

Final stage impact assessment

Title: Age verification for online sales and delivery of crossbows

Type of measure: Primary Legislation

Department or agency: Home Office

IA number: HO IA 1012

RPC reference number: N/A

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Date: 2 December 2025

1. Summary of proposal

1. The government introduced amendments at the Committee Stage of the Crime and Policing Bill to strengthen the law concerning the online sale, hire and delivery of crossbows or part of a crossbow. These measures seek to align with measures already existing, or being introduced (see paragraph 6), in respect of the sale and delivery of knives. Under section 141A of the Criminal Justice Act 1988 (CJA 1988)¹ it is an offence to sell a bladed article remotely to someone without verifying the purchasers age and that, when sold, the item must only be delivered to someone aged 18 years or older and not to a locker. Under the Offensive Weapons Act 2019 (OWA 2019), it is an offence to deliver a bladed product to residential premises (section 38²) or to a person aged under 18 years (section 39³).
2. Section 1 of the Crossbows Act 1987 (CA) already makes it an offence to sell or let for hire 'a crossbow or part of a crossbow' to a person aged under 18 years unless they believe the person to be aged 18 years or older and that they had reasonable grounds for the belief. The maximum penalty is six months' imprisonment or an unlimited fine. The government are making amendments to the CA 1987 to introduce equivalent age verification methods as those set out in section 141B of the CJA 1988 that apply to

¹ Criminal Justice Act 1988, section 141A: <https://www.legislation.gov.uk/ukpga/1988/33/section/141A>

² Offensive Weapons Act 2019, section 38: <https://www.legislation.gov.uk/ukpga/2019/17/section/38>

³ Offensive Weapons Act 2019, section 39: <https://www.legislation.gov.uk/ukpga/2019/17/section/39>

bladed articles so that these also apply for the sale or letting of a crossbow or part of a crossbow. These are that the seller operated a system for checking a buyer is not aged under 18 years, and the system was likely to work; the package containing the article was clearly marked by the seller that it contained a crossbow or part of a crossbow and it should only be delivered into the hands of a person aged 18 years or older; that the seller took all reasonable precautions and exercised all due diligence to ensure that it would be delivered into the hands of someone aged over 18 years and that the seller did not deliver the package (or arrange for its delivery) to a “locker”).

3. Similar amendments to the CA 1987 are also being made to those proposed for the new age verification policy for bladed articles. As with bladed articles, before dispatch of the crossbow or part of a crossbow, the seller must receive from the buyer a copy of an identity document (namely a UK passport, a foreign passport, or a UK drivers licence) issued to the buyer and a photograph of the buyer to confirm the buyer is aged 18 years or older. Amendments to the CA 1987 create a new offence on the part of the seller if they deliver or arrange for delivery to residential premises in respect of the sale or letting of a crossbow or part of a crossbow similar to that set out in section 38 of the OWA 2019, with equivalent defences to those in section 39A of the OWA 2019 for bladed articles.
4. Further amendments also create a new offence on the part of the courier or person delivering on their behalf equivalent to the new offence described for the delivery of bladed article in new amendments to section 42 of the OWA 2019. The courier or person delivering on behalf of the courier must only provide crossbow or part of a crossbow into the hands of the actual buyer and only at the address the buyer provided at the outset. If the courier or person delivering on behalf of the courier fails to do this, they will commit a summary offence attracting a penalty of an unlimited fine. It will be a defence for a courier or person delivering on behalf of the courier to show that they checked an official identity document (defined as a UK or foreign passport or UK drivers licence) and that the ID has the name of the person indicated by the seller, and it shows that the holder is aged over 18 years, and that as far as they can tell, the picture in the ID is of the person at the doorstep. Further amendments confer power on the Secretary of State (in practice the Home Secretary) to add to the list of identity documents for these purposes and to provide for other defences for a person charged with an offence under sections to be made.
5. Where, in this Impact Assessment, there is the reference to the sale or hire or delivery of a ‘crossbow’ this would also include the sale or hire and delivery of a part of a crossbow.

Two Step Age Verification

6. The government plans to further amend the CA 1987, to ensure that a two-step age verification is required which mirrors the same amendments being introduced in respect of knives so that:

Step 1 - at the point of sale. The legislation would strengthen the age verification requirements at the point of sale and set out in legislation the minimum requirements for age verification. This requirement will include providing an official identity document that verifies the purchaser's date of birth. This could be a UK passport, foreign passport, or UK driving licence.

The buyer must also provide a current photograph of themselves to the seller, at the point of purchase, to show that the photograph in the identity document they have provided to the seller is that of the buyer. The legislation will provide the government with the power to specify other forms of identification in secondary legislation.

Step 2 – at the point of delivery. The courier, or person acting on behalf of the courier, must ensure that (if the buyer is an individual) the person receiving the package is the same person who purchased the crossbow, or part of a crossbow, and is aged 18 years or older by checking their official identification and, if the buyer is an individual, is the buyer. This measure will apply in England and Wales.

5. The legislation will require that a package containing a crossbow, or part of a crossbow, must be delivered into the hands of the buyer (who must be aged 18 years or older). Failure to do this will result in an offence with the sanction of a level five (unlimited) fine. It will be a defence for a person charged with an offence to show that they did not know, and a reasonable person would not have known, that the package contained a crossbow, or part of a crossbow, or that they had checked an identity document and that a reasonable person would have been satisfied that the person was 18 years or older and the buyer.

