

RESEARCH PROJECT

INTRODUCTION

Aim of the project

The Research Project aim was to look into the level of control over, and limitations on the use of, Sunbeds and Skin Tanning Equipment.

The Chartered Institute of Environmental Health is strongly opposed to the use of sunbeds and skin tanning equipment to promote the development of sun tans. Those who support their use, including some local authorities in Wales that continue to provide such facilities, argue that the use of the equipment is controlled, and that potential users are provided with advice as to usage, including

1. Frequency of use,
2. Skin types and the effects of excessive use,
3. Effect of using sun tanning equipment when taking medication or pregnant,
4. Effect of sun tanning equipment on skin and other medical conditions.

Operators also claim that they are able to, and do, restrict the number of occasions on which an individual can use the equipment to prevent overexposure.

The project seeks to ascertain what information is given out to those seeking to use sun beds and skin tanning equipment, what advice is given and what, if any, restrictions are placed on users to prevent excessive use?

The project brief

The Brief for the project included the area in which the survey will be carried out. The Local Authority areas within South East Wales comprised: -

Monmouthshire
Torfaen
Newport
Blaenau Gwent
Cardiff
Vale of Glamorgan
Rhondda Cynon Taf
Caerphilly

The survey was to include both premises within the private and public (local authority) sectors.

The researcher was to record those premises claiming to be current members of the professional body representing the sunbed industry, The Sunbed Association (TSA).

The researcher role was to: -

- a) Set up and deliver a programme of “secret shopping” of sunbed facilities and premises offering tanning equipment to determine what advice/warning information is provided to those wishing to use the facilities regarding
 - Minimum age of users,
 - Frequency of use and time between each use,
 - Use when suffering from particular illnesses,
 - Use when taking medication,
 - Use when pregnant,
 - Use of eye protection,
 - Any other information/warnings offered.
- b) Where the facility imposes a restriction on the number of uses that a user can have during a specified period, ascertain how easily or otherwise this restriction can be circumvented,
- c) Produce a protocol that details the research methodology used in a form that will allow the study to be reproduced,
- d) For one town in each local authority area determine how many sunbed or tanning sessions it would be possible to have during one normal working day, recording in each case whether information was sought by the operator about previous and recent exposures, and specifically recording when access to a session was refused on the grounds of recent exposure.

Current industry standards and recommendations

The Sunbed Association (TSA) has issued a Code of Practice with which their members must comply. "The Sunbed Code" is based on European Standard EN60335-2-27:2003 and the Health and Safety Executive Guidance Note "Controlling Health Risks from the use of UV Tanning Equipment".

TSA members must maintain prescribed performance and safety levels. This includes ensuring that their sunbeds are installed and maintained in accordance with manufacturer's instructions.

TSA staff members must be trained in accordance with HSE Guidance Note (INDG209). This is implemented through a training programme and accompanying manual. Information within the above guidance note is to be passed on to their customers.

The Sunbed Association is in agreement with government guidance, which states that sunbeds should not be used by children under 16 years. Members of TSA must not let anyone under 16 use their sunbeds, even with parental consent.

TSA members are to advise on the correct session length, dependant on the sunbed, skin type, and stage of tan development.

TSA advises that people with skin type 1 (very fair and liable to immediate burning), children under 16, people on certain medication, and people with a history of cancer in their family should not use sunbeds. They advise that 2 to 3 sessions a week is acceptable for everyone else but the skin should be rested for a minimum of 24 hrs between each session, and at least 48 hours for skin type 2.

The Sunbed Association states that you should **not** use a sunbed if

- You are under 16
- You always burn in natural sunlight
- You have a medical condition that becomes worse in sunlight
- You have an excessive amount of moles and/or freckles
- You have a history of sunburn, particularly from childhood
- You, or any member of your immediate family have/had skin cancer

The view of the British Medical Association (BMA) on sunbeds is that they should not be used at all, or if they are used their use to be limited to no more than two courses – or 10 sessions – a year.

The BMA also advise that children under 18 should never use sunbeds due to the high risk of skin cancer in later years.

Cancer Research UK and TSA are calling on the government to ban the use of sunbeds by children under 16 years of age. They are also calling for salons to insist on sunbed users reading information which offers advice to people with different skin types.

