

Impact Assessment

Title: Delivery of Bladed Articles and Bulk Sales

Type of measure: Primary Legislation

Department or agency: Home Office

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1. Summary of proposal

1. The government introduced amendments to knife-related legislation at the Commons Stage of the Crime and Policing Bill to strengthen the law concerning the online sale of knives and delivery of age-restricted knives. These measures, outlined in the two proposals below, seek to reduce the likelihood of future knife attacks. Recent incidents include two 16-year-old boys who murdered 16-year-old Ronan Kanda, and a 17-year-old boy who killed three young girls and injured eight children and two adults in Southport last July. In both attacks, the perpetrators bought knives online. The measures implement recommendations of the *Independent end-to-end review of online knife sales*¹
2. The measures introduce stricter, two-step, age verification for the sale and delivery of knives. They also introduce a requirement on sellers to report remote bulk purchases to the police. The requirements apply when the buyer and seller, or a person acting on behalf of the seller, are not in the presence of each other.

Proposal 1: Two-step Age Verification

3. Section 141A of the Criminal Justice Act 1988 (CJA 1988) already makes it an offence to sell bladed articles to a person aged under 18 years². The maximum penalty for a breach of section 141A (selling bladed articles to a person aged under 18 years) is six months' imprisonment and a fine. The government has included provisions in the Crime and Policing Bill to increase the maximum penalty to two years' imprisonment.
4. The government plans to amend the Offensive Weapons Act 2019 ('OWA 2019')³, insert new sections into the OWA 2019 and amend section 141B of the CJA 1988⁴ to ensure that a two-step age verification is required. This mirrors the amendments being introduced in respect of crossbows:

Step 1 - at the point of sale. The legislation will specify and strengthen 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 knife and is aged 18 years or older, by checking their official identification. This measure will apply in England and Wales.

5. The legislation will insert a new section, section 39 A, after section 39 of the OWA 2019 to require that a package containing a knife must be delivered into the hands of the buyer who must be aged 18 years or over. Failure to do this will result in an offence with the sanction of an unlimited fine. It will be a defence for a person charged with an offence

¹ Independent end-to-end review of online knife sales - GOV.UK:

<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales>

² Criminal Justice Act 1988: <https://www.legislation.gov.uk/ukpga/1988/33/section/141A>

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

⁴ Criminal Justice Act 1988: <https://www.legislation.gov.uk/ukpga/1988/33/section/141B>

to show that they did not know, and a reasonable person would not have known, that the package contained a knife, or that they had checked an identity document and that a reasonable person would have been satisfied that the person was 18 or over and the buyer.

Proposal 2: Reportable bulk sales to the police

6. A reportable sale of knives occurs where the seller sells: six or more bladed articles, none of which form a qualifying set of knives (such as kitchen knives); two or more qualifying sets of bladed articles; or one or more qualifying sets of bladed articles and five or more bladed articles that do not form a qualifying set⁵.
7. The sale is reportable if it occurs in a single transaction, or in two or more transactions within a 30-day period to the same person or the same residential premises. A “qualifying set” means three or more knives packaged together for sale as a single item, where each bladed article is a different size or shape from the others.
8. Knives for eating food, sometimes known as “cutlery knives”, (other than steak knives with sharp points) will be exempt from the requirement. Pocket-knives, with a cutting edge which do not exceed three inches (7.62cm) and razor blades are exempt under the CJA 1988 (Offensive Weapons) (Exemption) Order 1996⁶ and will be exempt from these measures.
9. The sale of a qualifying set will not have to be reported to the police by the seller. However, two sets of bladed articles sold in the same transaction would have to be reported, as would one set of bladed articles and the purchase of five individual bladed articles in one transaction. Secondary legislation will enable the Secretary of State to specify the details that sellers will have to provide, how reports are made, and when they are made.
10. The legislation requires sellers to report any bulk transactions that meet the above criteria to the police if the delivery address is a residential address. The provisions do not apply to business-to-business sales: a sale will not be reportable if the buyer informs the seller that he is carrying on a business where he is registered for VAT or registered as a company.
11. These requirements would apply to any transactions involving the purchase of specified bladed articles with a blade or point within the meaning of section 141A of the CJA 1988.
12. There is a power in the legislation for the Secretary of State to prescribe the reporting process for reportable purchases.

⁵ A “bladed article” means an article to which section 141A CJA 1988 applies:
<https://www.legislation.gov.uk/ukpga/1988/33/section/141A>

⁶ The Criminal Justice Act 1988 (Offensive Weapons) (Exemption) Order 1996:
<https://www.legislation.gov.uk/uksi/1996/3064/made>

Penalties

13. The legislation will include a criminal sanction for a person found guilty of not reporting a reportable sale; this would be a penalty on summary conviction of an unlimited fine.

Defences

14. It would be a defence to the offences of not reporting bulk purchases, where a seller shows that they took all reasonable precautions and exercised all due diligence to avoid the commission of the offence.

2. Strategic case for proposed regulation

Proposal 1: Two-step Age Verification

15. The attack in Southport by a 17-year-old boy in September 2024, in which three young girls were murdered, eight children and two adults were injured, and the murder of 16-year-old Ronan Kanda in 2023, revealed weaknesses in the existing age verification processes concerning the sale of knives online that need to be addressed. This is to ensure that knives are only delivered to those aged 18 years or older and that the person receiving the knife is the buyer. These systemic failings in the age controls placed on bladed articles resulted in the person responsible for the Southport murders, and the two underage boys who killed Ronan Kanda, obtaining knives online⁷.
16. *The Independent end-to-end review of online knife sales*, published in February 2025, cited, “the lack of a minimum standard of verification and of the true identity of both the buyer and those who receive the goods. In many cases age verification does not include using documents to identify the buyer or receiver of the goods, priority is placed on speed of sale process and delivery which may come at the cost of any such system⁸.”
17. It is important that the government reassures the public following these recent cases and shows that effective action is being taken. The age verification measures applicable to online sales and delivery of knives supports the work of the Safer Streets Mission, and the government’s manifesto commitment from 2024 to halve knife crime within 10 years⁹.

Proposal 2: Reporting bulk sales to the police

18. The proposed amendment to legislation follows concerns from the police, as highlighted in the *Independent end-to-end review of online knife sales*¹⁰ about people who purchase knives and offensive weapons in bulk to sell them via social media accounts and peer networks, without age verification or any other checks being conducted.

⁷ 'I knew I was running for my life': How the Southport attack unfolded - BBC News: <https://www.bbc.co.uk/news/articles/c0lz48yx89do>

⁸ Independent end-to-end review of online knife sales (accessible) - GOV.UK: https://assets.publishing.service.gov.uk/media/67b5b2e54a80c6718b55bf76/E2E_Review_-_Online_Knife_Sales_Final_Report_.pdf#page=75 (page 75)

⁹ Labour Manifesto 2024: <https://labour.org.uk/wp-content/uploads/2024/06/Labour-Party-manifesto-2024.pdf#page=66> (page 66)

¹⁰ Independent end-to-end review of online knife sales - GOV.UK: https://assets.publishing.service.gov.uk/media/67b5b2e54a80c6718b55bf76/E2E_Review_-_Online_Knife_Sales_Final_Report_.pdf#page=12 (page 12)

3. SMART objectives for intervention

19. The measures are intended to form part of a wider set of actions to achieve the government's ambition to halve knife crime over the next decade. The age verification measures seek to ensure that the buyer (who must also be the recipient of the package) is at least 18, and the requirement on sellers to report bulk purchases will enable the police to take the necessary action to pursue purchases of particular concern, for example where the police hold intelligence indicating that a buyer has a gang affiliation or has a previous conviction for a violent offence.
20. To illustrate the degree of knife-related crime, police recorded crime data for the year ending December 2024 showed that offences involving knives or sharp instruments (excluding Greater Manchester Police)¹¹ increased by two per cent (to 54,587 offences) compared with the year ending December 2023 (53,413 offences). This was similar to the year ending March 2020, before the COVID-19 pandemic (55,170 offences)¹².
21. In the year ending in March 2024, there were over 18,000 cautions and convictions made for possession of a knife or offensive weapon, accounting for 29 per cent of total offences. This was a slight decrease of two per cent compared with the previous year¹³.
22. The government's comprehensive approach to improve preventive measures aims to reduce the number of offences involving a sharp instrument, and the number of people carrying offensive weapons. This approach includes the new 10-year Young Futures Programme which aims to intervene earlier to stop young people being drawn into crime¹⁴.
23. Between April 2023 and April 2024, there was a three per cent increase in the number of hospital admissions for assault with a sharp object. This prompted government intervention to reduce the number of people admitted to hospital for knife-related injuries.
24. Addressing the problems of knife crime requires a range of solutions, and the government is determined to put measures in place to address violence involving knives.
25. The Home Office has considered how to strengthen the age verification elements of knife legislation to minimise the risk of a person under the age of 18 buying a knife, as well as the risk of a knife being received on delivery by a person aged under 18.
26. Section 141A of the CJA 1988 makes it an offence for sellers to sell bladed articles to persons aged under 18 years. The maximum penalty for an offence under section 141A (selling to a person under the age of 18 years) is a six months' prison sentence. The government is proposing to increase the maximum prison sentence for this offence in the Crime and Policing Bill to two years' imprisonment.

¹¹ Figures for Greater Manchester Police (GMP) are not included in the England and Wales and regional totals of knife or sharp instrument offences. GMP have been unable to supply offences involving knives or sharp instruments data because of an IT issue in processing these data.

¹² Crime in England and Wales - Office for National Statistics:
<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingdecember2024>

¹³ Knife and Offensive Weapon Sentencing Statistics: January to March 2024 - GOV.UK (www.gov.uk)
<https://www.gov.uk/government/statistics/knife-and-offensive-weapon-sentencing-statistics-january-to-march-2024/knife-and-offensive-weapon-sentencing-statistics-january-to-march-2024>

¹⁴ More information can be found in the governments press release on the launch of a new coalition to tackle knife crime.
<https://www.gov.uk/government/news/government-to-launch-new-coalition-to-tackle-knife-crime>

27. The *Independent end-to-end review of online knife sales*¹⁵ highlighted concerns about people buying knives and offensive weapons in bulk to sell them via social media accounts and peer networks without age verification or any other checks being conducted. The government is urgently progressing measures to strengthen the legislation in this area to help deal with this problem.
28. Knife crime causes physical and emotional harm to victims. It also affects the economy and wider society (for example, through loss of output, costs to health and victim services, police, and the wider criminal justice system (CJS)). These measures will determine the extent to which these costs are reduced.

