Appendix 5

APPLICATION FOR A NEW PREMISES LICENCE

The Kay Group, Stafford Gate Service Station, Creswell Grove, Creswell, ST18 9QP

Hearing 16th November 2026

APPLICANT SUPPORTING INFORMATION

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THE KAY GROUP

Company History and Business Overview

The Kay Group is an established, family-owned North West business with more than 50 years of trading history and one of the UK's top 15 independent petrol retailers.

It was established in 1972 by Ken Kay, a Blackburn businessman, who began operating a petrol service station at Intack Service Station in Blackburn. Since then, it has evolved into a substantial multi-site retail and hospitality operation.

Its growth has been underpinned by investment in property and infrastructure, the development of modern forecourt facilities and partnerships with recognised national brands.

The Kay Group remains a family-owned business, with its origins and leadership closely associated with its founder, Ken Kay.

Business Operations and Development

The Kay Group have 24 locations nationwide, half of the locations centred round Lancashire and West Yorkshire spreading down the M6 into North Wales, Crewe, Stoke and as far South as Birmingham and across from North of Nottingham to Shefield and as far North as Newcastle

They employ over 400 staff and serve 300,000 customers a week.

The company has increasingly concentrated on developing new to industry larger, modern forecourt sites, incorporating multiple retail and food operators rather than simply providing traditional petrol station facilities.

One of the company's most notable achievements was the opening of the world's first Greggs drive-through at Irlam in 2017.

At the heart of each site is a substantial convenience store, which represents the one-stop retail and convenience destination. These are sizeable, full-service grocery outlets, principally supplied through Londis, offering customers a broad range of everyday food, grocery and household products.

The stores also include a range of additional convenience services, including National Lottery facilities and parcel lockers, further broadening their appeal and encouraging repeat visits.

An addition to the convenience store offering customers will have a Greggs & Subway food outlet available to them.

Corporate Responsibility and Community Involvement

The company identifies community engagement and environmental considerations as elements of its business strategy.

Ken and his wife Jean were founder members of Blackburn Youth Zone.

The Kay Group is also a patron of East Lancashire Hospice and Darwen Youth Zone and supports other local and national charitable organisations.

Its environmental initiatives include investment in vapour recovery systems and rainwater harvesting at its developments along with Solar panels at all locations

The Stafford Gate Development

The development that is the subject of this application is a new forecourt at Stafford Gate, adjacent to Junction 14 of the M6 in Stafford, Staffordshire.

The development represents the company's 25th forecourt and is a new-to-industry site, following a lengthy planning process. It forms part of a wider 10-acre commercial development and represents a further investment in the Kay Group's established forecourt retail model.

The proposed site will incorporate all the facilities that customers have grown to enjoy from the Kay Group including a petrol filling station, a substantial convenience store and food service from Greggs and Subway. It will also benefit from a Costa Coffee drive-through.

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THE KAY GROUP (UK) LTD

Petrol Filling Stations & Vehicle Rental

Training for Age Restricted Sales

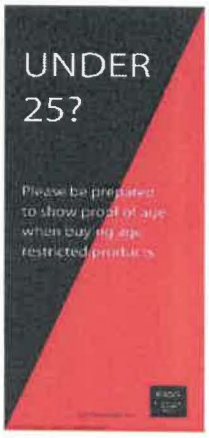
Alcohol, Vaping, Tobacco and other Age Restricted Products















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4.

Training for Age Restricted Sales

Alcohol, Vaping, Tobacco and other Age Restricted Products

Why do staff serving customers at The Kay Group sites need to complete mandatory training in relation to Age Restricted Sales?

There are **laws** that restrict the sale of certain products and services to underage people. The Kay Group sell several products that have age restrictions, including:

- Alcohol
- Cigarettes/Tobacco
- e-cigarettes, e-liquids
- Lottery tickets
- Energy drinks
- Petrol and diesel

The company **must comply with the law** and have a duty to ensure that all staff involved with the sale of age restricted products receive the **relevant training**. The **law is enforced** by the **Police** and **Trading Standards**. They make **'test purchases'** at the sites. If a site fails the test purchase, they have the authority to impose fines on both individuals and companies. They also have the power to revoke licences.

