

# Delivering a problem?

ALCOHOL

CHANGE<sup>UK</sup>

Online sales and deliveries of alcohol – how robust are current systems in **protecting** children and vulnerable adults from alcohol harm?

## Executive summary

In recent times, UK consumers have been buying alcohol online in record numbers, from an ever-growing variety of retailers, increasingly promising delivery to the doorstep within minutes.

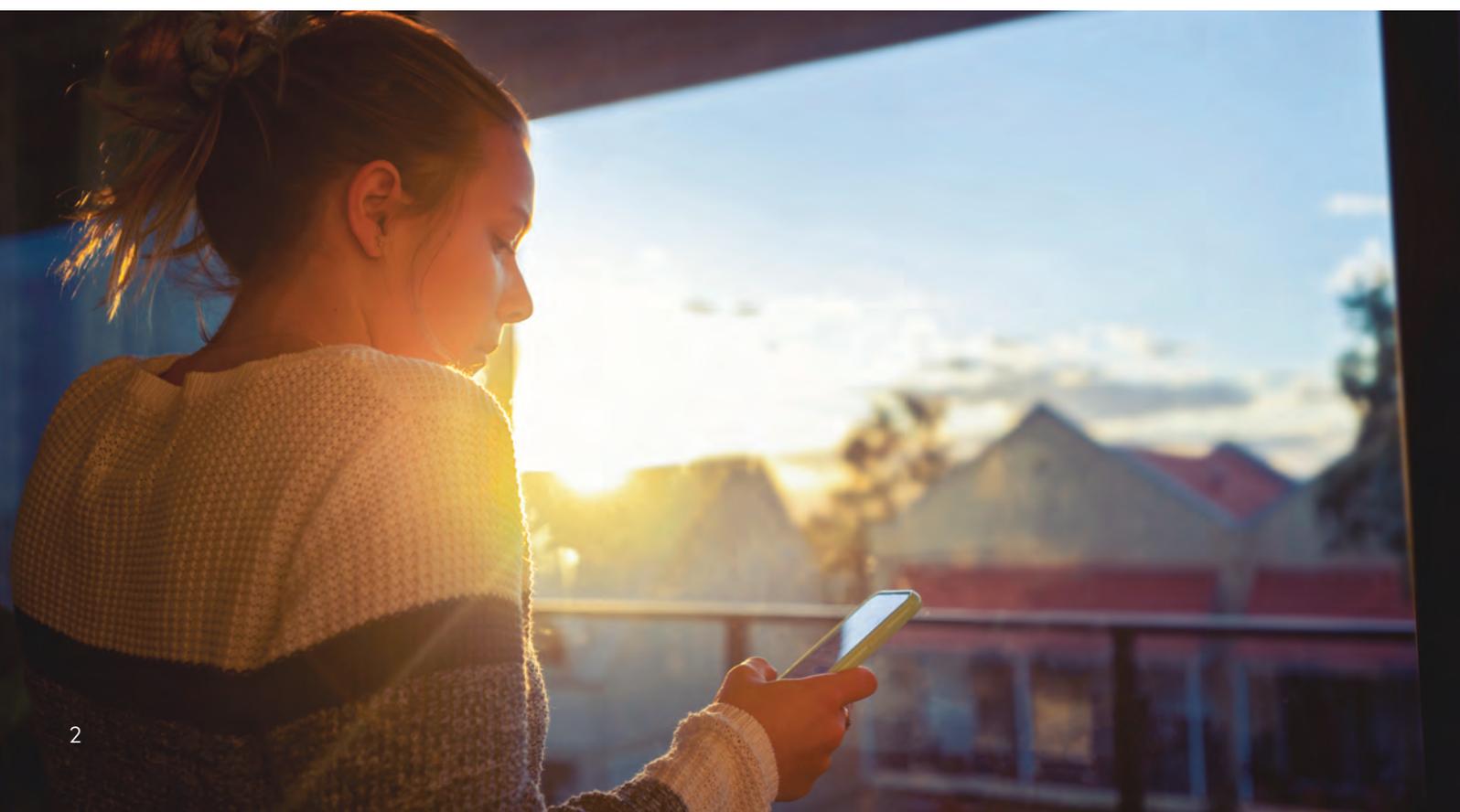
However, as the market continues to expand, Alcohol Change UK's commissioned research questions how robust current systems are in protecting children and vulnerable adults from alcohol harm. In particular:

- Research from Wrexham Glyndŵr University, commissioned by Alcohol Change UK, examined online age verification controls on retailers' websites. The research identified major weaknesses, concluding that current methods of online age verification are "largely ineffectual"
- A test purchases operation, commissioned by Alcohol Change UK, tested a range of online retailers selling alcohol. It found that in 72% of cases where alcohol was ordered for delivery within two hours, this was subsequently handed over to the 18- and 19-year-old test purchasers without seeking proof of age. This is in direct contravention of retailers' own policies on delivering age-restricted items to those who may be underage
- Qualitative research, undertaken by Cogent Research on behalf of Alcohol Change UK, revealed

confusion amongst delivery drivers about retailers' policies on age verification, and a lack of effective age verification training. Similar concerns were identified in relation to deliveries to intoxicated customers.

The findings suggest that retailers selling alcohol online are failing in their responsibilities to ensure that alcohol is not being delivered to minors, or intoxicated adults, on the doorstep and immediate improvement is needed. We recommend taking a multi-component approach to this issue, including:

- A robust training and support system being set up by retailers, to enable their delivery drivers to effectively and routinely refuse to hand over alcohol to anyone underage or showing visible signs of intoxication
- Police and trading standards teams across England and Wales routinely undertaking test purchase operations using participants under 18 years of age, to test retailers' adherence to the law and their own policies in not selling or delivering alcohol to minors; with consideration also given to how best to test whether alcohol is being delivered to people who are intoxicated
- Further research examining the extent to which minors may be acquiring alcohol via online sales and home deliveries
- Revisiting the licensing legislation in England and Wales, and the associated guidance, to ensure it provides the necessary clarity for all concerned about their roles and responsibilities when selling alcohol online and delivering it to people's homes.

