

THE SOUTHPORT INQUIRY
FIRST WITNESS STATEMENT OF LUKE BULLOCK

Witness Name: Luke Bullock

Exhibits: LB/01-LB/11

Date: 31/07/2025

I, Luke Bullock, will say as follows: -

Introduction

1. I'm the Company Director of Springfield Of Burton Ltd. Within my role as the director of a small business, I oversee the day to day running of the business. I order stock, maintain the website and ensure we are compliant with current legislation.
2. We are a third generation family business established in 1973, supplying bushcraft, outdoors and field sports equipment to schools, local authorities, scout groups, outdoor educators and the general public. We have over 1000 scout groups, charities, outdoors centres and outdoor educators with trade accounts on our website. We employ 5 people including myself. Springfields of Burton Limited is owned by Bullock Holdings and both entities are UK registered.
3. This witness statement is made to assist the Southport Inquiry (the "Inquiry") with the matters set out in the Rule 9 Request dated 28th July 2025.

Factual narrative of involvement

4. The first contact we had from AR using the pseudonym "Alice [DPA]" was when the order was placed on the 10th of June 2023.
5. **Date:** 10.06.2023 **Time:** 23.32 **Action:** An order was order placed on Springfields.co.uk with the following details:
6. Delivery Address:
Alice [DPA]
10 Old School Close
Banks
PR9 8SB
7. Billing Address:
Alice [DPA]
10 Old School Close
Banks
PR9 8SB
8. Items Ordered
22 inch Bushcraft Survival Machete (SKU: R2250) £9.49

Extra Large Sharpening stone (SKU: 68064C) £3.32

9. Other Costs

Postage of £4.49

Total Cost: £17.30

10. The order was paid using the Paypal payment gateway. Paypal shows a payer email address of a.megalia7@yahoo.com for this transaction.
11. **Date:** 10.06.2023 **Time:** 23.32 **Action:** An order confirmation automatically sent by our ecommerce system. A copy of order confirmation email sent to a.megalia7@yahoo.com which I exhibit as **LB/01-** **SPRB000002**
12. **Date:** 12.06.2023 **Time:** 08:37 **Action:** Email received from a.megalia7@yahoo.com to support@springfields.co.uk stating: "Do I need to show ID?"
13. **Date:** 12.06.2023 **Time:** 09.20 **Action:** Springfields age checker checked the electoral register against 'Alice **DPA**' our age checking software was run for all of the weekends orders including that of AR under the name 'Alice **DPA**'. Our software queries the Electoral Register for the name of the person who has ordered against their delivery address.
14. Our software did not find an 'Alice **DPA**' at 10 Old School Close, Banks, PR9 8SB so an email and a text message were automatically sent to the contact details as per their order (phone number: 07428362306, email: a.megalia7@yahoo.com)
15. The wording of the message was the following: "Hello Alice, Your order has failed age verification. We have looked for any previous orders which have been placed with this email address and also performed a search on the electoral register. Could you please reply to this email with a copy of your photo ID? If a mobile number was provided with your order, a text message has also been sent to you. You only need to send your ID once. Kind Regards, Springfields.co.uk"
16. **Date:** 12.06.2023 **Time:** 10.00 **Action:** Email sent from support@springfields.co.uk in reply to a.megalia7@yahoo.com "Hello Alice, As you have ordered an age-restricted item we have to by law confirm that the person receiving this order is over 18, we do this via either the electoral roll or via some form of I.D Would you be able to email us a photo or scan of either your driver's license, passport, or birth certificate showing your full name and date of birth? Kind Regards, Ginette Springfields Powered by eDesk, the world's #1 eCommerce customer support software"
17. **Date:** 13.06.2023 **Time:** 08.53 **Action:** Email received from a.megalia7@yahoo.com. An email containing an ID with the name 'Alice **DPA**' was received from a.megalia7@yahoo.com which I exhibit as **LB/02-** **SPRB000003**
18. **Date:** 13.06.2023 **Time:** 11.42 **Action:** Email sent from age@springfields.co.uk to a.megalia7@yahoo.com "Good Morning Alice, Thank you for confirming your age, your order will be dispatched without delay. If you order again you will not be checked a second time. I hope that helps, should you have any questions in the future please don't hesitate to

contact me I would be happy to help. Kind Regards Hayley Florence Assistant Manager Springfields”