All staff must ensure that **all** age restricted sales are transacted using the **"Think 25"** policy, without exception. The fine for selling to underage customers can be up to £5000

In addition to any checks that might be made by the authorities (Police/Trading Standards) The Kay Group carry out regular audits of all sites to check compliance with the law using an external company called **Serve Legal**. They will make 'test purchases' at all sites, covering Lottery, alcohol, vapes etc and report their findings. The Kay Group offers a **bonus** to the individual members of staff that **pass** the 'test purchase.'

Shop sales form a significant part of The Kay Group business. **The revenue from the sale of alcohol, tobacco and vape products represents 50% of shop sales on average across the business** and is therefore a crucial part of the business. There would be a serious financial impact if the licence to sell alcohol, tobacco and vapes were to be removed.

Reading the following information will help you understand: -

- The importance of the company and its employees complying with the law
- The consequences of selling alcohol, vaping & tobacco to underage people
- The law in relation to sale and purchase to persons under 18 years old
- The Refusal Register
- Proof of age and what identification is acceptable.
- Think 25 – What is it?
- Proxy purchases
- The law in relation to other age restricted products





After reading the information in this document, there will be a few questions to test your knowledge. If there is anything you are unsure about, please discuss with your line manager.

The Kay Group Licensing requirements

It is an offence to allow customers or employees to drink their purchases of alcohol, in the shop, or on any part of the site. Heavy fines can be imposed for allowing consumption on the premises and could result in the Premises Licence being removed.

Hours of Sale

- Alcohol can be sold during the permitted hours as detailed on the Premises Licence In the case of the Kay Group this is 24hrs at all sites excluding Hard Ings Road
- All Sites must have a Designated Premises Supervisor (DPS)
- The premises must have CCTV.
- Any person who looks or appears to be under the age of 25 will be asked to provide ID to prove they are over the age of 18. Photo driving licence, Passport or Government approved proof of age cards are acceptable. (PASS)



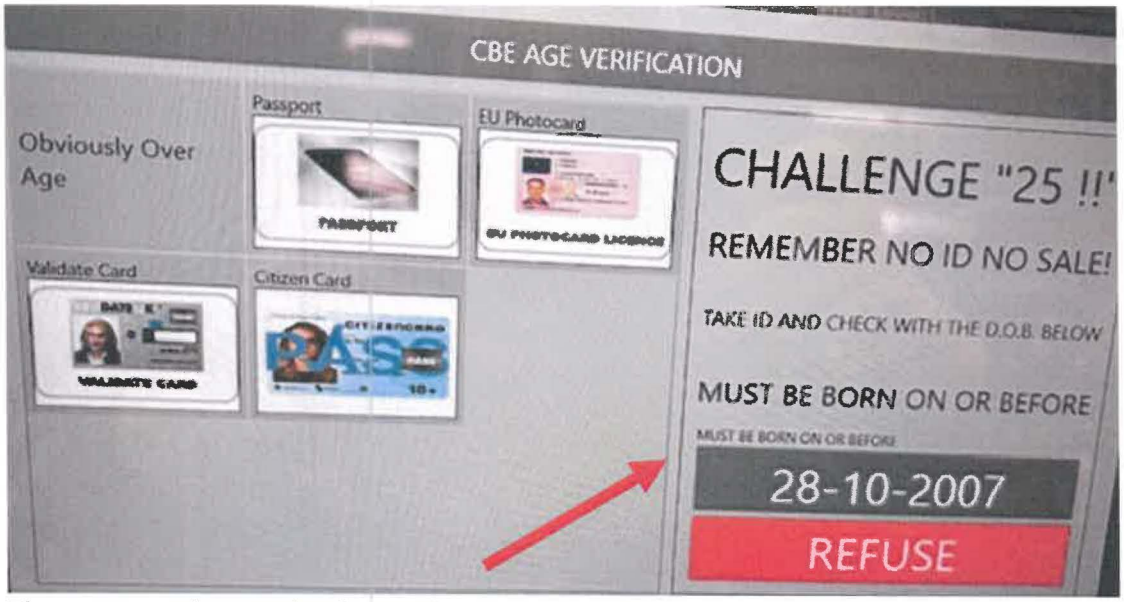
Authorisation to Sell Alcohol

As an employee of the company, you are authorised to sell alcohol upon satisfactory training and authorisation from the Designated Premises Supervisor.