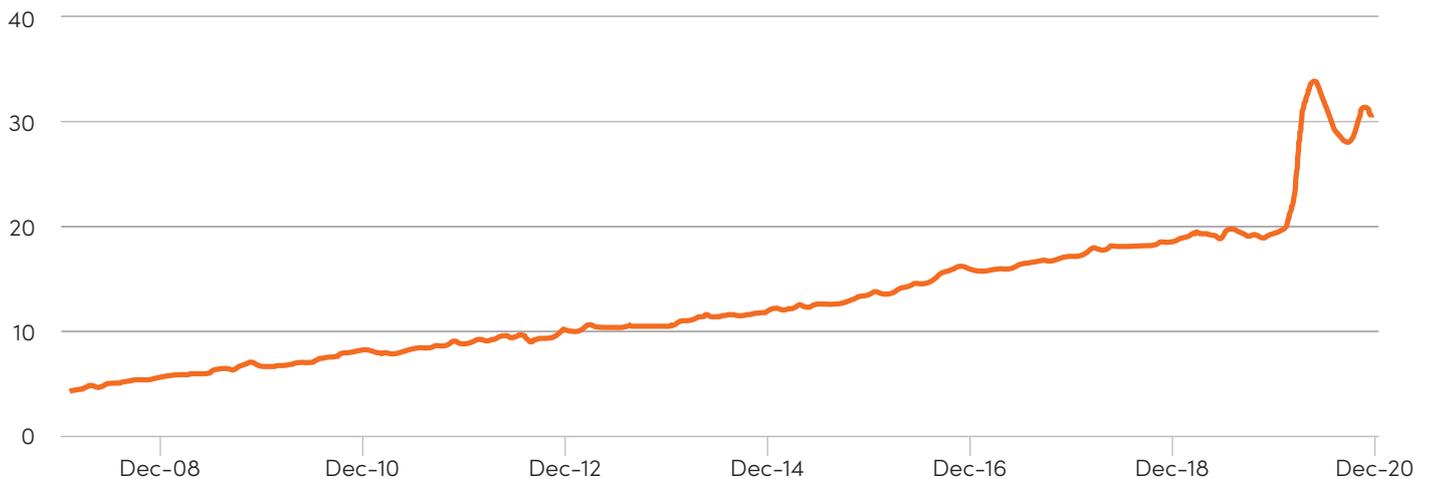


## Background: the boom in online shopping

We have become a nation of online shoppers. As a proportion of all retail sales, the money spent online by consumers in Britain has increased more than threefold over the past decade or so, from a monthly average of around 5% in 2008 to nearly 18% in 2018.<sup>1</sup>

The COVID-19 pandemic and the regulations put in place in response to it – including lockdowns, rules around social distancing, and the requirement to wear masks in stores – have prompted even more of us to switch our shopping online, to such an extent that online sales represented more than a third (33.9%) of total retail spending in Britain in 2020.<sup>2</sup>

**Figure 1: Great Britain internet sales index: value seasonally adjusted internet sales as a proportion of all retailing<sup>3</sup>**



Clothing and footwear retailers continue to be the main destination for online shoppers;<sup>4</sup> however shopping for other items, in particular online groceries, has become increasingly popular in recent years.

Again, the pandemic triggered a sharp upturn in this trend. Research published by a leading UK supermarket in August 2020 reported that 77% of people did at least some of their grocery shopping online, compared to 61% a year prior.<sup>5</sup> This sharp growth was most pronounced in the over-55 age group, many of whom say they will continue to do at least some grocery shopping online post-pandemic.<sup>6</sup>

“E-commerce accelerated everywhere through 2020, but the growth was very acute in total beverage alcohol.”

Ivan Menezes, Chief Executive of Diageo, 2021<sup>8</sup>

Online food and drink delivery services have also reported huge increases in demand: Just Eat, which saw the largest growth, was visited by nearly 10 million

people in December 2020, with UK orders 58% higher in the last quarter of 2020 compared to the same period in 2019.<sup>7</sup>

Online alcohol sales hit record figures in 2020, with the value of alcohol e-commerce increasing by 42% in just one year.<sup>9</sup> However, a growing thirst for online alcohol sales was present long before the pandemic hit: in 2017, more than a fifth (21%) of UK consumers had reportedly bought alcohol online, compared to a global average of 8%.<sup>10</sup>

Indeed, even as life in the UK is anticipated to return to a more ‘normal’ footing, online alcohol sales are expected to continue to accelerate internationally across 20 key markets, including the UK, and the value of e-commerce alcohol sales is forecast to grow by 74% between 2020 and 2024.

“People had the necessity of ordering alcohol online [during lockdown], and now they’re starting to wake up to how convenient it is.”

Sara Goucher, Director of E-commerce at Molson Coors, 2021<sup>11</sup>

## Online alcohol retailers

As the trend towards buying alcohol online accelerates, so too do the different categories of retailers offering food and drink deliveries ordered online, illustrated in Table 1 below. Supermarkets and 'corner shops' are no longer necessarily the go-to place for our 'basics' when

it comes to online orders, especially for smaller 'top-up' purchases or impulse buys.

Moreover, the days when we would be required to wait several days for our order are quickly disappearing; instead, products ordered via a website or app can be at our door within minutes.

**Table 1: The increasing variety of retailers in the sector**

Category of online alcohol retailers	Examples	Description
<b>Supermarkets</b>	Tesco, Sainsbury's, Waitrose, Asda, Morrisons, Co-op	Traditional bricks-and-mortar supermarkets, and also some of the first retailers to sell alcohol online in the UK
<b>Online-only grocery stores</b>	Ocado, Amazon Fresh	Online-only entities, although Amazon is also trialling checkout-free physical stores
<b>On-demand retailers</b>	Beelivery, Jiffy, Gorillas, GoPuff, Fancy, Getir, Zapp	Retailers that aim to deliver groceries, including alcohol, within as little as 10 minutes after ordering. Products are sourced from 'dark stores' (small, local distribution hubs) or local suppliers. App-based
<b>Online delivery food services</b>	Just Eat, Uber Eats, Deliveroo	Online retailers acting as intermediary between food and drink outlets and customers. Primarily restaurants, but also tie-ins with major supermarkets and local grocery stores. App-based
<b>Convenience stores</b>	Premier, Nisa, Spar, Londis	Do not offer online shopping, but have joined software platforms like Appy Shop and Snappy Shopper, making their products available for delivery via an app
<b>Specialist retailers</b>	Naked Wines, Virgin Wines, BeerHawk, Honestbrew, Brewdog Beer Club	Subscription-based retailers, primarily online, selling alcohol by the case/box, typically on a monthly basis

Whilst the categories highlighted in **Table 1** appear to be separate entities, the reality is that the boundaries between them are often blurred.

