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| TUC logo mono |
| Sunday Trading |
| response to the BIS consultation |

**1:** **Summary**

The TUC is the national trade union centre and recognised social partner. We represent nearly 6 million trade union members in 52 affiliated trade union members. We also help many other people through our outreach work and advice. We articulate the voice of Britain at work.

This paper sets out the TUC’s views on the Department of Business Innovation and Skills consultation “Devolving Sunday trading rules”, which examines whether decision-making powers over Sunday trading should be given to local authorities and cities run by elected mayors.

The current rules, which were set by the Sunday Trading Act 1994, limit the Sunday opening of large stores in England and Wales to six hours.

The TUC opposes extension of the Sunday opening hours for large stores. We regard the 1994 rules as a reasonable compromise and judge that negative side effects of further deregulation would outweigh any possible benefits.

We are particularly concerned about the negative social effects of longer opening hours, and urge BIS to ensure that these are fully evaluated, since they are not assessed in the consultation document.[[1]](#footnote-1)

In summary, our key concerns are that:

* decision making on whether to extend Sunday opening hours would end up effectively being handed to large retail chains;
* small stores, which are not subjects to the current rules, would lose their completive edge, leading to small business closures and greater concentration of market share amongst the giant chains;
* town centres would become noisier, more congested places on Sundays, to the detriment of those who live in or near shopping areas;
* more shop workers would be under pressure to work unsocial hours;
* workers in the retail supply chain and business services would be similarly affected; and
* this negative impact would also be felt by their families, friends and children.

Some protection for shop workers was included in the 1994 Act, although it has been poorly enforced in non-unionised stores. In particular, changing labour practices, including a growing use of zero-hours contracts, effectively mean that shop workers are simply unable to refuse to work on Sundays. Furthermore, the extension of Sunday trading would put further downward pressure on the remaining Sunday premium pay rates. Those who find the requirement to work Sundays in conflict with strong faith-based views tend to leave the retail sector.

The TUC’s view is that the current review has been driven by the concerns of just two or three large supermarket chains. Many other retail employers are either neutral or opposed.

It has been asserted that these proposals would give local authorities and elected mayors “greater control of their local economy and improve the well-being of local citizens.”[[2]](#footnote-2) We are concerned that, in practice, giant retail chains will use their power to bend local authorities to their will over this issue.

The proposal to shift decision-making on Sunday trading to a more local level sounds superficially attractive, but we fear that the promise of enhanced democracy will turn out to be illusory in this case. Already, local authorities often find their planning decisions challenged by well-funded retail chains. In addition, planning conditions are often flaunted and promised planning gains, such as sports centres, are not delivered.

In addition, those calling for change argue that large chains now have to compete with internet trading businesses in a much more intensive way than they did a decade ago. This view might carry more weight if it were not for the fact that those chains that are calling for deregulation are trading on the internet themselves, and some of them are counted amongst the most successful online retailers in Europe.

Neither do we believe that longer opening times for large retail stores will necessarily help to sustain local high streets, since many large outlets are now based in barn-like structures in out-of-town retail parks.

There is no public outcry at the moment demanding that large stores open longer on Sundays. In contrast with the position in the early 1990s, most people are now comfortable with the current Sunday trading arrangements. The TUC sees no reason to change these arrangements

**2: The current law and the proposals for change.**

The 1950 Shops Act recodified the pre-existing cultural norms that had been reflected in the 1912 and 1938 Acts, by simply preventing the majority of shops from opening on Sunday. There were a number of specified exemptions for newsagents, sweet shops and so on.

The 1994 Sunday Trading Act was a strongly liberalising measure. This legislation meant that all shops in England and Wales could open on Sunday. It set slightly different rules for small and large stores, with the latter being defined as those with a floor space of more than 280 square metres (3,000 square feet).

Large stores were allowed to open on Sundays for the first time by the 1994 legislation (except for Easter Sunday), but opening hours were limited to six hours of business between 10.00 and 18.00. Supermarkets often choose to open from 10.00-16.00, whilst some city centre stores, such as London’s Oxford Street, choose to open from 12.00 to 18.00 to better reflect patterns of demand.

There are also a few exemptions for certain types of large store, such as airport malls, pharmacies and farm shops, where Sunday hours are not limited at all.

