

On your doorstep

Underage access to alcohol
via home delivery services



Alcohol Concern
Making Sense of Alcohol



Alcohol Concern

Alcohol Concern is the national charity on alcohol misuse campaigning for effective alcohol policy and improved services for people whose lives are affected by alcohol-related problems.

Our work in Wales

Alcohol Concern opened its office in Cardiff in August 2009. Alcohol Concern Cymru is focusing on policy and public health in Wales, acting as a champion for alcohol harm reduction.

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Executive summary



Underage drinking remains a key concern in Wales. Whilst it is illegal to sell alcohol to persons under 18 years old, in reality, children and young people can and do get hold of alcohol, either via 'proxy sales' or directly themselves.

Online supermarket grocery services, and late-night and 24 hour alcohol home delivery services, have to date received little attention as a potential source of alcohol for minors. In January and February 2013, an online survey was undertaken, on behalf of Alcohol Concern Cymru, of nearly 1,000 people in Wales aged 14 and 17 years old, to ascertain their usage of such services.

Of the 636 respondents who stated that they had previously bought or attempted to buy alcohol for themselves or someone else, 15 per cent stated they have successfully bought alcohol online, and over two thirds of these said they find it "easy" to do so. Similarly, 13 per cent said they have successfully bought alcohol by telephone from a home delivery service, and again over two thirds of these said it was "easy" to do so. Both online and telephone alcohol delivery services were chosen by many because they regarded them as easy ways to bypass age verification checks, and as a quick and convenient way of acquiring alcohol.

In March 2013, South Wales Police undertook a test purchases operation in Cardiff, using 15 year olds, to find out whether they were able to buy alcohol from major supermarket grocery websites. It was found that alcohol could be purchased online with relative ease, by simply agreeing to terms and conditions that indicated they were 18 years old or over, and being in possession of a debit card and email address. In 44 per cent of the test cases, alcohol was handed to the test purchasers in person with no proof of age requested.

The findings indicate that a significant minority of children and young people in Wales acquire alcohol via supermarket websites and home delivery services, and test purchasing suggests that age verification policies are not being adequately adhered to.

Alcohol Concern therefore makes the following recommendations:

Recommendation 1

Supermarkets and other off-trade retailers that provide an alcohol home delivery service should review their existing age verification procedures at both the point of sale and delivery stages, to ascertain whether they are fit for purpose. Particular attention should be paid to making it clearer to customers that receipt of orders that contain alcohol must be by an adult. Retailers should ensure that delivery staff have been given appropriate training in procedures relating to requesting and identifying proof of age, and implement these procedures as standard.

Recommendation 2

Further research should be undertaken in determining the proportion of children and young people who buy alcohol online and/or by telephone. More widespread test purchasing by police and trading standards is recommended.

Recommendation 3

The UK Government should review the efficacy of current licensing law relating to the home delivery of alcohol, in terms of whether it adequately protects children and young people from alcohol-related harm.

Introduction



The negative health implications of excessive alcohol consumption remain one of the biggest problems facing Wales. Thirty thousand hospital bed days are related to the consequence of alcohol consumption,¹ and the estimated health service cost of alcohol-related chronic disease and acute incidents is between £70 and £85 million each year.²

Particular concern is focused on the dangers of alcohol misuse amongst the young, and it has long-been recognised that controlling children and young people's access to alcoholic products should be at the forefront of interventions. In recent years, this has comprised policing under-age sales, with increased levels of fines for retailers caught selling alcohol to under-18 year olds.

Despite such interventions, evidence shows that young people are able to access alcohol in a variety of ways. However, one means that has received little attention to date is via alcohol home delivery services. This report considers the potential for services offered by bespoke alcohol delivery companies and supermarkets online to become an alternative or additional avenue for minors to source their alcohol. It includes the findings from an Alcohol Concern Cymru commissioned survey of 14-17 year olds in Wales and test purchases undertaken by South Wales Police.

Alcohol and young people



In recent years there have been significant changes in both the way young people in the UK drink and how much they drink. Overall, the proportion of young people who abstain from alcohol is increasing; however, among those who do drink, there seems to have been an increase in alcohol consumption.³

In Wales, underage drinking remains a key concern. Statistics show that:

- 40 per cent of 15 year olds drink alcohol on a weekly basis⁴
- 20 per cent of 15 year olds report having been drunk for the first time at age 13 or younger⁵
- Since 1990 the amount of alcohol consumed by 11 to 15 year olds has doubled⁶
- In 2011-12 there were 830 referrals for treatment of alcohol misuse amongst patients aged 19 and younger⁷

Potential adverse consequences of alcohol consumption by minors include hospital admission, poor school performance, regretted sex and offending,⁸ as well as a higher risk of future alcohol-related problems.⁹ In 2010, the Chief Medical Officer for Wales recommended that children under 15 years of age should avoid alcohol completely, due to evidence that it can harm the developing brain, bones and hormones, whilst also warning that heavy alcohol use amongst older teens can be hazardous to health.¹⁰ Consequently, there is now a general acceptance that children and young people's access to alcohol needs to be robustly regulated.