Proposal 1: Two-step Age Verification

29. The OWA 2019 updated the law on sales of knives to extend age-related restrictions to the online sale and delivery of knives. It requires age verification systems to be in place to check online sales. However, the OWA 2019 does not specify what the age verification system should be and leaves it to the sellers and delivery companies to determine their own checks. This has resulted in an inconsistent approach, and as part of the government's mission to make streets safer, the government is specifying via legislation a minimum level of age verification checks at the point of sale and at delivery for online sales¹⁶.
30. The first step is identity verification at the point of sale where an official identity document (ID) - such as a UK passport, foreign passport, UK driving licence or other document to be specified in secondary legislation - confirms that the person purchasing the item is who that person purports to be and is aged 18 years or older. 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 of the buyer.
31. The second step will be on delivery, where the courier or person acting on behalf of a courier must ensure that the person receiving the item is aged 18 years or older and (where the buyer is an individual) is the buyer.
32. The courier or person acting on behalf of a courier will need to check the age and identity of the recipient against the official ID which they provide. 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.
33. For example, where a seller delivers the bladed product, or arranges for its delivery, to residential premises, the seller can show from records that the arrangement they made with the courier required them to ensure that the person to whom the knife was delivered was the same person as the buyer and aged 18 years or older.

Proposal 2: Reporting bulk sales to the police

34. The legislation will introduce a requirement on sellers to report remote bulk purchases of knives to the police. A reportable sale of knives occurs where the seller, sells: six or more bladed articles, none of which form a qualifying set of knives (such as kitchen knives); two or more qualifying sets of bladed articles; or one or more qualifying sets of

¹⁵ Independent end-to-end review of online knife sales - GOV.UK: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales>

¹⁶ Safer Streets - GOV.UK: <https://www.gov.uk/missions/safer-streets>

bladed articles and five or more bladed articles that do not form a qualifying set. A “qualifying set” means three or more knives packaged together for sale as a single item, where each bladed article is a different size or shape from the others.

35. The sale is reportable if it occurs in a single transaction, or in two or more transactions within a 30-day period to the same person or the same residential premises. This provision applies where the delivery address is a residential premises, and to any transaction involving the purchase of articles with a blade or point within the meaning of section 141A of the CJA 1988 but excluding a knife which does not have a sharp point and is designed for eating food.
36. The legislation also includes a power for the Secretary of State to prescribe the details that sellers will have to provide, how reports are made, and when they are made.
37. The primary objective is for companies to report any reportable sales within a set period to the police. If the criteria for a reportable sale are met the seller must notify the police in writing.
38. As illustrated in Figure 1, (see page 10) the combination of these two measures, to strengthen age verification and the requirements on sellers to report bulk purchases, aims to reduce the opportunity of access to knives for those aged under 18 and to contribute to a reduction in knife crime. Through a combination of the requirement on sellers to check specific forms of identity from a buyer at the point of purchase and for delivery companies to ensure in the cases of deliveries to residential addresses that the person to whom a knife is delivered is the buyer himself, the age verification requirements increase the traceability from the point of purchase to final delivery of a knife. By ensuring that a buyer and recipient must be at least 18 years old (and the same person) there is reduced opportunity for those underage to obtain knives.
39. The requirements to report bulk sales to the police should enable the police to tackle the criminal use of knives and in particular grey market sales via social media, where age verification checks are highly unlikely to take place. As the police will be able to check purchases reported to them against other intelligence, the measures will enable them to target persons of concern who might, for example, be seeking to obtain knives for criminal purposes, or those seeking to avoid providing identification documents to legitimate sellers. The desired outcome of the combination of these two measures and the associated activities and ‘outputs’ would be reduced knife crime.

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

Proposal 1: Online Sales and Delivery of Knives

Option 0 – ‘Do nothing’

40. The Home Office does not amend the OWA 2019. The OWA 2019 does not specify what the age verification system should be and allows sellers and delivery companies to continue to determine their own checks. The ability of a 17-year-old boy to purchase a knife online and use it to murder three young girls, injure eight other children and two

adults in Southport, along with the murder of 16-year-old Ronan Kanda, highlight the weaknesses in the current system that need to be addressed. If the government opt for the 'Do nothing' option, the risk that those under the age of 18 obtain knives for illegal use would remain the same.

Option 1 – Introduce a two-step identity verification system to help prevent those under 18 years of age from buying knives

41. The two-step age and identity verification measure will establish minimum standards which sellers and couriers must adopt for remote sales. Online sellers must check an official identity document provided by the buyer at the point of sale, such as a UK or foreign passport or UK driving licence, and the buyer must produce a current photograph of themselves to show to the seller at the point of purchase that the photograph in the identity document they have provided to the seller is of the buyer themselves. 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 and that they are also the buyer (where the buyer is an individual).
42. The seller will have to, when arranging for the delivery of a bladed product, ensure that the arrangement requires the person with whom it is made not to deliver it without checking the recipient's age and, if the buyer is an individual, that they are the buyer. 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 knives. **This is the government's preferred option.**

Proposal 2: Bulk sales

Option 0 – 'Do nothing'

43. Police have raised concerns about persons purchasing knives in bulk and selling them across social media accounts and peer networks without age verification or any other checks being conducted. Doing nothing would fail to address these concerns and would enable grey market sales to continue.

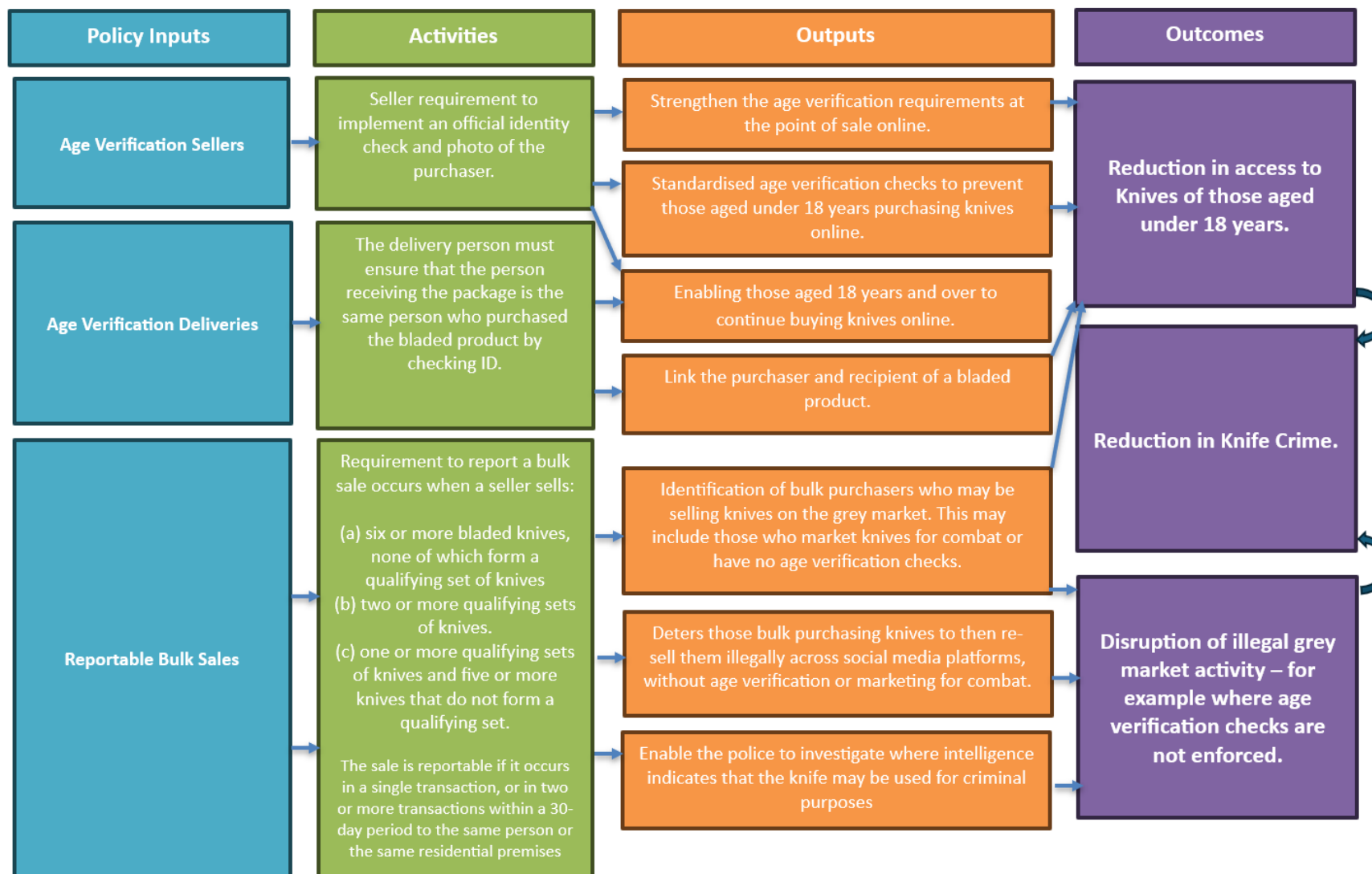
Option 1 – Reporting bulk sales to the police

44. The legislation will introduce a requirement on sellers to report remote bulk purchases of knives to the police. A reportable sale of knives occurs where the seller sells: six or more bladed articles, none of which form a qualifying set of knives (such as kitchen knives); two or more qualifying sets of bladed articles; or one or more qualifying sets of bladed articles and five or more bladed articles that do not form a qualifying set. A "qualifying set" means three or more knives packaged together for sale as a single item, where each bladed article is a different size or shape from the others. The sale is reportable if it occurs in a single transaction, or in two or more transactions within a 30-day period to the same person or the same residential premises.
45. This provision applies where the delivery address is a residential premises and to any transaction involving the purchase of articles with a blade or point within the meaning of section 141A of the CJA 1988. The legislation includes a power for the Secretary of State to prescribe details that sellers will have to provide, how reports are made, and when they are made.

46. This will enable the police to check whether relevant intelligence exists to suggest the knives may be used for criminal purposes (including “grey market” sales via social media), and, if so, investigate further. **This is the government’s preferred option.**

This Theory of Change flowchart is intended to present the effect of interventions from the formation of policy to the outcomes of this intervention.