The Law in relation to sale and purchase to persons under 18 years old

It is an offence to sell alcohol, vaping & tobacco to any person under the age of 18. It is your responsibility to ensure you do not sell these products to anyone under the legal age. **Take the time to look at any customer who is purchasing age restricted products.** If you think they look under the age of 25 you **must** ask for ID.

When you scan an age restricted product on the till, the prompt below will appear.
It will prompt you to **ask for approved ID if the customer looks under the age of 25.**



The screen indicates the date to be born on or before.

You must apply the **'Think 25'** policy for age restricted products. For anyone who looks under the age of 25 you **must** ensure they can offer proof of age.

It is NOT possible to use the till prompt shown above for cigarettes, as you MUST verify the customers age by checking ID BEFORE you retrieve them from the cigarette gantry. (this is the law, see page 11 of this document)

If you suspect a person is underage, and they are unable to provide ID **you must** not sell alcohol, vaping or tobacco to them. You should politely refuse service and complete the refusal register. This must be completed in all cases. For both **challenges and refusals**.

The Licensing Act is the law that covers the sale of alcohol.



The law makes it an **offence to serve a customer with alcohol if they appear to be intoxicated/drunk**. You **must** refuse service to this person. In addition, if the person has someone with them who requests service of alcohol but is obviously buying it for the person who is drunk, you must also refuse service.

Refusal Register

The Refusal Register is a very important legal document which is stored behind the counter in a designated area. The register shows that the site is dealing with the sale of alcohol, vaping, tobacco and other age restricted sales correctly.

An entry must be made on every occasion that you refuse to sell an age restricted product to a customer. It is important that you complete the register accurately and if possible, straight after the refusal. You must also **record all challenges.**

The details recorded in the refusal register include:



- The time and date of the refusal
- What products the customer was attempting to buy
- The reason for refusal
- Who refused the sale.
- Any other relevant information such as if the person is known to them, were they with other people and their description.

The Refusal Register will be regularly reviewed by the Manager at your site, to ensure it is being used correctly by all staff.

Trading Standards, Council Licencing Officers or the Police will expect to see the register during any visit they make to a site. They will look at the register to check that we are following the correct procedure. Following an underage sale the Designated Premises Supervisor would be interviewed, and the register would be looked at in detail.



IT IS ILLEGAL TO SELL TOBACCO PRODUCTS TO ANYONE UNDER THE AGE OF 18.

This notice must be displayed in a prominent position and be easily visible at the point of sale. Check if there is a notice on display at your site. It may be on the cigarette cupboard door?

The consequences of selling alcohol, vaping & tobacco to underage people

If you serve alcohol, vaping or tobacco to a person under the age of 18 years old, not only would you be committing a criminal offence but so would the Designated Premises Supervisor, the owner of the business and the business itself could be put at risk. It can also have an impact on the reputation of the business.

Consequences for you

The authorities can take several forms of action to deal with an underage sale such as issue a warning, a formal caution, an instant fine or even prosecution.

Consequences for the business

The authorities could issue a warning or action plan, prosecution or hold a further review of the premises. Heavy fines can be imposed for allowing sale to a minor on or near the premises and could result in the Premises Licence being removed.



Consequences for the underage person

Alcohol can have a negative effect on their behaviour and put their safety and the safety of others at risk. The person could become unwell or violent. They could be aggressive towards others or to staff members serving in the shop.

It is illegal to be drunk and disorderly in a public place. If the police were involved, they would want to know where the alcohol was purchased.

Proof of age and what identification is acceptable.

It can be very difficult to recognise if someone is underage, but it is a very **important part of your job**, the following are some of the signs to look out for

- Physical appearance and body language of the person
- The **type of product**, the quantity, and the price of the product
- The type of payment method used.

Try not to judge a person or be deceived by appearances. It is impossible to accurately guess a person's age simply by looking at them. This is why we always require them to produce photo ID which confirms their age.