For example, although still primarily physical stores, major supermarkets have quickly recognised the value of rapid deliveries of products bought from their online stores, including alcohol. To illustrate, Tesco has recently teamed up with the rapid delivery group Gorillas to test out 10-minute deliveries from its supermarkets as well as launching its own fast-track delivery service, Whoosh, from its convenience stores in 2021.<sup>12</sup>

Uber Eats, Just Eat and Deliveroo are all partnered with major UK supermarkets,<sup>13</sup> whilst Co-op and

Morrisons customers can now do their full grocery shop on Amazon, with free same-day delivery for Amazon Prime members.<sup>14</sup>

"There has been significant growth from offline to online over the last one and a half years... Now there is a second move from online to on-demand."

Kristof Van Beveren, co-founder of Weezy (now Jiffy), 2021<sup>15</sup>

## Delivering alcohol

Retailers utilise a variety of means to get orders to the delivery destination: employing their own staff, using self-employed drivers or third-party employees.

All of us will be familiar with supermarket-branded vans and uniformed drivers delivering groceries and alcohol to people's homes. In such cases, these delivery drivers are employed directly by the supermarket. An exception is where supermarkets offer rapid deliveries where third-party couriers are used instead: for example, Tesco's Whoosh service is partnered with Stuart Delivery Limited (a part of DPD),<sup>16</sup> whose clients also include online supermarket Ocado, and Brewdog.<sup>17</sup>

In contrast, other retailers such as Amazon Flex use self-employed drivers, as do some on-demand retailers, who can "range from students, Uber drivers, professional driver(s) to those who want to earn some extra cash".<sup>18</sup> In contrast, other on-demand retailers have decided to hire pickers and riders as full- or part-time contracted employees, rather than gig-economy workers.

Meanwhile, specialist retailers like Beerhawk<sup>19</sup> and Virgin Wines<sup>20</sup> use third-party delivery partners such as Yodel, DHL, Hermes and Royal Mail.

## Adults only

All online retailers selling alcohol, that we found, have written policies in place, published on their respective websites, whereby you must be at least 18 years old to use their services and purchase goods for delivery or collection.

Such policies also typically state that age verification on the doorstep will be required for alcohol orders if the recipient appears to be under 18 years old. Half of the retailers included in our research explicitly operate a Challenge 25 policy, whereby anyone who looks under 25 years old will be routinely asked for ID verifying their age (typically a driving licence or passport), with the delivery refused to those unable to provide such evidence. See **Appendix 1** below for a selection of typical online retailers' verification policies.

## Bypassing online checks

In 2013, Alcohol Change UK's predecessor charity Alcohol Concern published the report *On your doorstep*,<sup>21</sup> which examined the efficacy of age verification controls on retailer websites. Such controls were found to offer only a weak barrier to preventing underage sales, one that relied on the honesty of the customer to confirm their age.

In 2019, Alcohol Change UK commissioned Wrexham Glyndŵr University to look again at this issue, to determine whether there had been improvements to online verification on retailer websites. Their report highlighted major weaknesses, concluding that current methods of age verification are "largely ineffectual".<sup>22</sup>

The report confirmed again the reliance on simple 'honour' checks, which are easily deceived, or alternative forms of 'authentication' that can be bypassed in various ways. These comprise either statements of confirmation, whereby the user is shown a statement either on the page or as a modal window that must be ticked prior to an order being placed, or an interface that asks the user to input their date of birth. In addition, some retailers use payment via credit cards as proof that the payee is over 18 (under the terms of the Consumer Credit Act 1974 under-18s are not permitted to take out credit cards<sup>23</sup>). This is problematic, however, for the reasons set out in the report:

"There are clear circumstances where under-18s can obtain and/or use such credit cards. For example, it is possible for an adult to present an under-18 with a legally held credit card in their name where the bill is paid by an over-18. In this case, the use of a credit card cannot be used robustly as a proxy for age, although the retailer has no mechanism to detect if this is the case.

"The same applies to any service... that only allows those over the age of 18 to create accounts (whether purchasing alcohol or not) based on the initial pre-authorisation of a credit card. Anyone could create the account for them."<sup>24</sup>

**Figure 2: Examples of online age verification controls**

**CONFIRM YOUR AGE** ✕

Please confirm you are over 18 years of age.

**Confirm**

Close

Please confirm your date of birth

26 ▼    March ▼    2022 ▼

That age verification checks online can be easily bypassed in theory, however, doesn't tell us what proportion of children may be actually acquiring alcohol in this way. There is no firm data available to clarify this, however there are some indications that the numbers may be significant. Alcohol Concern's 2013 *On your doorstep* report included the results of a survey of 636 young people aged 14 to 17, of whom 15% said that they had successfully bought alcohol online, and over two thirds of these said they found it "easy" to do so.<sup>25</sup> As part of the Wrexham Glyndŵr study, the 93 student participants were asked to recall whether they had purchased alcohol online when under 18 years of age. 8% of the students said they had done so, and 12% said they knew of others who had bought alcohol in this way. Whilst this small sample cannot be considered representative of the wider population, the methods they adopted are revealing – either misrepresenting their age or borrowing an adult's payment card – see **Figure 3** below.

### Figure 3: Sample comments from Wrexham Glyndŵr students

- "Lied about age on collection"
- "Lied about age; no ID check"
- "Websites just asked for DOB or if you're over 18"
- "Adding alcohol onto Mum's weekly delivery without her realising"
- "Ordered on Amazon and ASDA Online; no ID check at purchase or delivery"
- "Amazon account was someone's over 18; signed for by someone else"
- "Ordered off Amazon with Dad's credit card"

Moreover, recent surveys by Community Alcohol Partnerships in England and Scotland (with sample sizes of up to 640 each) have found that between 2% and 20% of under-18s in various areas have said they "usually buy alcohol online".<sup>26</sup>

## Putting age verification to the test

Alcohol Concern's *On your doorstep* report included the results of a test purchases operation in Cardiff, carried out by South Wales Police and involving 15-year-old participants. Out of a total of nine occasions whereby alcohol was purchased from supermarkets online, on four occasions alcohol was handed over to the 15-year-olds without asking for proof of age, essentially failing the retailers' own voluntary pledges to not deliver alcohol to minors.