Figure 1: Theory of Change



5. Summary of long-list and alternatives

47. Both these measures are government priorities. It is important that the government quickly rectifies the weaknesses in the system that regulate online knife sales and monitor the activities of illegal knife sellers which have been exposed by the attack in Southport and the murder of Ronan Kanda. No alternative options were considered given the necessity to improve safeguards to prevent the illegal sales of knives following these murders. These are necessary to reduce the likelihood of those wishing to cause harm to others buying knives from online sellers.

6. Description of shortlisted policy options carried forward

48. Option 1 from each proposal has been carried forward:

Option 1 - Introduce a two-step identity verification system to help prevent those under 18 years of age from buying knives

49. The age verification measure will strengthen the minimum standards of age verification at the point of sale and delivery. This requires buyers to provide proof of their identity, such as a UK or foreign passport or UK driving licence, along with a current photograph of themselves at the point of sale to show that they are at least 18 years of age and that the identity document they present is of themselves. Delivery companies will have to ensure that they check the identification of the person receiving the knife to determine that that person is also the buyer (where the buyer is an individual).
50. Sellers and delivery companies who do not carry out these checks will be committing an offence under the proposed changes to legislation. This will achieve the objective of ensuring that knives can only legally be sold and delivered to those aged 18 years or older to reduce the opportunities for those underage to obtain knives online. These provisions apply to sales and deliveries to residential addresses only. **This is the government's preferred option.**

Option 1 - Reporting bulk sales to the police

51. The bulk purchases measures will enable the police to check whether relevant intelligence exists to suggest the knives may be used for criminal purposes (including "grey market" sales via social media) and, if so, investigate.
52. The legislation will introduce a requirement on sellers to report remote bulk purchases of knives to the police. A reportable sale of knives occurs where the seller sells: six or more bladed articles, none of which form a qualifying set of knives (such as kitchen knives); two or more qualifying sets of bladed articles; or one or more qualifying sets of bladed articles and five or more bladed articles that do not form a qualifying set¹⁷.
53. The sale is reportable if it occurs in a single transaction, or in two or more transactions within a 30-day period to the same person or the same residential premises. This provision applies where the delivery address is a residential premises and to any transaction involving the purchase of articles with a blade or point within the meaning of

¹⁷ A qualifying set is defined as three or more knives packaged together for sale as a single item, where each bladed article is a different size or shape from the others.

section 141A of the CJA 1988. The legislation includes a power for the Secretary of State to prescribe details that sellers will have to provide, how reports are made, and when they are made.

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>Two-step age verification:</p> <p>These changes are anticipated to impact online knife sellers, buyers, delivery companies, and wider society.</p> <p>Under existing legislation an online seller is obliged to operate a system for checking that persons who bought bladed articles were not under the age of 18 years. However, the legislation did not specify how those checks should be made. The strengthened age verification measure will establish which checks sellers should make. Online sellers will now need to implement ID checks and require a photo of the buyer at the point of sale.</p> <p>Couriers who deliver knives bought remotely will now need to check ID at the point of delivery to verify that the recipient is at least 18 and the buyer.</p> <p>The CJS may receive a marginal additional burden, as the strengthened minimum requirements for age verification by sellers and the new offences on delivery and for non-reporting of bulk sales may result in additional charges.</p> <p>Reportable bulk sales:</p> <p>The legislation will introduce a requirement on online sellers to report remote bulk purchases of knives to the police. The sale is reportable if it occurs in a single transaction, or in two or more transactions within a 30-day period to the same person or the same residential premises.</p> <p>This will likely require online sellers to update their online systems or perform manual checks to determine whether sales are reportable under the provisions.</p> <p>Implementing a new reporting requirement will necessitate a reporting system to collect reports.</p> <p>The possible investigation of reports could lead to increased court cases to prosecute selling without age verification or the illegal marketing of knives. These additional cases are unlikely to put additional burdens on prisons or the crown courts.</p>	<p>Uncertain</p> <p>Based on all impacts (incl. non-monetised)</p>
Monetised impacts	<p>The combined current NPSV for these measures' ranges from between -£0.02 million and -£0.85 million with a central estimate of -£0.25million.</p> <p>This estimate solely reflects possible CJS costs and omits significant costs and benefits outlined in the non-monetised section below. These will likely determine the value for money of the two measures.</p> <p>The underlying calculations and methodology for CJS costs can be found in Section E. Additional costs are through</p>	<p>Negative</p> <p>Based on likely £NPSV</p>

	<p>additional cases, either for illegal marketing of knives online or for the lack of age verification. Costs are associated with the Magistrates' Courts and legal aid, rather than additional burdens on prisons or the Crown Courts which are unlikely to be impacted.</p>	
Non-monetised impacts	<p>Two-step age verification:</p> <p>Non-monetised Costs:</p> <p>The new delivery offence will require checking the identity of the buyer at delivery, impacting delivery companies through familiarisation and increased delivery times.</p> <p>Online sellers who perform sales without ID verification and a photograph will need to update their online systems. This will introduce an additional cost for businesses. The use of a photograph is less common and likely to require system updates from a wider number of online businesses.</p> <p>Non-monetised Benefits:</p> <p>The <i>Independent end-to-end review of online knife sales</i> highlights the variability of delivery and seller standards for age verification remains a "key vulnerability"¹⁸. The review found multiple examples of practices prohibited under the regulations. Standardising age verification and creating a stronger link between the buyer and the recipient could prevent those aged under 18 years from accessing knives, potentially reducing knife crime and improving public safety.</p> <p>This benefit has not been monetised due to the uncertainty about the number of people aged under 18 years who commit knife crimes using knives purchased online, as well as the extent to which knives could instead be obtained through other means.</p> <p>Reportable bulk sales:</p> <p>Non-monetised Costs:</p> <p>Online sellers will face additional burdens, including time, staff training, and system updates.</p> <p>Implementing a new seller reporting requirement will require a reporting system.</p> <p>The police will need to check reports against existing intelligence, and potentially investigate further where the intelligence suggests the knives may be used for criminal purposes, which may need additional resources¹⁹.</p> <p>The scale of these costs is largely unknown due to the absence of a defined reporting system, uncertainty on the number of transactions that would necessitate reports and how many may be subsequently investigated by enforcement agencies.</p> <p>Non-monetised Benefits:</p>	Uncertain

¹⁸ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 15

¹⁹ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 12

	<p>The impact of these changes is uncertain; it is likely to add an additional burden to online knife sellers but may benefit wider society through disrupting illegality within the grey market^{20 21}.</p> <p>Bulk purchases are often used by grey market sellers. These tend to sell indiscriminately without the existing age verification requirements or for marketing knives for combat²². This could be disrupted through new reporting requirements.</p> <p>This could fill a significant evidence gap, as the survey within the independent review highlighted the very limited capability in online investigation to identify grey market sellers and very restricted training of enforcement to identify them.²³</p>	
Any significant or adverse distributional impacts?	<p>There are some small distributional impacts that may be expected for businesses or households.</p> <p>Smaller retailers, especially independent knife sellers may struggle more to implement system changes for effective ID checks and the required photograph²⁴. This may also extend to smaller and subcontracted couriers, who are likely to be disproportionately affected by any increased delivery costs.</p> <p>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 ID²⁵.</p>	Negative

²⁰ "Grey market" is defined as knife sellers who tend to operate outside of the traditional knife retailer or online marketplace model. Sellers are usually private persons and not a registered business, who advertise and transact over social media and through personal networks.

²¹ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 21

²² As above, page 10, 54

²³ As above, page 38

²⁴ As above, page 60

²⁵ Voter ID demographic analysis research. Electoral Commission.
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	<p>Two-step age verification:</p> <p>The amendments strengthen minimum requirements for sellers (to obtain official identification and photograph).</p> <p>The new offence for delivery will now require a check of the ID with the buyer.</p> <p>Reportable bulk sales:</p> <p>The legislation will introduce a requirement on online sellers to report remote bulk purchases of knives to the police. The sale is reportable if it occurs in a single transaction, or in two or more transactions within a 30-day period to the same person or the same residential premises.</p> <p>The impact on sellers is challenging to predict due to limited market data on potentially affected transactions and uncertainty regarding the functionality of the reporting system.</p>	Negative
Monetised impacts	<p>The Business NPV impact has not been estimated. However, this is likely to represent a negative cost to businesses due to the non- monetised impacts outlined below</p>	Negative Based on likely business £NPV
Non-monetised impacts	<p>Two-step age verification:</p> <p>The Offensive Weapon Act 2019 already mandates ID verification for knife deliveries to ensure that knives are not delivered to individuals under the age of 18 years²⁶. The survey and test purchase conducted as part of the <i>Independent end-to-end review of online knife sales</i> highlights that most knife retailers use verified delivery with ID checks and often incur an extra cost for this service for them to infer that delivery is lawful²⁷. The review also revealed that most delivery companies – when aware of delivering knives - included ID verification at delivery²⁸. Additional checks to confirm that the recipient is the buyer may cause delays due to lack of public awareness. For example, another adult in the household seeking to collect, leading to failed deliveries and increased costs. This could be passed on to buyers or sellers through increased delivery charges.</p> <p>The cost of failed deliveries has not been estimated due to uncertainties regarding the number of knife deliveries and the potential increase in the likelihood of failed deliveries. The additional check is expected to take additional courier time, but this is anticipated to be minimal due to existing ID checks and couriers can cross check package names with customer ID.</p>	Negative

²⁶ Offensive Weapons Act 2019: Part 3 Section 38/39: <https://www.legislation.gov.uk/ukpga/2019/17/section/39>
<https://www.legislation.gov.uk/ukpga/2019/17/section/39>

²⁷ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 63

²⁸ As above, page 39

	<p>The proposed amendments require online knife sellers to check ID and obtain a photograph of the buyer. Current legalisation does not standardise age verification requirements and instead states that the seller should have a system in place that is likely to prevent purchases to anyone aged under 18 years²⁹. While online knife retailers³⁰ largely already implement ID checks³¹, the limited numbers relying on self-certification or other means will face additional costs to update their systems.</p> <p>The requirement for photographs at the point of sale is less common and will likely necessitate system updates, impacting a wider range of businesses. The cost of this is unknown and will vary depending on the system retailers use to meet this requirement. However, this may create costs in terms of online software or licensing, storage/processing and security and data compliance.</p> <p>Knife retailers' familiarisation has not been monetised due to the unknown number of affected retailers. Scenario modelling, summarised in Section E, was produced to provide an idea of scale. This estimated knife retailer familiarisation between £0.01 million and £0.12 million in the first year.</p> <p>Courier familiarisation has not been monetised due to unknowns on the number couriers who deliver knives. Scenario modelling, summarised in Section E, was produced to provide an idea of scale. This estimated delivery familiarisation between £0.01 million and £0.13 million. This cost would likely only occur in the first year.</p> <p>These changes may reduce retailers' "compliance concern" with the current legislation by standardising required age verification. This uncertainty could be deterring firms from selling knives and subsequent market entry could reduce prices.</p> <p>Reportable bulk sales:</p> <p>Reporting requirements will impose an additional burden on online sellers, requiring training and potential updated systems or manual checks to understand if the quantity of knives bought by the buyer, or the duration within which the quantity of knives is bought, requires the seller to report the sale to the police".</p> <p>The cost of reporting for businesses has not been monetised due to unknowns on the number of affected transactions and time for each report. Scenario modelling, summarised in Section E, was produced to provide an idea of scale. This estimated reporting costs between £0.0 million and £0.18 million, with a central estimate of £0.03 million per year. This would represent an ongoing cost to business which over an appraisal period would represent the largest cost.</p>	
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²⁹ Offensive Weapons Act 2019: Part 3 Section 35: <https://www.legislation.gov.uk/ukpga/2019/17/section/35>

³⁰ Knife Retailers: Sellers who operate on the open or clear web with a virtual store, and (in the UK) will be registered as a company and pay taxes. Sales are usually hosted and transacted through an independent website managed by the retailer.