2. Strategic case for proposed regulation

5. The government will be taking action to introduce tougher age verification controls on online sales and delivery of crossbows, or part of a crossbow, in the Crime and Policing Bill similar to the measures in the same Bill on bladed articles and bladed products.
6. Crossbows are, if misused, lethal weapons that increasingly have features similar to firearms. The previous government published a call for evidence paper in February 2024⁴ to seek information and evidence about whether further controls on crossbows should be introduced to help minimise the risk to public safety from individuals who would misuse crossbows and use them to commit criminal offences.
7. The current legislation for crossbows remains almost unchanged since its introduction in 1987 as there are no requirements in that legislation, unlike legislation for other age restricted items such as knives, that sets out the steps that should be followed, as defences, in verifying the age of someone buying a crossbow online. These new measures seek to remedy this gap and are preventive rather than punitive and help support the long term objective of the government's Safer Streets mission of reducing serious harm.

3. SMART objectives for intervention

8. The primary objective is to prevent the underage sale of a crossbow, or part of a crossbow, by making sure that online sellers and delivery companies have a two-step identity verification at the point of sale where an official identification document - such as a UK passport, foreign passport, UK driving licence or other document to be specified

⁴ Controls on crossbows - GOV.UK: <https://www.gov.uk/government/calls-for-evidence/controls-on-crossbows>

in legislation – that confirms that the person purchasing the crossbow, or part of a crossbow, is who that person purports to be and is aged 18 years or older.

9. The second step will be on delivery where the delivery person must ensure that the person who has purchased the item is the person receiving the package. Failing to hand the package to the person who purchased it will be a summary offence attracting an unlimited fine. The delivery person will need to check the age and identity of the person through production of an official identification document. Delivery records should be kept clearly and legibly so that online sellers and delivery companies can avail themselves of the defences provided for in the legislation.
10. For example, where a seller delivers a crossbow, or part of a crossbow, or arranges for its delivery, to residential premises, the seller can show from records that the arrangement made with the delivery company required them to ensure that the person to whom the crossbow was delivered was the same person as the buyer and is aged 18 years or older.
11. By issuing statutory guidance the government will also be able to ensure that sellers and delivery companies keep records in line with national data protection standards. Recent media articles⁵ have shown that data on purchases of crossbows is being kept for far longer than is necessary.

4. Description of proposed intervention options and explanation of the logical change process whereby this achieves SMART objectives

Option 0 – ‘Do nothing’

12. The Home Office does not amend the CA 1987 to mirror the existing age verification and delivery requirements for bladed articles or the new two-step age verification requirements being introduced for the sale of bladed articles through amendments to section 141A⁶ of the CJA 1988 and the delivery of bladed products under sections 38⁷ and 39⁸ of the Offensive Weapons Act 2019. The CA 1987 does not specify what the age verification system should be and allows sellers to continue to determine their own checks that they are selling a crossbow, or part of a crossbow to someone who is aged 18 years or older and that they are confident that the item will not be delivered to someone who is either underage or not the person buying the crossbow, or part of a crossbow.

Option 1 – Introduce a two-step identity verification system to help prevent the sale or hire and delivery of crossbows to persons aged under 18 years

13. The two-step age and identity verification measure will establish minimum standards which sellers must adopt. Sellers must check an official identification document provided by the buyer at the point of sale, such as a passport or UK driving licence, and the buyer

⁵ Triple killer's weapon of choice on sale for less than £100 - and there's no licensing system - Birmingham Live: <https://www.birminghammail.co.uk/news/midlands-news/triple-killers-weapon-choice-sale-31185230>

⁶ Criminal Justice Act 1988, section 141A: <https://www.legislation.gov.uk/ukpga/1988/33/section/141A>

⁷ Offensive Weapons Act 2019, section 38: <https://www.legislation.gov.uk/ukpga/2019/17/section/38>

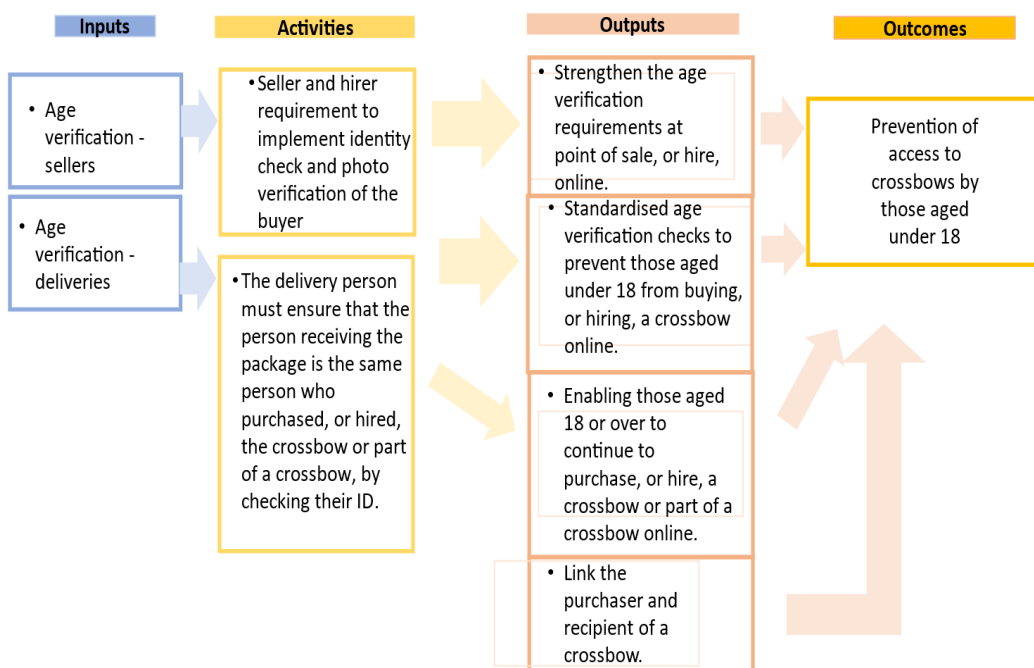
⁸ Offensive Weapons Act 2019, section 39: <https://www.legislation.gov.uk/ukpga/2019/17/section/39>

must provide a current photograph or picture of themselves to show that they are the holder of the official identification document.