How do young people access alcohol?

The law in the UK states that it is illegal for anyone under 18 to buy, or attempt to buy, alcohol in a pub, off-licence, supermarket or other outlet or for anyone to buy alcohol for someone under 18 to consume in a pub or public place. (The only exception is where young people aged 16 or 17 can drink beer, wine or cider with a table meal if it is bought by an adult and they are accompanied by an adult.)¹¹ Likewise, a person commits an offence if he sells alcohol to a child under 18.¹²

In reality, children and young people under 18 in Wales can, and do, get hold of alcohol. Indeed, a survey of young people's use of alcohol home delivery services in Wales, on behalf of Alcohol Concern Cymru in 2013, found half of the respondents stating they find it "easy" to purchase alcohol (see more below). Other research has shown that this age group most commonly access alcohol through 'proxy sales', that is, via their parents (with or without permission) and, especially in the case of older teens, from their friends or asking another adult to buy it for them.¹³

However, significant numbers of under-18s directly purchase their own alcohol. A recent study of nearly ten thousand 15-16 year olds across North West England, for example, found over a quarter (28%) of drinkers reporting that they had purchased the alcohol themselves, 44% of whom stating they had done so without their age ever being checked by alcohol sellers.¹⁴

Age-checking



Historically, the policing of under-age alcohol sales by regulatory authorities has been uncoordinated, but the last decade has seen an increase in age-checking practices and awareness-raising aimed at ensuring that retail staff are adhering to the necessary regulations and processes.¹⁵ Research from Serve Legal and Plymouth University suggests that under-age checks now take place around three out of every four times a young person attempts to buy alcohol.¹⁶

In 2009-10 in Wales, Trading Standards organised 1,121 attempts by young volunteers to purchase alcohol, in person from off-trade retail premises, 147 (13%) of which resulted in a sale. Proof of age was found to have been requested in 89% of the attempts to purchase alcohol. Petrol filling stations were found to be the retailers most likely to sell alcohol; next were 'other traders' (which included post offices, discount retailers, a video rental store and fast food outlets), followed by newsagents and convenience stores.¹⁷

In the on-trade (pubs and clubs), 216 attempts made by young volunteers, 91 of which resulted in a sale (42%). Proof of age was requested in only 55% of all attempts to purchase alcohol.¹⁸

Various schemes and initiatives have been developed and adopted that represent good practice in alcohol retailing. Perhaps the most relevant to tackling under-age sales is 'Challenge 21', which was developed by The Retail of Alcohol Standards Group in 2006 to provide staff serving alcohol with a wide margin of protection to ensure that alcohol is not sold to anyone under 18, by making it a policy that all customers who look as though they are under 21 years old are asked for proof of their age when attempting to purchase alcohol. 'Challenge 25', launched in 2009, pushes this margin of protection even wider and has been adopted by large sections of the off-trade, including the big supermarket chains, although much of the on-trade continues to adopt the Challenge 21 policy. (Interestingly, recent changes to Scottish licensing law have seen a blanket Challenge 25 policy adopted throughout Scotland.)

Alcohol home delivery services



“Today the availability of alcohol is beyond comparison to previous generations. From corner store to supermarket, pub, off-licence and petrol station, wherever you are in this country alcohol is within the reach of all... it is against this background that home delivery services have proliferated.”

Allan Brown, former lead on drug prevention and education for Cheshire Constabulary (2009)¹⁹

As consumers increasingly embrace the internet as a means to acquire goods, many of the major supermarkets now provide a home delivery service for groceries (and other goods) via their online websites. Indeed, the IDG Retail Analysis estimated in 2011 that, by 2015, the value of the internet grocery market will have doubled, with online sales set to reach £9.9 billion, and younger adults in particular expected to increase their use of these supermarket’s home delivery services.²²