In their UK Policy Statement on Sunbeds, Cancer Research does not recommend the use of sunbeds for cosmetic purposes. They believe that under-18s should not be permitted to use sunbeds and support the banning of unstaffed, coin-operated salons as a matter of priority. They are of the view that voluntary regulation of the sunbed industry is currently inconsistent and largely unmonitored, and believe this places users at greater risk. They therefore support the principle of a licensing scheme for salons and other premises offering the use of tanning facilities to members of the public. They believe that salon licensing could provide an opportunity for premises to be thoroughly inspected, encourage salons to effectively train all staff, guarantee that sunbed sessions are monitored and an individual's annual number of sessions limited.

Health and Safety guidelines recommend keeping sunbed use to a maximum of 20 sessions per person per year.

European guidelines suggest that adults should not use sunbeds more than once a week.

METHODOLOGY

Visits or telephone survey?

The decision was made to visit as many premises offering sunbed sessions, as opposed to telephone canvassing as it was felt that the actual professionalism and expertise of the operator could be best gauged by carrying out a personal interview. Greater information could be gained by visiting, such as the professionalism of the facilities themselves, the amount of visual information on display, and the expertise and knowledge of the salon staff. The researcher could be more persuasive and can gauge whether to push for greater information.

A telephone survey would limit the number of questions one could ask, as too many would be likely to raise suspicion within the local sunbed/tanning industry. Further it could not be certain that the operator was reading off a script.

Establish protocol

The following working method was considered the best by the researcher. Slight modification of dialogue was carried out as a result of the earliest interviews, in order to fine tune the method and ensure increased information was obtained. This working method enabled the gathering of both quantitative and qualitative information.

1) Identify premises

Primarily the addresses to be visited needed to be established. This was achieved by researching various sources, including certain on-line resources such as Yellow Pages (Yell.com), BT Directory, search engines, etc. Should Local Authorities wish to reproduce the study they will have additional information sources such as Health and Safety records of local businesses, local knowledge, etc.

The search headings included the terms "Sunbed", "Tanning", "Beauty", "Health", "Sports Clubs", etc. These headings were cross-referenced to the area in question, including "South Wales", the Local Authority area (e.g. "Caerphilly County Borough Council"), and individual conurbation.

It was more productive to search those headings not only relating to the Local Authority area, but also searching against each individual conurbation.

Initially the conurbations were identified within each local authority area. This was to enable better targeting of resources to those areas where tanning centres are likely to be situated. The conurbations were identified from National Statistics data, and are reproduced at Appendix 1.

Some sorting was required to ensure visits were not carried out to businesses not offering sun tanning sessions. This was achieved through telephone canvassing each of the businesses identified to ask whether sunbeds were available. It was also helpful at the same time to ask for opening hours to avoid visiting the premises when closed, particularly where the situation was remote.

Further, it was helpful to identify those premises where the use of the sunbeds was restricted to members only. It was not possible to gauge the facilities at those premises as the researcher did not want to compromise his position by giving away personal data.

The identification process would include manned, unmanned, and Local Authority premises.

There was consideration as to whether visits should be scheduled. If appointments were made, the operator had time to prepare "model" information. It was decided that the visits would be *ad hoc*, to ensure anonymity, and also to ensure that preliminary salons surveyed did not become suspicious and spread the word to their colleagues in the local industry. If the survey was compromised it was to be aborted and switched to another area.

2) Format of the survey

Prior to leaving the base of operations a format of interview had to be formulated. The questions asked had to be the same to each operator, to avoid introducing bias, and to ensure the maximum quantitative data was obtained to ensure that it was possible to make real comparisons between each of the operators.

The purpose of "secret shopping" is to illicit information not normally proffered when carrying out an overt survey. The questions therefore could not be profuse as this would raise suspicion and therefore the choice of questions would need to hinge on the usefulness and pertinence of the information which was obtained. The questions designed therefore attempted to obtain sufficient information in as few questions as possible to satisfy the brief.

The researcher's age and sex precluded asking questions based on their own age and certainly on pregnancy. However, it may have been possible to gauge reaction to the operator being asked whether the researcher's partner could use the sunbed if pregnant. Other questions were felt more pertinent and realistic.

A Visit Record Sheet was constructed, in order to record the results of the interview (see Appendix 2).

3) The physical survey

The described identification method was followed by route-planning of those premises to be visited.

However, the researcher needed to be observant when travelling the route, to scan the roadside and ensure that other business premises not previously identified as offering a sunbed service, e.g. Beauty/Hairdressing Salons offering use of a sunbed, new business premises, and those premises not advertising their services via the yellow pages, local directory, and on the Internet, were included in the research.