In 2021, Alcohol Change UK sought to test again online retailers' compliance with their published pledges. On this occasion, the work was undertaken by a leading third-party ID testing company, recruiting 18- and 19-year participants (for legal reasons, the operation was not able to include participants under 18 years of age).

All of the retailers included have published policies not to deliver alcohol to under-18s, and most explicitly reference operating a 'Challenge 25' policy (or equivalent), meaning that anyone who reasonably looks under this age will, in theory, be required to produce valid identification that confirms they are aged 18 or over in order to receive their goods.

A wide range of online retailers were included in the operation, including major supermarkets, app-based delivery services and online retailers partnering with local convenience stores, to gauge levels of compliance across the sector. Each of the alcohol purchases was for delivery within two hours of ordering.

### Figure 4: Retailers included in the test purchases operation:



## Findings

Fifty test purchases were made in February 2021 from a total of 12 retailers, where alcohol was ordered online to be delivered within two hours. Each of the retailers included were tested at least twice and a maximum of six times. On the majority of occasions (46 times) alcohol was ordered for delivery alongside food; on four occasions alcohol was ordered on its own.

The operation found that alcohol was handed to the 18- or 19-year-old recipients on the doorstep without requesting to see a valid photo ID to verify their age, on 36 of the 50 occasions – a compliance rate of just 28%. No individual retailer recorded a compliance rate of more than 50%, and two retailers recorded a 0% compliance rate.

Alcohol was handed over, without requesting ID to verify age, on 36 of the 50 occasions – a compliance rate of just 28%.

Appropriate age-verification was deemed to have occurred on the 14 occasions (28%) when the driver requested ID showing proof of age and examined it. On three of these occasions, the driver also asked the recipient to state their date of birth.

On six of the 36 occasions on which a failure was recorded, the driver verbally requested the recipient's age and entered this in their device but did not request proof of age; in other words, a verbal confirmation from the recipient that they were over 18 was deemed sufficient. On the remaining 30 occasions, the recipient's age was not requested, nor proof of age. On one occasion, there was no dialogue at all between the recipient and driver. More positively, on no occasions was the alcohol left on the doorstep unattended – see **Appendix 2** below.

Retailers selling alcohol online are failing across the board to consistently ensure that alcohol is not being handed to minors on the doorstep.

These findings suggest that retailers selling alcohol online are failing across the board to consistently ensure that alcohol is not being handed to minors on the doorstep. As the recipients in question were over 18 years' old, no laws have been broken (see below), but there is a clear failure of adherence from retailers to their own policies which state that photo ID will be requested in all cases where the receiver of the goods looks under the age of 25.

The purpose of such policies is to reduce the incidence of underage drinking, and their adoption in physical stores has contributed to raised standards of age checking: in December 2015, supermarkets, convenience stores and petrol stations selling alcohol were reported to have passed over 80% of age verification tests.<sup>27</sup>

A compliance rate on the doorstep of 28% therefore represents a significant failure. In 2013, in response to the test purchases operation findings reported in *On your doorstep*, retailers suggested the lack of compliance was the result of driver error. These new findings come from a larger sample and it is consequently much more difficult to lay the blame again on individual drivers – they suggest a more systemic failure.

Indeed, in 2018 a separate and larger operation involving 4,395 mystery shoppers ordering alcohol and other age-restricted goods from online retailers, also reported a compliance rate of below 50%.<sup>28</sup> It is quite reasonable to presume that the COVID-19 pandemic and accompanying social distancing rules have presented new challenges for age-checking on the doorstep, however these figures suggest that the problem has existed long before this arose.

## Online alcohol sales and the law

The Licensing Act 2003, applicable to England and Wales, is nearly 20 years old, passed at a time when online shopping was in its infancy. Is the Act fit for purpose when it comes to online sales and home deliveries of alcohol?

One of the original aims of the Act, namely to protect children from harm, is as important as ever and clearly set out as one of the four overall objectives.<sup>29</sup> Similarly, a Home Office policy paper on alcohol sales clearly states that (with a few limited on-trade exceptions) the sale of alcohol "to anyone under the age of 18 is illegal in England and Wales."<sup>30</sup>

It is Section 151 of the Act that deals specifically with the delivery of alcohol to children, and it states that no offence is committed where "the alcohol is delivered at a place where the buyer or, as the case may be, person supplied lives or works" even if that person is under 18 years of age.<sup>31</sup> In short, in England and Wales, it seems there is no offence of delivering alcohol to a child.

Section 190 of the Act states that "the sale of alcohol is to be treated as taking place where the alcohol is appropriated to the contract", (i.e. the place where it is identified and specifically set apart for delivery to the purchaser);<sup>32</sup> however, accompanying 2017 Home



Office guidance says that it is “the responsibility of the person serving or delivering the alcohol to ensure that age verification has taken place and that photo ID has been checked if the person appears to be less than 18 years of age”<sup>33</sup>.

This could be interpreted as meaning that age verification is required at both the online transaction stage and subsequently on delivery. Therefore, either the legislation itself, or the accompanying guidance, would benefit from clarification.

Interestingly, in Scotland’s Licensing Act 2005, Section 108 – which covers the delivery of alcohol to children – makes it an offence to deliver alcohol, or allow it to be delivered, to a child, without the exception made in Section 151 of the Licensing Act 2003 referenced above i.e. when delivered to a person’s home or workplace.<sup>34</sup>

Northern Ireland’s Licensing and Registration of Clubs (Amendment) Act 2021, which will come into force in April 2022, places an additional requirement on the person delivering the alcohol: namely, that as well as checking for appropriate ID (as per the 2017 Home Office Guidance for England and Wales, and Section 108(7) of the Licensing (Scotland) Act 2005), there is also a requirement to “enter in the delivery book or invoice that the holder, servant or agent was carrying... the description of the document that was shown”.<sup>35</sup> In other words, all delivery drivers must not only require ID to be shown to verify age, but also record what kind of ID it was.

Following the new regulations in Northern Ireland, Asda have stated that they are strengthening their own processes for delivering alcohol to customers via online delivery. From April 2022, the company’s policy is that all orders containing alcohol, across the UK, must be manually checked by the driver, including recording if the customer in question can provide age identification and what type of ID is presented. It is not yet clear whether other retailers are taking the same UK-wide approach to the new Northern Ireland regulations.