³¹ Independent end-to-end review of online knife sales - GOV.UK: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> pages 21 and 60

	<p>Training and familiarisation have also not been monetised due to the unknown number of online retailers who sell knives. Scenario modelling, summarised in Section E, was produced to provide an idea of scale. This estimated training and familiarisation between £0.00 million and £0.08 million. This likely cost would only occur within the first year.</p> <p>Possible criminal sanctions for non-reporting and additional burdens for reporting could prompt some sellers to exit the market, potentially driving up prices.</p>	
<p>Any significant or adverse distributional impacts?</p>	<p>These measures are limited to impact online businesses involved in the selling of knives.</p> <p>Possible impacts on knife retailers that lead to increases in prices, may adversely shift buyers to purchase knives online from abroad which tend to be less stringent checks, such as age verification³².</p> <p>International sellers also often lack knowledge of UK legislation and there is evidence that they intentionally circumvent current laws such as mislabelling.³³ It is unlikely that these changes to the legislation will lead to purchasing of knives to shift to international sellers.</p> <p>Equally, this may steer some purchases to stores/ in person.</p> <p>A low risk of increased domestic regulation is that online businesses move abroad.³⁴ For example, surveys carried out as part of the independent review highlighted that a few online businesses stated that they were considering relocation outside the UK but still supplying knives to the UK.³⁵</p>	<p>Neutral</p>

³² Independent end-to-end review of online knife sales - GOV.UK: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales>, page 21

³³ As above, page 48

³⁴ As above, pages 12 and 41

³⁵ As above, page 41

(3) Expected impacts on households

Description of overall household impact	<p>Age verification:</p> <p>The proposed amendments outlined to delivery and seller processes 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> <p>Reportable bulk sales to the police:</p> <p>Reporting requirements are very unlikely to impact households. Households may face inconvenience if bulk knife purchases are avoided by online retailers. Alternative purchasing patterns, such as ordering from multiple websites, may mitigate this. However, these alternatives would also undermine the policy's effectiveness.</p>	Uncertain
Monetised impacts	<p>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.</p>	Uncertain Based on likely household £NPV
Non-monetised impacts	<p>Buyers are unlikely to be significantly impacted by requiring ID at the point of sale, as it is already commonly requested. However, sending a photo may take additional time or deter some customers.</p> <p>ID requirements at delivery may impact buyers, as the original purchaser must receive the package. This means other adults within the household will not be able to receive the parcel.</p> <p>Households will benefit if these measures are effective at reducing knife crime, either through preventing access for under-18s, or allowing police investigations into bulk sales marketed illegally in the grey market.</p>	Uncertain
Any significant or adverse distributional impacts?	<p>There are limited adverse distributional impacts associated with this measure.</p> <p>ID requirements can impact certain demographics, as the ownership of ID differs across age, gender and income levels. For example, tracking research from the electoral commission shows that people from disadvantaged backgrounds are less likely to have photo ID than other groups³⁶. Local election data in 2024 shows that 15 per cent of the poorest households (on an income of under £5,000 per year) had no photo identification compared with 1.6 per cent of those with a household income greater than £60,000³⁷.</p>	Neutral

³⁶ Voter ID demographic analysis research. The Electoral Commission:

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

³⁷ How have voter ID requirements affected British elections? The Constitution Unit <https://constitution-unit.com/2025/02/21/how-have-voter-id-requirements-affected-british-elections/>

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?	<p>The overall impact of these measures on business environment is not known but they do introduce additional barriers to selling knives online in the UK.</p> <p>Online sellers will now require the use of ID and a photograph for each sale and delivery drivers will have an additional cross check at each knife delivery.</p> <p>The new reporting obligations and associated offence for non-compliance may increase costs and deter businesses from engaging in online knife sales.</p> <p>The precise scale of this impact is difficult to ascertain as information on number of sales and firms affected is limited.</p>	May work against
International Considerations: Does the measure support international trade and investment?	<p>The regulation does not impact international trade, either directly or indirectly, through imposing or reducing barriers to exports or imports.</p>	Neutral
Natural capital and Decarbonisation: Does the measure support commitments to improve the environment and decarbonise?	<p>The impact of these measures on the UK's natural capital and decarbonisation of economy is not known. Age verification introduces minimal procedural changes, and reportable bulk purchases create a new reporting requirement. It is not unreasonable to assume that the impact will be negligible.</p>	Neutral

8. Monitoring and evaluation of preferred option

54. The impact of these measures on online sales, businesses and knife crime is uncertain. Ongoing monitoring and feedback are crucial to understanding the impact of these changes.
55. The changes to age verification for sellers and delivery drivers will raise the minimum standards for verifying the age and identity of buyers. The UK Trading Standards conducted a comprehensive test purchase operation to assess how easily knives are sold and accessed online with age verification in place. This found three per cent of transactions from online retailers failed age verification³⁸. This was, however, limited to online retailers and their click and collect services only. Future testing will help determine whether the changes have had a positive result and if further adjustments are necessary. The new age verification requirements will increase due diligence obligations for sellers and create a new offence for delivery firms. These may add

³⁸ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> pages 12 and 13

additional burdens to the CJS, and the number of the cases will be monitored to understand their use and frequency.

56. Monitoring of bulk sales is particularly essential due to potential business burden. Business engagement will focus on the time for reporting and training/familiarisation costs, as scenario modelling suggests these are likely the biggest drivers of business burden. The Home Office will also assess the disruption to the grey market by accessing the number of reports and percentage linked to investigations and charges. This will be complemented by police engagement to understand the usefulness of the information and reporting system and post-implementation engagement with key knife retailers to understand any additional burden the changes may have caused.
57. While quantifying the impact this measure has on the grey market and other criminal activity may be difficult, further understanding of the grey market's size and prevalence is required. This remains the main evidence gap. Future research will aim to scope the extent of grey market knife sales and monitor changes over time.

9. Minimising administrative and compliance costs for preferred option

58. There will be an administrative cost to online sellers and couriers to update their verification systems for complying with the two-step age verification measure. The Home Office cannot make an estimate of this cost at this time. Identification measures can be satisfied by either a digital check on a UK or foreign passport or a UK driving licence. These standards are set out in the UK digital identity and attributes trust framework³⁹. 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.
59. The government is seeking to introduce regulation making powers to enable alternative forms of identity documents specified by the Secretary of State. In relation to the bulk sales provisions, the government considered the administrative burden on businesses. These measures recognise that knife sets and blocks (a qualifying set of which will consist of at least three different knives) are commonly bought by households. To limit the reporting burden on businesses, the government has not imposed an upper limit on the number of knives which such sets or blocks may contain.

³⁹ UK digital identity and attributes trust framework - GOV.UK: <https://www.gov.uk/government/collections/uk-digital-identity-and-attributes-trust-framework>

10. Main assumptions / sensitivities and economic / analytical risks

Age verification:

60. Many costs and benefits remain non-monetised, including business impacts.
61. The Independent end-to-end review of online knife sales helpfully defines two types of online knife sellers. Retailers host online shops where knives can be viewed and purchased using their own systems. Peer-to-peer sales, often referred to as the grey market, involve reselling knives via social media and sales platforms, and can be legal or illegal⁴⁰. Retailers tend to have robust systems in place for age verification, often incorporating third party software⁴¹.
62. Grey market sellers tend to not follow current requirements through anonymising purchases, using unmarked shipping, and locker boxes⁴². As the grey market tends to not follow current rules, there is no evidence that standardising the age verification process will result in grey market sellers changing their practices.
63. The implementation of these measures in part relies on enforcement. Survey results of enforcement agencies as part of *the Independent end-to-end review of online knife sales* highlighted that, “51% of respondents also said that they didn’t know which online platforms are commonly used for knife purchases” and many highlighted that they do not prosecute sellers of knives on online platforms⁴³. This points to availability of knives online and their origin online being lesser priorities for police forces. Investigation of grey market sales, including age verification, requires covert investigatory powers which may highlight why enforcement is often not prioritised.
64. There is no legal obligation on police to record the type of knives recorded in offences or their origins⁴⁴. As such, many police forces do not have this data available or the knowledge across officers. The latter was highlighted within a survey of law enforcement which found that, “57% of enforcement respondents said they didn’t know, didn’t investigate, or have never encountered a knife involved in a crime that has been purchased online.”⁴⁵ Current absence of data on precise origins and types of knives used in crimes makes it difficult to determine the success of these measures or what future action may be needed. For example, there is a risk that those under the age of 18 may simply find alternative ways to obtain knives and it is not known how many people under 18 commit knife crime with a blade they directly purchased. This remains a significant evidence gap.
65. Measures intended to reduce knife crime by affecting supply may be limited due to the widespread availability of knives. According to UK manufacturers’ sales data, an

⁴⁰ Independent end-to-end review of online knife sales - GOV.UK:
https://assets.publishing.service.gov.uk/media/67b5b2e54a80c6718b55bf76/E2E_Review_-_Online_Knife_Sales_Final_Report_.pdf#page=9 page 9

⁴¹ As above, page 60

⁴² As above, pages 9 and 10

⁴³ As above, pages 38 and 47

⁴⁴ As above, page 10

⁴⁵ As above, page 38

estimated 6.2 million “knives with fixed cutting blades” were sold in 2023 alone⁴⁶. Although this is not entirely representative of knives used in knife crime, it highlights difficulties in restricting supply of knives for use in crime. For example, knives can also be accessed in communal areas, such as kitchens. This may suggest that policies focusing on supply regulation could be ineffective. Instead, a reduction in knife crime across all age groups, including those aged under 18, may require interventions that tackle the deeper cultural and social problems underlying its cause.

