawson (Legal Advisor to the Sub Committee) sought clarification on the no-single can policy. Mr Rajesh explained that this was one of his client's practices as he had another 24-hour business not far away (in the Mountain Ash area) and that troublemakers were more likely to purchase single cans, which was not good for business. Mr Rawson asked how the applicant intended to obtain a list of troublemakers. Mr Rajesh explained that this would be obtained through the police, Trading Standards and the Pubwatch scheme, and the premises would also keep a running list of difficult customers. Mr Rawson also asked about the night hatch proposal and it was explained that customers would be served their groceries through this hatch after 23:00.

A Member sought clarification on the opening hours of the garage, the plans for trade after 23:00 and the procedure around serving customers through the hatch. Mr Rajesh explained that the business is open from 05:00 to 02:00. Hatch service starts at 23:00, with everything served through the hatch, meaning that service is slower and more controlled. He confirmed that a small section of the shop would be allocated for the display of alcohol and there would be a minimum of two staff on site.

Representations were then invited from Responsible Authorities.

Ms Leah Wilson (Trading Standards Officer) referred to the representation submitted by her colleague (Mr Tim Keohane) and confirmed that conditions had been advocated to enhance the application, which had been accepted by the applicant. She added that Trading Standards supported the representations made by Gwent Police and the Licensing Authority.

All parties present were afforded the opportunity to ask questions. Mr Todd Rawson referenced the support given to the Gwent Police representation and asked why these concerns were not raised in the Trading Standards representation. Ms Wilson explained that this is because these concerns are outside the remit of Trading Standards, as their representation related to the Protection of Children from Harm Licensing Objective.

Mr Rawson also asked if the proposals to prohibit single-can sales had changed Trading Standards' view on the application. Ms Wilson confirmed that the position of Trading Standards remained the same as they were already satisfied with the conditions proposed and agreed by the applicant. She also confirmed that standard conditions had been applied due to this being an initial premises application and because there was no evidence of issues

at the premises to warrant enhanced conditions, although these could be requested if required.

A Member asked if Trading Standards had been in contact with other Responsible Authorities beforehand regarding the application. Mrs Dicks (Assistant Licensing Manager) confirmed that there had been no interaction with Trading Standards.

Mr Rajesh stated that he had not been aware that Trading Standards were supporting the representations of Gwent Police. However, he added that the applicant had accepted the conditions proposed by Trading Standards and would also put other measures in place to remind staff before every sale about underage sales.

Representations were then invited from Gwent Police.

PC Dan Allen referred Members to the representations from Gwent Police as set out in the agenda pack. He made reference to social economic factors which highlighted Rhymney as being one of the most deprived areas in the UK, which links to higher than average unemployment in the area, and which in turn has led to increased anti-social behaviour (ASB) within the locality and created a breeding ground for organised criminality. Secondary crime, including violence with injury / public order and ASB behaviour, are significantly higher than the force rate, contributing to residents not feeling safe and heightened community tension.

PC Allen drew Members' attention to the location of the premises which is on the main street in Rhymney, and explained that other off-licences in the area close at 23:00. He referred to the high levels of ASB in the town, with Rhymney regarded as the second most dangerous small town in Gwent, and with a high number of crimes. In a 6-month period, 215 calls were made to Gwent Police specifically relating to Victoria Road (where the garage is located), High Street and Church Street, with 56 of these calls (28%) linked to ASB. Over a 3-month period (1st April-30th June 2021) 139 calls were received for the same locations, with 28% of these calls again being for ASB.

PC Allen explained that these calls range in their timings from early to late evening, to the early hours of the morning and are commonly of large congregations of youths causing alarm and distress, youths and vehicles congregating in car parks. The calls have become so evident to the Victoria Road, High Street and surrounding area that a "Problem Orientated Policing Plan" (or POP plan) has been created to combat the high volume of calls made in the immediate area of the garage and its surrounding area. Further details of the POP plan were appended to the Gwent Police representation.