## Delivering a problem?

Back in 2013, in response to Alcohol Concern’s *On your doorstep* findings, a spokesperson for the British Retail Consortium insisted that, as well as there being “robust systems in place for age-restricted products purchased online”, all “delivery drivers are trained to ask for ID if they have good reason to believe that age is an issue.”<sup>36</sup>

Alcohol Change UK sought to learn more about the experiences of delivery drivers, including their understanding of both their responsibilities and those of their employers. In 2021, Wales-based market

research consultancy Cogent Research<sup>37</sup> were commissioned to explore in particular the experiences of those delivery drivers working for rapid, app-based food and drink delivery services, as well as drivers working for the major supermarkets and third-party delivery companies.

The research comprised 12 in depth face-to-face Zoom interviews with a variety of delivery drivers to explore their experiences of alcohol delivery in Wales. Each interview was 45 minutes in length. The final sample breakdown can be found in **Appendix 3** below.

## Findings

The interviews revealed real confusion amongst drivers about retailers’ policies on age verification and inconsistencies in performance. For example, some drivers reported being aware of a company policy not to deliver to individuals who look under 18; others were unaware of such a policy; and others again would, on occasion, turn a blind eye regardless. Some drivers reported that they assumed age checks had been undertaken online and therefore checking age on the doorstep was not necessary nor needed.

“We can leave it anywhere. We’re not selling it, so it’s nothing to do with us.”

Third-party delivery driver

“I’ve never ID-ed anyone, I guess I only would if they looked quite young – but they’re always clearly over the age of eighteen when I’ve turned up. It’s never been an issue. I just assume that there’s a verification process when people are ordering it.”

App-based delivery driver

The issue of time pressures on drivers was noted, whereby a requirement to deliberately verify age versus the need to move on to their next delivery created a noticeable tension. Moreover, returning undelivered alcohol to the seller was not always desirable, creating an inconvenience or potentially being penalised financially as a consequence.

“I wish there was some way of verifying ID before we get there instead of relying on drivers to do it. The problem is relying on drivers, we’re busy enough as it is. You don’t want to be hanging around or taking orders back. It’s a fuss you don’t want to be bothered with.”

App-based delivery driver

"If they looked very young, I'd take the order back – for my sins! I wouldn't get paid."

App-based delivery driver

In some cases, drivers were willing to leave alcohol in the customer's chosen 'safe place', meaning age verification was impossible at the point of delivery, as no person to person interaction would ever take place.

"I've never had to ask for ID or confirm age to hand over a parcel. I've left Beer 52 [a craft beer delivery club] in a garage, in a summerhouse for another customer."

Third-party delivery driver

Alarming, an absence of specific training around alcohol was noted on a number of occasions, especially amongst those working as drivers part-time or as a top-up to their main income source.

"There's no training. You have to learn yourself or take a mate with you to show you how it's done."

App-based delivery driver

"I've had no reason to question their age. I imagine it does arise but we don't get given any training. It's simply a case of pitch up, drop it off."

Third-party delivery driver

It would be incorrect to say that all delivery drivers took this view. Indeed, there were several comments highlighting their perceived responsibilities not to deliver alcohol to minors.

"We all take it seriously [checking for ID]. We're earning good money, sometimes £650 per week so we don't want to destroy that by giving alcohol to someone young."

App-based delivery driver

"Most of the time you do have to check for age. If they look too young then the app tells you that you need to see ID."

App-based delivery driver

Nevertheless, the overall picture is very much a mixed one, whereby at least some drivers were poorly trained or not at all; ill-informed about company policy; and left to make individual judgements about whether or not to complete their alcohol delivery.

## Intoxicated customers

Besides checking for age, a further issue that requires attention concerns the delivery of alcohol to someone who appears to be intoxicated.

Section 141 of the Licensing Act 2003 states it is an offence for a licensee to sell, or attempt to sell, alcohol to a person who is drunk, or to allow alcohol to be sold to such a person.<sup>38</sup> In reality, there are only a handful of prosecutions each year related to this offence, probably because of a high evidential bar that requires the retailer or staff have "knowingly" sold that alcohol to someone who appeared to be drunk.<sup>39</sup>

It is reasonable to suggest that determining whether someone ordering alcohol online is intoxicated is extremely difficult, perhaps impossible currently – meaning that there is an even greater responsibility that such checks are undertaken at the doorstep. Some, but not all, retailers included in this study have published policies that they will refuse to deliver alcohol on the doorstep to someone who appears to be drunk.

A polling company working on behalf of Alcohol Change UK undertook a survey in 2020 with 491 adults in Wales who had purchased alcohol online in the previous 12 months.<sup>40</sup> Over a third (37%) of respondents said that there had been occasions where they were drunk at home when their online order of alcohol arrived.

Over half (53%) of those who were drunk on one occasion only said their alcohol order was directly handed over to them by the delivery driver, and 16% said it was left for them on the doorstep or in a safe place. Similarly, over half (52%) who were drunk on more than one occasion said that on at least one of those occasions their alcohol order was directly handed to them by the delivery driver, and a third (33%) said it was left on the doorstep or safe place. Only 7% of these said the delivery driver had refused to hand over the alcohol.

Over half of those who were drunk said their alcohol order was directly handed over to them by the delivery driver

The survey is relatively small in scope, and therefore caution should be applied to generalising these results to the wider population. However, similar and larger research has been conducted in Australia recently, with similar findings. In one study,<sup>41</sup> 23% of 1,600 adults who used rapid delivery alcohol retailers reported "very risky drinking" (defined as more than 11 Australian standard drinks in one sitting every week – equivalent to around six pints of lager). Over a quarter (28%) of respondents said they had been drunk on all, most or

some occasions when receiving their alcohol delivery, and this was as high as 71% amongst those who received alcohol deliveries every week.

The 2021 qualitative research undertaken by Cogent Research with delivery drivers, discussed above, included questions about their experiences of delivering alcohol to intoxicated customers. Very few said they had encountered such occasions, but some did express concern about the practical difficulties of assessing whether or not someone is drunk in a transaction that can last just a few seconds.

"If you see someone for ten or fifteen minutes in a pub, you can make a judgement on if they've had enough alcohol, but not when you knock on a door and interact for ten seconds, you can't tell – that's not my call to make, it's not my domain."

Third-party delivery driver

Some respondents reported not feeling it was their place to decide whether or not a customer was intoxicated. They also considered that the sometimes isolated locations and circumstances that they deliver in meant that a refusal to hand over a delivery could endanger themselves.