66. The survey conducted as part of the *Independent end-to-end review of online knife sales* highlighted that most couriers reported where items are correctly labelled as a knife – age verification is instructed⁴⁷. The problems tend to arise when items shipped are incorrectly labelled, negating existing requirements and concealing the presence of a knife. Clearer labelling is needed to ensure compliance⁴⁸. This is especially associated with the grey market or international sellers. These measures will do little to counter this unless they help enforce compliance with existing provisions.
67. Similarly, online marketplaces are often used to find buyers, but conversations about purchases can move from them to peer-to-peer platforms which are encrypted and unmonitored. This could be used to allow those aged under 18 to purchase knives without the adequate age verification checks⁴⁹.

Reportable bulk sales:

68. There has been limited business consultation on the reportable bulk sales measures, which means business impact remains uncertain. It is unknown how many reports will be received, actioned and investigated; and whether police have the resources and means to effectively use these reports.
69. There may be means to evade reporting requirements through alternative purchasing patterns such as multiple purchases across different retailers/sellers or through in-person purchases.
70. The government hopes that the measure will reduce illegality in the grey market. However, those in the grey market might now seek international sellers to buy knives in bulk, as international sellers often lack knowledge of UK legislation and there is evidence that they intentionally circumvent current laws.⁵⁰ This is more pronounced due to limitations in Border Force’s scanning capability for knives, which makes knife detection difficult if these are mislabelled in shipping⁵¹. This may collectively undermine the benefits or purpose of bulk reporting.
71. Benefits rely on firm compliance and the use of enforcement to investigate possible grey market sellers. *The Independent end-to-end review of online knife sales* however noted a “dearth” of trained investigators able to identify advertising and marketing offences or CPS prosecutors with the knowledge to progress them through the justice system⁵².

⁴⁶ UK manufacturers’ sales by product ONS
<https://www.ons.gov.uk/businessindustryandtrade/manufacturingandproductionindustry/datasets/ukmanufacturerssalesbyproductprodcom>

⁴⁷ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 39

⁴⁸ As above, page 68

⁴⁹ As above, page 11

⁵⁰ As above, page 48

⁵¹ As above, page 11

⁵² As above, page 9

This has led to sales and marketing offences not being commonly used. These reports may not be effectively used without additional training and resources.

72. Reporting methods and system requirements are potentially costly and have not been monetised.
73. The size of grey market is not known. This makes it difficult to determine how, and if, current and future policies are impacting this area. This undermines the evaluation of bulk purchases and could mean that any post-implementation review will rely on anecdotal evidence.
74. Lastly, bulk reporting requirements have been introduced elsewhere to tackle other weapons used in violence. For example, California has implemented reporting requirements on bulk purchases of certain types of firearms⁵³. However, the Home Office is not aware of substantial evidence to support the effectiveness of these measures in reducing crime.

⁵³ Bulk Gun Purchases in California <https://giffords.org/lawcenter/state-laws/bulk-gun-purchases-in-california/>

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

Price base year:

2025/26

PV base year:

2025/26

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)
Costs (£m)	Low	0	£0.02 million
	High	0	£0.25 million
	Best	0	£0.85 million
(Distinguish between setup and ongoing costs, as well as private/public costs)			
Benefits (£m)	Low	0	0
	High	0	0
	Best	0	0
(Distinguish between setup and ongoing benefits, as well as private/public benefits)			
Net present social value (£m)	Low	0	-£0.02 million
	High	0	-£0.25 million
	Best	0	-£0.85 million

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)
Public sector financial costs (with brief description, including ranges)	N/A	<p>The current NPSV for these measures' ranges between -£0.02 and £0.85 million with a central estimate of -£0.25 million.</p> <p>However, this estimate solely reflects CJS costs and omits significant costs and benefits outlined in the non-monetised section below. These will likely determine the value for money of the two measures.</p> <p>Monetised impacts:</p> <p>CJS: the increase requirements for due diligence defence, new delivery offence and bulk reporting may result in more cases proceeding to the Magistrates' Courts. The scale of this impact will likely be minimal as additional cases generated are unlikely to put further burden on prisons or the Crown Courts.</p>
Significant un-quantified benefits and costs (description, with scale where possible)	N/A	<p>The Home Office anticipate the following un-monetised costs and benefits</p> <p>Proposal 1: Age verification:</p> <p>New delivery offence requires cross-checking ID with the buyer, impacting delivery companies through familiarisation and additional delivery times. Requirements for online knife sellers may require system updates. Buyers may also face</p>

		<p>minor impacts from photo ID requirements and needing to receive packages personally.</p> <p>Clearer standards may deter irresponsible seller and delivery practices. Enhanced age verification could also reduce knife access for those aged under 18, potentially decreasing knife crime and improving public safety. Although international or grey market purchases could undermine this impact.</p> <p>Proposal 2: Reportable bulk sales:</p> <p>New reporting requirements for sellers will necessitate a reporting system and police resources for investigation. Online sellers may also face additional burdens, potentially leading to market exits and higher prices.</p> <p>Disrupting grey market sellers – or enhancing their compliance with seller and delivery requirements - through data on bulk purchases could reduce knife crime and enhance public safety. High compliance is crucial, but a shift towards international bulk purchases or in-person purchases may undermine potential benefits.</p>
<p>Key risks (and risk costs, and optimism bias, where relevant)</p>	<p>This risks the government failing to meet its objective of reducing knife crime by 50 per cent in the next decade.</p>	<p>The implementation of age verification measures for online knife sales presents several challenges. Many costs and benefits remain unquantified, including business impacts. Potential price increases from increased regulation may drive buyers away from knife retailers to international sellers who tend to not comply with regulations. Additionally, the absence of detailed data on the</p>

		<p>origins of knives used in crimes complicates the assessment of these measures' effectiveness. There is also a risk that offenders may simply find alternative ways to obtain knives given their prevalence in wider society and communal areas like kitchens.</p> <p>For reportable bulk sales, the impact of these measures is uncertain. Compliance levels and benefits of the new rules are unknown, and there is uncertainty about enforcement resources to handle reports on bulk sales. Reporting methods and system requirements are not costed, and this IA does not estimate the cost for enforcement. Furthermore, the size of the grey market is unknown, complicating policy impact evaluation and driving a reliance on anecdotal evidence.</p>
Results of sensitivity analysis	N/A	N/A

Evidence base

A. Strategic objective and overview

Strategic Objective

1. The government is committed to halving knife crime in a decade and is pursuing a range of measures to achieve this goal. The government has already banned zombie-style knives and machetes and will be banning ninja swords and adding them to the list of prohibited offensive weapons set out in the Criminal Justice Act 1988 (Offensive Weapons Order) 1988⁵⁴. The Home Office has consulted on the legal definition of ninja swords and which defences should apply. The Home Office also commissioned the *Independent end-to-end review of online knife sales*, to ensure that dangerous blades do not end up in the wrong hands⁵⁵.
2. The findings of this review were published on 19 February 2025 and the report is available on GOV.UK⁵⁶. A Coalition to Tackle Knife Crime has been established to save lives and make Britain a safer place for the next generation and the government has established the Young Futures Programme⁵⁷, which aims to intervene earlier to stop young people being drawn into crime⁵⁸. Halving knife crime is an important component of the Safer Streets Mission⁵⁹.

Background

3. The murder of three young girls and the injury of eight children and two adults in Southport in July 2024 by a 17-year-old boy, and also the murder of 16-year-old Ronan Kanda (both cases were linked to knives bought online by children under the age of 18), revealed weaknesses in the age verification requirements of knife sales that need to be improved.
4. This includes systemic failings in the age controls (the provisions of which are outlined in section 35 of the Offensive Weapons Act 2019⁶⁰) which were intended to prevent the sale and delivery of knives to individuals under 18. The government is concerned that these failings might be replicated elsewhere.
5. The police have also raised concerns about the buying of knives and offensive weapons in bulk to sell these weapons via social media and peer networks without age verification or any other checks being conducted.
6. The government wishes to introduce a two-step age verification for online sellers and delivery companies, and a requirement for sellers to report bulk sales to the police.

⁵⁴ The Criminal Justice Act 1988 (Offensive Weapons) Order 1988: <https://www.legislation.gov.uk/ukxi/1988/2019>

⁵⁵ National Police Chiefs' Council – Independent end-to-end review of online knife sales. 31 January 2025: https://assets.publishing.service.gov.uk/media/67b5b2e54a80c6718b55bf76/E2E_Review_-_Online_Knife_Sales_Final_Report.pdf

⁵⁶ Independent end-to-end review of online knife sales - GOV.UK: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales>

⁵⁷ Government to launch new coalition to tackle knife crime - <https://www.gov.uk/government/news/government-to-launch-new-coalition-to-tackle-knife-crime>

⁵⁸ Government to launch new coalition to tackle knife crime - GOV.UK: <https://www.gov.uk/government/news/government-to-launch-new-coalition-to-tackle-knife-crime>

⁵⁹ Safer Streets – GOV.UK: <https://www.gov.uk/missions/safer-streets>

⁶⁰ Offensive Weapons Act 2019: <https://www.legislation.gov.uk/ukpga/2019/17/section/35>

7. Both these measures are priorities for the government. The government is taking action to remedy the failures that the Southport attack identified in systems of online knife sale regulation and improve the police's ability to identify and investigate those who sell knives illegally online.

Groups Affected

8. **The public** – Those wishing to buy knives online will be subject to a two-step age verification process, requiring them to produce their official ID, and to receive in-person any knife which they themselves have ordered online.
9. **Sellers** – Sellers will have to ensure that their systems are able to implement the strengthened age verification requirements, and match the photographs of buyers with their ID. They may also face prosecution if they do not adopt two-stage age verification. They will also have to report bulk purchases.
10. **Delivery companies/couriers** – Couriers will have to make sure that they do not deliver a knife to someone other than the person who ordered it. They may have to amend their IT systems and processes. They may also face prosecution if they do not adopt two-stage age verification, give the item to a person other than the person who purchased the item, or deliver the item to an address other than the one specified by the seller as the address where the buyer resides.
11. **Criminal justice system** – There might be an increase in the prosecution of online retailers/delivery companies if they do not comply with their new responsibilities under two-step age verification measures coupled with the requirement only to deliver a bladed article to the person who bought it.