Members were also referred to a statement contained in the representation from the local Gwent Police Inspector, Lysha Thompson, which described how she has been working closely with partners to assist in the issues that contribute to the high number of calls in Rhymney and how Gwent Police have recently achieved significant funding through the Home Office Safer Streets initiative to further strengthen efforts in driving down crime and disorder in Rhymney.

The Sub Committee were then introduced to Inspector Thompson who gave an overview of her role. It was noted that Inspector Thompson moved over into the Caerphilly North area in May 2021 with a clear remit from Chief Officers, the existing staff team and elected Members regarding the need to tackle ongoing crime and disorder issues in relation to Rhymney.

Inspector Thompson gave a detailed overview of the policing challenges faced by Gwent Police in Rhymney and explained that 9 out of her 14 Community Support Officers are currently based in Rhymney, which is at the detriment of other areas. She outlined the increasing demands placed on Gwent Police arising from the issues in the Rhymney area, with the area around Rhymney Garage in particular requiring the largest number of resources. It was explained that until Gwent Police can get on top of these issues, it would be unfair to place additional pressures on resources by allowing an additional licensed premises to trade

into the night. Inspector Thompson asked for acknowledgement of the policing statistics and recognition of the drain on resources, particularly given the limited resources and funding available to tackle these issues.

Inspector Thompson referred to the extended hours applied for between 23:00 and 02:00 and appealed to the Sub Committee to strongly review these hours and not grant until Gwent Police can achieve stability in the area, particularly given that 23:00 to 02:00 is when officers are most in demand. Inspector Thompson highlighted the detailed work that is ongoing to tackle crime and disorder in the area and break the cycle, and she asked the Sub Committee to keep the licence to a 23:00 terminal hour in order to help Gwent Police manage their resources. She added that the Community Support Officers are only funded up to midnight, and so additional licensing hours past that point would increase demand which Gwent Police would struggle to meet.

In closing, Inspector Thompson stated that she would support the grant of the licence to 23:00 and asked the Sub Committee to maintain the status quo in line with the closing time of other off-licences in the area.

All parties present were afforded the opportunity to ask questions, and a Member asked how many of the calls cited in the statistics from Gwent Police were alcohol related. Inspector Thompson explained that these are broken down into crime and antisocial behaviour, but it is not possible to break these down any further. However, she also urged caution around trying to establish a correlation between crime and alcohol, as alcohol is not always the purely contributing factor to these issues.

Mr Rajesh explained that he respected the views of Gwent Police and the issues faced in the Rhymney area. However, he asked if the measures proposed by the applicant could be seen as good practice and a way of setting the standard for the responsible supply of alcohol. Inspector Thompson disagreed with this suggestion, outlining the unpredictability of individuals when consuming alcohol, and she explained that Gwent Police are trying to take preventative measures to stabilise the area. She emphasised that Gwent Police do not need anything that would exacerbate an already concerning situation in Rhymney. She acknowledged that the applicant could put good strong measures in place, but this would not fully reduce the risk of alcohol contributing further to the crime and ASB problems in the area.

Mr Rawson asked what the split of over and under-18s was in relation to the statistics around ASB and the congregation of youths. PC Allen explained that Gwent Police held no information in this regard but they held general concerns over proxy sales of alcohol in connection with these congregations. Queries were received around congregation numbers during and after Covid-19 lockdown. PC Allen confirmed that any gatherings breaching the exceeded number of people permitted under Covid regulations had been recorded against another category and not ASB, and that the crime statistics did not include separate reports of Covid breaches. He confirmed that ASB had significantly increased since lockdown lifted and there had also been a significant increase month-on-month.