It should be noted that there is still separate national legislation limiting the sale of alcohol, and that some businesses such as fast food outlets have their opening hours defined by their local authority licence. In addition, local authorities often prohibit goods being loaded and unloaded before 09.00 on Sundays.

Since the 1994 Act there have been two further changes to the law:

* A 2004 Regulatory Reform Order removed the requirement for large shops in England and Wales to give prior written notification to the local authority of their Sunday opening hours or change in these hours.
* The Christmas Day (Trading) Act 2004 prohibits large shops from opening on Christmas Day, which may fall on a Sunday. (Easter Sunday opening was specifically prohibited by the 1994 Act).

The 2004 Act was introduced after it became clear that many large stores were planning to open on Christmas Day, following the examples of Sainsbury’s and Woolworths stores in London the previous year.[[3]](#footnote-3) The 2004 Act drew majority cross-party support.

The current BIS consultation proposes to “devolve the new power to determine retail opening hours on Sundays to local areas, for example to elected mayors, through devolution deals[[4]](#footnote-4)” as part of a wider set of powers.

The consultation also sets out “a second option as to how we might empower local authorities to set the Sunday trading rules locally”.[[5]](#footnote-5) It is argued that these proposals sit alongside a range of policies aimed at supporting high streets, and that “delegating these powers to local areas would give them greater control of their local economy and improve the well-being of local citizens”[[6]](#footnote-6).

**3: The proposals are not responding to any visible public demand.**

There is no public campaign to change the Sunday trading rules.[[7]](#footnote-7) Most people are content with the current arrangements, which allow them ample time to visit the big stores when they wish to do so and to continue to use smaller shops later in the day if they find that they need more groceries, for example.

Rather, the call has come from a small number of large retail chains, with ASDA and Morrisons being perhaps the most vocal. However, other large chains, including Tescos, Sainsbury’s and Waitrose are either very sceptical or simply opposed to changes to the current rules.

Some senior figures in the industry are sceptical about whether longer Sunday opening would bring in extra takings. Indeed, some insiders have warned that extending Sunday opening could generate the same takings with a higher wage bill.

This review should not settled by reference to opinion polls, since the projected changes will impact much more sharply on shop workers and those who live near large stores than anybody else, but we note that no groundswell of support for longer trading hours can be seen in the following:

“ACS research conducted in February 2015 by ComRes shows that 76% of the public support existing Sunday trading regulations. Of those who are in favour of change, 60% called for greater restrictions on trading hours”.[[8]](#footnote-8)

**4: The proposals would have a negative effect on small businesses**

The key grocery market is already completely dominated by larger chains. Just four supermarkets account for 72.3 per cent of total sales, namely Tesco, Asda, Sainsbury’s and Morrisons. Other large chains make up a further 23.4 per cent of sales, leaving just 4.3 per cent to convenience stores and independents.[[9]](#footnote-9) In other words, the large chains have been so successful that small businesses are in danger of being completely squeezed out of this market.

The initial reaction from small businesses to the current consultation has generally been negative. The Federation of Small Businesses, for example, is “concerned” and wants a “guaranteed voice in any local changes.[[10]](#footnote-10)”

The Association of Convenience Stores said: “the short period of time that small stores are open while large stores are shut is a crucial advantage for convenience stores, most of which are owned by small businesses.  Liberalising Sunday trading hours would make some small stores unviable.[[11]](#footnote-11)”

In addition, some sole-trader retail businesses have said that they simply do not have the capacity to open on Sundays at all, so more sales on Sunday for big stores would mean reduced takings for many micro-retailers. This could exacerbate the trend towards concentration in the sector.

Furthermore, large workplaces account for an increasingly large share of retail jobs. The table below compares the share of employees in businesses with less than 10 workers, which are disproportionately independents or convenience stores, with businesses with more than 25 employees, which are largely chain outlets.

This shows a considerable shift towards employment in larger retail workplaces between since 1998.

***Share of retail employment by side of workplace 1998-2015***

|  |  |  |
| --- | --- | --- |
|   | 1-10 employees | 25+ employees |
| 1998 | 35.7% | 48.9% |
| 2005 | 26.9% | 56.6% |
| 2015 | 24.9% | 58.4% |
| Change 1993-2015 | -30.3% | +19.4% |

Source: LFS Microdata Service (spring quarters). Employees in main job only. Note that records for workplace size begin in 1993. The LFS, which is a survey of workers, asks about workplace size because employees are very likely to know this, but may not know how many people are employed in the whole of a multi-site chain.