4) The visit dialogue

The researcher set the ball rolling at the interview stage by introducing a preconceived dialogue. The dialogue was chosen to obtain the information required, without asking too many questions and therefore arousing suspicion.

The researcher asked questions which the receptionist was expecting to hear and in a natural order.

The same questions were asked to all premises so that the response would be uniform. These questions are reproduced at Appendix 3.

The researcher did not prompt a response with regard to illness or medication, skin type, and previous sunbed use (whether today or otherwise) as this might have elicited a textbook reply. The researcher noted which premises particularly asked questions regarding these matters.

Many operators asked the researcher to sign a card, on which was printed various safety information. The card asked whether the answer was “yes” or “no” to set health-related questions. The cards were uniform within certain salon chains and although not identical to all sunbed premises, appeared to ask the same questions.

Without completing a card, and thereafter commencing a session, it is not possible to tell whether the researcher would be asked whether they understood the safety questions printed thereon or answered “yes” to any of those questions.

It is considered that operators should do more than passively depend on the user reading the card to obtain safety information, since the potential user may not answer questions honestly in case they may be refused a tanning session. Further there did not appear to be multi-lingual cards in evidence.

5) Recording of information

The details of each interview were written up immediately after each visit. This ensured that all information was fresh and would prevent confusing the dialogue with that of other visits. The write up was done away from the premises.

RESULTS

From the desk top study and telephone survey, a total of 120 businesses were identified as having sunbeds within the survey boundary. It was found that a large number of related businesses were no longer trading or providing sunbeds, many having switched to spray-tanning. Although the dangers of sunbed tanning

may encourage salons to chose “safer” tanning methods, the spray tan procedure has its own risks, particularly in relation to exposure to Dihydroxyacetone (DHA - the tanning ingredient in all tanning products and spray tan mists), other products which may elicit an allergic response, and the spray method (which may affect certain asthmatics and others with respiratory problems).

Of those 120 businesses, 6 were found to be entry/use by members only and were excluded from the physical survey.

There were 15 unmanned studios identified. Of those 15 there were 3 stand-alone businesses, the other 12 salons between spread between two multi-outlet groups. Each of the stand alone premises was visited. It was felt that a visit to only one of each group’s studios was sufficient to gain evidence on what level of service it provided to members of the public. Therefore 10 unmanned salons were not visited.

Of those resulting 107 to be interviewed, 69 interviews actually took place. This represents 64%. The number of premises interviewed was felt to be a representative sample of all types of premises offering sunbed sessions. The premises appeared to conform to definite types; sunbed salons, beauty salons, fitness centres/gyms, and hairdressers. The response in each of these types of premises was very similar and therefore it was not felt necessary to visit all of the 107 premises.

Of the 69 interviewed, 21 (30%) operators were TSA members.

23 (33%) of the 69 operators required the signing of an application form prior to having a sunbed session. 18 of these forms had important safety information relating to time between sessions, skin type assessment, medical information, etc.

The operators were asked whether they were members of The Sunbed Association (TSA) AFTER the conclusion of the physical interviews. This was to ensure that information about the survey was not passed to other sunbed operators. This may have led to misinformation, a reluctance to co-operate, or the researcher being given model answers by those with prior knowledge of the survey.

With regard to the specific study requirements the following information became available: -

Minimum age of users

Without specifically using minors to carry out “secret shopping”, i.e. to use persons under 16 to try to have a sunbed session, the survey relied on the

researcher's comment about "whether their 15 year old daughter would be able to use a sunbed". The age of 15 was chosen, as a younger age would have been likely to have met refusal in all cases.

The survey showed that of the 69 tanning shops surveyed, less than half (30, or 43%) of the salons refused to allow persons under 16 to use the sunbed facilities.

Of those 39 salons allowing a 15 year old to use the sunbeds (as long as they had parental consent and were accompanied by an adult) 3 were TSA members.

Therefore, 57% of the sample allowed persons under 16 to use the sunbeds. However, of these, all shops required parental consent and/or the signing of an indemnity form, and the adult had to be in attendance.

Whilst the researcher was inside one of the unmanned premises, where there was a clearly visible sign stating that under-16s were not permitted to use the sunbeds, a number of individuals who appeared to the researcher to be under 16 years of age were placing coins inside the machines to obtain a sunbed session.