Mr Rajesh asked PC Allen if any calls had been made to the police in connection with alcohol when the premises was licensed under previous management. He also highlighted the proxy sale restrictions that were proposed in the application and had been accepted by the Responsible Activities. Inspector Thompson reiterated that it is both crime and ASB that is alcohol-related and Gwent Police are trying to carry out education work across the Rhymney area to break this cycle of behaviour. It was confirmed that the statistics only go back to 1st January 2021 and so Gwent Police held no data on the previous proprietor of the garage. However, PC Allen highlighted that the previous premises stopped trading at 19:00 Monday to Friday and only traded from 08:00 to 14:00 on Saturday on Sunday, and therefore there was a huge disparity between the two premises. Inspector Thompson acknowledged that it would be naïve for Gwent Police to look at that area alone and they are trying to address the factors that spill out into other areas.

Representations were then invited from the Licensing Authority as a Responsible Authority. Mrs Annette Dicks (Assistant Licensing Manager) referred to her representation and highlighted an error in that the representation should refer to Paragraph 10.4 of the Council's Statement of Licensing Policy (and not Paragraph 7.4). She explained that in her view, the applicant had not given proper consideration to the nature of the application, and that they are required to satisfactorily address the Council's licensing policy when making an application. Mrs Dicks explained that the applicant had not sought any pre-application advice from the Responsible Authorities, and if they had done so, Gwent Police would have alerted him to the current problems in the Rhymney area.

Mrs Dicks explained that her representation did not object outright to the application, but that the previous licence was for lesser hours, and that the application in its current format was not in keeping with the current issues and surrounding area. The Licensing Authority supported the representations of Gwent Police and would therefore advocate a lesser period as stated by the police. It was noted that the applicant had suggested the modification of hours but this would still be a 21 hour operation of alcohol sales.

Mrs Dicks drew Members' attention to Paragraph 5.4 of the Council's Licensing Policy which states that the applicant should very carefully consider the hours they seek when devising their operating schedule, and recommends they discuss such an application with the appropriate Responsible Authorities, and should also have regard to the particular local environment. The Licensing Authority is also required to consider the potential for problems, which could arise from 24-hour licensing of this premises based on the information from Gwent Police. Mrs Dicks also explained that she would have expected a far more comprehensive operating schedule than what was supplied in the application, which made no reference to the minimum number of staff that would be on site or the night serving hatch that would be in operation, and these particular factors had only emerged subsequent to the application or through the course of the Licensing hearing that day.

All parties present were afforded the opportunity to ask questions. A Member sought clarification on whether Mrs Dicks had been made aware of the night serving hatch before the meeting. Mrs Dicks explained that she had held a conversation with the applicant's agent where she had outlined the reasons for her objections and explained that she was not willing to withdraw them in light of the modified hours. There was no previous mention of the number of staff that would be on the premises, and the operating schedule proposed ten measures to promote the Licensing Objectives, but in Mrs Dicks' view, they were rather ambiguous, and more concise information could have been put into these element of the application in accordance with the Council's Licensing Policy. This included a lack of information given around staff training and referred to a Challenge 21 policy rather than the Challenge 25 policy advocated by the Council. There was no mention around displaying notices, staffing levels or reference to night-time controls in relation to service after certain times. This had only been brought up through discussions with the applicant's agent and the information submitted at the Licensing hearing.

Mr Rajesh stated some conditions had been added during the consultation period and also explained that the Licensing Authority had only alerted him of these issues on Day 24, which gave him very little time to discuss the application further with his client in detail. In his view, the 28 consultation period was not used effectively and he had been under the impression that the Licensing Authority had been satisfied with the measures put in place. He explained that many of the measures are already in place at the existing business and therefore had not been included in the application in detail. However there were a raft of additional measures that the premises was intending to put in place, and he asked Mrs Dicks if she was satisfied with the operating schedule or if she would prefer additional measures to be included.

Mrs Dicks explained that she would have expected more comprehensive detail in the initial application given that the applicant is an experienced licence holder. She added that given the number of applications received by the Licensing Authority, it would not be normal process for them to contact the applicant towards the very start of the consultation period. Mrs Dicks

explained that having consulted with Gwent Police, many of her comments related to problems in the Rhymney area, and she would have expected a far more comprehensive operating schedule at the start of the process. Mrs Dicks reiterated her concerns and stated that due to the problems in the area and the potential for issues, her objections still stood regarding a 24-hour or 21-hour operating period.

