



Institute of Licensing  
**2021**  
25th National Training Conference

## Online alcohol sales and home deliveries

Andrew Misell, Alcohol Change UK

Promoting Excellence in Licensing for 25 Years

#instoflicensing  
#NTC2021

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## We are Alcohol Change UK

- Alcohol Change UK** was formed from the merger of Alcohol Concern and Alcohol Research UK. Our new charity launched in November 2018.
- We believe that alcohol harm is **not inevitable**. Our vision is of a **world free from serious alcohol harm**.
- We aim to make change happen through:
  - Improved **knowledge**
  - Better **policy** and **regulation**
  - Improved **drinking behaviours**
  - Shifted **cultural** norms
  - More and better **support** and **treatment**.

ALCOHOL CHANGE UK

Hello 2021!  
GET YOUR **YOU** BACK.  
DRY JANUARY™

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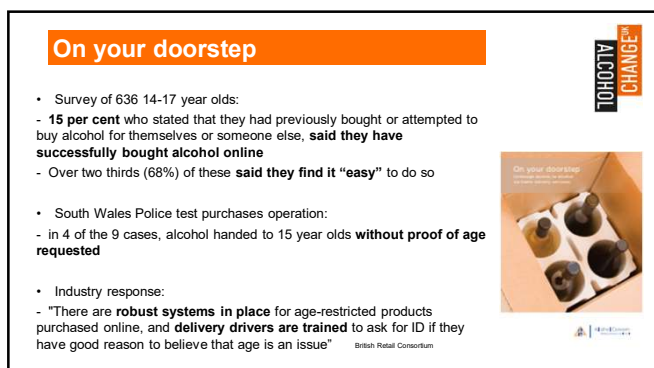
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## On your doorstep

- Survey of 636 14-17 year olds:
  - **15 per cent** who stated that they had previously bought or attempted to buy alcohol for themselves or someone else, **said they have successfully bought alcohol online**
  - Over two thirds (68%) of these **said they find it "easy"** to do so
- South Wales Police test purchases operation:
  - in 4 of the 9 cases, alcohol handed to 15 year olds **without proof of age requested**
- Industry response:
  - "There are **robust systems in place** for age-restricted products purchased online, and **delivery drivers are trained** to ask for ID if they have good reason to believe that age is an issue"

ALCOHOL CHANGE UK

On your doorstep  
alcohol is easy to buy

British Retail Consortium

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## Growth in buying alcohol online

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**"Impressive" online drinks uplift here to stay**  
By Andrea Caporale  
Published: 08 June, 2020

The influx of new online shoppers looks set to be sustainable, with alcoholic drinks to the fore of this growth in e-commerce.

**Coronavirus: Online beer and wine shop reports 1,000 per cent surge in sales**  
Londoners have been stocking up on alcohol supplies during the coronavirus lockdown, with one online craft beer reporting a 1,000 per cent increase in sales.

- Online grocery sales are **booming**
- In 2017, **21% of UK consumers** had bought **alcohol online**, the third highest proportion in the world
- One in three British households shopped online for groceries during January 2021, with **alcohol the fastest growing category**
- Online alcohol sales are projected to represent a **record 8.6% of total UK alcohol sales** this year

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## Growth in online alcohol retailers

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**Just Eat Takeaway, Grubhub, Deliveroo, And Uber Eats Cook-Up A Global Delivery War**  
By Mark Farnham | Contributor at 10 June



Powered by a stellar array of food delivery giants Just Eat Takeaway, Grubhub, Deliveroo, and Uber Eats are facing up to a multi-billion dollar bid for the hearts, minds, and stomachs of consumers worldwide.

And the frontline has been driven up in lockdown London.


**Snappy Shopper Sales Break More Records**  
February 05, 2021



Snappy Shopper sales are continuing to break records in Stoke-on-Trent, with the last few weeks seeing the most remarkable growth for the online retailer.

**Virgin Wines announces £100m London float**  
By Ann Matthews | 10 February 2021

The fast-growing wine importer and distributor expects its shares to be admitted to London Stock Exchange's AIM on or around a March



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## Rapid delivery model

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If you're anywhere near Cardiff, Newport or Swansea and you want a booze delivery, then look no further. We provide a 24 hour alcohol delivery service in which we can deliver in under 1 hour delivery time. Order anything ranging from wine, Tequila and Vodka, all the way to craft beer, IPA, lager and even non-alcoholic beer. We will cater to your needs at home!

Enter your postcode to check if we deliver in your area

Enter your postcode

Then, choose a delivery option


**now**

Within 15-60 minutes\*  
Delivery £3.50  
Min spend £12

**today**

Same day LOWEST PRICES  
Delivery £2.50  
Min spend £40

Start Shopping




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## Licensing law and online sales

Is the law clear?

- **s146**, Licensing Act 2003 makes it **illegal** in England and Wales to sell alcohol to anyone under the age of 18
- **s151**, Licensing Act 2003: **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"*
- **Revised guidance issued under s182** of the Licensing Act 2003 (April 2018): *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"*



## Online age verification

- Current methods of age verification are **"largely ineffectual"**
- When implemented online, they often involve **simple 'honour' checks, which are easily deceived**, or alternative forms of 'authentication' that can be bypassed in various ways
- Introducing **technical measures** to prevent the sale of alcohol to under 18s would help increase the safeguarding of minors, reducing the possibility of obtaining alcohol online and bypassing existing checks.
- Despite several emerging technologies and promising developments in other domains such as online gambling and pornography, the simplest and most effective measure could be to extend the use of **Merchant Category Codes** (MCC codes) to repurpose banks' existing identity and age verification checks.



