



The Royal College of Pathologists' response to Strengthening the regulation of commercial sunbeds in England - consultation document

August 2026

Mandatory age verification through ID checks

This policy option would require businesses offering sunbed services to verify the age of users through an approved form of identification, such as photo card ID, prior to sale or use.

Question for all respondents

Do you support or oppose mandatory ID checks of sunbed users to verify their age?

- Strongly support **Yes**
- Support
- Neutral
- Oppose
- Strongly oppose
- Prefer not to say

Question for all respondents

Do you support or oppose mandatory supervision of sunbeds?

- Strongly support **Yes**
- Support
- Neutral
- Oppose

- Strongly oppose
- Prefer not to say

Please provide further details about any support you would require. (Optional, maximum 300 words, do not include any personal information in your response)

Prohibiting the sale or hire of sunbeds to people under the age of 18

This policy option would prohibit businesses from selling or hiring out sunbed devices to people under the age of 18 (under 18s) for use outside of business premises. This is in addition to the existing prohibition of the sale of sunbed services within the business premises.

Question for all respondents

Do you support or oppose prohibiting the sale or hire of sunbeds to under 18s?

- **Strongly support Yes**
- Support
- Neutral
- Oppose
- Strongly oppose
- Prefer not to say

Mandatory provision of health risk information

This policy option would require businesses to provide clear, accessible and accurate information on the health risks associated with sunbed use before the sale of sunbed services.

Question for all respondents

Do you support or oppose the mandatory provision of clear and accessible information on health risks associated with sunbed use?

- **Strongly support Yes**
- Support
- Neutral
- Oppose
- Strongly oppose
- Prefer not to say

Question for all respondents

Do you support or oppose mandating businesses to provide protective eyewear?



- Strongly support **Yes**
- Support
- Neutral
- Oppose
- Strongly oppose
- Prefer not to say

Prohibiting the promotion of unproven health benefits

This policy option would prohibit businesses from promoting unproven or misleading health benefits of sunbed use.

Question for all respondents

Do you support or oppose the prohibition for businesses to promote unproven health benefits of sunbed use?

- Strongly support **Yes**
- Support
- Neutral
- Oppose
- Strongly oppose
- Prefer not to say

Impact of the proposed regulations

To what extent do you agree or disagree with the following statements?

The proposed regulations would improve user awareness of the health risks from sunbed use.

- Strongly agree
- Agree **Yes**
- Neutral
- Disagree
- Strongly disagree
- Don't know

The proposed regulations would prevent use of sunbed services by under 18s.

- Strongly agree **Yes**
- Agree
- Neutral



- Disagree
- Strongly disagree
- Don't know

The proposed regulations would improve protection of sunbed users' health.

- Strongly agree **Yes**
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

Further comments

Please include any further comments that you wish to share. (Optional, maximum 300 words, do not include any personal information in your response)

If you would like to upload a document to support your submission, you will be able to do so. (Optional, please do not upload information that could identify you or another member of the public)

- There are concerns about the sustainability of the cellular pathology workforce (from which the dermatopathology workforce is drawn).
- Only 8% of histopathologists who responded to the RCPATH 2025 Census said staffing levels are adequate for current and future sustainable demand.
- NHS England workforce data 2016 – 2026, indicates a small (<2%) annual increase in workforce each year. This contrasts with Cancer Research UK data in [Estimating the cost of growing the NHS cancer workforce in England by 2029](#) which showed that a 47% growth was needed in histopathology (553 WTE) by 2029 to grow the cancer workforce. Workforce numbers remain far lower than this recommended requirement.
- Demand for pathology services is rising faster than the supply of trained pathologists. The workforce faces mounting pressure from rising workload, increasing complexity and persistent staff vacancies. Chronic workforce shortages across all areas threaten patient safety and service delivery.
- Aligned with the [RCPATH Workforce Strategy 2025–2028](#), action is needed to train more pathologists, retain existing staff and reform service models. Contingency measures must also ensure that patient care remains a priority by using the current workforce most efficiently.
- Investment is essential – both in expanding core pathology workforce capacity and in modernising pathology services through innovation and technology.



Contact details

This response was collated by Janine Aldridge, Public Affairs Officer, the Royal College of Pathologists, with input from the College's Specialty Advisory Committees.

Please contact the College if you have any questions on.

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About the Royal College of Pathologists

The Royal College of Pathologists is a professional membership organisation with more than 11,000 fellows, affiliates and trainees, of which 23% are based outside of the UK. We are committed to setting and maintaining professional standards and promoting excellence in the teaching and practice of pathology, for the benefit of patients.

Our members include medically and veterinary qualified pathologists and clinical scientists in 17 different specialties, including cellular pathology, haematology, clinical biochemistry, medical microbiology and veterinary pathology.

The College works with pathologists at every stage of their career. We set curricula, organise training and run exams, publish clinical guidelines and best practice recommendations and provide continuing professional development. We engage a wide range of stakeholders to improve awareness and understanding of pathology and the vital role it plays in everybody's healthcare. Working with members, we run programmes to inspire the next generation to study science and join the profession.

