



Children's Charities' Coalition on Internet Safety

David Poley
Chief Executive
The Portman Group
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Cavendish Square
London W1G 9DQ

4th July, 2007

Dear Mr Poley,

We were very pleased to see from your recent press release that you had been thinking afresh about the importance of the internet as a potential means by which persons under the age of 18 could obtain access to alcoholic beverages or alcohol related web sites. We were, however, surprised to see the conclusion you had reached, as published in the "Best Practice Guidelines" in the marketing advice section of your web site¹. Simply to create a web page which asks people to confirm their age, falls a long way short of what is desirable or possible.

It is very easy to confirm that someone is over the age of 18 and lots of companies do it all the time. The gambling industry is now under an express legal obligation to determine that no one under the age of 18 can place bets on any of their web sites. Gambling web sites must have in place a robust age verification system or else their companies could be made the subject of unlimited fines, or worse. The courts have also indicated that where adult oriented products or images are being sold or promoted, responsible web site hosts ought to take steps to ensure that only those people who are old enough to access them, and those who positively want to access them, are able to do so.

Where someone wishes to buy alcohol online and they choose to pay by a method restricted only to persons who are aged 18 or above then, broadly-speaking, in our view the company is under no further obligation to require any additional proof.

However, where the person wishing to buy alcohol chooses to use a method of payment which is (entirely properly) open to legal minors e.g. a Solo card or a Visa Electron card, then in addition to requiring the would-be purchaser to confirm they are

¹ See <http://www.portmangroup.org.uk/?pid=30&level=3>

legally entitled to buy the goods, the vendor should also run an online check to determine whether or not the person is in fact telling the truth. Where they are unable to confirm that the person is telling the truth e.g. by reference to an online database, the vendor should decline to sell the goods in question unless and until some other form of proof is produced. By extension, the same approaches could be applied to any and all alcohol-related web sites which promote alcoholic beverages.

There are now a number of age verification products on the market which would easily allow a person who only possesses a Solo or Visa Electron or similar card to demonstrate conclusively that they do, in fact, meet the specified age criteria. The gambling industry is using them. We think the alcohol industry can and should do the same in relation to all of its promotional activities.

I would be grateful for your comments and we would, of course, be happy to meet up to discuss this with you. In particular we would also be interested to know if the Portman Group monitors the methods used by vendors who sell alcohol online. Are you satisfied that online vendors are using robust age verification systems to control the sale of alcohol to minors?

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John NCH', written in a cursive style.

Secretary

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