19. **Date:** 13.06.2023 **Time:** 12.35 **Action:** Order Printed, Picked, Packed and Dispatched to DPD. Order Printed, Picked and Packed ready for collection by DPD. When the order was scanned by DPD an email would have been sent to a.megalaria7@yahoo.com with tracking information.
20. **Date:** 13.06.2023 **Time:** 13.45 **Action:** An email with tracking information sent to a.megalaria7@yahoo.com“ Thank you for your order from Springfields. If you have questions about your order, you can email us at support@springfields.co.uk [mailto:support@springfields.co.uk] . Your shipping confirmation is below. Thank you again for your business. Your Shipment #000060462 for Order #000037783 Shipped ByTracking NumberDPD UK:15501504267797 [https://www.springfields.co.uk/shipping/tracking/pop up?hash=dHJhY2tfaWQ6MT Q5NzE5OjRmNWM1ZGQ3Nj czMWZjYzE2YTc3MzNIYzdj “
21. **Date:** 13.06.2023 **Time:** 13.55 **Action:** Email from DPD to a.megalaria7@yahoo.com “We’re expecting your Springfields parcel. We'll be in touch when we have it and it's out for delivery Remember, your driver will need to see proof of age! We won't ask you to sign for your parcel, we'll take a photo of it instead in your open doorway as proof it has been delivered. Show my options Your parcel: 1550 1504 267 797 Choosing to have your parcel delivered to a DPD Pickup Point, can reduce CO2 emissions per parcel by 63%”

AR's purchase from Springfields in June 2023

22. AR under the pseudonym “Alice [DPA]” ordered a 22 inch Bushcraft Survival Machete (SKU: R2250) Which I exhibit as LB/03- [SPRB000004] This is an agricultural style basic machete primarily used by those wanting to clear areas of overgrowth. This type of machete comes with a fairly dull edge.
23. Extra Large Sharpening stone (SKU: 68064C) which I exhibit as LB/04- [SPRB000005] This is a basic tool sharpening stone, typically ordered for use with tools such as axes and machetes
24. The photo in the documents provided to as part of the rule 9 request looks to be the machete purchased from us, I recognise the folded up invoice from us in the photo with our logo. The items look not to have been opened and the invoice was also still folded. The total length of the machete ordered is 22”

Age Verification Procedure

25. In 2023-2024 we were using the age verification methods as outlined in the Offensive Weapons Act 2019, this stipulates that the seller must operate an age verification system and dispatch the items using an age verified courier.
26. This involved checking all orders against the electoral register when an order was placed and only dispatching checked orders with age verified delivery.

27. If an order failed it would be held on our system, this would prevent it from being dispatched, printed or altered in any way until age verification had been completed or the order cancelled.
28. Once an order was successfully age verified a note would be added to the order with the age verification method and the order would be released for dispatch.
29. There were a number of failsafes to ensure items could not be sent without the appropriate delivery and checks. When a new item was added to our website it would be added as a bladed item by default which would then have to be manually changed to 'unrestricted' if it was something which did not require age verification, such as a rucksack. All orders are set to be age checked unless manually removed from the age verification process and orders are not able to be printed unless they have an age verified note on them or a note stating that they are not age verified, which has to be applied manually.
30. All orders that required age verified delivery were sent with a red square on the shipping label which read 'Bladed Items Delivery To 18+ Only" As well as being sent on an age verified delivery service. DPD provides us with two accounts; one for age verification and one for standard non restricted parcels. Our age verified account is set by default to verify every parcel that is sent on that account. The delivery service was set automatically to this age verified service, this ensures that our staff don't have to manually select age verification on delivery and it is set when an item is first added to our website. AR's parcel was sent via our Age Verified DPD account.