14. At the point of delivery, the delivery person must check the identification provided by the person receiving the package to ensure that they are aged at least 18 years and that they are also the buyer. The seller will need to pass the buyer's identity to the delivery company to pass to the delivery person. If sellers do not fulfil these requirements, they may be prosecuted. This will help achieve the objective of ensuring that all sellers will use the minimum standards and reduce the opportunities for those under the age of 18 years from obtaining crossbows or parts of a crossbow. **This is the government's preferred option.**
15. The Theory of Change flowchart below is intended to present the effect of interventions from the formation of policy to the outcomes of this intervention.

Theory of Change

Introduction of age verification: theory of change



5. Summary of long-list and alternatives

16. No alternative options were considered given the opportunity to introduce these measures now alongside identical ones for knives and so ensuring an identical regime for both of these age restricted products in terms of their sale and delivery.

6. Description of shortlisted policy options carried forward

17. Two options have been carried forward:

Option 0 – 'Do nothing'

18. The Home Office does not amend the CA 1987 to mirror the existing age verification processes for the sale of bladed products or the new two-step age verification requirements being introduced for the sale of bladed articles through section 141A⁹ of the CJA 1988 and the delivery of bladed products under sections 38¹⁰ and 39¹¹ of the Offensive Weapons Act 2019 and anticipates that online sellers, of crossbows and parts of a crossbow, have robust age verification procedures in place to verify that the purchaser is over the age of 18 years. The CA 1987 does not specify what the age verification system should be and allows sellers to continue to determine their own checks that they are selling a crossbow, or part of a crossbow to someone who is aged 18 years or older and that they are confident that the item will not be delivered to someone who is either underage or not the person buying the crossbow, or part of a crossbow.

Option 1 – Introduce a two-step identity verification system to help prevent the sale or hire of crossbows to persons aged under 18 years

19. Amend the Crossbows Act 1987, to create a minimum standard of a two-step age verification required at point of sale and point of delivery. This will mirror the same amendments being introduced in respect of knives (as outlined in paragraphs 13 and 14 above). This will achieve the objective of ensuring that all individuals, sellers of crossbows and parts of a crossbow, and delivery companies, in England and Wales will use a specified minimum standard. **This is the government's preferred option.**

⁹ Criminal Justice Act 1988, section 141A: <https://www.legislation.gov.uk/ukpga/1988/33/section/141A>

¹⁰ Offensive Weapons Act 2019, section 38: <https://www.legislation.gov.uk/ukpga/2019/17/section/38>

¹¹ Offensive Weapons Act 2019, section 39: <https://www.legislation.gov.uk/ukpga/2019/17/section/39>

7. Regulatory scorecard for preferred option

Part A: Overall and stakeholder impacts

(1) Overall impacts on total welfare		Directional rating
Description of overall expected impact	<p>Households are unlikely to be significantly impacted by having to produce photographic ID such as a passport or driving licence at the point of sale, as ID documentation is largely already requested.¹²</p> <p>Impacts to the criminal justice system (CJS) are estimated to be between £0 to £11,400 across the ten-year appraisal period.</p> <p>Companies delivering crossbows and crossbow parts will be required to cross-check official identification documentation at the point of delivery to verify that the person receiving the crossbow, or part of a crossbow, was the buyer at the point of sale. This is expected to impact delivery companies in familiarisation and additional delivery times through the cross-check itself and failed deliveries. This will add costs to businesses which could be passed onto consumers in the form of higher delivery fees.</p>	Uncertain Based on all impacts (incl. non-monetised)
Monetised impacts	<p>The NPSV is estimated between -£2,800 and -£69,300 with a central estimate of -£14,500 across the ten-year appraisal period.</p> <p>The NPSV is not comprehensive of all impacts, as it has not been possible to monetise the benefits, and some associated costs, such as broader business impacts. Only familiarisation and CJS costs have been monetised.</p>	Negative Based on likely £NPSV
Non-monetised impacts	See section (2) and (3) of the scorecard for the breakdown of impacts on businesses and households respectively.	Uncertain
Any significant or adverse distributional impacts?	<p>Smaller retailers, especially independent crossbow sellers, may struggle to implement effective ID checks and could be disproportionately affected by increased delivery costs.</p> <p>ID requirements also impact various demographics differently, as ownership of official photographic ID varies by age, gender, and income. For example, research from the electoral commission indicates that disadvantaged people are less likely to possess photo ID¹³.</p>	Negative

¹² Using the independent end to end review of knife sales as a suitable proxy due to both being age restricted items. Independent end-to-end review of online knife sales:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales/independent-end-to-end-review-of-online-knife-sales-accessible#summary-of-recommendations-and-further-areas-to-explore>

¹³ Voter ID Demographics: https://www.electoralcommission.org.uk/sites/default/files/2023-09/Voter%20ID%20demographic%20analysis%20research_%20%281%29.pdf

