

**Appendix B - Copies of the representation submitted by this council's Trading Standards service and correspondence relating to the representation**

**From:** Moore, Ray  
**Sent:** Thursday, May 02, 2019 6:53 PM  
**To:** Regen, Licensing  
**Cc:** [REDACTED]; [Alcohol@homeoffice.gsi.gov.uk](mailto:Alcohol@homeoffice.gsi.gov.uk); Qau Safeguarding; Costin, Holly; DIP Team; [FireSafetyRegulationSE@london-fire.gov.uk](mailto:FireSafetyRegulationSE@london-fire.gov.uk) ([FSR-AdminSupport@london-fire.gov.uk](mailto:FSR-AdminSupport@london-fire.gov.uk)); Graham White; Highwayslicensing; Moore, Ray; Planning.Enquiries; Public Health Licensing; Reg Env Protection; Reg Health and Safety; [southwark.repro@pbms.co.uk](mailto:southwark.repro@pbms.co.uk); Taylor, Dan; Tear, Jayne; West Team diary  
**Subject:** FW: Application for a premises license for Liqroo Ltd for Unit 1, Haymerle Road, SE15 6SQ Application no 867558

As a responsible authority under the Licensing Act 2003, Trading Standards are in receipt of an application from Liqroo Ltd for an application to sell alcohol on line and use the above address to deliver to residential homes once an order has been made online. In the licensing objectives on "the protection of children from harm" it puts the full onus on delivery drivers to confirm that the person the alcohol is delivered to and / or intended for is over 18. There is no attempt at online age verification. Surveys conducted by this and other authorities about ordering age restricted products on line has revealed that very rarely is any attempt made to verify the age of the purchaser.

It is also of concern that this business will be seeking to deliver 24/7 when such hours go against policy with respect to areas covered by cumulative impact zones.

I would therefore ask the applicant to contact trading standards in order to discuss suitable conditions to cover online age verification.

Ray MOORE  
Principal Trading Standards Enforcement Officer  
Southwark Council | Environment & Leisure| Regulatory Services  
Post: 3rd Floor Hub 2, PO Box 64529 | London SE1P 5LX  
Direct line 020 7525 0816 | Fax 020 7525 5735 | Call Centre 020 7525 2000  
[www.southwark.gov.uk/TradingStandards](http://www.southwark.gov.uk/TradingStandards)  
Need proof of age? Visit [www.southwark.gov.uk/pal](http://www.southwark.gov.uk/pal)  
Need advice on consumer issues? Visit Citizens Advice via [www.direct.gov.uk/consumer](http://www.direct.gov.uk/consumer)

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**From:** [REDACTED]  
**Sent:** Friday, May 03, 2019 4:55 PM  
**To:** Moore, Ray  
**Subject:** Re: FW: Application for a premises license for Liqroo Ltd for Unit 1, Haymerle Road, SE15 6SQ Application no 867558

Dear Mr. Moore,

Thank you for your inquiry. You have rightfully said that we have not mentioned the online age verification in our application but it has just been an oversight. We are doing an age verification check at the start of the website and app. I have attached screenshots of the same. Further we are adding a statement on product pages about over 18 requirement to purchase and a signature requirement at the time of delivery. A screenshot of the same is also attached. We will hence deter under 18's to enter the site and make sure they are aware that they cannot get stock from us. Our drivers will be a part of the same loop and will be trained well and will stand an immediate dismissal

and will be reported to the police in case of any inefficiencies on their part. We have further planned to blacklist any addresses where we suspect underage ordering. We are also registered with Drinkaware UK to further promote responsible drinking. We are also determined to establish strong methods as we go further into the digital age.

Dear Mr. Moore, we will try our very best to support the licensing objectives and will make sure that we only add to responsible drinking scenarios. Kindly contact us for any further queries. We hope that you will support our application.

Look forward to hearing from you.

Best Regards

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**From:** Moore, Ray  
**Sent:** Tuesday, May 07, 2019 9:10 AM  
**To:** ██████████  
**Cc:** Regen, Licensing; Tear, Jayne  
**Subject:** RE: FW: Application for a premises license for Liqroo Ltd for Unit 1, Haymerle Road, SE15 6SQ Application no 867558

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Online age verification is not a tick box stating that you are 18... that would be an inadequate checking system.