Internal Policies

31. At the time AR placed his order with us our policies were to ensure that all items that are placed on the website were labelled correctly as bladed items. Our staff were trained on how to spot fake IDs using either a driving license or passport number. All initial orders from customers were age checked against the electoral register. If the order raised suspicion or met certain criteria they would be asked for a reason for purchase then either dispatched, refunded or refunded and reported. If someone attempted to order in one name then placed an order in a second name, we would not allow the second order to be processed until ID was seen for the name on the initial order.
32. We use these rules as a baseline, as we're a small company we are able to adapt to different circumstances. At the time and it is still the case today that it is a regular occurrence for a different ID type or scenario to come up and for one of our two customer service agents to call me to give approval.
33. In one example order from October 2023 a customer tried to order multiple items and when questioned they said they were an outdoor educator, which is our policy to accept. However, when we asked for more evidence a website address was provided several days later on which it looked like you could book a course and see information about the group. When I was asked by my colleagues to check the information, I found that the website had recently been created and the course booking form was a template and didn't work. I forwarded it to the Met

Police who later confirmed that it was a child attempting to order using a parents ID, their child had made the website in order to attempt to circumvent our age verification procedure. The two members of staff who were age verifying were our most senior and had been with the company for 7 years and 9 years at the time and helped shape our operating procedures on a day to day basis.

Public Facing Policies

34. There are a number of public facing places on our website to be informed of age verification. This includes when a customer has an age restricted product in their basket our website changes the shipping options to only show age verified delivery, I have exhibited this as **LB/05-SPRB000006**
35. There is a shipping policy popup link on the checkout which states age verification may be required, this is exhibited as **LB/06-SPRB000007**
36. Item 1 of our terms and conditions states that products may be age verified, our terms and conditions are exhibited as **LB/07-SPRB000008**
37. We also have an FAQ page with details of how old you need to be to order at the top of the page, I exhibit this section as **LB/08-SPRB000009**
38. As well as age specific age verification FAQs which I exhibit as **LB/09-SPRB000010**
39. Our privacy policy also states: "When purchasing age restricted goods from our website, age verification will be performed using the electoral roll. If no result can be found we will use your data to search Companies House and previous orders for a matching postcode. Other data sources may be used to aid identification if the process of age verification falls outside of the usual protocol for checking age or validity of order. If all other methods fail you will be contacted on the numbers provided on your order to request ID to be sent. ID will be stored off site on secure servers, using two step authentication. You may request your photo ID to not be stored by us, in this case the digits from your ID will be stored using strong encryption in our order management system (Linnworks - You can read their Privacy Policy here - <https://www.linnworks.com/linn-systems-privacy-policy>). This is to comply with any request from law enforcement."
40. Our Personal Data Policy: "11. The Reduction of Knife Crime. In order to help the reduction of knife crime, orders which are placed with a fake or edited ID or method of verification may be passed to any publicly funded body including but not limited to The Police or Trading standards. If we suspect an order has been placed in order to supply knives to anyone who would otherwise but unable to purchase them legally your details may be passed on also. "

Delivery Companies

41. At the time we used two delivery companies for our age verification, DPD & Royal Mail. They both offered an age verification on delivery service which is widely used in the bladed product industry. When age verification is selected for relevant orders, we know from experience and customer feedback it is used on delivery. Presently the method of age verification is not fed

back to the retailer by Royal Mail or DPD. However, they hold legal responsibility as per the Offensive Weapons Act 2013 to ensure age verified delivery is adhered to.

Age verification before access to the website

42. We do not restrict access to our website by initial age verification on entry. I have not seen this implemented in a way which would function like the requirements for the Online Safety Act (by limited access to view age restricted products). The reason for this is with around 2000-3000 visitors to the site every day and there being a significant cost to any meaningful age verification, this is not practical. The alternative would be for users to enter a date of birth to view those pages although that functionality is not currently available in our ecommerce platform and in doing so may make potential underage purchasers think they have “passed” some kind of age verification.

Age Verification

43. We first tried to age verify 'Alice DPA' at the address given to which there were no results on the electoral register. This is not unusual as many people are not registered to vote and also the address data can be up to 12 months out of date by which time customers may have changed their residential address. Consequently, we then automatically sent a text message and email to request ID. An ID was sent in the name on the order so all legal requirements were met to dispatch the order with age verified delivery, furthermore none of the risk factors at the time were met to raise the order as suspicious. The offensive weapons act 2019 was bought in at the time to address exactly this kind of scenario. Prior to the offensive weapons act websites selling online were required to age verify but not use age verified delivery, the intention was to stop underage buyers using an ID from someone over the age of 18 but getting it delivered to someone under 18.