(2) Expected impacts on businesses

Description of overall business impact	There is expected to be some cost to business of administering the new legislation.	Negative
Monetised impacts	<p>The BNPV is estimated between -£2,700 and -£58,000 with a central estimate of -£14,500.</p> <p>The BNPV is not comprehensive of all business impacts, due to absence of well evidenced data regarding crossbow sellers, the annual volume sold and clear oversight on the current age verification processes in place by businesses. Only the familiarisation cost to businesses have been monetised within the BNPV.</p>	Negative Based on likely business £NPV
Non-monetised impacts	<p>The Independent end-to-end review of online knife sales¹⁴, citing industry surveys, highlighted that most large and well-established retailers implement ID checks to meet current age restriction requirements. Although not directly comparable to the market for crossbows and crossbow parts, it is anticipated similar processes are in place, as crossbows are already an age restricted item. It is expected that only minor adjustments to existing processes will be needed to align with the new standardised approach, with no significant changes required in most cases, and without the need to build new systems or overhaul existing procedures. The more limited examples of online sellers who rely on “self-certification” and other methods will likely face additional costs to update their online systems to introduce ID checks.</p> <p>There is no evidence of a widespread requirement to provide a recent photograph of themselves alongside photographic ID at the point of sale. This photograph is intended to confirm that the person presenting the ID matches the identity on the document. The introduction of this specific requirement is expected to have a greater business impact and create additional burden. Smaller retailers may find it more difficult to introduce these measures and may lack the resources to implement this effectively.</p> <p>Businesses may also incur costs associated with GDPR data requirements as they are required to store personal information.</p> <p>Companies delivering crossbows, or part of a crossbow will be required to cross-check ID at the point of delivery to verify that the person receiving the crossbow was the buyer at the point of sale. This is expected to impact delivery companies in familiarisation and additional delivery times through the cross-check itself and failed deliveries.</p>	Negative

¹⁴ Independent end-to-end review of online knife sales: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales/independent-end-to-end-review-of-online-knife-sales-accessible#summary-of-recommendations-and-further-areas-to-explore>

Any significant or adverse distributional impacts	None expected	Neutral
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(3) Expected impacts on households

Description of overall household impact	<p>The proposed amendments outlined to delivery and seller process are anticipated to have negligible impact on households.</p> <p>Buyers will now need to produce ID and a photograph at the point of sale and the original purchaser will need to be present with ID to receive the package rather than another adult.</p>	Uncertain
Monetised impacts	The impact of these measures on households remains uncertain but is likely to be fairly neutral. Impacts remain non-monetised and are outlined below. Some business impacts above may be passed on to households in the form of higher prices.	Uncertain Based on likely household £NPV
Non-monetised impacts	<p>Households are unlikely to be significantly impacted by having to produce ID at the point of sale, as ID documentation is largely already requested. Photo requirements will take time to complete but are expected to be minimal. New standards of ID at delivery may affect buyers, as the purchaser themselves will need to receive the package rather than another adult.</p> <p>Some business impacts may also be passed on to households in the form of higher prices, this could be on crossbows or delivery fees.</p>	Uncertain
Any significant or adverse distributional impacts?	ID requirements can disproportionately impact certain demographics, as the possession of ID differs across age, gender, and income levels, but these are already widely utilised to meet current sale requirements ¹⁵ .	Neutral

¹⁵ Voter ID Demographics: https://www.electoralcommission.org.uk/sites/default/files/2023-09/Voter%20ID%20demographic%20analysis%20research_%20%281%29.pdf

Part B: Impacts on wider government priorities

Category	Description of impact	Directional rating
Business environment: Does the measure impact on the ease of doing business in the UK?	The overall impact of this measure on business environment is not known but could add barriers to selling crossbows, or part of a crossbow, online in the UK but only to those businesses where the proposed requirements are not already embedded in business as usual.	May work against
International Considerations: Does the measure support international trade and investment?	The regulation is not expected to impact international trade, either directly or indirectly, through imposing or reducing barriers to exports or imports.	Neutral
Natural capital and Decarbonisation: Does the measure support commitments to improve the environment and decarbonise?	The impact of these measures on the UK's natural capital and decarbonisation of economy is not known. Age verification introduces minimal procedural changes. At a high level it is reasonable to assume that the impact will be negligible.	Neutral

8. Monitoring and evaluation of preferred option

20. The impact of these measures on online sales, businesses and crimes involving crossbows or parts of a crossbow, is uncertain. Ongoing monitoring and feedback is crucial to understanding the effects of these changes.
21. The changes to age verification for sellers and hirers of crossbows, or part of a crossbow, and delivery drivers aim to raise the minimum standards for verifying the age and identity of buyers.
22. The new age verification requirements will increase due diligence obligations for sellers and create a new offence for delivery firms. The Home Office will work with police forces and the National Policing lead to monitor any additional burdens to the CJS and the number of the cases will be reviewed to understand their use and frequency. Once the Bill receives Royal Assent, the Home Office will publish statutory guidance on the operation of these new offences. Ahead of this, the Home Office will need to consult with businesses and delivery companies involved in the sale and delivery of crossbows,

or parts of a crossbow, on the guidance and will monitor, through ongoing engagement and discussion, any potential burdens that there may be on businesses. Responses from the consultation will form part of the monitoring and evaluation plan. At present, there is no broader data collection on crossbow related offences involving underage sales, which prevents an assessment of the effectiveness of implementing this measure. The Home Office is actively exploring various options for gathering this information.

9. Minimising administrative and compliance costs for preferred option

16. There will be an administrative cost to online sellers and hirers of crossbows, or parts of a crossbow, and delivery companies to update their verification systems for complying with the two-step age verification measure. The Home Office cannot make an estimate at this time, as further evidence will need to be obtained from crossbow retailers. Identification measures can be satisfied by either a digital check on a UK or foreign passport or a UK driving licence. Measures to be introduced by Department for Science, Innovation and Technology around digital identity will ensure that retailers can be compliant and have a reference point on GOV.UK¹⁶.
17. In addition, the measures being introduced in the Crime and Policing Bill contain a power for the Home Secretary to issue statutory guidance on the operation of the new measures. This guidance must be publicly consulted on before being published and the Home Office will use this as an opportunity to engage with businesses affected and ensure the guidance meets their business needs.
18. These standards are set out in the UK digital identity and attributes trust framework¹⁷. The trust framework sets a consistent methodology for digital verification services to describe how they have verified an identity or attribute but does not prescribe how these checks could be satisfied. These provisions can be referenced in secondary legislation and reference those in the Data (Use and Access) Bill¹⁸.