In recent years, there has been a noticeable shift in where consumers choose to consume alcohol. Research undertaken by Alcohol Concern in Wales in 2010 found that 50 per cent of drinkers said they now only drink alcohol at home, and an additional 21 per cent said they drink equally at home and in the pub.²⁰ This rise in the popularity of home drinking is likely a result of a combination of factors, most notably a fear of alcohol-related disorder and violence associated with town and city centres after dark and an increase in the availability and affordability of alcohol in the off-trade, with growing numbers of supermarkets offering heavily discounted alcohol. 46 per cent of drinkers in Wales have said they drink at home because it has become cheaper.²¹

Perhaps unsurprisingly, as more of us choose to drink at home, the marketplace has adapted to meet this demand. In particular, the presence of late-night and 24-hour alcohol home delivery services, whereby alcohol can be ordered either online or via telephone (in the latter case, often at marked up prices compared to the supermarkets), in larger towns and cities, is now commonplace across much of the UK, either as bespoke businesses or additional services offered by takeaway restaurants. In March 2013, for example, South Wales Police found at least four businesses in Cardiff to be operating an alcohol home delivery service, two of which were set up solely for the purpose of selling alcohol (see more below). A brief internet search shows this situation is likely replicated in large urban areas across the country.

Alcohol Concern Cymru's study



As shown above, some progress has been made in making it more difficult for underage young people to purchase alcohol for their consumption via public houses and in-store at supermarkets and off-licence venues. Alcohol Concern was interested to discover whether, perhaps as a consequence of this progress, minors are turning to alcohol home delivery services as an alternative means through which they acquire alcohol.

In January and February 2013, a short, anonymous online survey was completed by 976 people in Wales between the ages of 14 and 17 years old. The survey was advertised on various social media platforms, including Facebook and Twitter. It was also publicised with various schools, colleges and youth organisations across the country.²³ A limitation of the survey is that it was conducted via the internet and therefore excluded young people without internet access.

636 (65 per cent) of respondents stated that they had bought or attempted to buy alcohol for themselves or someone else. 26 per cent of these respondents were aged 14-15 years old and 74 per cent were aged 16-17 years old. The results below relate to these 636 respondents:

1. Alcohol purchases in general

- 50 per cent of respondents stated that they find it generally find it “easy” to purchase alcohol, including 24 per cent stating they find it “very easy”. Only 15 per cent regarded it as “difficult”.

2. Buying alcohol online

- 15 per cent of the respondents stated they have successfully bought alcohol online, whilst a further seven per cent have tried to buy alcohol online but were unsuccessful. A greater proportion of respondents from the 14-15 years old age group had successfully purchased alcohol online (21 per cent) than respondents from the 16-17 years old age group (13 per cent).

- Of those who have successfully bought alcohol online, 66 per cent said they had last done so within the past week and 22 per cent within the past month.
- Over two thirds (68 per cent) of respondents said that they find it “easy” to purchase alcohol online, including 43 per cent who regard it as “very easy”.
- Those respondents who were successful in ordering alcohol online were asked their main reasons for purchasing alcohol in this way. The most common reasons cited were because it is easy to bypass ID checks (66 per cent) and it is quick (52 per cent).

3. Buying alcohol by telephone

- 13 per cent of respondents stated they have successfully bought alcohol by telephone from a local home delivery service, whilst five per cent have tried but were unsuccessful. A greater proportion of respondents from the 14-15 years old age group had successfully purchased alcohol by telephone (16 per cent) than respondents from the 16-17 years old age group (12 per cent).
- Of those who have successfully bought alcohol by telephone, 48 per cent stated they had done so within the past week and 13 per cent within the past month.
- Over two thirds (68 per cent) of respondents said that they find it “easy” to purchase alcohol via telephone, including nearly half (49 per cent) who find it “very easy”.
- Those respondents who were successful in ordering alcohol by telephone were asked their main reasons for purchasing alcohol in this way. The most common reasons cited were because it is quick (63 per cent) and convenient (52 per cent).

Test purchases



In tandem with our online survey of young people, on 23 and 30 March 2013, test purchases on alcohol home deliveries from some of the major supermarket retailers, were undertaken by South Wales Police in Cardiff, using test purchasers aged 15 years old.

In all cases, the test purchases were instructed that they could lie about their age during the online or phone transaction. In cases where alcohol was subsequently delivered, if the test purchasers were asked by the deliverer for identification to verify age, the test purchasers would state they had none, and if asked their age, they would correctly state that were 15 years old.

A total of nine test purchases were made from five supermarkets, with four supermarkets being tested more than once.