44. AR ordered with a shipping address in Banks but provided ID for an address in Sunderland. Ordering from one address and being sent to another is quite commonplace in online ordering as generally deliveries are made when people are at work so customers will get items delivered to a spouse or their own work address. We accept passports as age verification too, which do not show a current address so to make a policy to check it would not be practical for all ID types. Although it is used as a risk factor, alongside other factors if we have any suspicion of a purchase not being legitimate.

45. We routinely receive email questions about our age verification policy, usually from first time buyers asking if they would need to provide ID or how they'd send in a photo of ID. These questions are usually from older customers who struggle using IT rather than probing questions from underage buyers, who are usually more technologically savvy. If we received genuine questions which fall outside of those which we would normally expect then they would again lead to us flagging the order.

46. If any order is flagged or for certain items we ask for a reason for purchase, this policy was introduced after AR's purchase so was not in place at the time. This is still not a legal requirement, however we routinely ask bulk purchasers of bladed items or orders which raise suspicion within our criteria, if no valid reason is given and the order has met several of our criteria that information is then sent to the Met Police. We have been forwarding intelligence reports to the Met Police since January 2022 on a voluntary basis.

DPD Obligations

47. As detailed in the letter exhibited as LB10- [SPRB000012] dated 24/10/2022 our agreement was for DPD to age verify all of our parcels on our 'Age Verified' account at the door to ensure they are only handed into the hands of someone 18 or over to comply with the Offensive Weapons Act 2019
48. The expectations are laid out in the provided document and applied to our account, on a per parcel basis as outlined above these items are restricted to age verified couriers from the moment they are available on our website.
49. We received no correspondence from DPD nor the Police to inform us of the outcome. Receiving this request this was the first time we have been informed that the machete was physically found at the Old School Road premises, although I was aware AR had purchased from us. The last correspondence I have from the North West Regional Organised Crime Unit (NWROCU) on the delivery was "I have followed this up with DPD who have no record of any parcel being carried by them to this address at the time the purchase was made."
50. We regularly receive and send parcels with DPD using this service both professionally and personally and have never known them not to check age. We regularly receive customer feedback that indicates age verification takes place as well as parcels returned due to no one being home or no one being able to provide ID.

Reflection on events

51. After being notified that the buyer was AR, we have investigated whether there was anything we could have done differently. However, there were none of the usual markers which would have led us to believe the purchase was not for a legitimate customer, if there had been multiple purchases or multiple items, an edited ID, the order placed in one name and ID provided in another or anything that gave our order processors at the time a reason to flag the purchase, then they would have. The order also wasn't in one of our high risk knife crime areas, wasn't placed in the early hours of the morning and wasn't placed with next day delivery.
52. AR also purchased a sharpening stone which legitimate buyers in need of such a tool would purchase in order to maintain the blade. The order was also not part of a string of orders to that address. The order was placed in a name to which age verification was provided. The driving license provided did not appear to be tampered with or edited to our knowledge.