You are only permitted to accept certain types of identification to prove someone's age, these **must have a photograph of the person**, their date of birth, hologram.

Acceptable forms of Identification

- UK or foreign passports are acceptable.
- Proof of Age Standards Scheme (**PASS card**)
- Driving Licence



8.

Unacceptable forms of Identification (ID we do not accept)

- Identity Card
- National Identity Card
- Student Card
- Military Card
- International/European Drivers Permit
- Provisional Motorcycle Permit
- Any tampered document where a detail has been manually changed.



A photograph of a passport or driving licence on a person's phone is **NOT** acceptable. You **MUST** see the original. A paper photocopy of the ID is **NOT** acceptable.

When you are checking identification, it is important that you do this carefully.

Don't let the customer rush you!

Don't let the customer refer to another member of staff ***'oh he/she knows me and has served me before'***. This is your sale, your responsibility! If you don't believe they look 25 ask for ID.

Remember, if you are making a challenge and other customers are waiting to be served, press the call bell to gain assistance from one of your colleagues.

Check that the photograph on the ID is a true likeness to the cardholder. Ask them to remove any sunglasses, hats, helmets or hoodies so you can see them clearly. If you are not certain ask them a question like what's their date of birth, their middle name or address, checking against the card. On a UK driving licence you will find the date of birth on line 3. You will find the persons address on line 8.

Check the quality of the document, are there any alterations to numbers, or a photo stuck to the card.

If a PASS card is presented, check the PASS **hologram**. Make sure the card has a flat, smooth surface (example of the cards shown on the previous page)

Ensure all documents are removed from wallets/purses etc as the identification could be easily obscured and could lead to mistakes. Politely ask the customer to remove it so you can conduct the check accurately and thoroughly.

We will always support you should you experience a difficult or uncooperative customer.

Think 25 – what is it?







Think 25 is in place to prevent the sale of alcohol, vaping & tobacco and other age restricted products to any person who might be underage. The staff member should ask themselves the

question – **'does the person in front of me look like they might be under the age of 25 years?'** If the answer is yes, then they **must** ask the person for a valid proof of age.

If the customer does not look 25 ask for ID, if none is available you must refuse to serve apologetically. **It can be difficult to refuse service but always emphasise that you are following company policy and your professional and legal responsibilities.** Request they bring proof next time. Complete the refusal register.



This policy serves to protect you firstly and secondly the company. Any employee failing a test purchase by Trading Standards will be subject to a **fixed penalty fine** of at least £90. The company is unlikely to be fined for any single failing due to our policies and procedures.



Failure to observe the above legislation and comply with Think 25 could result in disciplinary action, including dismissal following a full investigation.

Proxy purchases

"Proxy" purchases are adults buying alcohol, vaping, tobacco or other age restricted products for underage people. Adults buying for underage people can be as big a problem as underage sales. Young people always have, and always will try to obtain age restricted products and they have become more inventive as they try to find new ways to get around producing their I.D. Most retailers are adopting stricter policies in relation to sales to young people, as are we. The only way many children can obtain age restricted products, is to ask **adults to buy it on their behalf.**

You have a responsibility in law to refuse any sale if you suspect that an adult is buying any age restricted products to pass on to persons under 18.

While it is very difficult at times to tell whether an adult is buying for children, you have a duty to do your best to prevent it.

Types and signs of Proxy Sales

<u>Parents or Guardians</u>

You may on odd occasions be faced with a situation where a parent brings their children in to help choose which alcohol, vaping, tobacco or other age restricted product to use at home. It is not an offence for parents to allow their children to drink alcohol or smoke at home but when serving an adult, you can never be sure that is the intention and if they drink or smoke on the street or anywhere from home then it is an offence.



<u>18-year-olds buying for their underage friends</u>

<u>Groups of youths hanging around the service station.</u>

Be aware of groups of underage people hanging around the site as they may well try to purchase age restricted products themselves or ask an adult to buy it for them. Some adults

may not be aware they are breaking the law or maybe afraid of the under 18s. Some adults may take a fee for this either money, a drink or cigarettes for themselves.

Product type.