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

12. Knife crime affects victims through the emotional and physical harm following an attack, or threat of attack. It also inflicts costs on the economy and wider society (for example through loss of output, and costs to health and victim services, police, and the wider CJS). In the year ending December 2024, police recorded a total of 54,587 offences, involving a sharp instrument. This was a two per cent increase compared with the year ending in December 2023 (53,413 offences).
13. Of all recorded homicides in year ending December 2024, the proportion of homicides where a knife or sharp instrument was the method of killing was 41%. This was a slight decrease compared with 45% in the previous year.
14. Knife crime is complicated and requires multi-faceted solutions. The government is determined to put measures in place to reduce violence involving knives. This includes measures to reduce the ease with which knives can be marketed or sold illegally, or illegal weapons obtained, online.
15. The Southport attack, resulting in the deaths of three young girls and the injury of eight other children and two adults, and the failure of an online marketplace to conduct age verification checks, has revealed weaknesses that need to be addressed. This includes systemic failings in the age controls that prevent the sale and delivery of knives to those aged under 18 years, enabling a 17-year-old boy to buy knives online. There were also earlier failures in 2023 by two other online sellers and two delivery companies which led

to him obtaining machete knives. Although these failings relate to this specific case, the government is concerned that this might be happening elsewhere.

16. The police have also raised concerns about people purchasing knives and offensive weapons in bulk in the *Independent end-to-end review of online knife sales* and the resulting possibility of them selling these across social media accounts and peer networks without age verification or any other checks being conducted.

C. Policy objective

Proposal 1: Two-step Age Verification

17. The intended outcome is to make sure that online sellers and delivery companies implement strengthened age verification measures. Sellers will have to request an official identity document, to confirm that the person purchasing the item is at least 18 years old, and a current photograph at the time of the purchase to confirm that the person providing the identity document is the person purchasing the item.
18. The second step will be on delivery where the courier must ensure that the person receiving the package is the buyer. The courier will also need to check the age and identity of the person with the official identity document to ensure that they are 18 or over.

Proposal 2: Reportable bulk sales

19. The primary objective is for companies to report any bulk sales to the police. These measures require sellers to notify the police within a specified period where a person buys six or more knives in one transaction, or two or more sets of knives (a set is three or more knives packaged together as a single article where each knife is a different size or shape), or a person or persons living at the same address buys a total of at least six knives, or two sets of knives on two separate occasions within a 30-day period. One set of knives of any number is exempt from the reporting requirements.

D. Description of options considered

Option 0 – ‘Do nothing’

20. The Home Office does not amend the OWA 2019. The OWA 2019 does not specify what the age verification system should be and allows sellers and delivery companies to continue to determine their own checks. If the government opts for the “Do nothing” option, the risk that individuals under 18 obtain knives for illegal use would remain the same.

Option 1 – Proposal 1: Two-step Identity Verification

21. Strengthened, two-step identity verification will create minimum standards of age verification, otherwise sellers and couriers may face prosecution. This seeks to ensure that sellers and couriers meet minimum standards.

Option 1 – Proposal 2: Reporting bulk sales to the police

22. The reportable sales measure will enable the police to check whether relevant intelligence exists to suggest the knives may be used for criminal purposes (including grey market sales via social media), and, if so, investigate further.

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

23. The combined current NPSV for these measures' ranges from between -£0.02 million and -£0.85 million with a central estimate of -£0.25 million. However, this estimate solely reflects CJS costs and omits significant costs and benefits outlined in the non-monetised section below. These will likely determine the value for money of the two measures.

Monetised impacts:

24. The increased requirements for due diligence defence, and new delivery offence/reporting may result in more cases proceeding to courts. The scale of this impact will likely be minimal as additional cases generated are unlikely to put further burden on prisons or the Crown Courts.
25. This is further evidenced *the Independent end-to-end review of online knife sales* which noted a “dearth” of trained investigators able to identify advertising and marketing offences or CPS prosecutors with the knowledge to progress them through the justice system⁶¹. This has led to knife sales and marketing offences not being commonly used.

Cases

Sellers – Two-step age verification:

26. According to the Outcomes by Offences tool, between 2019 to 2023, there are on average 22 cases involving selling offensive weapons to a person aged under 18 years per year⁶². 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 knives and other items as well as both online and in-person sellers⁶³. Data available does not distinguish the type of weapon, or between online and in person sales. In the low, central, and high scenario it is assumed that 40 per cent, 60 per cent and 80 per cent of these cases are online knife sellers. This variation allows a wider variety of possible events.
27. In the low scenario, it is assumed that the number of cases remain the same. This scenario would be based on most online knife retailers already having an ID check in place, adapting to photo requirements, and enforcement remaining at current levels.
28. In the high scenario, it is assumed that the number of cases increase to the high of 76 which was observed in 2019 – representing an additional 44 cases a year assuming 80

⁶¹ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 9

⁶² Outcome by offences tool. Criminal Justice System Statistics June 2024 - GOV.UK
<https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

⁶³ [Knives and offensive weapons:
https://assets.publishing.service.gov.uk/media/5a7a3bf740f0b66a2fc00dcd/Knives_and_offensive_weapons_information_GDS_FAQ.pdf](https://assets.publishing.service.gov.uk/media/5a7a3bf740f0b66a2fc00dcd/Knives_and_offensive_weapons_information_GDS_FAQ.pdf) page 1

per cent of cases are online⁶⁴. This scenario reflects an anomalous year with elevated counts due to the introduction of the OWA 2019 and increased testing by local councils. While atypical, it represents a realistic surge that could occur if this change increases the charge rate (as the defence for selling knives to those aged under 18 years is restricted) and possible renewed police focus on sellers.

29. The central scenario is estimated between these two increases on the assumption that 60 per cent of those represent knives being sold by online sellers. These assumptions combined lead to 13 additional cases each year.

Deliveries – Two-step age verification:

30. Delivery companies will now need to check that the recipient is the same as the person who bought the knife at the point of sale. Although, this is an additional burden, review of court data highlighted that since 2019 there have been no prosecutions under section 42 of the OWA 2019 relating to the delivery of bladed articles to persons under 18 years⁶⁵.
31. The new charge of delivery is expected to have minimal prosecutions. It is anticipated to lead to no additional cases in the low scenario. In the high scenario, it is assumed that the charges for cross-checking at delivery (and possible focus on age verification at delivery) will lead to cases reaching the average annual levels of offences for sellers, that is, selling offensive weapons to a person aged under 18, as highlighted above. Assuming that 60 per cent of cases are online knife cases, this would represent an additional 13 cases a year. The central scenario is assumed between two at seven cases per a year.

Reportable bulk sales:

32. There are two routes for possible impacts on the CJS. The direct possibility that sellers may be charged with offences when they do not report bulk sales; and where reporting intelligence leads to downstream costs.
33. On direct impacts through the new offence, it is anticipated that no additional burden will be put on CJS. This is based on police being unlikely to monitor the reporting of sellers and instead prosecute as and when they come across a report that leads to an investigation and charge of a purchaser.
34. Updates to the Poisons Act 1972 provide a viable proxy for this as it created legal obligations in relation to the sale, purchase, and use of these chemicals for suppliers, including reporting requirements⁶⁶. The Outcomes by Offence table shows no prosecutions or cases under 195 The Poisons Act by Schedule 21 of the Deregulation Act 2015 which includes related summary offences for non-reporting by sellers⁶⁷.
35. However, as noted above, there are possible downstream costs which could include a range of cases. The most obvious and clearly outlined in the *Independent end-to-end*

⁶⁴ Outcome by offences tool. Criminal Justice System Statistics June 2024 - GOV.UK: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

⁶⁵ Outcome by offences tool. Criminal Justice System Statistics June 2024 - GOV.UK: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

⁶⁶ Supplying explosives precursors and poisons - GOV.UK: <https://www.gov.uk/government/publications/supplying-explosives-precursors/supplying-explosives-precursors-and-poison>

⁶⁷ Criminal Justice System statistics quarterly: June 2024 – GOV.UK: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

review of online knife sales is the identification of sellers in the grey market who sell the knives to others via social media platforms without appropriate checks.

36. It is not illegal to sell knives, but the *Independent end-to-end review of online knife sales* noted that, the grey market can “facilitate both legal and illegal sales”⁶⁸.
37. There was a total of seven cases for the offence of marketing knives for combat⁶⁹ for the year ending June 2024 and the number of cases averaged three over the last four years.⁷⁰ number of cases for this year ending June 2024 was seven and averaged three over the last four years⁷¹. These cases are restricted to summary only and are only heard in the Magistrates’ Court.
38. For calculating CJS burden – it would be necessary to estimate the number of likely reports, the number investigated and the proportion that may lead to a charge. This is very uncertain. There is clear familiarisation, and compliance needs for affected retailers, unknowns on the exact number of purchases that could be prescribed as ‘bulk’ and how this information would be used by police.
39. Due to unknowns, a wide selection of scenarios is used to highlight potential costs if the above offences outlined above increase. In the low scenario, it is assumed that the June 2024 number of seven cases becomes the new normal – representing an additional four cases a year⁷². For the central scenario, it is assumed that the number of cases increases to the average of 22 cases of selling an offensive weapon to a person aged under 18 years per year. This would represent an increase of cases of 19 compared with average levels. In the high scenario, it is assumed cases increase by 50 – representing an increase of 15.6 times the current average number of cases. This allows for a wide number of scenarios due to the uncertainty outlined above.
40. Crucially, the mandatory reporting of bulk purchases could act as a significant deterrent, effectively disrupting this flow of purchases into the grey market. This countervailing force may naturally mitigate the occurrence of such cases.

Legal aid

41. As these are limited to summary offences, legal aid cost is assumed at the rate of the Magistrates’ Court. It is assumed that legal aid take-up is the same at the Magistrates’ Court and police station. Legal aid use is assumed to be 20 per cent in the low, 40 per cent in the central and 60 per cent in the high.