"It could get quite aggressive, if you were in a pub and this happened then you have bar staff around, other customers to back you up but if you're on your own in a darkened garden or on a front doorstep – that's not a good place to be in."

App-based delivery driver

"I'd imagine they'd get angry, they could say 'hold on, I've paid for this'. It could kick off quite horribly."

App-based delivery driver

Many of the delivery drivers interviewed reported that they would like to know where they stand on not delivering to customers who are intoxicated, which suggests that retailer training on this issue is lacking or absent.

## The future?

In January 2021, the International Alliance for Responsible Drinking's 12 member companies – the world's leading beer, wine, and spirits producers – announced a new partnership with 12 (now 14) prominent global and regional online retailers and e-commerce and delivery platforms to prevent the online sale and delivery of alcohol to those underage. The result has been the publication of a global set of standards to prevent sales to underage

customers and to people who are drunk.<sup>42</sup> Such standards, alongside guidance from the Retail of Alcohol Standards Group,<sup>43</sup> are welcome, but caution should also be applied as regards their likely future impact, given the previous disappointing performance of alcohol industry pledges.<sup>44</sup>

As the digital world becomes ever-more entwined in our physical world, there has been a renewed focus by the UK Government on safeguarding privacy and protecting children from online harm. One recent development has seen the Home Office work with the Office for Product Safety and Standards (OPSS) to produce proposals for a Regulatory 'Sandbox'. In a nutshell, this is intended to provide an opportunity for industry and retail to test innovative approaches to age verification, such as digital ID and other products with age assurance attributes, in the specific context of the sale of alcohol under the Licensing Act 2003.<sup>45</sup> One such approach, reported in the media recently, has seen five major supermarkets trial artificial intelligence powered self-checkout cameras to assess whether shoppers look over 25.<sup>46</sup>

Could such technology be applied on the doorstep? Hipbar, described as India's first drinks app,<sup>47</sup> requires customers use their phone camera to scan their ID and complete a short video capture of their face, allowing age estimation to be recorded. At the time of first delivery, a physical face-match check is then undertaken by the delivery driver to ensure that the supplied ID and video capture corresponds to the person receiving the delivery. It would be interesting to learn how acceptable this method of age verification might be to UK consumers, possibly raising questions around personal privacy, given the doorstep could be regarded as a private, not public, space.

Finally, future developments like driverless deliveries, which likely bring an even greater reliance on digital technology to verify someone's age or decide whether or not someone is intoxicated, are no longer the stuff of science fiction. Asda supermarket, for example, recently announced it would be the first to commercially test a new type of technology to power driverless vans in partnership with Wayve Technologies as, it says, it seeks to find new and innovative delivery options for customers.<sup>48</sup>

Future developments like driverless deliveries... are no longer the stuff of science fiction

As more and more customers embrace shopping for alcohol online and as technology continues to advance, it seems more important than ever that the regulation of online sales and home deliveries of alcohol is revisited, and improved, to ensure that children and vulnerable adults are properly protected from harm.



## Conclusion and recommendations

The issue of weak age verification controls, coupled with poor compliance in checking age on the doorstep, was highlighted by Alcohol Concern, our predecessor charity, back in 2013. Almost a decade later, it seems the same complaints remain – only now, the issue is more important and more pressing than ever. We live in a world where shopping for alcohol online, whether it's alongside food or groceries, as part of planned monthly purchases via wine and beer clubs, or impulse buys from local convenience stores via an app, and delivered to our doorstep within minutes, is part of our 'new normal' – a trend that was already growing pre-pandemic but has now accelerated and is likely here to stay.

A multi-component approach that seeks to create an environment that reduces alcohol harm from online drinks sales is urgently needed. This should include:

- A robust training and support system being set up by retailers, to enable their delivery drivers to effectively

and routinely refuse to hand over alcohol to anyone underage or showing visible signs of intoxication

- Police and trading standards teams across England and Wales routinely undertaking test purchase operations using participants under 18 years of age, to test retailers' adherence to the law and their own policies in not selling or delivering alcohol to minors; with consideration also given to how best to test whether alcohol is being delivered to people who are intoxicated
- Further research examining the extent to which minors may be acquiring alcohol via online sales and home deliveries
- Revisiting the licensing legislation in England and Wales, and the associated guidance, to ensure it provides the necessary clarity for all concerned about their roles and responsibilities when selling alcohol online and delivering it to people's homes.

## Appendix 1: Selected online retailers' verification policies

Retailer	Published verification policy
<b>Amazon Fresh</b>	By placing an order for one of these items you are declaring that you are 18 years of age or over...To confirm the recipient is over 18 years, valid photographic ID with a date of birth may be required upon delivery. The driver will input your year of birth into their device and may then require an ID check to complete the age verification process...If the recipient is not over the age of 18 and has not been able to show valid photo identification, the item will be returned to Amazon. <sup>49</sup>
<b>Asda</b>	To place an order on our site you must be over 18 years of age. It is your responsibility to ensure that the person accepting delivery is over 18 and can demonstrate this to us if challenged. If we are not satisfied that the person accepting delivery is over the age of 18, then we may not hand over your delivery...We also follow a Challenge 25 policy for the purchase of alcohol...If the person accepting your order appears to be under the age of 25, the driver will request photo ID...to prove that they are over the age of 18 and can lawfully purchase such products. <sup>50</sup>
<b>Beelivery</b>	You are able to order alcohol... if you are over 18. If you look under 25, the driver will ask you for proof of age. Only driving licences or passports are accepted. If you are not able to provide proof of age, the driver will return the products and you may be charged a fee (taken out of your refund) for the cost incurred in returning the products. <sup>51</sup>
<b>Beerhawk</b>	You must be of the legal drinking age in your country, province or state of residence (18 years or older in the UK) to use this site and/or purchase products <sup>52</sup> ...Please note that by law we are not permitted to leave any alcoholic goods with any person unable to provide proof that they are over 18. <sup>53</sup>
<b>Brewdog</b>	When ordering and making a payment you will be required to confirm that you are aged 18 or over. If your order is a gift and contains alcohol, the recipient must also be aged 18 years or older. An adult over the age of 18 will be required to sign for delivery. <sup>54</sup>
<b>Co-op</b>	By placing an order you are confirming that you are 18 or over...We operate a Challenge 25 policy. This means that if the person collecting or receiving delivery of Age Restricted Items to be under 25, we will request photo ID (such as a driving licence or passport) to prove that they are over the age of 18. <sup>55</sup>
<b>Deliveroo</b>	By placing an order through our application, you confirm that you are aged 18 or older. Deliveroo operates an age verification policy whereby customers ordering age restricted products will be asked by the rider to provide proof that they are aged 18 or over before the delivery is completed. The rider may refuse to deliver any age restricted product to any person unless they can provide valid photo ID proving that they are aged 18 or over. <sup>56</sup>
<b>Fancy</b>	We can only sell alcohol to you if you are at least 18 years of age. Our drivers will ask you to present your valid ID to confirm you are at least 18 years of age. If you fail to provide a valid ID confirming you are at least 18, your driver will not deliver the products to you and we will refund your order cost, minus any delivery charges. <sup>57</sup>
<b>Getir</b>	We're enforcing Challenge 25 for the sale of alcohol. If the courier believes that you're younger than 25, they'll ask for a valid ID to confirm your age. The courier will try and verify your age in your mask or face covering if you're wearing one, but where they can't, they'll ask if you can briefly remove it from a safe distance. Unfortunately, if you're unwilling to do this, the sale will be refused. <sup>58</sup>