10. Main assumptions / sensitivities and economic / analytical risks

19. There is an absence of information regarding the number of retailers selling crossbows, or parts of a crossbow, the annual volume sold, and how many already have relevant checks in place. This makes it difficult to identify how many businesses would be impacted by the new requirements.

¹⁶ See footnote 23.

¹⁷ UK digital identity and attributes trust framework: <https://www.gov.uk/government/publications/uk-digital-identity-and-attributes-trust-framework-04>

¹⁸ Data (Use and Access) Bill: <https://bills.parliament.uk/bills/3825>

20. It is unknown how often crossbows, or parts of a crossbow, are sold to those aged under 18 years. Unlike knives, where there are reported cases of those aged under 18 years obtaining weapons, the number of incidents, if any, of those aged under 18 years buying crossbows, or parts of a crossbow, is unclear. This uncertainty affects the ability to derive any benefits from the policy and makes it difficult to identify how many businesses would be impacted by the new requirements.
21. The levels of compliance from businesses with the new requirements are unknown. The levels of enforcement are also uncertain. It is unclear how the police will react, whether they will increase enforcement checks or if they have the capacity to do so. Both factors could affect the costs to the CJS as non-compliance coupled with increased enforcement checks by the police, could lead to a rise in the number of cases being prosecuted.

Declaration

Department:

Home Office

Contact details for enquiries:

CrimeandPolicingBillTeam@homeoffice.gov.uk

Minister responsible:

Sarah Jones MP, Minister for Policing and Crime

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed:



Date:

25 November 2025

Summary: Analysis and evidence

For Final Stage Impact Assessment, please finalise these sections including the full evidence base.

Price base year:

N/A

PV base year:

N/A

This table may be reformatted provided the side-by-side comparison of options is retained	0. Business as usual (baseline)	1. Preferred way forward (if not do-minimum)
Net present social value (with brief description, including ranges, of individual costs and benefits)		<p>The NPSV is estimated between -£2,800 and -£69,300 with a central estimate of -£14,500.</p> <p>The NPSV is not comprehensive of all impacts, as it has not been possible to monetise the benefits, and some associated costs, such as broader business impacts. Only familiarisation and CJS costs have been monetised.</p>
Public sector financial costs (with brief description, including ranges)		Costs to the criminal justice system are estimated between £0 and £11,400 across the 10 year appraisal period.
Significant un-quantified benefits and costs (description, with scale where possible)	By doing nothing, there is a risk of crossbows and crossbow parts being delivered to lockboxes or left on doorsteps, increasing the chance of them falling into the	<p>New delivery offence requires cross-checking ID with the buyer, impacting delivery companies through familiarisation and additional delivery times. Requirements for online sellers may require system updates. Buyers may also face minor impacts from photo ID requirements and needing to receive packages personally.</p> <p>Clearer standards may deter irresponsible seller and delivery practices, though international or grey market purchases could undermine this impact. Enhanced age</p>

	wrong hands or being accessed by young individuals.	verification could however reduce crossbow access for those aged under 18 years, potentially decreasing crossbow crime and improving public safety.
Key risks (and risk costs, and optimism bias, where relevant)	...	<p>There is an absence of information regarding the number of retailers selling crossbows, or parts of a crossbow, the annual volume sold, and how many already have relevant checks in place. Making it difficult to identify how many businesses would be impacted by the new requirements.</p> <p>It is unknown how often crossbows, or parts of a crossbow, are sold to those aged under 18 years. Unlike knives, where there are reported cases of those aged under 18 years obtaining weapons, the number of incidents, if any, of those aged under 18 years buying crossbows is unclear. This uncertainty affects the ability to derive any benefits from the policy and makes it difficult to identify how many businesses would be impacted by the new requirements.</p> <p>The levels of compliance from businesses with the new requirements are unknown. The levels of enforcement are also uncertain. It is unclear how the police will react, whether they will increase enforcement checks or if they will lack the capacity to do so. Both factors could affect the costs to the CJS as non-compliance coupled with increased enforcement checks by the police, could lead to a rise in the number of cases being prosecuted.</p>
Results of sensitivity analysis	...	N/A

Evidence base

A. Strategic objective and overview

22. The government will be taking action to introduce tougher age verification controls on online sales and delivery of crossbows, or part of a crossbow, in the Crime and Policing Bill. Crossbows are, if misused, lethal weapons that increasingly have features similar to firearms.
23. The previous government published a call for evidence paper in February 2024 to seek information and evidence about whether further controls on crossbows should be introduced to help minimise the risk to public safety from individuals who would misuse crossbows and use them to commit criminal offences.

B. Problem under consideration, with business as usual, and rationale for intervention

24. The sale and possession of crossbows are, like knives, age restricted but there have been no changes to the legislation around crossbow since the Crossbow Act was introduced in 1987. There is, therefore, no requirements set out in statute about how sellers should verify the age of a purchaser who is buying online.

C. Policy objective

25. The intended outcome is to make sure that online sellers and delivery companies implement a two-step identity verification at the point of sale of a crossbow, or parts of a crossbow where they will have to request an official identification document, to confirm that the current photograph to be provided at the time of the purchase by the buyer is of the person purchasing the item, and also provides proof that the buyer is aged 18 years or older.
26. The second step will be on delivery where the delivery person must ensure the person who has purchased the crossbow, or parts of a crossbow is the person receiving the package. The delivery person will also need to check the age and identity of the person with the official identification document to ensure that the recipient is aged 18 years or older.