⁶⁸ Independent end-to-end review of online knife sales - GOV.UK:

<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> (paragraph 2.3)

⁶⁹ Home Office offence code 09001 - Unlawful marketing of knives (selling or hiring), Home Office offence code 09002 - Unlawful marketing of knives (offering or exposing to sell or hire), Home Office offence code 09003 - Unlawful marketing of knives - having in possession for the purpose of sale or hire, Home Office offence code 09004 - Publication of any written, pictorial or other material in connection with the marketing of any knife - the material suggesting or indicating knife suitable for combat, Home Office offence code 09005 - Publication of any written, pictorial or other material in connection with the marketing of any knife - the material is otherwise likely to stimulate or encourage violent behaviour involving use of the knife as a weapon.

⁷⁰ Outcome by offences tool. Criminal Justice System Statistics June 2024 GOV.UK:

<https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

⁷¹ Outcome by offences tool. Criminal Justice System Statistics June 2024 GOV.UK:

<https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

⁷² Outcome by offences tool. Criminal Justice Statistics June 2024 GOV.UK:

<https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

Prison places:

Sellers – Two-step age verification:

42. According to the Magistrates data tool, offence 195 Selling offensive weapon to a person aged under 18 years has no associated prison sentence for anyone prosecuted over the last five years⁷³. It is fair to assume no or very minimal prison place impact.

Deliveries – Two-step age verification:

43. The new offence, delivery to a person other than the buyer, will not have a custodial element, but an unlimited fine so there are no expected prison place impacts.

Reportable bulk sales:

44. The sanction for not reporting a bulk purchase is a fine only, so this offence directly will not have an impact on prison places.
45. Regarding indirect impacts and the increased cases associated with marketing knives for combat within the grey market, there will likely be minimal prison place impact. These measures are covered in the Outcome by Offence tool under the offence code “90 Knives Act 1997” and other knife-related legislation. These do not show any custodial sentences for the associated offences over the last five years⁷⁴. The appraisal assumes zero prison place impacts as a result.

Proposal 1: Two-step age verification

Non-monetised Costs:

46. The additional cross check against the purchaser and person receiving the delivery is expected to impact delivery companies through familiarisation and additional delivery times. The latter may be caused through the additional check, or a lack of public awareness on the changes and failed deliveries. These added checks may increase the costs of delivering knives for delivery companies and may be transferred on to buyers or sellers.
47. The proposed amendments stipulate minimum requirement for online knife sellers to obtain official identification and photograph of the buyer. Current legislation relies on the seller having a system in place that is likely to prevent purchases to anyone under 18⁷⁵. The term likely is not defined but suggests it would be effective for 60 to 75 per cent of cases⁷⁶. These changes mean sellers will be more likely to verify a buyer's identity using ID before agreeing to a sale. While ID requirements may require legitimate knife sellers to update their online system, responses to a recent survey of knife sellers in the *Independent end-to-end review of online knife sales* highlighted that most retailers already implement ID checks to meet these requirements⁷⁷. The effect of the

⁷³ Outcome by offences tool. Criminal Justice Statistics June 2024 GOV.UK:

<https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-june-2024>

⁷⁴ Criminal Justice System Statistics December 2023 - GOV.UK: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2023>

⁷⁵ Independent end-to-end review of online knife sales - GOV.UK: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 10.

⁷⁶ Fore, Je, 'A Court Would Likely (60-75%) Find...', *Defining Probability Expressions in Predictive Legal Analysis* (October 5, 2019). *Legal Communication & Rhetoric*: 16 JALWD 49 (2019), Available at: <https://ssrn.com/abstract=3281040> (Accessed: 12 January 2024).

⁷⁷ Independent end-to-end review of online knife sales - GOV.UK: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 63

requirement for buyer to provide a photograph of themselves is more uncertain, and this will likely impact a wider selection of businesses to update their sales process.

Non-monetised Benefits:

48. In 2019/20, UK Trading Standards conducted a comprehensive test purchase operation where only three per cent of the transactions failed an age verification process⁷⁸. This tested online retailers and click and collect age verification only, rather than door-to-door deliveries or the grey market. The review still found multiple examples of practices prohibited under the act⁷⁹. The increased strengthening and standardising of age verification measures (introduce via the Crime and Policing Bill) could lead to a further reduction in access to knives for those aged under 18, which may potentially decrease knife crime. This could enhance public safety and demonstrate government action in response to anecdotal delivery and seller process failures.
49. Quantifying the reduction in knife crime these measures may cause is challenging due to uncertainties about how those aged under 18 years access knives, grey market compliance with these changes after introduction, and how behaviour might change in response. However, there might be particular benefit if the specification of process requirements increases charge rates through clearer standards, deterring or reducing irresponsible seller and delivery practices.
50. Furthermore, retailers tend to have robust systems in place, often incorporating third party software⁸⁰. The grey market tends to not follow the current rules. Reductions in knife crime may be reliant on these peer-to-peer sellers becoming compliant. This is a prominent issue given that, “algorithms within these platforms are designed to tailor content towards the user and therefore searching or viewing content about knives or featuring knives may lead to advertisements for knife retailers being shown to under 18s”⁸¹.

Proposal 2: Bulk purchases

Non-monetised Costs:

51. Implementing a new online seller reporting requirement will necessitate a reporting system to collect reports and communication on the new requirements for sellers. Similar systems on reporting have costed in the millions of pounds and the system will have ongoing costs each year.
52. The investigation of reports will also require enforcement resource which at minimum represent an opportunity cost. The scale of these costs is largely unknown due to the absence of a defined reporting method and system. However, this will likely represent the largest cost for this policy.
53. This will impose an additional burden on online sellers, requiring time and potential updated systems or manual checks to understand if either of the clauses are met. The risk of criminal sanction for non-reporting may lead some sellers to exit the market and potentially increases prices, although this effect may be limited as this only impacts

⁷⁸ Independent end-to-end review of online knife sales - GOV.UK:

<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 12,13

⁷⁹ As above, page 10

⁸⁰ As above, page 60

⁸¹ As above, page 14

online firm. It also may reduce through clear and streamlined reporting guidelines and the use of a fine rather than custodial sentence for breaches of reporting.

Non-monetised Benefits:

54. Social media or the grey market is often used by people who bulk buy knives to sell indiscriminately without age verification or meeting current requirements. For example, the *Independent end-to-end review of online knife sales* highlighted how fifteen grey market sellers sold 2,000 knives without any checks on who these were sold to⁸². Gathering data on online bulk purchases may enable the police to disrupt grey market sellers or deter bulk purchases that allow such practice. This could reduce knife crime and enhance public safety. As outlined above, the *Independent end-to-end review of online knife sales* highlighted that international sellers of knives often do not follow strict guidance such as that relating to age verification.
55. A possible shift from online domestic to international bulk purchases or in person purchases – which would be unaffected by these changes - would undermine these benefits. These benefits will also rely on enforcement agencies investigating reports, as there is no evidence of social media companies actively scanning and removing illegal posts and accounts⁸³.

F. Costs and benefits to business calculations

56. The Business NPV impact has not been estimated, however, this is likely to represent a negative cost to businesses due to the non-monetised impacts outlined below.

Two-step age verification:

57. Delivery driver familiarisation has not been monetised due to unknowns on the number delivery drivers who deliver knives. Scenario Modelling was produced to provide an idea of scale. This estimated delivery familiarisation between £0.01 million and £0.13 million, with a central estimate of £0.04 million.
58. In all scenarios, the total number of delivery drivers and couriers was assumed to be 269,000, based on the 2024 Annual Population Survey⁸⁴. The percentage of delivery drivers who would undertake training was assumed to be 2 per cent, 6 per cent, and 10 per cent. The 10 per cent aligning with the proportion of licensed to unlicensed carriers as a proxy⁸⁵, and the *Independent end-to-end review of online knife sales* noted that Knife Retailers tended to use certified drivers⁸⁶. Previous guidance on age verification for the sale and delivery of knives under the OWA 2019, consisting of 3,845 words, was used as a proxy for time of familiarisation⁸⁷. A reading time calculator estimated the time required to read the guidance, using reading speeds of 200, 400, and 700 words per minute for the low, central, and high scenarios, respectively⁸⁸. This resulted in a low

⁸² Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 9

⁸³ As above, page 11

⁸⁴ NOMIS Official Census and Labour Market Statistics
<https://www.nomisweb.co.uk/datasets/aps218/reports/employment-by-occupation?compare=K02000001>

⁸⁵ Industry- Business Register and Employment Survey 2023
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/industry235digitsicbusinessregisterandemploymentsurveybrestable2>

⁸⁶ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 39

⁸⁷ Offensive Weapons Act 2019: <https://www.legislation.gov.uk/ukpga/2019/17/contents>

⁸⁸ Speed Reading Test: <https://readingsoft.com/>

estimate of 6 minutes, a central estimate of 10 minutes, and a high estimate of 19 minutes. The wage of the individual was assumed to be £12, in line with average earnings in sales and customer services⁸⁹. An optimism bias of 20 per cent was also applied.

59. Retailers would also need to familiarise themselves with these changes. Retailer familiarisation has not been monetised due to unknowns on the number of affected retailers. Scenario Modelling was produced to provide an idea of scale. This estimated knife retailer familiarisation between £0.01 million and £0.12 million, with a central estimate of £0.03 million. This was based on several assumptions that were purposely flexed given uncertainty.
60. This familiarisation cost would only impact online firms. This means each unique store, for example a supermarket, would experience costs for one website rather than for each store. The number of distinct stores selling knives, and how many have an online presence is highly uncertain. The following calculations serve as an estimate for the number of unique businesses selling knives which may have an online presence.
61. By examining UK manufacturers' sales by product⁹⁰ and calculating the value of product codes which include the word "knives" (excluding those that explicitly state "excluding knives"), knives account for 0.02 per cent of total manufacturing value. Multiplying this by the number of businesses in UK⁹¹ results in an estimate of 1,384 firms. This was used as a low estimate for the unique businesses selling knives online. As a sense check, the same approach was applied to product codes including firearms, which resulted in approximately 2,000 businesses. This figure closely aligns with the number of registered firearms sellers⁹².
62. The high estimate was generated by doubling the number of firearms dealers (2,876). This approach was used to account for inherent risk in the above methodology, and on the basis that firearm sellers may act as reasonable proxy for the scale of online stores selling knives. The central scenario uses a midpoint between the high and low.
63. Similar to the previous section, the time to read the guidance is estimated at 6 minutes for the low scenario, 10 minutes for the central scenario, and 19 minutes for the high scenario. The wage of the individual is assumed to be £26, in line with average earnings of 'Managers, Directors & Senior Officials'⁹³. It is assumed that 1, 1.5, and 2 persons per affected store would need to familiarise themselves with the guidance in the low, central, and high scenarios, respectively. An optimism bias of 20 per cent was applied.
64. The absence of specific requirements for seller ID checks may however currently be creating a barrier to market entry. The lack of clarity on a lawful process may have

⁸⁹ ONS Gross Weekly earning by occupation – GOV.UK: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/grossweeklyearningsbyoccupationearn06>

⁹⁰ UK manufacturers' sales by product (ONS) – GOV.UK: <https://www.ons.gov.uk/businessindustryandtrade/manufacturingandproductionindustry/datasets/ukmanufacturerssalesbyproductprodcom>

⁹¹ Business Population estimates 2023 UK <https://www.gov.uk/government/statistics/business-population-estimates-2023/business-population-estimates-for-the-uk-and-regions-2023-statistical-release>

⁹² Statistics on firearm and shotgun certificates GOV.UK: <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#:~:text=2.-,Summary%20of%20statistics,compared%20with%2031%20March%202023>

⁹³ ONS Gross Weekly earning by occupation – GOV.UK: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/grossweeklyearningsbyoccupationearn06>

caused concern among sellers on being compliant – these changes may prevent that concern and may increase businesses entering the market.

