Growing up in the online world

Alcohol Health Alliance UK

Deadline: 11.59pm on 26 May 2026

Chapter 1

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

For the purposes of this question, we are focussing on the harms and risks around children being exposed to the digital marketing of alcohol while being online.

Evidence consistently shows that children exposed to alcohol marketing are more likely to start drinking earlier, and drink more (Anderson et al., 2009; Jernigan et al., 2017; Sargent & Babor, 2020). Exposure to digital marketing specifically was associated with 75% greater odds of alcohol use, 80% greater odds of 'binge drinking', and 78% greater odds of susceptibility for those who have never drunk before to start drinking (Donaldson et al., 2025). This is particularly worrying as early onset drinking is a predictor of hazardous drinking in adulthood (Enstad et al., 2019), and the developing adolescent brain is particularly vulnerable to alcohol's effects (Wellere, A., 2024).

Young people are frequently being exposed to alcohol marketing, despite it being an age-restricted product. In 2021, we reported that over 40% of young people had seen alcohol adverts on social media platforms such as YouTube, Facebook, Snapchat, Instagram or others in the past month (Alcohol Health Alliance, 2021) – a figure that is likely to have only increased in recent years. More recent international evidence indicates that young people see up to 20 alcohol advertisements per hour on social media (Rutherford, 2024). While there have been reports of sweet, colourful, pre-mixed alcoholic drinks targeted at younger generations 'blowing up' on social media platforms like TikTok (BBC, 2026), marketing does not need to target children and young people directly to cause harm. Exposure to content primarily intended for adults still shapes attitudes and normalises drinking culture from a young age. This is very relevant as the UK has some of the highest rates for alcohol consumption among children as young as 11-years old, compared to other OECD countries (OECD, 2025).

Digital alcohol marketing presents specific harms and risks for children for several reasons:

- The ubiquitous nature of the online world now means that children can encounter alcohol marketing across every digital space, from social media feeds to video platforms, gaming environments, and live-streamed sporting events.
- Sophisticated data analytics and real-time algorithmic processing mean brands deliver highly personalised marketing.

- In turn, this means it is very difficult for regulators to monitor and measure, as the content only exists in a child's private digital feed.
- The rise of influencer and disguised advertising means products are often promoted in ways that are indistinguishable from organic content. Influencers (often with large followings) are effective at normalising alcohol consumption, while routinely ignoring or circumventing disclosure requirements (Hendriks et al., 2020; WHO European Office, 2021).
- One of these loopholes is 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, so 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).
- 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.
- Age-verification on alcohol-related digital content remains largely ineffective: 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).
- Digital alcohol marketing is a cross-border issue, as content is produced by transnational alcohol corporations and distributed via global platforms, reaching children regardless of national restrictions (WHO, 2022). Domestic regulation along is therefore insufficient to protect children from exposure.

References (by order of appearance)

Anderson, P. et al. (2009) Impact of alcohol advertising and media exposure on adolescent alcohol use: a systematic review of longitudinal studies. *Alcohol & Alcoholism*

Jernigan, D., et al. (2017) Alcohol marketing and youth alcohol consumption: a systematic review of longitudinal studies published since 2008. *Addiction*

Sargent, J. D., & Babor, T. F. (2020) The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*

Donaldson, S. I. et al. (2025) Association between exposure to digital alcohol marketing and alcohol use: a systematic review and meta-analysis. The Lancet Public Health

Enstad, F. et al. (2019) Predicting hazardous drinking in late adolescence/young adulthood from early and excessive adolescent drinking-a longitudinal cross-national study of Norwegian and Australian adolescents. *BMC public health*

Wellere, A. (2024) Alcohol and its impact on the adolescent brain. Institute of Alcohol Studies

Alcohol Health Alliance UK (2021) No escape: How alcohol advertising preys on children and vulnerable people

Rutherford, B. N. et al. (2024) Through the looking glass: an alcohol advertisement every 3 minutes. *Drug and Alcohol Review*

BBC (26 April 2026) We thought Gen Z weren't drinking. But these cocktails in a ball may suggest otherwise.

OECD (2025) Health at a glance 2025: OECD Indicators

Hendriks, H., et al. (2020) Picture me drinking: Alcohol-related posts by Instagram influencers popular among adolescents and young adults. *Frontiers in psychology*

WHO European Office (2021) Digital marketing of alcohol: challenges and policy options for better health in the WHO European Region.