## Comments from Wrexham students:



- "Amazon online - no ID - DoB only"
- "Pre-paid credit card"
- "Online Tesco's shopping; delivered; no ID check"
- "Lied about age on collection"
- "No ID needed"
- "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"
- "No ID check from Amazon"
- "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"



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- **41% of 18-24 year olds respondents who had had alcohol delivered to their homes said that they were not asked for proof of age**



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- The screenshot displays the Wine.com mobile application. The top navigation bar includes the Wine.com logo, a search icon, and a shopping cart icon. Below the navigation bar, the 'New by' section is highlighted. It contains two rows of wine bottles. The first row shows 'Three Flavors & Caffeine' for \$45.99 and 'The California Wine' for \$59.99. The second row shows 'K&S' for \$59.99 and 'The California Wine' for \$59.99. At the bottom, there is a navigation bar with icons for Home, Shop, Search, New Arrivals, and Account.

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[illegible]

## Test purchases operation



- Independent audit company undertook **50 test purchases** in Cardiff
- 4<sup>th</sup> – 27<sup>th</sup> February 2021
- Participants were aged **18 and 19 years old**
- **12 different retailers** audited
- Rapid deliveries only
- Alcohol ordered alongside food in majority of cases

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ASDA

beelivery

deliveroo

MORRISONS  
amazon

co  
op

snappysupplier

TESCO

Uber Eats

JUST EAT

Sainsbury's

Morrisons

WAITROSE  
A PARTNERS

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## Results

- 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 28%**
- No individual retailer recorded a compliance rate of **more than 50%**, and two retailers recorded a **0% compliance rate**
- 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**
- On **no occasions** was the alcohol **left on the doorstep unattended**

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## The experiences of UK delivery drivers

- Research explored the experience of delivery drivers, primarily working for app-based food and drink delivery services
- 12 in-depth, face-to-face Zoom interviews, lasting 45 minutes each. The respondents comprised 9 males, 3 females, all based in Wales
- 8 of the 12 respondents relied on their delivery role as their full-time job; the remainder used the role to 'top up' their main source of income
- The drivers were delivering exclusively on behalf of a major supermarket; Hermes, who deliver from hundreds of retailers; and app-based retailers such as Uber Eats and Deliveroo, collecting orders from convenience stores, a major supermarket and fast-food outlets



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## The experiences of delivery drivers

*"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 one kind of verification process when people are ordering it."*

Rapid app driver

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

Rapid app driver

*"We can leave it anywhere. We're not selling it, so it's nothing to do with us."*

Hermes driver

*"You don't want to be hanging around (to verify age) or taking orders back, it's a fuss you don't want to be bothered with."*

Rapid app driver

*"I haven't dealt with alcohol an awful lot and sometimes it's packed into the order, so I don't even know if it's there."*

Rapid app driver

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## Deliveries to intoxicated persons

- Very **difficult to determine** whether someone ordering alcohol online is drunk
- Survey: **37% of respondents** said they had sometimes been **drunk at home when their online alcohol order arrived**; on very few occasions did the delivery driver refuse to hand over the alcohol
- Research from Australia suggests:
  - Customers who use online rapid delivery services were **more likely to report risky drinking** and subsequent harm
  - 28% of respondents again said that they **had been drunk** on all, most or some occasions when successfully receiving their delivery
  - 28% of people who received a rapid delivery online order said they **would have had to stop drinking** if the delivery service was not available



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The experiences of UK delivery drivers

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*"I probably have delivered to someone who is drunk. I can't think when. It doesn't mean to say they'll open the parcel at that point and drink it."*

Rapid app driver

*"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.**"*

Rapid app driver

*"I imagine they'd get angry (if I refused to hand over the alcohol), they could say 'hold on, I've paid for this'. It could kick off quite horribly"*

Rapid app driver

*"How can you not serve to people who are drunk? It's [the law] broken all over the place."*

Rapid app driver

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Future developments

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- In March 2021, call for proposals launched to explore **how technology can improve or enhance achieving the licensing objectives** for the sale of alcohol, including age verification
- Global alliance** between leading drinks producers, online retailers and ecommerce platforms to introduce **mechanisms to prevent underaged sales and sales to intoxicated individuals**
- Possible **test purchases operation** to be undertaken by a police force in Wales in the coming months
- Alcohol Change UK's commissioned research to explore the **experiences of delivery drivers in delivering alcohol**; report to be published February 2022

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Recommendations

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- All retailers selling alcohol for home delivery must **re-evaluate their internal controls**, both at the point of sale (online) and point of delivery (the doorstep), to ensure people under 18 years old are not accessing alcohol by these means
- Police Forces and other bodies, such as Trading Standards teams, should be **routinely undertaking test purchases operations** to gauge retailers' ongoing levels of compliance
- Further research** is required to examine the extent to which minors may be accessing alcohol in this way, and to ascertain what levels of support and training drivers receive regarding age verification and making deliveries to visibly intoxicated customers
- Licensing law** (and/or accompanying guidance) relating to online alcohol sales needs revisiting to ensure it is **fit for purpose** in a retail landscape that is now vastly different to when the Licensing Act 2003 was first introduced in England and Wales.

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