Frequency of use and time between each use

Of the sample, 61 (88%) premises would allow a customer to have a tanning session every day (subject to there being a 24 hour gap between sessions).

8 (12%) premises insisted on tanning with a 48 hr interval between sessions.

In all of the cases it was strongly recommended to the researcher, after the information being requested, that the sunbed should not be used more than once on any day. Opinion was very strong in this regard and the researcher felt it very unlikely that salons would permit this. However it was also felt that an individual could obtain an additional session on the same day on the changing of the shift of the receptionist. This was particularly evident in fitness centres/gyms, where premises were sometimes open as early as 0700 hrs and closed around 2200 hrs. It is unlikely that the same "receptionist" would be in attendance throughout this period.

With regard to unmanned premises in particular it would be possible for the individual to have as many sessions as he or she wanted and for whatever length of session. Although CCTV was in evidence at all these salons, it is felt unlikely that particular recognition of the same faces, in the same day, would illicit an emergency physical response resulting in a staff visit to the premises to deny use. It is more likely that the CCTV systems are used to protect the equipment and premises from damage, vandalism and theft.

Use when suffering from particular illnesses

Of the 69 samples only 3 (4%) salons enquired about whether the researcher was suffering from illness. In the remainder, although it may have been the case that the operator may have formed an uninformed view as to whether the customer appeared in good health, this was not confirmed by questioning.

Of those shops displaying notices regarding illness, none verbally confirmed whether the researcher was suffering from any form of ill health.

Use when taking medication

As above, on only 2 (3%) occasions was the researcher asked whether he was on any form of medication. Although in some premises notices were displayed asking for such information, no premises specifically enquired about this.

Notwithstanding the presence of signage or cards relating to medication, it is unlikely that the operator has the necessary knowledge to decide whether a particular drug or medicine would give rise to any adverse health effects.

Use when pregnant

The researcher, being male, was not able to gain information about this question. A possible question, such as “my partner is pregnant but would still like to use the sunbed” could have been asked. However, it was felt that the number of questions that could be asked of the operator without raising suspicion was limited, to prevent causing the operator to behave in an atypical manner.

Had the researcher been female the operator might be able to make their own visual assessment as to whether they appeared pregnant, but no further comment can be made in this regard.

Use of eye protection

All bar one of the manned premises provided goggles. In the majority of those an adhesive patch was available, as an alternative to the plastic goggles which some believed resulted in “panda eyes”.

In one premise, a gym, the business was under take-over and the provision of goggles had been overlooked. However, the researcher was advised that sessions would be refused until goggles became available.

More importantly, in the unmanned salons the provision of goggles was not free. The charge at the vending machines was equivalent to several minutes on the sunbed, notwithstanding that the goggles could be re-used in subsequent sessions. It is likely that some users, particularly minors, would forsake purchase of goggles in favour of a longer tanning session. Although it was not observed at the time of the visit, it would be possible for a customer to bring their own goggles to the session.

Any other information/warnings offered?

Only 19 (28%) out of the 69 premises visited displayed clearly legible warning notices in prominent places, both at reception and within the cubicle areas. Other premises exhibited some signage in one or other of the areas, but most of this signage was the manufacturer's own sign found within the tanning booth.

In 18 (26%) of the premises a safety sheet or card was presented to the researcher who was asked to read the details. However, there was no questioning as to whether the answer to any of the safety points was positive.

Most importantly, none of the 69 premises surveyed actually asked when the researcher had last had a session, meaning that overuse was not restricted or prevented.

Skin type assessed?

25 (36%) of the 69 asked the researcher whether he had used a sunbed before. So as not to introduce bias he stated that he had, but many years ago. This led to varying periods being suggested for the first session, based on the strength of the individual tanning booth. 17 (25%) of the 69 interviewed did not proffer a suggested tanning period.

Only 16 (23%) of the 69 premises carried out a skin type assessment. These premises suggested an appropriate tanning period based on the information obtained. However the possibility that the operator made their own visual assessment when the researcher presented themselves at the premises cannot be ruled out, and provided information accordingly. If the researcher had been particularly fair-skinned this would have been readily evident.

How many sessions could one have in a day, in a single conurbation?

The skin colour of the customer may indicate whether that individual had already had a number of sunbed sessions that same day. If however the customer was already tanned this may be more difficult to determine.