The TUC’s view is that large retail chains are increasing their dominance of the traditional non-internet retail market. These companies are most likely to be unionised, but outweighing this consideration is the fact that our members tell us that they want to see a diverse choice of retail stores and a thriving High Street.

In addition, there is widespread concern that the purchasing power of the large chains holds back wages and profits in the supply chain. Farmers are particularly badly hit by this pressure, to the extent that many now find it hard to make a living.[[12]](#footnote-12)

Weakening the Sunday trading rules would further strengthen the power of big retailers over smaller competitors and squeezed suppliers.

**5: Is the high street threatened by internet sales – or by big retail?**

An important part of the current debate is the pressure that the growing role of internet shopping may put on physical stores and the High Street.

Many large chains have not been stout defenders of the high street but have sought to move to greenfield sites out of town.

The BIS paper “Understanding high street performance”[[13]](#footnote-13) included research which showed that in 2000, 50 per cent of retail spending took place on the High Street compared to 42 per cent in 2011. One component of this change was the preference for out-of town stores amongst large retailers. The value of retail sales in such stores increased from 28.1 percent to 31.5 per cent of the total over the same period.

The value of internet sales doubled to reach the rather smaller figure of 10.2 per cent of the total over the same period, although this figure is expected to continue to grow. Truly, “geographical expansion is no longer the only way that established retailers could extend brand reach and increase sales.”[[14]](#footnote-14)

Many retail chains have leapt wholeheartedly into online marketing, to the extent that 9 well known UK high street names feature in a list of the top 50 European on-line marketers ranked by net revenue, including Tesco, Dixons, Next, Asda, John Lewis, Sainsbury’s, Marks and Spencer, Carphone Warehouse, and H&M. Together, their online sales totalled more than 12.5 billion Euros in 2013.[[15]](#footnote-15)

Those who currently buy online are unlikely to be tempted back to traditional shopping by longer opening hours, but we must note that those who are calling loudest for a relation of the Sunday trading restrictions have fully embraced on-line retailing and thus may have rather less of a stake in fighting off the challenge of internet shopping than perhaps they might admit.

6: International comparisons – France and Germany

One potential benefit claimed for longer Sunday trading hours is that they would allow tourists to spend more. In fact, the benefits are at best unproven.

The temporary deregulation of Sunday trading during the 2012 London Olympics was predicted to boost takings[[16]](#footnote-16). In fact, the British Retail Consortium reported that sales actually fell during the period[[17]](#footnote-17).

It has also been said that French deregulation means that the UK is in danger of falling behind its key European comparators. In fact, the French Sunday trading laws remain quite strict.

The vast majority of shops still do not open in France on Sundays. However, shops can open on Sundays, usually in the afternoon, in the Christmas shopping weekends. In addition, shops in tourist areas can open on Sundays in the tourist season. Some supermarkets are also open on Sunday morning, for food only. Finally, shops can open on Sundays in the main shopping areas of Paris, Lille and Marseille, and in tourist areas throughout France.[[18]](#footnote-18)”

French deregulation has been quite modest. Most major stores nationwide open for the three Sundays prior to Christmas. Supermarkets (but not hypermarkets) are allowed to open every Sunday until 13:00 for grocery shopping. Although in a number of tourist areas across France stores are now able to open on Sunday, most do not. The main change has been that many clothing stores now open on Sunday in a few key shopping streets such as the Champs Elysees and La Défense in Paris, and the equivalent streets in Marseille, Cannes and Nice. Existing UK rules actually allow many more shops to open here on Sunday than would do so in France.

Germany is generally held to be one of the most successful economies in the EU and is a key comparator. Sunday trading in Germany is still very tightly regulated. With exception of shops within airports, or major railway or subway stations, only small bakeries are generally allowed to open on Sunday.

However, Berlin has been experimenting with allowing Sunday opening on a few days per year, including in the run-up to Christmas (10 Sundays in 2013, reduced back to 8 in 2014[[19]](#footnote-19)). Retail chains have not judged the German experiment to be a success, since it has not generated additional revenue.