Mr Rajesh responded to a query around staffing numbers and confirmed that there would be a minimum of two staff members on the premises.

All parties were then afforded the opportunity to sum up before the Licensing and Gambling Sub Committee retired to make its decision.

Mr Lee Morgan (Licensing Manager) asked Members to consider all the information before them and to take into account all relevant licensing guidance. He referred to the report recommendation and reminded Members that the decision rested with the Sub Committee.

Ms Leah Wilson (Trading Standards) confirmed that the applicant had accepted the conditions proposed and she would welcome contact from the applicant in relation to any advice or training needs as necessary.

PC Dan Allen (Gwent Police) reiterated the problems around anti-social behaviour and crime in the Rhymney area and emphasised that if a 21 hour licence were to be granted, this would have a detrimental impact on people living in the area, increase strain on police resources, and damage all the preventative partnership work that has already been carried out.

Mrs Annette Dicks (Licensing Authority) referred to guidance issued under Section 182 of the Licensing Act and the expectation around hours of trade to be appropriate to the local environment. She reiterated her earlier concerns and advocated a lesser period of licensable hours if the licence were to be granted.

Mr Rajesh (Licensing Consultant) referred to his client's significant investment in the business and explained that Mr Piratheepan would not jeopardise his livelihood by undermining the Licensing Objectives. He referred to the lack of direct evidence to prove that the premises will cause problems and reminded Members of the numerous restrictions and controls that will be put in place at the garage. Mr Rajesh emphasised that the shop will be run to a high standard and he acknowledged the licensing tools in place to bring forward a premises review if needed. In view of the measures that would be put in place, Mr Rajesh felt that it would be unfair to refuse the application in its current form based on perceptions alone, and he also referenced the lack of objections from local residents or other Responsible Authorities.

The Legal Advisor informed all parties present that the Sub Committee would retire to consider the representations made at the meeting and they would be informed in writing of the decision in the next 5 days.

The Sub Committee retired at 11.22 a.m. to make its decision and all other parties left the meeting.

Following consideration of the application for a new premises licence at Rhymney Garage, Victoria Road, Rhymney, and having regard to the Licensing Manager's report and all the representations made, the Licensing and Gambling Sub Committee unanimously

RESOLVED that the application for a new premises licence be granted to allow the sale of alcohol via off-sales from the premises between the hours of 07:30 hrs to 23:00 hrs, 7 days per week, and subject to the conditions set out in Appendix 8 of the Licensing Manager's report. For ease of reference, the conditions are attached to these minutes.

In making their decision, the Sub Committee considered all four Licensing Objectives, the Licensing Act 2003, revised Home Office Guidance and Caerphilly Council's Licensing Policy.

The Sub Committee accepted that Rhymney, at present, is experiencing issues involving anti-social behaviour and crime. The Sub-Committee gave weight to the representations from Gwent Police about the additional measures it has had to put in place to reduce the prevalence of the same. The Sub-Committee accepted that there may not be historic issues with ASB or criminal behaviour associated with the Premises, but further held into account that the previous licence did have significantly different hours for the off-sales of alcohol.

The Sub-Committee gave significant weight to paragraph 5.4 and 5.7 of the CCBC licensing policy in determining the application. They formed the view on the evidence before them that to grant a license for the off-sales of alcohol for 21 hours every day would not promote the licensing objectives, primarily the prevention of crime and disorder, public safety, and the prevention of public nuisance. The Sub-Committee took into account the Home Office National Guidance, particularly paragraph 9.12, and took into account the expertise Gwent Police possess in assessing and dealing with crime and disorder, and further potential for the same, within the Rhymney community.

The Sub-Committee were satisfied, given the nature of the licensed activity, that the conditions contained within Appendix 8 of the report are sufficiently clear, proportionate and targeted to promote the licensing objectives.

The Sub-Committee took into account the personal experience of the applicant within the off licence trade. However, in this instance the extended availability of alcohol within this local community area, given the current levels of crime and disorder, outweighed the same.