At the point of sale i.e. the online transaction, the following issues were noted:

- Purchasers were asked to agree to terms and conditions of sale, which included being of a legal age to purchase alcohol, although in all but one case, these were displayed on a separate webpage. In one case, purchasers were specifically asked to tick a box to confirm that they were 18 or older. In all cases, the system relied entirely on the honesty of the purchaser about their age.
- Purchases could be made with any debit of credit card, and the card details did not need to relate to the e-mail address given during registration or the delivery address. Where confirmation was requested as to whether the delivery address matched the billing address, this could be confirmed by the purchaser even when the two addresses given were in fact different.

Major supermarket's home delivery policies:

Asda	If there is no one at the delivery address who is 18 years of age or over, we'll leave notification of our visit and will return the goods to our store. We'll then contact you to arrange re-delivery at a convenient time. Customers who are lucky enough not to look 25 or over will be asked by our driver to provide proof of age to show that they are 18 or over. Orders can only be delivered to persons over 18 years of age to ensure that we comply with laws regarding the sale of age-restricted goods e.g. alcohol. ²⁴
The Co-operative	Due to licensing restrictions our home delivery service is only available to persons over the age of 18. Proof of identity may be requested on delivery. ²⁵
Sainsburys	You or someone aged 18 or over on your behalf must be available to receive, inspect and sign for your grocery order. We will not be able to leave goods unattended under any circumstances. ²⁶
Tesco	All goods must be signed for on delivery by an adult aged 18 years or over. Tesco follows a "Think 21" policy, so if the person receiving the goods looks under 21, 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 may be retained by the driver. ²⁷
Waitrose	Deliveries can only be left with someone over the age of 18. ²⁸
Ocado	You must be 18 years old or over and must have completed the registration process in order to participate in our service. If you have ordered alcohol from us and cannot be at home at your selected delivery time, it is your responsibility to ensure that a suitable person is there to receive the order. ²⁹



At the point of receipt, it was found:

- In four of the nine cases (44%), alcohol was handed to the underage test purchasers by delivery drivers with no proof of age requested.
- One supermarket failed on both dates test purchases were conducted.

Aside from the supermarkets, South Wales Police obtained details of 11 other businesses offering home delivery of alcohol in Cardiff. Of these, a number had either ceased trading, no longer had a license to sell alcohol, or were not contactable, for example the phone number provided was no longer in use. A total of four businesses were found to be operating a home delivery service and contactable:

- Two were takeaway restaurants selling primarily food, and not selling alcohol unless food was also bought. Both declined to deliver unless proof of age could be shown at the point of delivery.
- The remaining two were purely alcohol delivery services. One opened too late in the evening for it to be appropriate to use a 15 year test purchaser; the other declined to make a delivery unless proof of age could be shown.

South Wales Police also noted that the 11 businesses initially identified may also be a small proportion of the alcohol delivery services operating in the Cardiff area. Any licensee holding an off-trade licence, that is, a license to sell alcohol for consumption off their premises, could in theory offer to deliver alcohol. Licensees are requested to advise the licensing authority (in this case the City and County of Cardiff) if they are operating such a service, but are not obliged to under law.

The relevant law relating to home delivery of alcohol in England and Wales

Licensing Act 2003: Section 151

(1)(a) A person who works on relevant premises in any capacity, whether paid or unpaid, commits an offence if he knowingly delivers to an individual aged under 18 alcohol sold on the premises

BUT

(4) The above does not apply where – (a) the alcohol is delivered at a place where the buyer or, as the case may be, person supplied lives or works.

To illustrate, where a child answers the door and signs for the delivery of his parent's order at home, no offence has been committed under Section 151.

Discussion and recommendations



“Most underage drinkers realise that it’s now not that easy to walk into a shop to buy alcohol. This factor, added to more relaxed attitudes toward alcohol consumption by parents and relatives, added to the growth of the internet, is creating a perfect storm in the battle against underage drinking.”

Dr. Adrian Barton, Plymouth University (2012)³⁰

The results from our survey of young people aged between 14 and 17 years old indicate that home delivery services provide a source of alcohol for underage drinkers in Wales. They also tally with findings from two international research studies which have previously raised concerns about children and young people’s ability to acquire alcohol from home delivery services via telephone, and more recently, the internet.^{31 32}

Our findings also suggest that it is younger age groups, that is, children well below the legal drinking age, who source at least some of their alcohol by these means. Alcohol home delivery services are a unique form of alcohol availability in that the sale of alcohol is achieved with relative anonymity and privacy, away from traditional commercial outlets.³³ Respondents to our survey expressed their perception that these services offer less robust age verification practices, and provide a quick and easy way to acquire alcohol, especially for younger teenagers who would likely have greater difficulty in buying alcohol in person from in-store at a supermarket or a public house.