Retailer	Published verification policy
<b>Gorillas</b>	To register with Gorillas via the app and receive the products you must be 18 years of age or over...We operate a Challenge 25 policy, which means that if the person receiving delivery of alcohol looks under 25, we will request identification...We may retain the products if proof of age or an alternative adult is not available. <sup>59</sup>
<b>Go Puff</b>	By viewing, using or accessing the services, you certify that you are at least 18 years of age and will provide photo identification upon delivery to verify your age. You agree that you will not furnish age-restricted products obtained through Gopuff to any person who is not over the age of 18. <sup>60</sup>
<b>Honestbrew</b>	By placing an order with us online, signing up for an account, or signing up for marketing, you are confirming you are aged 18 or older...If you are buying alcohol for someone else the recipient must also be aged 18 or older. Deliveries must be signed for by a person aged 18 or older. If our couriers are in any doubt about the age of the recipient on delivery, they will request some form of ID. We reserve the right to cancel the delivery if the age and identity of the recipient is in doubt. <sup>61</sup>
<b>Jiffy</b>	By placing an order for an age restricted product, you confirm that you are at least 18 years old. Jiffy operates an age verification policy. As an example, customers ordering age restricted products will be asked by the rider to provide proof that they are aged 18 or over before the delivery is completed. The rider may refuse to deliver any age restricted product to any person unless they can provide valid photo ID proving that they are aged 18 or over. <sup>62</sup>
<b>Just Eat</b>	By placing an order through the website, you warrant that...you are at least 18 years old. If your order includes any alcohol...you will be asked to provide proof of your age on collection or delivery of your order. If you are unable to provide proof that you are aged 18 or over to the satisfaction of your chosen restaurant, or if the restaurant reasonably believes that the alcohol...you have ordered has been bought by you on behalf of someone under the age of 18, the restaurant reserves the right not to complete the delivery...to you. <sup>63</sup>
<b>Morrisons</b>	We will not sell products to people under the age of 18...We follow a Challenge 25 policy for the purchase of alcohol...Accordingly, when delivering age restricted products, if the person accepting your delivery appears to be under the age of 25, we will request photo ID (such as a driving licence or passport) to prove that they are over the age of 18 and can lawfully purchase such products. <sup>64</sup>
<b>Naked Wines</b>	By placing an order with Naked Wines you are confirming that you are 18 or older <sup>65</sup> ...Our delivery company will leave your wine with a neighbour or in a safe place if you're not in (just not by the bins in case it's bin day!). <sup>66</sup>
<b>Ocado</b>	You must be 18 years old or over and must have completed the registration process in order to place an order...We operate a Challenge 25 policy, which means that if the person receiving delivery of alcohol looks under 25, we will request identification. If we are not satisfied that there is a person at the delivery address who is 18 years of age or over who can accept delivery, we will retain the alcoholic products and you may have to pay another delivery charge. <sup>67</sup>
<b>Sainsbury's</b>	You must be 18 years or over and must complete the registration procedure to use our grocery service. We operate a Think 25 policy. If the person receiving the goods looks under 25 we will request proof of age. We may retain the goods if proof of age or an alternative adult is not available. <sup>68</sup>

Retailer	Published verification policy
<b>Tesco</b>	To register on the site you must be over eighteen years of age...Tesco follows a Think 25 policy when delivering age-restricted items, so if the person receiving the goods looks under 25, proof of age will be requested. If proof is not available and there is no-one of that age at the address when delivery is being made, the goods will be retained by the driver. <sup>69</sup>
<b>Uber Eats</b>	You must be at least 18 years of age...to obtain an account. The service is not available for use by persons under the age of 18. <sup>70</sup>
<b>Virgin Wines</b>	When you register your details you will be required to enter a valid date of birth to confirm you are 18 years old or older. By placing an order you also confirm that you are at least 18 years old. If you are buying a case of wine as a gift - the recipient must also be over 18 years old. If our couriers are in any doubt about the age of the recipient on delivery, they will request some form of ID. If the person receiving the wine is unable to produce appropriate ID, unfortunately our couriers will be unable to leave the wine. <sup>71</sup>
<b>Waitrose</b>	If your nominated representative is not aged 18 or above, we will not deliver any products, including those that are restricted Items...Our drivers apply our Challenge 25 policy and so proof of age will be requested if the person receiving the products looks under 25 years old. <sup>72</sup>
<b>Zapp</b>	Zapp operates the Challenge 25 age verification policy whereby customers who look under aged 25 will be asked by the delivery rider to provide proof that they are aged 18 or over. The rider may refuse to deliver any age restricted product to any person who does not look aged 25 unless they can provide valid photo ID proving that they are aged 18 or over. <sup>73</sup>