Reportable bulk sales:

65. This will place an additional burden on online sellers, necessitating time, staff training, and potential updates to systems or manual checks to ensure compliance with reporting clauses.
66. The cost of bulk reporting itself has not been monetised due to several unknowns. Scenario modelling was produced to provide an idea of scale. This estimated reporting costs between £0.00 million and £0.18 million, with a central estimate of £0.03 million. The key factors that determine the finalised cost will be the number of affected transactions and the time taken to report.
67. The low, central, and high estimates assume a varying number of reports a year at 25,000, 137,500 and 250,000 respectively. The time taken to report was assumed at 0 minutes in the low which would only occur if firms automated the process, one minute in the central and three minutes in the high. In line with average earnings in sales and customer services⁹⁴, a £12 hourly wage is used for relevant staff. An optimism bias of 20 per cent was applied.
68. This cost could be expected to be larger for smaller firms, as larger firms often already provide training to ensure current compliance, whereas many smaller firms follow a less structured approach⁹⁵.
69. Online shop staff will need to familiarise themselves with the process of reporting. Training/ familiarisation have also not been monetised due to unknowns on the number of retailers who sell knives or number of staff per retailer/store which would undergo relevant upskilling. Scenario modelling was produced to provide an idea of scale. This estimated training and familiarisation between £0.00 million and £0.08 million, with a central estimate of £0.02 million. This likely represents the highest costs for businesses across the measures but would likely only occur in the first year.
70. This familiarisation cost would only impact online firms. This means each unique store, for example a supermarket, would experience costs for one website rather than for each store. The number of distinct stores selling knives, and how many have an online presence is highly uncertain. In the low scenario, approximately 1,400 stores are assumed to be affected, 5,800 in the high scenario, and a midpoint of 3,600 in the central. These are referenced in paragraph 59 above.
71. The number of people per online store requiring familiarisation is estimated to be 1, 2, and 3 in the low, central, and high scenarios, respectively. The time required for familiarisation is estimated to be 6 minutes in the low scenario, 10 minutes in the central scenario, and 19 minutes in the high scenario. The wage of the person is assumed to be £12, in line with average earnings in sales and customer services. An optimism bias of 20 per cent has also been applied.

⁹⁴ (SOC Code=711) SOC 2020 Volume 1: structure and descriptions of unit groups – Office for National Statistics: <https://www.ons.gov.uk/methodology/classificationsandstandards/standardoccupationalclassificationsoc/soc2020/soc2020volume1structureanddescriptionsunitgroups>

⁹⁵ Independent end-to-end review of online knife sales - GOV.UK: <https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales>. page 62

72. The risk of criminal sanctions for non-reporting may prompt some sellers to exit the market, potentially driving up prices. However, clear reporting guidelines and effective communication of the policy could mitigate any reduction in sellers.

G. Costs and benefits to households' calculations

73. 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.

Age Verification:

74. Buyers are unlikely to be significantly impacted by requiring ID at the point of sale, as the survey as part of the *Independent end-to-end review of online knife sales* indicated that ID is largely already requested⁹⁶. They will however have to send a photograph which will take additional time and could put customers off purchases.
75. The requirement to produce an identification document at delivery may affect buyers specifically as the original purchaser will need to receive the package – a buyer will not be able to nominate a person to receive the package in their place.

Bulk purchases:

76. The *Independent end-to-end review of online knife sales* highlighted the benefits of disrupting the grey market, through preventing the illegal marketing of knives or preventing access to knives for those aged under 18 years.

H. Business environment

77. The overall impact of these measures on business environment is not known but they do introduce additional barriers to selling knives online in the UK.
78. The survey conducted as part of the *Independent end-to-end review of online knife sales* highlights that most established retailers already require buyers to produce proof of identity, so it is reasonable to assume the impact of the ID requirement will be negligible⁹⁷. Photograph requirements are less prevalent, so may be more costly.
79. Bulk sales measures may reduce the attractiveness of business for online companies focussed on knives. However, reporting is limited to domestic addresses. The new reporting obligations and the associated offence for non-compliance may increase costs and deter businesses from engaging in online knife sales. This may lead to businesses leaving the market and reduce online competition. Reporting imposes an additional burden on sellers, requiring potential training and updated systems or manual checks to meet the new requirements.

I. Trade implications

80. The regulation does not impact international trade, either directly or indirectly, through imposing or reducing barriers to exports or imports.

⁹⁶ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 63

⁹⁷ As above, page 60

81. The *Independent end-to-end review of online knife sales* highlighted a disparity between the laws on online knife sellers in the UK and abroad. This “presents difficulties in enforcing the current law against international retailers”⁹⁸. Further barriers or costs on domestic online sellers could inadvertently drive consumers towards international purchases with lower standards on age verification or delivery.

J. Environment: Natural capital impact and decarbonisation

82. The impact of these measures on the UK’s natural capital and decarbonisation of economy is not known. Age verification introduces minimal procedural changes and bulk purchases creates a new reporting requirement. At a high level it is not unreasonable to assume that the impact will be negligible.
83. A slightly more detailed consideration may highlight the below.
- Likely negative: the enhanced delivery requirement may lead to additional failed deliveries and subsequent re-deliveries.
 - Likely positive: reducing knife sales to individuals aged under 18 years would decrease overall delivery volumes.
 - 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.
84. At this time, there has been no appraisal of these factors, and the value of investigating this area is not considered high enough to justify the effort to do so.

K. Other wider impacts (consider the impacts of your proposals)

85. The *Independent end-to-end review of online knife sales* highlighted a disparity between the compliance with current regulations between the grey market, international sellers and online retailers. This “presents difficulties in enforcing the current law against international retailers”⁹⁹. Further barriers or costs on domestic online sellers could inadvertently drive consumers towards international purchases with lower standards on age verification, delivery and wider regulations.

L. Risks and assumptions

Age verification:

86. Many costs and benefits remain non-monetised, including business impacts.
87. ID requirements and changes for both deliveries and sellers could impose a heavier burden on smaller businesses, potentially leading to higher market concentration. The *Independent end-to-end review of online knife sales* also noted that smaller retailers, particularly independent knife sellers, may lack the resources to implement changes effectively¹⁰⁰. The exit of firms may lead to higher prices of online knives which can be transferred to customers and may lead to the adverse effect of buying knives on the grey market or internationally, where checks are not as thoroughly implemented.

⁹⁸ As above, page 11

⁹⁹ Independent end-to-end review of online knife sales - GOV.UK:
<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales>, page 11

¹⁰⁰ As above, page 60

88. Due to the lack of enforcement resources on knife sales, enforcement of current measures relies on those active in the community being exposed to the content on social media and raising reports¹⁰¹. Enforcement of new proposals would likely require further enforcement resources and training.
89. There are two further risks that may undermine potential benefits of these measures. These are the absence of detailed data on the precise origins of knives used in crimes, and how offender behaviour will change following implementation of policies. While the Home Office can track overall trends in knife crime, data does not currently pinpoint specific sources of knives, such as online marketplaces or retail outlets. It will be difficult to determine how these measures impact how knives are accessed for crime. For example, there is an inherent risk that offenders may resort to other methods of attaining knives.
90. Furthermore, retailers tend to have robust systems in place, often incorporating third party software¹⁰². The grey market tends to not follow the current rules. Reductions in knife crime may be reliant on these peer-to-peer sellers becoming compliant, which there is no substantial evidence will occur post these changes.

Bulk purchases:

91. There has been limited business consultation on the bulk purchasing measures. While the *Independent end-to-end review of online knife sales* highlighted strong reasons for the policy change, including disrupting the grey market, business impacts remain very uncertain¹⁰³.
92. Benefits are difficult to quantify, as the level of compliance with the new rules is uncertain at this stage. How many reports will be received, actioned and investigated is also unknown, as well as whether police have the resources and means to effectively use these reports.
93. The review noted a “dearth” of trained investigators able to identify advertising and marketing offences or CPS prosecutors with the knowledge to progress them through the justice system¹⁰⁴. These reports may not be effectively used without additional training and resources.
94. Reports will also lead to specific persons – however those who operate in the grey market purposely design their advertisements to avoid detection or move to encrypted spaces¹⁰⁵. This suggests reporting may not simply lead to convictions and is likely to be time consuming for enforcement agencies.
95. The method of reporting and system requirement is unknown. The system itself may represent substantial cost as well as a means of deciphering reports to investigate as the bulk purchasing and selling of knives itself is not illegal. The use of this information and possible deterrence to sell on the grey market or without appropriate age verification, will likely determine the potential benefit.

¹⁰¹ As above, page 54

¹⁰² Independent end-to-end review of online knife sales - GOV.UK:

<https://www.gov.uk/government/publications/independent-end-to-end-review-of-online-knife-sales> page 60

¹⁰³ As above, page 54

¹⁰⁴ As above, page 9

¹⁰⁵ As above, pages 11 and 54

96. The risks and assumptions outlined above about age verification measures also apply to the measures to tackle bulk purchases. The absence of detailed data on the precise origins of knives used in crimes, and how offender behaviour will change following implementation of policies. While the Home Office can track overall trends in knife crime, data does not currently pinpoint specific sources of knives, such as online marketplaces or retail outlets. It will be difficult to determine how these measures impact how knives are accessed for crime and there is an inherent risk that offenders may resort to other methods of attaining knives.

Annex

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p>Statutory Equalities Duties</p> <p>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>The SRO has agreed these summary findings.</p>	<p>Yes</p>