Failures highlighted by South Wales Police’s test purchasing exercises provide further evidence that young people are able to acquire alcohol in this way. These failings, whereby 15 year old test purchasers were able to buy alcohol for themselves, relate to online orders made at supermarket websites and subsequently delivered to their chosen address. Unlike the supermarkets, the other businesses in Cardiff identified as offering home delivery of alcohol met the required standards for age verification and therefore did not result in completed transactions. However, due

to practicalities, test purchasing was unable to be conducted with late-night only alcohol delivery services and it is clear that more extensive research is required to establish a fuller picture on whether age verification failings are an issue across the board or relate solely to supermarket delivery services.

Alcohol Concern Cymru has previously highlighted concerns about the robustness of age verification processes online relating to the promotion of alcohol, in particular how merely entering a fictitious date of birth or ticking a confirmation of age box enables underage users to access content on alcohol brand websites intended for adults only.³⁴ The test purchasing exercise found similar mechanisms on the supermarket delivery websites; purchases could seemingly be made by under-18s merely by ticking a box to demonstrate their agreement to general conditions of sale, which included a section on the legal drinking age, and being in possession of a debit card. South Wales Police concluded that, in all cases, the online component of the system relied entirely on the honesty of the purchaser about their age.

As alcohol industry representatives have been keen to express in the past, these online age verification processes are the best available standards,³⁵ and these issues go much wider as to how children and young people can be better prevented from accessing adult products in general. This suggests that, in order to provide relative certainty that alcohol is being supplied to an adult, robust age verification processes must be implemented at the delivery stage of the transaction. However, in 44 per cent of test cases, alcohol was handed to underage test purchasers by supermarket delivery drivers with no proof of age requested.

Interestingly, and as highlighted in this report, delivering alcohol to a child or young person at home does not appear to constitute a breach in licensing law, providing it has been ordered by an adult. On the other hand, there is a question of whether such activity goes against the spirit of the licensing legislation; one of the four objectives of the Licensing Act 2003 concerns protecting



children from harm, which is thought to encompass protecting under-18s from moral, psychological and physical harm.³⁶

The Mandatory Licensing Conditions, in force since 2010, provide that companies that sell alcohol remotely should operate an age verification policy.³⁷ As also shown above, all of the major supermarkets with an online grocery service, explicitly note on their websites that goods can only be delivered to an adult aged 18 or over. Presumably a key reason that this is in place is to ensure that any adult-only products that are part of the order from the supermarket, including alcohol, are only delivered to such persons. It would appear from the test purchases exercise, therefore, that supermarkets are failing to adhere to their own policies and consequently enabling children and young people to be in receipt of alcohol that they might then consume themselves.

In practice, what this means is that a child or young person with access to, or ownership of, a debit card and an email address, and who agrees with the terms and conditions of sale on the relevant website, can order quantities of alcohol from a supermarket and be in receipt of it the next day. A perfectly conceivable scenario would be where an under-18 orders alcohol from a supermarket online for a party planned for the following night. A significant minority of teenagers have told us that they have chosen to buy alcohol in this way within the past week because, in doing so, they are more likely to be able to avoid age checks.

Another, and perhaps more complex scenario, is where an adult has ordered alcohol from a supermarket online, perhaps as part of a larger grocery shop, and then has arranged for their teenage son or daughter to receive the goods the next day on their behalf. Legally, it would appear that supermarket delivery drivers are perfectly entitled to hand over goods which include alcohol to a minor in such a case. Morally, however, there is a question of whether this is appropriate behaviour given that such a child or young person would be unable to purchase the alcohol themselves.

This returns us to the argument that alcohol is not an ordinary commodity like other household goods, but instead a potentially addictive and harmful substance, particularly for the young, and should be treated and sold as such.

Alcohol Concern makes the following recommendations:

Recommendation 1

Supermarkets and other off-trade retailers that provide an alcohol home delivery service should review their existing age verification procedures at both the point of sale and delivery stages, to ascertain whether they are fit for purpose. Particular attention should be paid to making it clearer to customers that receipt of orders that contain alcohol must be by an adult. Retailers should ensure that delivery staff have been given appropriate training in procedures relating to requesting and identifying proof of age, and implement these procedures as standard.

Recommendation 2

Further research should be undertaken in determining the proportion of children and young people who buy alcohol online and/or by telephone. More widespread test purchasing by police and trading standards is recommended.

Recommendation 3

The UK Government should review the efficacy of current licensing law relating to the home delivery of alcohol, in terms of whether it adequately protects children and young people from alcohol-related harm.

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Alcohol Concern
Making Sense of Alcohol