

IAS response to DSIT consultation ‘Growing up in the online world: a national consultation’

Q2. What are the harms or risks of social media use, and being online, for children?

Our response to this question focuses specifically on the harms arising from children's exposure to digital marketing of alcohol. This is a significant and underappreciated risk within online environments, with a robust and growing evidence base demonstrating real harm to children's health and development.

The evidence base: alcohol marketing harms children

There is now a substantial body of longitudinal evidence establishing a causal relationship between exposure to alcohol marketing and alcohol use among young people. Systematic reviews and meta-analyses consistently show that marketing exposure accelerates the onset of drinking, increases drinking frequency, and shapes heavier consumption patterns in adolescence and early adulthood (Anderson et al., 2009; Jernigan et al., 2017; Sargent & Babor, 2020). As the World Health Organization (WHO) has concluded, the relationship between exposure to alcohol marketing and underage drinking is causal, not merely correlational (WHO European Office, 2021).

A 2025 Lancet meta-analysis of 31 studies involving over 62,000 participants – 84% of whom were adolescents aged 11–17 – found that exposure specifically to digital alcohol marketing was associated with 75% greater odds of alcohol use, 80% greater odds of binge drinking, and 78% greater odds of susceptibility to alcohol initiation among never-users (Donaldson et al., 2025). This is among the largest and most methodologically robust bodies of evidence yet assembled on this question.

Research from Australia indicates young people may be exposed to more than 20 alcohol advertisements per hour on social media (Rutherford, 2024), while a New Zealand study found 71% of young people reported seeing alcohol marketing on platforms they regularly use (McCreanor et al., 2025).

The recent evidence review by Public Health Scotland (2025) reinforces and contextualises this international evidence within a UK setting. Drawing on 65 studies across high-income countries, the review concludes with confidence that alcohol marketing is both pervasive and persuasive, with exposure occurring frequently across multiple channels – including online environments – and associated with increased consumption, intentions to drink, and harmful drinking patterns, particularly among children and young people. Importantly, the review also finds that voluntary industry self-regulation is ineffective, and that more comprehensive restrictions on marketing are likely to reduce exposure and consumption, with the strongest and most consistent benefits seen in younger populations. This UK-relevant synthesis strengthens the case for robust statutory controls on digital alcohol marketing as part of efforts to protect children online.

The harms also extend beyond initiation. Early drinking onset is itself a strong predictor of hazardous drinking in adulthood (Enstad et al., 2019). Teenage drinkers report significantly more hazardous and disinhibitory behaviour per unit of alcohol

than older drinkers, and the developing adolescent brain is particularly vulnerable to alcohol's neurotoxic effects. Research has also shown that those who drink more heavily are algorithmically targeted with more alcohol marketing, creating a reinforcing cycle of harm (Carah, 2017).

Importantly, alcohol marketing does not need to target children directly to cause harm. Exposure alone – through content primarily intended for adults – shapes attitudes and normalises drinking culture from a young age. The WHO European Region frames protection from this exposure as a children's rights issue under the UN Convention on the Rights of the Child (WHO European Office, 2021).

Why digital and social media environments are particularly harmful

Digital environments present a qualitatively different – and more dangerous – form of marketing exposure compared to traditional media, for several reasons:

- **Scale and ubiquity.** Children now encounter alcohol marketing across every digital space they inhabit – social media feeds, video platforms, gaming environments, messaging apps, and live-streamed sporting events. In 2020, a majority of UK children had their own mobile phone by age 7 (PA Media, 2020). The internet is not an occasional media environment; it is a continuous, ambient presence in children's lives.
- **Algorithmic personalisation and behavioural targeting.** Unlike broadcast advertising, digital platforms use sophisticated data analytics and real-time algorithmic processing to deliver highly personalised marketing. GPS location data, browsing history, social interactions and demographic profiling are combined to serve tailored alcohol advertisements to individual children – often while they are engaged in social activities – at moments of maximum psychological vulnerability (WHO European Office, 2021; WHO, 2022). This exploits children's developmental susceptibility in ways that traditional advertising cannot.
- **The 'dark' and invisible nature of digital alcohol marketing.** The vast majority of alcohol advertising online is invisible to regulators – it is only visible to the individual consumer for whom it is personalised (Carah & Brodmerkel, 2021). This makes it extremely difficult to monitor, measure, or enforce restrictions against. Unlike a television advertisement, there is no publicly observable broadcast – the content exists only in a child's private digital feed.
- **Influencer marketing and disguised advertising.** Alcohol brands routinely pay social media influencers – often with large followings among young people – to promote products in ways indistinguishable from organic content. Research shows that influencers are effective in normalising alcohol consumption among minors, and that disclosure requirements are routinely ignored or circumvented (Hendriks et al., 2020; WHO European Office, 2021). Native advertising, user-generated content campaigns, branded gaming integrations, and augmented reality filters further obscure the commercial intent of marketing.
- **A specific and currently unregulated gap concerns influencers who own their own alcohol brands.** Because promotion of a personally owned brand can be framed as authentic self-expression rather than paid advertising, existing disclosure requirements do not apply. A study of influencer accounts popular

with young people aged 16–20 found that 4 of the 20 most frequently followed influencers had their own alcohol brands, and none disclosed promotion of those brands as advertising (Lyons et al., 2026). Guidance should explicitly close this loophole.

- Normalisation through social identity. Social media environments link alcohol marketing to identity construction, social belonging and peer culture – domains of particular psychological importance to adolescents (Atkinson et al., 2017; Geusens & Beullens, 2021). User-generated content, sweepstakes and brand engagement campaigns transform children from passive recipients into active distributors of alcohol marketing, blurring the line between commercial promotion and authentic social interaction.
- Failure of age verification. Despite widespread legal requirements, age-verification on alcohol-related digital content remains largely ineffective. Research has demonstrated that the majority of alcohol brands fail to enforce age limits on social media platforms, and where tools exist they are easily circumvented (Barry et al., 2015; Kauppila et al., 2019).
- Cross-border nature of the harm. Digital alcohol marketing is inherently cross-border. Content produced by transnational alcohol corporations and distributed via global platforms – the majority of which are domiciled outside the UK – reaches children regardless of national restrictions (WHO, 2022). This means domestic regulation alone is structurally insufficient to protect children from exposure.

Taken together, the evidence demonstrates that children's online environments are saturated with alcohol marketing that is personalised, pervasive, largely invisible to regulators, and causally linked to harm.

Q51. What should be considered when taking further action to support positive online spaces and content for young people?

Creating genuinely safe digital spaces for children requires, as a necessary condition, removing or substantially restricting the harmful commercial content that currently pervades those spaces – including digital alcohol marketing. Below we set out the key considerations and evidence-based recommendations we believe should inform the next phase of action.

1. Statutory restrictions on alcohol marketing to children online must be strengthened

The current regulatory framework – combining industry self-regulation and the ASA codes – is demonstrably inadequate. Multiple WHO reports, and independent academic reviews, have concluded that industry self-regulation fails to protect children from exposure to alcohol marketing (WHO European Office, 2021; WHO, 2022; Noel & Babor, 2017). The alcohol industry's own voluntary codes have not produced meaningful reductions in children's exposure, and compliance monitoring is weak.

The UK's Children's Code (Age Appropriate Design Code), enacted in 2020, provides a model for how statutory online safety obligations can be designed to protect children's digital rights. A similar evidence-based, statutory approach should

now be applied specifically to alcohol marketing. This would require platforms to take proactive steps to prevent alcohol marketing from reaching users identified as – or likely to be – under 18, rather than relying on reactive complaints and ineffective age-gating.

It is worth addressing directly the claim, frequently made by platforms in policy consultations, that effective regulation of their advertising systems is technically complex or impractical. The opposite is true. Digital platforms are among the most technically regulatable institutions that have ever existed – entirely protocol-driven and rules-based, with the ability to track and control every exchange across their networks. Where platforms have been given sufficiently strong incentives to act – for example, in relation to tobacco advertising in some jurisdictions – they have demonstrated the ability to eliminate the relevant content almost entirely. The burden of proof should lie with platforms to demonstrate why equivalent controls on alcohol marketing cannot be implemented, not with regulators to prove that they can.