D. Description of options considered

Option 0 – ‘Do nothing’

23. The Home Office does not amend the CA 1987 to mirror the two-step age verification requirements being introduced for the sale of bladed articles through amendments to section 141A¹⁹ of the CJA 1988 and the delivery of bladed products under sections 38²⁰ and 39²¹ of the Offensive Weapons Act 2019 and anticipates that online sellers, of crossbows and parts of a crossbow, have robust age verification procedures in place to verify that the purchaser is over the age of 18 years. The CA 1987 does not specify what the age verification system should be and allows sellers to continue to determine

¹⁹ Criminal Justice Act 1988, section 141A: <https://www.legislation.gov.uk/ukpga/1988/33/section/141A>

²⁰ Offensive Weapons Act 2019, section 38: <https://www.legislation.gov.uk/ukpga/2019/17/section/38>

²¹ Offensive Weapons Act 2019, section 39: <https://www.legislation.gov.uk/ukpga/2019/17/section/39>

their own checks that they are selling a crossbow, or part of a crossbow to someone who is aged 18 years or older and that they are confident that the item will not be delivered to either someone underage or a person who is not the buyer of the crossbow or part of a crossbow.

Option 1 – Introduce a two-step identity verification system to help prevent the sale of crossbows to those aged under 18 years buying crossbows, or parts of a crossbow

6. The two-step age and identity verification measure will establish minimum standards which sellers must adopt. Sellers must check an official identification document provided by the buyer at the point of sale, such as a passport or UK driving licence, and the buyer must provide a current photograph or picture of themselves to show that they are the holder of the official identification document.
7. At the point of delivery, the delivery person must check the identification provided by the person receiving the package to ensure that they are aged at least 18 years and that they are also the buyer. The seller will need to pass the buyer's identity to the delivery company to pass to the delivery person. If sellers do not fulfil these requirements, they may be prosecuted. This will help achieve the objective of ensuring that all sellers will use the minimum standards and reduce the opportunities for those under the age of 18 years from obtaining crossbows. **This is the government's preferred option.**

Summary and preferred option with description of implementation plan

8. Amendments are being made to the Crossbows Act 1987 to mirror the requirements set out in the CJA 1988 at section 141A²² and sections 38²³ and 39²⁴ of the Offensive Weapons Act 2018 for knives in that a person who sells to a person under the age of 18 years a crossbow, or part of a crossbow, will be guilty of an offence, but it is a defence for the defendant to prove they took all reasonable precautions and exercised all due diligence to ensure that the item was not sold to someone under the age of 18 years and that the item was not delivered into the hands of someone under the age of 18 years or to a locker.
9. These legislative changes have been introduced through amendments at Committee Stage of the Crime and Policing Bill. New legislative changes will not be brought into effect until such time as guidance has been published. Engagement will take place with business who sell crossbows, or parts of a crossbow, as well as delivery companies before commencement of the measures and the Home Office will be issuing statutory guidance which the department will also consult on ahead of commencement.

E. NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

NPSV

10. The NPSV is estimated between -£69,300 and -£2,800 and with a central estimate of -£14,500. The NPSV is not comprehensive of all impacts, as it has not been possible to monetise the benefits, and some associated costs, such as broader business impacts. Only familiarisation and CJS costs have been monetised.

²² Criminal Justice Act 1988 S141A: <https://www.legislation.gov.uk/ukpga/1988/33/section/141A>

²³ Offensive Weapons Act 2018 section 38: <https://www.legislation.gov.uk/ukpga/2019/17/section/38>

²⁴ Offensive Weapons Act 2018 section 39 <https://www.legislation.gov.uk/ukpga/2019/17/section/39>

11. It has not been possible to monetise any benefits or broader business impacts associated with this policy due to significant gaps in the evidence base. These gaps include the number of crossbow sellers, the current ID verification procedures for online sales, and the volume of individuals under the age of 18 years are attempting to or have successfully purchased crossbows, or part of a crossbow.

Monetised Costs

Criminal Justice System

12. Impacts to the CJS are modelled by looking at the existing offence of selling offensive weapons to a person aged under 18 years.²⁵ According to the Outcomes by Offences tool between 2020 to 2024, there are on average 32 cases involving selling offensive weapons to a person aged under 18 years per year.
13. This defines an offensive weapon as “any article made or adapted for use for causing injury to the person or intended by the person having it with him for such use by him or by some other person”. This means the offence includes the selling of crossbows, knives, and other items. It is expected that most of these offences involve knives and only a very small proportion (one to three per cent), if any, will be crossbows.
14. This offence also covers both online and in-person sellers. Data available does not distinguish the type of weapon or between online and in person selling. In the low, central, and high scenario it is assumed that 40 per cent, 60 per cent and 80 per cent of these cases being online sellers. This variation allows a wider variety of possible events.
15. In the low scenario, it is assumed that the number of yearly cases remain the same. This scenario would be based on responsible online sellers already having an ID check in place, responsible sellers adapting to the legislation and the police prosecution remaining at current levels.
16. In the central scenario it is assumed 100 per cent increase in cases. In the high scenario, it is assumed that the number of cases increase by 200 per cent. The large range is adopted to reflect uncertainty.
17. By analysing the current offence volumes, which encompass multiple items, and estimating the fraction related to crossbow sales, then multiplying by the expected amount sold online and the projected increase in cases due to the new offence, a central scenario is derived that results in less than one additional case and a high scenario of two cases. There have been no prosecutions under this offence. The only associated costs are court costs, police station legal aid and Magistrates legal aid, which are assumed to have unit costs of £370, £260, and £540 respectively. This results in an estimated total MoJ cost of £0 to £11,400 over the ten-year appraisal period.

Familiarisation

18. Retailers who sell crossbows, or parts of a crossbow, will incur familiarisation costs as they adapt to the requirements of the new legislation. These costs are estimated to range between £800 and £57,400, with a central estimate of £10,800. A detailed breakdown of the methodology used to calculate these figures is provided in the business calculations section below.