Always be aware of what people are buying, for example, if an adult is buying an alcoholic product which is known to be popular with underage people such as alcopops, or vodka and cider. Vapes are also popular with underage people. **Be on your guard**.







Repeat purchase.

If you have already refused to sell to a person you suspect to be underage and soon after an adult comes into buy the same product, be sure it is for the customer and not a "proxy" sale for the person you have refused to sell it to.

Adults paying with lots of change.

Payment with large quantities of change in their hand can be an indication of an adult buying age restricted products on behalf of underage person as the have had a "whip round" to pay for it. Money taken out of a wallet or purse would be a more normal way and customers who pay by credit cards are less likely to be underage or making a "proxy" purchase.

Adults making 2 separate purchases.

If an adult makes 2 separate purchases at the same time this could also indicate that person is making a "proxy" purchase.

How to deal with a suspected "Proxy Purchase"

If you suspect that an adult is attempting to purchase alcohol, vaping, tobacco or any age restricted product for underage persons you should:

- Politely ask the customer, **'is the purchase for themselves?'** (You might explain you need to ask, due to the current problem of underage and proxy purchases. This would be particularly relevant if there are or have been groups of children around the site.)
- If they say it is for themselves, but you still are not sure, again politely inform them it is a criminal offence to make a purchase of an age restricted product for an underage person. The purchaser can be fined £90 with a fixed penalty or up to £5000 if convicted.
- Also, the site is covered by CCTV which is used by the police (when they come across underage purchases) to check who we have sold age restricted products to and how they may have got them.
- If you are still unsure you must be polite but refuse to serve them and complete the refusal register.

The law in relation to other age restricted products

Under 16 years of Age

The products below must **not** be sold

- Fuel
- Aerosol paint
- High Caffeine Energy Products
- Medicines (company policy)
- Party Poppers

Aerosols should not be sold to people under the age of 16. (company policy)

Under 18 years of Age

None of the below products must be sold.

- Alcohol
- Tobacco and Lighter Fuel/butane gas
- E-cigarettes or Vapes
- Lottery Tickets & Scratch Cards
- Solvents/intoxicating substances
- Offensive weapons – scissors, razor blades, corkscrews or similar

The refusal register **must** be completed in all cases. The register is used for any **challenge or refusal.**

Additional information in relation to the laws on the sale of tobacco

Tobacco Display Regulations (law) were introduced in 2015



Think 25 applies to the sale of tobacco but there are some additional laws you should be aware of. Cigarettes are kept in a closed cupboard behind the counter. This is because the law states that they **must not** be on display.

You should only open the cupboard to serve a customer with cigarettes. (after verifying their age) If cigarettes are taken out of the gantry **before** verifying the customer's age the cigarettes will be on display and you will be **breaking the display law.**

The law does allow you to open the cupboard when cleaning or restocking.

Non-compliance with the law is a criminal offence. Any person, including Site Managers and Customer Service Assistants, found guilty of these offences is liable:

- on summary conviction in a magistrates' court to an unlimited fine on the standard scale, or imprisonment for a term not exceeding six months, or both
  OR

- on conviction on indictment in the Crown Court to imprisonment for a term not exceeding two years, a fine or both.

As previously mentioned, The Kay Group carry out regular audits of all sites to check compliance with the law using an external company called **Serve Legal**. If they make a 'test purchase' for cigarettes. What will they look for?

- Was the cabinet open before the staff member retrieved the requested cigarettes?
- Did the staff member ask for ID?
- (If Yes) Were you asked for ID **before** the cigarettes had been retrieved from the cabinet?
- Was the cabinet shut immediately after the staff member has retrieved the cigarettes?



Thank you for taking the time to complete this training. Please take the opportunity to ask questions or discuss the contents with your trainer before you complete the questions which will assess your knowledge and understanding.

Your trainer will check your completed questions. If you have answered any questions incorrectly, they will ask some supplementary questions to ensure you fully understand your responsibilities and what is expected of you in relation to the sale of age restricted products.

Once completed, your trainer will ask you to sign the question sheet and the individual training record and will keep a copy in your file.
Remember, even after training is complete, you may at some point later, need to **recap** on some information contained in this document. Please feel free to ask your line manager questions about the contents or ask if you can read it again to confirm any points.