2. Platforms must be required to share data and enable monitoring

A fundamental obstacle to protecting children from digital alcohol marketing is the 'dark' nature of targeted advertising – its invisibility to anyone other than the intended recipient. Effective regulation requires that platforms be legally obligated to share audience data for alcohol advertisements with regulators and public health bodies. Alcohol producers and distributors should similarly be required to disclose marketing expenditure, channels used, and the demographic profiles of audiences reached.

The WHO CLICK framework – a monitoring methodology for digital marketing of unhealthy products to children – provides a practical tool that governments can adapt for the alcohol context (WHO European Office, 2021). Ofcom and the ICO should consider how existing powers under the Online Safety Act could be used to require greater advertising transparency, and where gaps exist, new duties should be introduced.

3. Algorithmic amplification of alcohol content must be addressed

Recommendation systems on major platforms actively surface and amplify alcohol-related content to users based on prior engagement. This means that a child who has interacted with alcohol-adjacent content – even incidentally – will be served increasingly more of it. This algorithmic reinforcement is distinct from intentional targeting but produces equivalent harm. Guidance should make explicit that recommender systems that serve alcohol content to under-18s constitute a risk that platforms must assess and mitigate under their safety duties.

4. Influencer marketing and disguised advertising require specific regulation

The existing disclosure regime under the ASA CAP Code is inadequate for the scale and sophistication of influencer alcohol marketing. Research consistently shows that disclosure requirements are widely ignored and, even where disclosures are made, they do not meaningfully mitigate the impact of alcohol marketing on young audiences (Hendriks et al., 2020).

Guidance developed under this consultation should specify that: influencers with audiences comprising a material proportion of under-18s should be prohibited from promoting alcohol; platforms should be required to label all commercial alcohol

content – including native advertising and sponsored posts – clearly and consistently; and pre-publication screening for compliance with age restrictions should be considered as a technical requirement placed on platform operators. Major platforms' existing content moderation algorithms – already used to identify harmful or hateful content – could be adapted for this purpose.

5. Industry should not lead the design of protective measures

Any future guidance or codes developed under this consultation should not be designed by the alcohol and digital advertising industries. Evidence from the UK, and from comparable international contexts, demonstrates that industry bodies consistently design self-regulatory systems that prioritise commercial interests over child protection (Noel & Babor, 2017; WHO, 2022). Civil society organisations, public health experts, and – crucially – children and young people themselves should be central to the design process.

6. International coordination is essential

Digital alcohol marketing is inherently transnational. Content produced by corporations headquartered outside the UK, distributed by platforms with servers outside the UK, reaches UK children regardless of domestic restrictions (WHO, 2022). The consultation should acknowledge this structural challenge and consider how the UK can leverage its post-Brexit position to lead on international coordination – including engagement with WHO processes, the UN Convention on the Rights of the Child, and bilateral arrangements with key platform-domicile countries – to ensure that national protections are not routinely circumvented.

Key recommendations in summary

- Introduce statutory restrictions on digital alcohol marketing to under-18s, moving beyond voluntary codes and self-regulation.
- Require platforms to proactively prevent alcohol marketing from reaching users under 18, with meaningful technical measures rather than declaratory age-gating.
- Place a legal duty on platforms and alcohol producers to share audience data for alcohol advertisements with regulators to enable monitoring and enforcement.
- Ensure guidance on recommender systems explicitly addresses the algorithmic amplification of alcohol-related content to children.
- Introduce specific rules on influencer alcohol marketing, including restrictions on promotion to audiences with a significant proportion of under-18s.
- Centre public health evidence and children's voices – not industry interests – in the co-design of future guidance.
- Pursue international coordination to address the cross-border nature of digital alcohol marketing, including engagement with WHO and the UN system.

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