²⁵ Outcomes by offence June 2024:

<https://assets.publishing.service.gov.uk/media/673dc6296d3c337b80acc483/outcomes-by-offence-june-2024.xlsx>

Non-monetised costs

Businesses

19. The Independent end-to-end review of online knife sales, citing industry surveys, highlighted that most large and well-established retailers implement ID checks to meet current age restriction requirements on the sale of knives²⁶. Although not directly comparable to the market for crossbows, it is anticipated similar processes are in place, as crossbows, including parts of a crossbow, are already an age restricted item. The policy is aiming to standardise the processes to an agreed level of robustness. The more limited examples of online sellers who rely on “self-certification” and other methods will likely face additional costs to update their online systems to introduce ID checks.
20. The new requirement to provide a recent photo alongside the ID at the point of sale, to confirm the buyer matches the ID being presented, may affect businesses. There is minimal evidence of widespread requirement for photos, and therefore, a greater business impact and burden is expected from the introduction of this specific requirement. Smaller retailers may find it more difficult to introduce these measures and may lack the resources to implement this effectively.
21. Businesses may also incur costs associated with GDPR data requirements as they are required to store personal information.
22. Companies delivering crossbows, or parts of a crossbow will be required to cross-check ID at the point of delivery to verify that the person receiving the crossbow, or part of a crossbow, was the buyer at the point of sale. This is expected to impact delivery companies in familiarisation and additional delivery times through the cross-check itself and failed deliveries.

Households

23. Households are unlikely to be significantly impacted by having to produce ID at the point of sale, as ID documentation is largely already requested for age restricted items like knives for example. Photo requirements will take time to complete but are expected to be minimal. New standards of ID at delivery may affect buyers, as the purchaser themselves will need to receive the package rather than another adult.
24. ID requirements can disproportionately impact certain demographics, as the possession of ID differs across age, gender, and income levels, but these are already widely utilised to meet current sale requirements.

Non-monetised Benefits

25. Estimating the benefits of this policy is challenging due to the absence of data on the extent to which crossbows are used in crimes or by those aged under 18 years. Without accurate information on the prevalence of crossbows in criminal activities or its usage among minors, it is difficult to quantify the potential benefits of the policy.
26. One potential benefit of the policy is the standardisation it provides to retailers and couriers regarding age verification requirements. It clarifies the expected processes and

²⁶ Independent end-to-end review of online knife sales: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales/independent-end-to-end-review-of-online-knife-sales-accessible#summary-of-recommendations-and-further-areas-to-explore>

aims to reduce the risk of selling to individuals aged under 18 years due to potential weaknesses in the current systems.

27. Although there is no identifiable data on incidents of individuals aged under 18 years purchasing crossbows, or part of a crossbow, the policy serves as a preventative measure to ensure these items do not fall into the wrong hands by enhancing the standard of checks.

F. Costs and benefits to business calculations

28. The BNPV is estimated between -£2,700 and -£58,000 with a central estimate of -£14,500.
29. The BNPV is not comprehensive of all business impacts, due to absence of well evidenced data regarding crossbow sellers, the annual volume sold and how many already have relevant checks in place. Only the familiarisation cost to businesses have been monetised within the BNPV.
30. The exact size of the crossbow market remains unknown. To provide some context, as of 31 March 2024, there were 2,876 registered firearms dealers in England and Wales
31. However, the relative size of the crossbow market compared to the firearms market is not clearly established.
32. Crossbows, including parts of a crossbow, are currently an age restricted item. A survey from the Independent end-to-end review of online knife sales²⁷ revealed that most responsible sellers already use verified delivery with ID checks. Although not directly comparable to the market for crossbows, it is assumed similar levels of ID checks are in place given crossbows are already an age restricted item.
33. The additional cross-check between the purchaser and the delivery process is expected to impact delivery companies due to increased delivery times. These delays may result from the extra verification step or a lack of public awareness about the changes, leading to failed deliveries. Consequently, these added costs could increase the expenses for delivery companies and be passed on to buyers or sellers.
34. The proposed amendments require sellers to obtain official photographic identification and a photograph. The test purchases by the UK Trading Standards conducted as part of the Independent end-to-end review of online knife sales highlighted that most sellers already verify ID. While most sellers already verify IDs to meet current requirements, the use of photographs is less common and will likely necessitate online system updates.
35. The absence of specific requirements for seller ID checks may currently be creating a barrier to market entry. The lack of clarity on a responsible process may have caused concern among sellers on being compliant – these changes may prevent that concern and may increase businesses entering the market.

Familiarisation costs

36. Companies will be required to familiarise themselves with the new legislation and its requirements to ensure compliance within their organisation.

²⁷ Independent end-to-end review of online knife sales: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales/independent-end-to-end-review-of-online-knife-sales-accessible#summary-of-recommendations-and-further-areas-to-explore>

37. Since the guidance for this policy is not yet available, previous guidance on age verification sale and delivery of knives under the OWA 2019²⁸ has been used as a proxy. This guidance is 3,845 words.
38. A reading time calculator²⁹ has been used to estimate how long it would take an individual to read the guidance, with reading speeds of 200, 400 and 700 words per minute used for the low, central and high scenarios, respectively. This provided a low estimate of 6 minutes, a central estimate of 10 minutes, and a high estimate of 19 minutes.
39. The size of the organisations that sell crossbows, or parts of a crossbow, and the number of people from each organisation who need to familiarise themselves with the legislation are unknown. Home Office assumes that one to three people from each company will be required. Home Office also assumes these individuals will be managers, directors and, or senior officials.
40. To estimate the number of individuals within scope, the firearms market is used as a proxy due to the availability of relevant data, which is lacking for crossbows. In 2024, there were approximately 2,900 registered firearm dealers³⁰. The crossbow market is assumed to be between 40 per cent and 80 per cent of the firearms market. While the exact proportion remains uncertain, this range is intended to provide indicative scenario modelling.
41. Based on these assumptions, the estimated size of the crossbow market ranges from 1,200 to 2,300 dealers, with a central estimate of approximately 1,700.
42. The familiarisation costs are calculated by multiplying the number of people in scope (one to three individuals per crossbow company) by the hourly wage of £26, in line with average earnings of 'Managers, Directors and Senior Officials'³¹ and the time taken to read the documentation. This results in an estimated cost range of £2,700 to £58,000, with a central estimate of £14,500. These costs are expected to be incurred in year one only and would thereafter be absorbed as part of business as usual.