**7: Empowering big retail to make the decisions on Sunday trading**

The government’s consultation document assumes that handing decision making to local authorities or elected mayors will give local people more power to influence the rules governing Sunday trading.

The financial might of the biggest retail chains means that they wield significant power. To get an ideal of the scale of these operations, even in a difficult year the Morrisons chain, the UK’s fourth largest grocer, recorded sales worth £16.8 billion[[20]](#footnote-20).

If well-funded big retail chains are pitted against cash-strapped local authorities then there are very big questions about whether local democracy would be able to prevail.

Many of the big retail chains have already demonstrated that they assiduous in pursuing what they want.[[21]](#footnote-21)

*'These guys are professionals and are in for the long haul. They have plenty of experience from around the country in winning planning permission – from PR campaigns in the local press to planning experts and expensive lawyers."[[22]](#footnote-22)*

Asda supports its in house capability with a partnership agreement with 3 law firms, for example.[[23]](#footnote-23)

Furthermore, a University of Stirling study, undertaken for the National Retail Planning Forum, noted that *“it is clear that planners do not have at their disposal major academic research which will give them case study material or broader analyses to be used in interpretation of their local material,”* while *“what research there is…is in literatures often following other agendas*” as “*the dynamism of the retail sector has created a literature which is often relatively foreign to planners*,” something which *“disempowers*” them[[24]](#footnote-24). In contrast, supermarket chains have the time and the money to persuasively argue their case, and do not hesitate to do so.

The DBIS consultation document also suggests that local authorities might be able to apply different rules to different geographical zones. Such arrangements would be particularly likely to face legal challenges from big retail chains, especially if they were perceived as favouring some companies more than others. The giant retail chains have been engaged in cut-throat completion for market share, and this battle would drive their views on zoning.

Supermarkets have already been known to challenge planning decisions that appear to favour their rivals, most notably in an instance that has been in front of the High Court on several occasions. An application to build an out of town superstore near Cinderford Gloucester by ASDA has been rejected three times by the High Court[[25]](#footnote-25), following legal challenges by the Mid Counties Co-operative, which successfully argued that the council’s planning committee "failed to consider and/or take reasonable steps to access the true extent of the harm to the town centre’ in the context of previous judgments", [[26]](#footnote-26) including a previous one on similar planning ground referring to the same case and brought by Tescos.[[27]](#footnote-27)

If a planning application can generate High Court cases under the existing arrangements, then a more complicated local zoning system is certain to multiply the number of legal challenges several-fold. Hard-pressed local authorities would be often be faced with the unpalatable choice of giving in to big retailers or facing very substantial legal bills

**8: Town centre noise, congestion and pollution issues**

Longer Sunday trading hours for large stores would lower the quality of life for those who live near them. Currently, large stores do not generally open before 10.00, with deliveries generally prohibited before 09.00. If stores were to open earlier, then it would be hard to see how the restriction on deliveries could be maintained, as modern retail chains operate on minimal inventory topped up by just-in-time delivery systems.

According to Centre for Cities, “the rise in demand for city-centre living has put serious pressure on housing in many places – with the share of households in large city centres classed as overcrowded having increased by 69 per cent between 2001 and 2011. To sustain this growth, cities need to develop more housing in central areas. “[[28]](#footnote-28)

Of course, big retail stores are not the only source of noise, congestion and pollution in town and city centres. However most leisure-related businesses do not open on early on Sundays, which gives those who live in town centres some respite.

The TUC wants town and city centres to have vibrant economies, but this can be achieved without big store opening early on Sundays.

**9: A threat to shop-workers and their friends and families**

Retail staff are generally opposed to any relaxation of the current Sunday trading restrictions[[29]](#footnote-29), since it would cause further problems for employees who already have unpredictable working patterns and variable hours. Retail workers are disproportionately likely to have zero-hours contracts or are contracted to work part time, but with some grace-and-favour extra hours. Furthermore, labour market intelligence indicates that those who say that they will not work on Sundays now find it hard to get a job in retail in the first place.

In many cases, unsocial working patterns are already having a negative impact on retail employees in terms of earnings and relationships, including parenting. Long-standing employees with religious beliefs that demand that they treat Sunday as special have tended to simply leave the retail industry.

Retail staff in large stores are already under great pressure to work at other anti-social times. Those with children miss out on time with them due to evening and weekend work.