The decision notice advised that any person aggrieved by the decision had the right to appeal to the local Magistrates Court within 21 days from the date of written notification of the decision.

The meeting closed at 12.05 p.m.

Conditions applicable to the grant of the licence as per Appendix 8 of the Licensing Manager's report :-

1. CCTV shall be in use at the premises and shall cover the whole of both the inside and outside areas of the premises. The video and images captured by the CCTV shall be of a sufficient quality to enable the facial recognition of all persons entering the premises. The CCTV shall be fully operational at all times during which alcohol is available for sale from the premises.

The CCTV equipment shall be maintained in good working order and the premises licence holder shall ensure images from the CCTV are retained for a period of 30 days. This image retention period may be reviewed as appropriate by the Licensing Authority. The correct time and date will be generated onto both the recording and the real time image screen.

If the CCTV equipment (including any mobile units in use at the premises) breaks down, the Premises Licence Holder shall ensure the designated premises supervisor (DPS), or in his/her absence other responsible person, verbally informs the Licensing Authority and the Police as soon as is reasonably practicable. This information shall be contemporaneously recorded in the incident report register (referred to in condition 2 below) and shall include the date and time this was done and the name of the individual to whom the information was reported. Equipment failures shall be repaired or replaced as soon as is reasonably practicable and without undue delay. The Licensing Authority and the Police shall be informed when faults are rectified.

The premises licence holder shall ensure that there are trained members of staff available during licensable hours to be able to reproduce and download CCTV images onto a suitable portable medium (e.g. DVD, SD card, memory stick) which shall be provided to any authorised officer of the Licensing Authority or a constable without delay upon request. There shall be clear signage indicating that CCTV equipment is in use and recording at the premises

2. The premises licence holder shall require the DPS, or in his/her absence another responsible person who shall be nominated by the DPS from time to time, to keep an Incident/refusals logbook in a bound book in which full details of all incidents are recorded. This shall include details of any refused sales and shall give details of persons involved, incident description, time and date, actions taken and final outcome of the situation. Such recording shall be completed as soon as possible and in any case no later than the close of business on the day of the incident. The time and date when the report was completed, by whom, is to form part of the entry. The logbook is to be kept on the premises at all times and shall be produced to an authorised officer of the Licensing Authority or a constable when required. The records shall be kept for a 12 month period.

3. The premises licence holder shall ensure that a sufficient number of suitable waste bins are located in appropriate locations on the premises for the depositing of waste materials such as food wrappings, drinks containers, etc. by customers and shall further ensure that such receptacles are emptied when full.

4. All sales of alcohol shall be processed through the EPOS terminal/s, which shall give a till prompt to staff reminding them to verify the age of the customer when alcohol is being purchased.

5. All spirit drinks shall be located behind the counter out of the reach of customers and shall not be displayed for sale in any other part of the premises. "Spirit drink" means any alcoholic drink with an alcohol content greater than 15% ABV.

6.All staff/members who serve alcohol shall be trained in the prevention of underage sales to a level commensurate with their duties, including but not limited to the requirements of the 'Challenge 25' scheme set out in condition 7 below. All such training shall be updated as necessary, for instance when legislation changes, and should include training on how to deal with difficult customers and customers who are intoxicated or under the influence of illicit substances. The training should be clearly documented and signed and dated by both the trainer and the member of staff receiving it. The documentation shall be available for inspection on request by an authorised officer of the Licensing Authority or a constable.

7.The 'Challenge 25' Scheme, whereby an accepted form of photographic identification shall be required to be produced by a customer appearing to be under the age of 25 before any alcohol is sold to that customer, shall be adopted and implemented.

Acceptable proof of age shall include identification bearing the customer's photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport.

Publicity materials notifying customers of the operation of the Challenge 25 scheme shall be displayed at the premises, including a Challenge 25 sign of at least A5 size at the entrance to the premises and where practicable at each point of sale.