Impact on small and micro businesses

43. Small businesses may be more significantly impacted by the burden of implementing the new checks, as it will be relatively more costly for them
44. Exempting SMBs is not possible, as it would undermine the policy's objective by allowing those aged under 18 years to still purchase crossbows, or parts of a crossbow, online.

²⁸ Statutory guidance: Offensive Weapons Act 2019 (accessible) - GOV.UK
<https://www.gov.uk/government/publications/the-offensive-weapons-act-2019/statutory-guidance-offensive-weapons-act-2019-accessible-version>

²⁹ Speed Reading Test: <https://readingsoft.com/>

³⁰ Registered Firearm Dealers: <https://www.gov.uk/government/statistics/firearm-and-shotgun-certificates-april-2023-to-march-2024/statistics-on-firearm-and-shotgun-certificates-england-and-wales-april-2023-to-march-2024#number-of-registered-firearms-dealers-increased-by-2>

³¹ ONS Gross Weekly earning by occupation:
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/grossweeklyearningsbyoccupationearn06>

G. Costs and benefits to households' calculations

45. The impact of these measures on households remains uncertain and non-monetised. Some business impacts above may also be passed on to households in the form of higher prices.
46. Buyers are unlikely to be significantly impacted by requiring official identification document at the point of sale, as the survey conducted as part of the Independent end-to-end review on knife sales indicated that official identification document is already requested. Although this survey did not directly address the crossbow market, it serves as a suitable proxy since both involve age restricted items. The individual is required to provide official identification documentation, such as a passport or UK driving licence, alongside a recent photo of themselves at the point of sale to confirm they match. This will take additional time and could put customers off purchases.
47. Official identification documents at delivery requirements may impact buyers, specifically as the original purchaser will need to receive the package rather than another adult. However, this impact could be reduced by effective delivery and seller communication. These measures aim to reduce crossbow access for those aged under 18 years, potentially decreasing crossbow use in crime and enhancing public safety.

H. Business environment

48. The overall impact of this measure on business environment is not known but could add barriers to selling crossbows, or parts of a crossbow, online in the UK but only if the proposed requirements are not already embedded in business as usual.
49. This policy represents small changes to current legislation and most responsible sellers use an identification document system to meet current requirements

I. Trade implications

50. The regulation is not expected to impact international trade, either directly or indirectly, through imposing or reducing barriers to exports or imports.

J. Environment: Natural capital impact and decarbonisation

51. The impact of these measures on the UK's natural capital and decarbonisation of economy is not known. Age verification introduces minimal procedural changes. At a high level it is reasonable to assume that the impact will be negligible.
52. A slightly more detailed consideration may suggest: likely negative: the enhanced delivery requirement may lead to additional failed deliveries and subsequent re-deliveries.
53. Likely positive: reducing crossbow sales to those aged under 18 years would decrease overall delivery volumes.
54. Potential negative: increased costs for domestic online sellers may lead to reduced domestic supply or inflated prices, potentially driving consumers towards international purchases with higher associated carbon footprints.
55. At this time, no investigation into these factors has been done, and the value of investigating this area is not considered high enough to justify the effort to do so

K. Other wider impacts

- 56. Further barriers or costs on domestic online sellers could inadvertently drive consumers towards international purchases with lower standards on age verification or delivery.
- 57. ID requirements also impact various demographics differently, as ownership of ID varies by age, gender, and income. For example, research from the electoral commission indicates that disadvantaged people are less likely to possess photo ID³².

L. Risks and assumptions

- 58. There is an absence of information regarding the number of retailers selling crossbows, or parts of a crossbow, the annual volume sold, and how many already have relevant checks in place. Making it difficult to identify how many businesses would be impacted by the new requirements.
- 59. It is unknown how often crossbows, or part of a crossbow, are sold to those aged under 18 years. Unlike knives, where there are reported cases of those aged under 18 years obtaining weapons, the number of incidents, if any, of those aged under 18 years buying crossbows, or parts of a crossbow, is unclear. This uncertainty affects the ability to derive any benefits from the policy and makes it difficult to identify how many businesses would be impacted by the new requirements.
- 60. The levels of compliance from businesses with the new requirements are unknown. The levels of enforcement are also uncertain. It is unclear how the police will react, whether they will increase enforcement checks or if they will lack the capacity to do so. Both factors could affect the costs to the CJS as non-compliance coupled with increased enforcement checks by the police, could lead to a rise in cases being prosecuted.

³² Voter ID Demographics: https://www.electoralcommission.org.uk/sites/default/files/2023-09/Voter%20ID%20demographic%20analysis%20research_%20%281%29.pdf

Annex

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p data-bbox="156 376 536 414">Statutory Equalities Duties</p> <p data-bbox="156 432 1299 629">The Government has also considered the Public Sector Equality Duty test and is satisfied that these measures are compliant, where relevant, with section 149 of the Equality Act 2010 and that due regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.</p> <p data-bbox="156 752 699 790">The SRO has agreed these findings</p>	<p data-bbox="1362 562 1422 600">Yes</p>