The six-hour limit means that shop workers can spend at least part of their Sunday with family and friends. Longer working hours working would effectively end this small amount of weekend leisure time.

Furthermore, Sunday pay premiums have been severely cut since the initial collective bargaining agreements made in 1994. Most shop workers have seen their Sunday premium payment fall from double time to time and a half and then to zero. Thus many shop workers now get no Sunday premium at all, including all staff that work at Asda. Longer opening hours would increase wage bills and this would lead to more downward pressure on Sunday premium payments.

Without premium payments, staff have been less willing to volunteer to work on Sundays and consequentially more now have no choice about Sunday work.

The Sunday opt-out[[30]](#footnote-30) for retail workers is not working well. The protection against detriment (unfavourable treatment) in the 1996 Act is poorly enforced. As evidence from our affiliates shows, retail staff who try to opt out of Sunday working face having their contracted hours cut, commonly by six. We would argue strongly that this unfair treatment should be stopped and all shop workers should have decent employment rights and be able to enforce them.

The protection that applies to existing retail staff has become dangerously eroded. It should be strengthened and extended to all retail employees.

Many staff in distribution, security, catering, public transport and banks would also find themselves under pressure to work longer hours on Sundays if the trading limits were relaxed. They do not even have the limited protection that applies to retail employees.

In large parts of the distribution industry, working patterns are dictated by the needs of the large retailers. It is also likely that extending Sunday opening hours would further increase the consolidation of the food market, which would intensify the existing pressure on supply-chain costs. These factors would put pressure on wages and conditions in distribution and would be likely to lead to job losses.

The Sunday working safeguards that apply to some retail workers should be strengthened and extended to the parts of the distribution sector where working patterns are driven by the needs of the retail client.

10: Conclusions

The evidence does not support the case for change. There would be a negative effect on a number of groups of people, including:

* small businesses, who would find their margins squeezed further by the big chains
* town and city centre residents, who would suffer more noise congestion and pollution
* Shop-workers and employees in the supply and distribution chain, who would also be drawn into more Sunday working against their will.

The potential benefits have been overstated. There is no real demand for longer Sunday opening hours and no robust evidence that such a change would boost tourism – indeed, the most experience of the Olympics suggests that the reverse may be true. Neither is it clear that such a measure would help persuade the large retail chains to maintain a physical presence in the high street, as they are already embracing on-line retailing. Furthermore, some business leaders fear that the measure may increase their costs more than their revenue. Neither are we at risk from our main competitor nations who, despite small steps towards along more shops to open on Sundays, still have much tighter rules than the UK.

The current rules on Sunday trading have widespread support. They represent a great British compromise. Changing at this point would do more harm than good.