13.

Staff Training Assessment

THE KAY GROUP (UK) LTD

Petrol Filling Stations & Vehicle Rental

STAFF NAME -

Age Restricted Sales - Questions for Assessment of Learning (Question Set 1)

Use for initial training

1. Name the **Designated Premises Supervisor (DPS)** at your site?

   .....

2. What are the possible consequences for you or the company if you serve someone underage...tick √ **all** the relevant answers?

Warning	Formal Caution	Instant Fine
Prosecution	Disciplinary Action	

3. **Circle** all the people below that you would ask for ID if they look under 25?



4. List **4 products in the boxes below,** other than **alcohol**, which have age restrictions on them?

5. When you check someone's identification (ID)? Give **4 examples** of what to look for?

14.

6. List 3 signs that might indicate a possible proxy purchase?

7. The Kay Group have an age policy with regard to the sale of **High Caffeine Energy drinks**. What age **must** a customer be to buy these products? **Tick or circle correct answer?**
   - 25 years old
   - 14 years old
   - 18 years old
   - 16 years old

8. To comply with the 'Tobacco Display Regulations' (law) we must ensure that cigarettes are not on display. We keep them in the gantry with the door closed. If a customer wishes to purchase cigarettes you must be satisfied, they look 25 or older. **If not**, you must ask for ID to verify their age **before** retrieving the cigarettes from the gantry. **Tick or circle the correct answer below.**

True **False**

I have completed Age Restricted Sales training. I have completed the assessment questions and understand my responsibilities and what is expected of me to prevent underage sales.

Employee full name (print)	
Employee signature	
Date of training and assessment	

I have delivered the training and discussed the importance of the Age Restricted Sales training with the staff member. I have checked the questions for the assessment of learning have been completed correctly using the MODEL answers for guidance. The CSA has made corrections if required before the sign off

Trainer full name (print)	
Trainer signature	
Date of training and assessment	
Site	

The completed assessment questions for staff, must be stored in the site file for Age Restricted Sales training. (or you can if you wish store in the Recruitment & Training file) The **Individual Training Record in the Recruitment & Training file should be completed and signed by both the trainer and employee.**

Individual Staff Training Record

THE KAY GROUP (UK) LTD

Petrol Filling Stations & Vehicle Rental

Age Restricted Sales - Individual Training and Assessment Record

This document should be stored in the **Training and Recruitment file** with the staff members training records. If you print this document, **it must be double sided.** (If a member of staff moves to work at another site, this record along with their other training records should go to the new site)

When a new member of staff commences work with The Kay Group as a CSA, they will complete an Induction and Training Programme. The company **does not** allow any new employee to work unsupervised until the Induction and Training Programme has been **'signed off' by the manager and CSA.**

During the Induction and Training Programme, Age Restricted Sales training **must be delivered by site management using the training document for Age Restricted Sales and the assessment questions.** This training should be completed on Day 2. This **must** be completed **before** you complete the induction sign off with the CSA.

After the initial training, **refresher training must be carried out every 6 months.** Site management must check when refreshers are required. Please set yourself a date each month in your diary to check. **Use Set 1 questions for initial training/ Set 2 for 1st refresher/ Set 3 for 2nd refresher/ Set 4 for 3rd refresher/ Set 5 for 4th refresher/Set 6 for 5th refresher.**

CSA Confirmation (sign in the boxes below)

I can confirm I have completed the training and assessment for Age Restricted Sales and the **Think 25 policy** and fully understand what is required of me to prevent underage sales.

Trainer confirmation (sign in the boxes below)

I have delivered the training and discussed with the member of staff, the importance of compliance with the law in relation to Age Restricted Sales. I have 'marked' the questions for the assessment of learning using the model answers for guidance.