Ray MOORE

Principal Trading Standards Enforcement Officer

Southwark Council | Environment & Leisure| Regulatory Services

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[www.southwark.gov.uk/TradingStandards](http://www.southwark.gov.uk/TradingStandards)

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Need advice on consumer issues? Visit Citizens Advice via [www.direct.gov.uk/consumer](http://www.direct.gov.uk/consumer)

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**From:** ██████████  
**Sent:** Thursday, May 16, 2019 2:48 PM  
**To:** Moore, Ray  
**Cc:** Regen, Licensing; Tear, Jayne  
**Subject:** Re: FW: Application for a premises license for Liqroo Ltd for Unit 1, Haymerle Road, SE15 6SQ Application no 867558

Dear Mr Moore,

Hope you are doing well. Kindly share the conditions regarding age verification online, as discussed.

We look forward to hearing from you.

Best Regards,

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**From:** Moore, Ray

**Sent:** Friday, May 24, 2019 12:33 PM

**To:** [REDACTED]

**Cc:** Regen, Licensing; Tear, Jayne; McArthur, Wesley; Alcohol@homeoffice.gsi.gov.uk ; Qau Safeguarding; Costin, Holly; DIP Team; FireSafetyRegulationSE@london-fire.gov.uk (FSR-AdminSupport@london-fire.gov.uk); Graham White; Highwayslicensing; Moore, Ray; Planning.Enquiries; Public Health Licensing; Reg Env Protection; Reg Health and Safety; southwark.repro@pbms.co.uk; Taylor, Dan; Tear, Jayne; West Team diary

**Subject:** RE: FW: Application for a premises license for Liqroo Ltd for Unit 1, Haymerle Road, SE15 6SQ Application no 867558

Below are the proposed conditions that Trading Standards would ask that you agree:-

1. That all online sales of alcohol are subject to a real time age verification check via an external third party.
2. That drivers (whether employed directly, as self employed or via third parties have to under take training on age restricted policies to ensure that the following checks are conducted at the point of delivery when the person appears to be under the age of 25...
  - That a challenge 25 scheme shall be maintained at the stalls selling alcohol requiring that staff selling alcohol request that any customer who looks under 25 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old. Valid photographic identification is composed of a driving licence, passport, UK armed services ID card and any Proof of Age Standards Scheme (PASS) accredited card such as the Proof of Age London (PAL) card.
  - That all staff involved in the sale of alcohol shall be trained in the prevention of sales of alcohol to underage persons, and the challenge 25 scheme in operation at the stall. A record of such training shall be kept / be accessible at the stall at all times and be made immediately available for inspection at the stall to council or police officers on request. The training record shall include the trainee's name (in block capitals), the trainer's name (in block capitals), the signature of the trainee, the signature of the trainer, the date(s) of training and a declaration that the training has been received.
  - That clearly legible signs shall be prominently displayed where they can easily be seen and read by customers stating to the effect that a challenge 25 policy is in operation at the premises, that customers may be asked to provide proof of age and stating what the acceptable forms of proof of age are. Such signage shall be displayed at all entrances, points of sale and in all areas where alcohol is displayed for sale. The signage shall be kept free from obstructions at all times.
  - That a register of refused sales of alcohol shall be maintained in order to demonstrate effective operation of the challenge 25 policy. The register shall be clearly and legibly marked on the front cover as a register of refused sales, with the address of the premises and with the name and address of the licence holder. The register shall be kept / be accessible at the premises at all times. The register shall be made immediately available for inspection at the premises to council or police officers on request.
3. That delivery drivers use body worn cameras not only for their own personal safety but also as a means to check they are complying with the above procedures and that

the refusal register is updated to show that checks have been made on body worn footage.

4. That all body worn footage should be kept for a period of 7 days and made available to the police or authorised LB Southwark officers upon request.

Ray MOORE

Principal Trading Standards Enforcement Officer

Southwark Council | Environment & Leisure| Regulatory Services

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