The number of sunbed sessions an individual could have in one day is only limited by travel ability (whether he or she had access to their own transport, used public transport, or walk between premises). Within large conurbations it is possible to walk between tanning salons, having a sunbed session in each. It would also be easy to obtain as many extra sessions of whatever length is required by visiting unmanned salons.

In Cardiff for example an individual could visit over 20 salons (including several unmanned salons) in a single day but one would need access to their own transport. Although possible it is conceded this figure might be ambitious.

Conversely, in the Caerphilly County Borough town of Blackwood an individual could easily visit 6 salons on foot (includes one unmanned salon) in the same day.

CONCLUSION

The majority of operators would allow persons under 16 to have a sunbed session. There did not appear to be a willingness for an operator to demand proof of age of a minor before granting a sunbed session. Under 16's were

permitted to have sunbeds in some cases, if accompanied by and with the consent of an adult. There was a failure to recognise the potential for skin damage to those under 16 years of age using sunbeds, there being greater concern to ensure the consent of an adult prior to use was in place.

Unmanned salons appear to be regularly used by persons who may not have reached 16 years of age. Unfortunately it appears to have become fashionable for youngsters to have tanned skin, and the unmanned salons are their way of achieving this.

There seemed to be some confusion within salons as to what period should elapse between sessions. Only a small number required a 48 hour gap between sessions. All other operators would allow a session every day. It is quite possible that in some cases this may consist of a session in late evening followed by another session the following morning, with less than a 24 hour gap in between.

Various salons offered a discount when purchasing a block of sunbed sessions. A card is used to record the sessions taken, the deducted minutes of which would reduce the outstanding balance. If purchasing a block of sunbed sessions it may be possible, if unmonitored (particularly where staff change shifts), to have them all in a short space of time. The effects may be cumulative and the customer may not feel the full effects until it is too late.

Very few operators asked the researcher about his state of health. Further, little information seemed to be available as to what medication would or would not preclude a customer from receiving a sunbed session.

In nearly all cases eye protection was provided. One operator commented however that they know of customers who forsake the eye protection provided, and that they have no control as to whether the eye protection provided is worn.

Given the importance of skin type in determining the appropriateness of sunbed use and the exposure time when used, the researcher expected the great majority of operators to make a formal skin type assessment. However this was not the case. A little less than a quarter of the operators formally assessed the researcher's skin type.

Of the premises surveyed a large proportion were operated by the customer placing coins in a slot. This is obviously the case in all unmanned studios. The number of coins (the cost of the session) put into the machine could be increased by the customer once inside the tanning booth. Although the customer may have been advised by the operator about how much money to put in, and therefore how many minutes of tanning, the operator would have less control over the session length once the customer had secured themselves within the tanning

booth. The operator is more likely to think that a lengthy session was due to the time taken for the person to undress, have the session, and then dress.

Conversely, there were a number of tanning booths operated by insertion of a token, which is purchased from the operator just prior to the tanning session. This is a much better control method, as the operator can issue only those tokens thought to be appropriate based on all the safety factors relating to the individual customer.

A small number of salons had an electronic control method from the reception area. This is the most effective method for control of the length of the session.

It was evident that a determined customer could, with the provision of transport, purchase as many sunbed sessions as they wanted, over whatever period they should chose.

The researcher felt that of those surveyed, the majority of tanning salons employed staff who appeared knowledgeable, well trained and efficient. Overall there was indeed a genuine appreciation of the dangers of sunburn and misuse of sunbeds. However some, more controversial, comments were made by salon staff, which are related in Appendix 4.

It was evident that those operators who were members of TSA were better run, more professional and appeared to be more knowledgeable. The staff had obviously received formal training in tanning and sunbed methods. There was a more formal approach to the work, employing well structured forms and/or computer records.

EXECUTIVE SUMMARY

In order to regulate the safe use of sunbeds the researcher makes the following recommendations: -

Legislate and issue codes of practice for the safe operation of the premises

The operation of sun tanning equipment in commercial premises should be controlled by statute. This would allow the formalisation of Codes of Practice, include a staff training requirement, etc.

Licensing of sunbed studios and businesses providing sun tanning equipment

All premises offering sunbed tanning sessions should be licensed and therefore subject to similar health and safety checks by the relevant statutory authorities.

Ban all unmanned studios

There is little or no control of the use of sunbeds by minors or those not capable of making informed decisions regarding the length of session, the regularity of use, their skin type, an allergic reaction, etc.