CSA Name (print full name)		Start Date	
Initial training date	CSA signature		Trainer full name and signature
Planned date refresher 1	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 2	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 3	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 4	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 5	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 6	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 7	Actual date	CSA signature	Trainer full name and signature

Planned date refresher 8	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 9	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 10	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 11	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 12	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 13	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 14	Actual date	CSA signature	Trainer full name and signature
Planned date refresher 15	Actual date	CSA signature	Trainer full name and signature

Site Management must make regular checks on the Refusal Register. If you find that a CSA is not using the Refusal Register correctly or not making enough entries, you may need to carry out further training between the 6-month refreshers. This could be a discussion about how important the register is and if they are confident to make a challenge. You may need to remind them how to approach a challenge. You may need to remind them that the register must be completed for ALL CHALLENGES AND REFUSALS. You might decide the CSA needs to read the training document again. It might be the discussion following a fail on Serve Legal test purchase

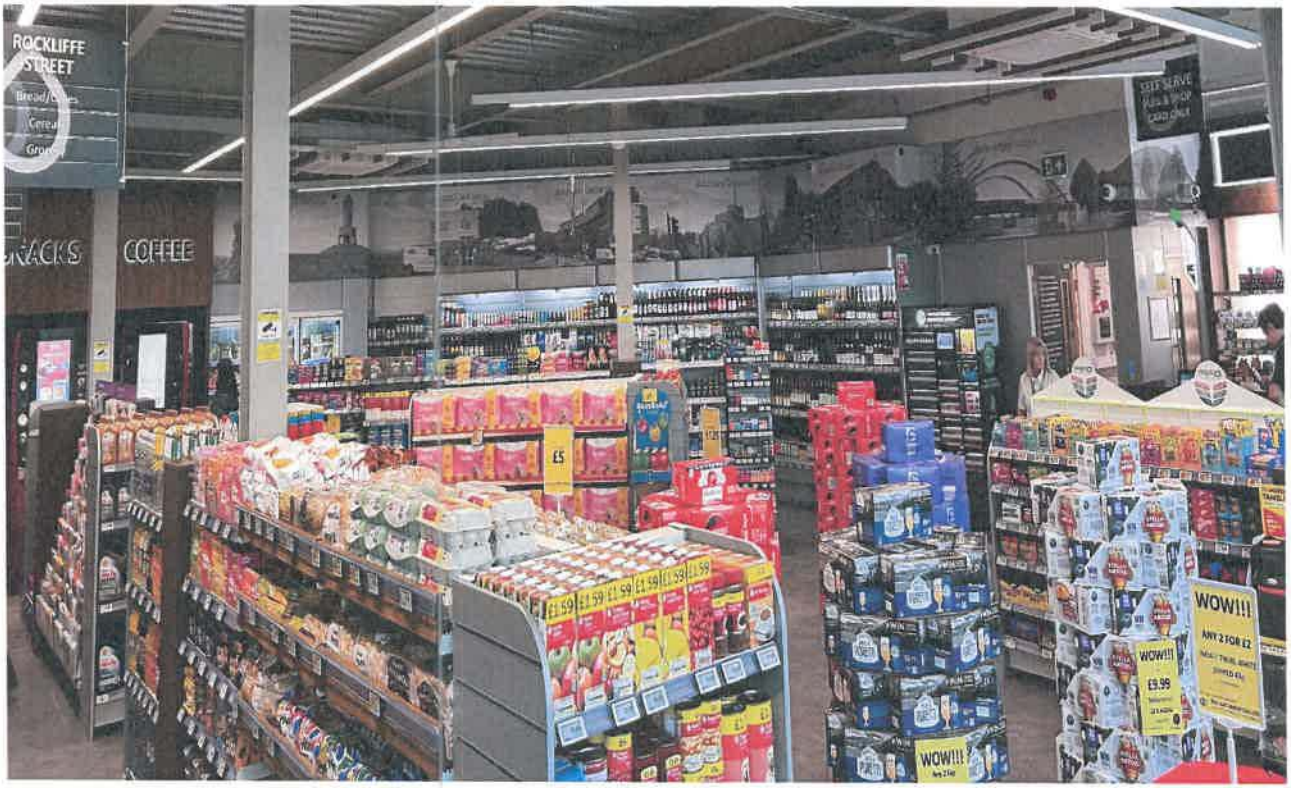
If this type of discussion/training has taken place, **please complete the information below**

Date	CSA signature	Trainer name and signature	Type of discussion/action

17.

Photos of a Kay Group Site – Internal





Photos of Kay Group Site - External