## Appendix 2: Test purchases operation results

Retailer	Pass Rate	Selected Comments from Test Purchasers on Fails
Just Eat	0 / 6	<ul style="list-style-type: none"> <li>• He asked if I was Sophie and I said 'yes' and he handed me the bag across his passenger seat through the window. I said 'thank you' and he said 'enjoy your meal'. <b>He didn't ask my age or for ID</b></li> <li>• The delivery man knocked on the door, confirmed the house number, and handed me the pizza, followed by the cider and the receipt. He told me to enjoy my meal and <b>left without asking for my age or ID</b></li> <li>• The driver rang my phone number. Once I was outside the order was on the floor and <b>she asked for my name and left</b>. It was a very quick transaction</li> <li>• The courier placed my order on the doorstep, knocked the door and stepped back, thanked me when I took my order and then left. <b>No mention of age or ID was made</b></li> <li>• The driver knocked on the door and confirmed my name with me before handing me the food. He then handed me the alcohol, as well as a 7up and prawn crackers I hadn't ordered but was presumably a gift from the restaurant. <b>He left without asking for ID.</b></li> </ul>
Uber Eats	3 / 6	<ul style="list-style-type: none"> <li>• (The driver) handed me the bag and <b>walked away without asking for ID</b></li> <li>• The driver handed me the bag of food and then the cider separately, then thanked me and left. I took the food to the kitchen and there was a knock on the door. The driver had returned and <b>asked me for my date of birth but not ID</b></li> <li>• The driver simply said 'hello', then handed over the delivery and left. <b>No mention of age or ID was made.</b></li> </ul>
Co-op	3 / 6	<ul style="list-style-type: none"> <li>• The driver arrived and asked me my name, then handed me the bag, <b>There was no mention of age or ID</b> and the transaction was very quick</li> <li>• The driver rang me to tell me he was outside. Once he saw me, he came and <b>dropped the bags by the door and left</b></li> <li>• He simply handed over the Coop branded bag over and <b>left without asking my age or for ID</b>. Nothing was said by the driver at all.</li> </ul>
Beelivery	1 / 6	<ul style="list-style-type: none"> <li>• The driver knocked on the door and then moved back when I answered. They then asked for my PIN number, confirmed that this was fine, <b>thanked me and left</b></li> <li>• He put the bag on the floor and I picked it up. He then asked me for the PIN which I gave him. He then said 'thank you' and <b>left without asking for my age or ID</b></li> <li>• The driver asked for my Pin and I gave it to him. He said 'thank you' and <b>left without asking for my age or ID</b></li> <li>• When I answered the door he asked me for my Pin number and then he handed me the bag. <b>No reference was made about my age</b></li> <li>• I opened the door and the bags were in front of the door. He asked for the Pin number to confirm it was my order and then left. <b>No age or ID was asked for.</b></li> </ul>

Retailer	Pass Rate	Selected Comments from Test Purchasers on Fails
Deliveroo	1 / 6	<ul style="list-style-type: none"> <li>The courier simply handed me the order and left; <b>no conversation was made at all</b></li> <li>I answered the door and <b>he asked for my date of birth</b>. He then showed me the open Deliveroo bag and asked me to take my food. He told me to 'enjoy my dinner' and to 'have a good night'</li> <li>The driver simply asked for my name and placed the food on the floor. <b>No age or ID was asked for</b></li> <li>He asked me if I was Sophie, and when I said 'yes' <b>he asked my for my date of birth which he entered into his phone</b></li> <li><b>He only asked me my name</b> and then gestured to the delivery on the floor.</li> </ul>
Amazon (Morrisons)	1 / 5	<ul style="list-style-type: none"> <li>He... left my shopping on the doorstep in a paper Amazon Prime bag in a black insulated bag. I took my grocery bag out of the insulated bag, he said 'thank you' and <b>left without asking me my age or for ID</b></li> <li>He <b>asked for my date of birth and typed it into the phone himself</b>. He apologized for taking so long in the delivery and then left</li> <li>He <b>asked me for my date of birth but not ID</b>, before thanking me and leaving</li> <li>He rang to say he had arrived and <b>upon opening the door he asked for my date of birth</b>. He then politely told me to 'have a nice day'.</li> </ul>
Snappy Shopper	1 / 5	<ul style="list-style-type: none"> <li>I opened the door and said 'thank you' and took my delivery. <b>The courier didn't ask for my age or ID</b></li> <li><b>He explained he had to substitute the rosé and I had ordered for another rosé</b> ... I thanked him and wished him a good day</li> <li>When I opened the door the shopping bag was by my door and the courier was by the car. <b>The courier said 'hello' and I said 'hello' and 'thank you', the courier said 'thank you' as well</b>. I then proceeded to close the door</li> <li>The courier placed my order on the doorstep, knocked, stepped back from the door, <b>thanked me when I opened the door and then left</b>.</li> </ul>
Tesco	0 / 2	<ul style="list-style-type: none"> <li>I answered the door and he explained about the substitutions. I then took my items out of the crate and we spoke about the rugby. He wished me well and <b>left without asking for my age or for ID</b></li> <li>The driver knocked on my door having placed the delivery on my doorstep. He said 'hello', indicated to me my items, then handed me the receipt. It was a very quick transaction, <b>and I was not asked for ID</b>.</li> </ul>
Waitrose	1 / 2	<ul style="list-style-type: none"> <li>I took the grocery bags out of the Waitrose delivery box and said 'thank you', then he picked up the box and walked back to his van. <b>He did not ask for my age or ID</b>.</li> </ul>
Asda	1 / 2	<ul style="list-style-type: none"> <li>The courier called me, and I opened the door. I then took the products and placed them in my own carrier bags. <b>The driver thanked me and left without asking for age or ID</b>.</li> </ul>
Morrisons	1 / 2	<ul style="list-style-type: none"> <li>No conversation made. <b>The courier just asked me for my name</b> and gestured to the delivery on the floor.</li> </ul>
Sainsbury's	1 / 2	<ul style="list-style-type: none"> <li>The driver asked for my name when I opened the door. <b>They did not ask for ID</b> but said to take my time unloading the items. They thanked me before leaving.</li> </ul>

**Appendix 3: Experiences of alcohol delivery workers in Wales project:  
Final sample breakdown**

Location	Number of Respondents
Cardiff and the surrounding area	5
Newport and Cwmbrân	5
Wrexham	1
Swansea and Neath	1

Gender	Number of Respondents
Male	9
Female	3

Age	Number of Respondents
20-25	6
26-30	1
31-35	2
36-40	1
41-45	0
46-50	0
51-55	1
56-60	1

Dependency on Delivery Role for Employment	Number of Respondents
Full time	8
Part time	4

Delivery Companies Represented	Number of Respondents
Courier company	2
Major supermarket	1
Rapid app	8
Independent takeaway	1

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