Coin operated booths disallowed

The use of coin operated machines should be stopped. There is no control over the sunbed session length when the customer locks themselves inside the booth. The operator should either issue special tokens, or set electronically from behind reception, for set session duration based on skin type, health assessments and other criteria.

Compulsory eye protection

The wearing of eye protection should become a duty for all those using sunbeds in commercial premises. The light from sunbeds is able to penetrate the eyelids and damage the eye. The damage is cumulative when customers use the sunbeds regularly without such protection. There should be a duty for operators to provide the equipment and for them to take action where its use is refused.

Limit use of sunbeds to those persons over 18 years of age

The use of sunbeds is becoming increasingly more popular by younger members of the community, principally those less than 16 years of age. This is particularly so in relation to unmanned salons. It should be made an offence for operators to permit persons less than 18 years of age to obtain a sunbed session. There should be a duty on operators to check the age of the customer prior to granting a sunbed session.

APPENDICES

APPENDIX 1

COUNCIL AREA POPULATIONS (FROM NATIONAL STATISTICS – MID 2005)

Blaenau Gwent (68,400)

Abertillery, Blaina, Brynmawr, Ebbw Vale, Nantyglo, Tredegar

Caerphilly (170,200)

Aberbargoed, Bargoed, Bedwas, Blackwood, Caerphilly, Crosskeys, Crumlin, Gelligaer, Llanbradach, Nelson, Newbridge, New Tredegar, Rhymney, Risca, Senghenydd, Ystrad Mynach, Oakdale

Cardiff (319,700)

Cardiff, Creigiau/St Fagans, Pentyrch, Radyr/Morganstown, Tongwynlais

Monmouthshire (87,700)

Abergavenny, Caldicot, Chepstow, Monmouth, Raglan, Tintern, Usk

Newport (139,600)

Newport, Caerleon, Malpas, Rogerstone

Rhondda Cynon Taf (231,600)

Abercynon, Aberdare, Ferndale, Hawthorne, Llantrisant, Llantwit Fardre, Pontypridd, Porth, Tonyrefail, Treforest, Treherbert, Treorchy, Tylorstown, Ystrad

Torfaen (90,300)

Blaenavon, Cwmbran, Pontypool

Vale of Glamorgan (122,900)

Barry, Cowbridge, Dinas Powys, Llantwit Major, Penarth

APPENDIX 2

VISIT RECORD SHEET

Members Only?	Y/N
Application form?	Y/N
Asked if used sunbed before	Y/N
Asked when I had last session?	Y/N
Skin type assessment?	Y/N
Suggested tanning period?	Y/N
Asked if suffering illness?	Y/N
Asked if on medication?	Y/N
Tanning notices on display?	Y/N
Given safety sheet to read? ("can I take one away for my partner to read?")	Y/N
Will allow U-16's?	Y/N
Eye protection provided?	Y/N
Is salon member of SBA?	Y/N
Time between sessions	24/48 hrs

APPENDIX 3

The visit dialogue

“I was *thinking about* having some sunbed sessions” (This form of words was used rather than saying that the secret shopper *wanted* a sunbed session – to preclude the offer to have one immediately being made). This allowed the researcher to withdraw, having said he would come back (rather than sign paperwork immediately).

“Can you tell me what the prices are?” The operator expects this question and therefore the enquiry seems more genuine.

“How many minutes would you recommend?” This enables the researcher to gauge the expertise of the operator.

“I’m going on holiday on *** (3 working days from day of visit) and thought I’d have a few sessions to stop me burning when I’m over there!” (Another realistic question. Be prepared to answer question on where you are going on holiday – preferably somewhere you’ve visited before).

“How many sessions could I get in before ***?”

“Could I have more than one session a day?”

“My daughter also would like to use the equipment. She’s 15/NEARLY 16!”

“I don’t need to sign any forms do I? I just need to come in?”

APPENDIX 4

Some comments from operators

“Spray tan is better for you”

“I got burnt once because of a 6 minute session with tanning cream” (comment from a receptionist).

“Use cream as it stops the smell of burnt skin”

“Some people don’t use eye protection”

When asked whether 15 year old could use... “what, what was that, you did say 16 didn’t you!?”

“Legally under 16’s shouldn’t be allowed to use sunbeds”

“Shouldn’t allow 15 year old, because they should legally be 16, but as long as you told me she was 16...!”

I/we used to do it when we were under 16. And if you go in **** (a well known, unmanned salon – author) you can go in there any age. All the kids do it.”