53. If any suspicions are raised about an order we also use the purchaser's email address as a risk factor when deciding whether or not to fulfill the order. Although it is noted in this case the first initial was the same and the email address could have reasonably been for 'Alice'. It is quite common to have an email address which does not include your name. This was routinely being looked for by our order processing staff. Around 3 weeks before AR placed their order we had flagged a completely unrelated order due to the email address, which was sent to the Met Police. At the time I wrote to our Police contact "This person sent us their birth certificate which shows they were born in 1962. I don't think it is really 'Barbra' ordering, judging by the email address." The name on the order was 'Barbra Brown' but the email address was DPA, coupled with the quantity of items (3) this order was deemed not legitimate.
54. We are always looking for ways to improve our age verification systems. We have some of the most stringent checks in our industry and implementing video ID for purchases of bladed items that fail age verification via electoral register would have prevented AR from ordering. Currently it is not automatically applied to all orders as the request is a manual process which is used for orders which are flagged. In the last 12 months or so this technology has been available to smaller retailers and is starting to be used in our industry, it is something we are going to adopt across various product groups.
55. With the knowledge we had at the time we were confident that age verified delivery would capture any attempts to circumvent age verification. The Offensive Weapons Act had commenced around 14 months before and age verified delivery was seen then as the 'new' solution to underage buyers using someone else's ID. In this case, as we are confident that DPD would have age verified at the door, we are under the assumption that a neighbour at number 10 or parent or guardian handed the parcel, labelled with 'bladed items over 18 only' and 'Alice DPA' to AR, if it is the case that the parcel was found in AR's home and AR had access to it.
56. Currently, a team of two people are responsible for checking IDs and orders. We are constantly adapting to new technologies, profiles and altering our age verification processes to suit. This includes asking purchasers for a reason for purchase, looking for any indicators that a person may not be who they say they are. If we're unsure we have now built our own video ID system which will request a photo ID and a short video ID, these cannot be uploaded at a later date and must be filmed using a computer website or a smartphone on request.
57. If any suspicions are raised by a question such as "Can I provide ID for a friend?" or "Can I change the name on an order?" We use those kinds of emails as a risk factor if an order is received that we are unsure of its legitimacy. In this case "Do I need to show ID?" is a fairly common question when using our age verification systems as our messaging suggests that we will be in contact if ID will need to be provided. If we suspect that someone may be using an adult's ID and we are still unsure we will call the number and speak to the customer to try and ascertain who they are.

58. Since 2016 I have been involved in shaping knife legislation, I started by attending meetings of retailers at New Scotland Yard in 2016 and started liaising with contacts I made in the Met Police. This work meant that I was part of a Knife Retailer Working Group who discussed topics such as new and current legislation, current issues the police are facing and problem areas such as social media sales. I have also been on the Met Police Steering Committee. I have worked with local Trading Standards on a publicity video for OpSpectre which is a bi annual week of action on knife crime.
59. Through the contacts made in the Met Police I was able to start a scheme intelligence sharing for suspicious orders. If we receive fake ID or have a large order of bladed items with no legitimate reason given for purchase we would routinely refund orders and receive a reply along the lines of "i'll go elsewhere, they let me order". This felt like I was not really solving any issues, more passing the potential problem on. With a change to our privacy policy to comply with GDPR I established a relationship with a Met Police contact who takes any order information and compiles an intelligence report. The work we do with this scheme has now lead to it's implementation into the Crime & Policing bill, currently in the House Of Lords.
60. We are heavily led by feedback from the Police on what the current issues they face are, currently bulk purchases of items that may be sold on social media is their main area of concern.
61. We now have a page on our website on UK knife law explaining some of the legislation, we utilise this page for any questions from trade or retailer customers as a starting point, this wasn't published until November 2023, which I exhibit as LB/11-SPRB000011
62. We are well known in our industry to be well versed on UK knife legislation. We attend a trade show every year with scout groups and have a variety of different knives on display as well as a flow chart indicating the differences with finger guards and blade types. We also have over 1000 scout groups, education, council trade customers and a regular question is on the legalities of knives for scouts. I have also written for a bushcraft magazine before on UK knife legislation.

Improvements

63. Whilst it is difficult to find criteria from within the data we received from AR that would have prevented the purchase, from media reports at the time it seems that the relevant information would have been available to other agencies.
64. We have a system in place which allows us at the age verification stage to block postcodes & addresses. Currently, due to GDPR we are unable to share data with other retailers and no data is shared with us from other sources. This means in order to block an address we must have had a problematic or suspicious order in the first place.
65. It would be extremely useful to have a system in place which would allow law enforcement, social services to flag addresses and parents to add their own addresses to a list which either notifies or blocks purchases to that address. A reason wouldn't have to be given to retailers

and to comply with GDPR the list wouldn't be viewable, but searchable by anyone with the correct credentials, returning a 'true' or 'false' for if the address is blocked or not. If this could be queried by ecommerce platforms or couriers it could prevent cases like this regardless of age verification or delivery methods.

Statement of Truth I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed: Luke Bullock

Signature

Dated: 31/07/2025