1. <https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/451376/BIS-15-359-consultation-on-devolving-sunday-trading-rules.pdf> [↑](#footnote-ref-1)
2. [https://www.gov.uk/government/consultations/devolving-sunday-trading-rules](%20https%3A/www.gov.uk/government/consultations/devolving-sunday-trading-rules) [↑](#footnote-ref-2)
3. Hansard, 26 March 2004, columns 1157/1158. <http://www.publications.parliament.uk/pa/cm200304/cmhansrd/vo040326/debtext/40326-01.htm> [↑](#footnote-ref-3)
4. BIS Consultation Document, p4. [↑](#footnote-ref-4)
5. Ibid. [↑](#footnote-ref-5)
6. Ibid. [↑](#footnote-ref-6)
7. Open Sundays is a private company limited by guarantee. Its purpose is listed at Companies House as “public relations and communications activities” <https://beta.companieshouse.gov.uk/company/08730553> . Its two directors are a consultant and a public affairs specialist <https://beta.companieshouse.gov.uk/company/08730553/officers>. [↑](#footnote-ref-7)
8. Ibid. [↑](#footnote-ref-8)
9. Source: “Market share of grocery stores in Great Britain for the 12 weeks ending July 19, 2015”, Statista – the Statistics Portal: <http://www.statista.com/statistics/279900/grocery-market-share-in-the-united-kingdom-uk/> [↑](#footnote-ref-9)
10. FSP release, 7 July 2015: <http://www.fsb.org.uk/pressroom/assets/81%20-%20sunday%20traiding.pdf> [↑](#footnote-ref-10)
11. ACS release 7 July 2015: <http://www.acs.org.uk/sunday-trading-plans-complicated-harmful-and-unnecessary/> [↑](#footnote-ref-11)
12. For example, see NFU report on unsustainable milk prices, 24 August 2015: <http://www.nfuonline.com/news/latest-news/morrisons-what-we-want/> [↑](#footnote-ref-12)
13. BIS, December 2011: <https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/31823/11-1402-understanding-high-street-performance.pdf> [↑](#footnote-ref-13)
14. C. Rhodes, House of Commons briefing paper 061866, “the retail industry – statistics and policy, 20 May 2015: <http://researchbriefings.files.parliament.uk/documents/SN06186/SN06186.pdf> [↑](#footnote-ref-14)
15. Statista – the statistics portal: “leading 50 online retailers based on net revenue in Europe in 2013 (2015): <http://www.statista.com/statistics/453804/online-retail-leading-online-stores-by-revenue-europe/> [↑](#footnote-ref-15)
16. For example, the Centre for Retail Research’s “The summer of love for UK retailers” predicted a net boost of £188 million sales. <http://www.retailresearch.org/londonolympics2012.php> [↑](#footnote-ref-16)
17. “Retail sales hurt by Olympics in August” 4 September 2012: <http://www.bbc.co.uk/news/business-19468578> [↑](#footnote-ref-17)
18. See, for example, summary on the About France website: [http://about-france.com/shopping-in-france.htm#opening](http://about-france.com/shopping-in-france.htm%23opening) [↑](#footnote-ref-18)
19. <http://www.visitberlin.de/en/article/sunday-shopping> [↑](#footnote-ref-19)
20. W.M.Morrison Supermarkets Group PLC, “Annual report and financial statements” 2014/15, p16: <http://www.morrisons-corporate.com/ar2015/pdf/Morrisons_AR_2014_Full.pdf> [↑](#footnote-ref-20)
21. In the rare case of Hadleigh in Suffolk, the local authority stood firm and fought-off serial planning applications from a major supermarket over a 26 year period. [↑](#footnote-ref-21)
22. “Charles C”, a local anti-supermarket campaigner in Shaftesbury, Dorset. See also numerous local media reports and, for example, Corporate Watch/Grassroots Action on Food and Farming, “Checkout Chuckout! A DIY guide to stopping supermarket developments (2005)” and Friends of the Earth Briefing “calling the shots: how supermarkets get their way in planning decisions” (2006)

<http://library.uniteddiversity.coop/Food/Supermarkets/Checkout_Chuckout-DIY_Guide_to_Stopping_Supermarket_Developments.pdf> ; <http://www.foe.co.uk/sites/default/files/downloads/calling_the_shots.pdf> [↑](#footnote-ref-22)
23. Announcement reported here, for example: <http://biglaw.org/news/tags/asda> [↑](#footnote-ref-23)
24. A. Findlay, L. Sparks "In brief: the National Retail Planning Forum Briefing Paper series", International Journal of Retail & Distribution Management, Vol. 36 Iss: 12, pp.1015 – 1023, 2008 [↑](#footnote-ref-24)
25. <http://www.planningresource.co.uk/article/1346200/judge-rejects-cinderford-asda-application-third-time> [↑](#footnote-ref-25)
26. <http://www.planningresource.co.uk/article/1310913/co-op-launches-fresh-fresh-bid-block-cinderford-asda> [↑](#footnote-ref-26)
27. R (Tesco Stores Limited) v. (1) Forest of Dean District Council (2) Asda Stores Limited and Others [2014] EWHC 3348 (Admin), 2014 : <http://www.39essex.com/r-tesco-stores-limited-v-1-forest-dean-district-council-2-asda-stores-limited-others-2014-ewhc-3348-admin/> [↑](#footnote-ref-27)
28. Centre for Cities, “Urban demographics: where people live and work”, July 2015. <http://www.centreforcities.org/press/young-people-leading-21st-century-resurgence-in-city-centre-living/> [↑](#footnote-ref-28)
29. By a factor of 9 to 1, according to successive USDAW surveys and other union evidence. [↑](#footnote-ref-29)
30. The Employment Rights Act 1996, Section 4: <http://www.legislation.gov.uk/ukpga/1996/18/contents> [↑](#footnote-ref-30)