Lyons, A. C. et al., (2026) Evading regulation: young people's exposure to harmful commodity marketing in the social media feeds of their favourite influencers. *Health Promotion International*

Barry, A. E., et al. (2016) Alcohol marketing on Twitter and Instagram: Evidence of directly advertising to youth/adolescents. *Alcohol and alcoholism*

Kauppila, E. K., et al. (2019) Alcohol marketing on social media sites in Finland and Sweden: A comparative audit study of brands' presence and content, and the impact of a legislative change.

WHO (2022) Reducing the harm from alcohol by regulating cross-border alcohol marketing, advertising and promotion: a technical report.

Chapter 4

What should be considered when taking further action to support positive online spaces and content for young people? For example, how would this work in practice for services, taking into account existing best practice across industry, and who should feed into future guidance.

In order to support positive online spaces and content for young people, it is necessary for action to remove or substantially restrict the advertising of harmful (and age-restricted) products such as alcohol. The Alcohol Health Alliance recommends:

1. Strengthening statutory restrictions on alcohol marketing to children online

Currently, alcohol marketing is regulated through a combination of industry self-regulation and Advertising Standards Authority (ASA) codes. Reports from the World

Health Organization (WHO) and academic research have shown that this approach fails to protect children from exposure to alcohol marketing (WHO European Office, 2021; WHO, 2022; Noel et al., 2017).

The UK's Children's Code (Age Appropriate Design Code) provides a model for how statutory online safety obligations can be designed to protect children's digital rights, which should now be applied to alcohol marketing. Platforms must take proactive steps to prevent alcohol marketing from reaching those under 18, rather than reacting to complaints from an ineffective age-gating system.

Despite claims that effective regulation is too complex or impractical, digital platforms are in fact incredibly regulatable, being entirely protocol-driven and rules-based. We know it is possible: where tobacco advertising has been banned in certain jurisdictions, content is omitted almost entirely.

There is support among young people themselves for simple restrictions to limit exposure to alcohol advertisements: Cancer Research UK found that over half of young people (51%) thought that the social media accounts of businesses who make and sell alcohol should be private (e.g., you need to follow them to see what they post) (Saunders et al., 2025).

2. Require platforms to share data and enable monitoring

All platforms should be legally obligated to share audience data for alcohol advertisements with regulators and public health bodies. This would address a current issue where content is only visible to the targeted recipient.

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).

3. Address the algorithmic amplification of alcohol content

Recommendation systems on major platforms amplify alcohol-related content to users based on prior engagement, meaning a child who has interacted with alcohol-related content (even incidentally) will be served more of it. Platforms must address their use of recommender systems that serve alcohol content to under-18s.

4. Introduce specific regulations for influencer marketing and disguised advertising

The disclosure regime under the ASA Committees of Advertising Practice (CAP) Code is insufficient for the scale and sophistication of influencer 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).

Revised regulations 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 clearly and consistently; pre-publication screening for compliance with age restrictions should be considered as a technical requirement for operators. Major platforms could adapt existing content moderation algorithms (designed to identify harmful or hateful content) for this purpose.

5. Industry should not lead the design of protective measures

Any future regulations, codes, or guidance developed under this consultation should not be led by the alcohol and digital advertising industries, which prioritise commercial interests over child protection (Noel et al., 2017; WHO, 2022). The design process should be led by civil society organisations, public health experts, and children and young people themselves.

6. International coordination is essential

Due to the transnational nature of digital alcohol marketing, international coordination is essential. Engagement with international organisations and protocols e.g., WHO processes and the UN Convention on the Rights of the Child, can ensure that national protections are not routinely circumvented.

References (by order of appearance)

WHO European Office (2021) Digital marketing of alcohol: challenges and policy options for better health in the WHO European Region.

WHO (2022) Reducing the harm from alcohol by regulating cross-border alcohol marketing, advertising and promotion: a technical report.

Noel, J. K., et al. (2017) Industry self-regulation of alcohol marketing: a systematic review of content and exposure research. *Addiction*.

Saunders, A. et al. (2025) Digital influence: Young people's exposure to the marketing of cigarettes, vapes, unhealthy food/drink and alcohol. Cancer Research UK.

Hendriks, H. et al. (2020) Picture me drinking: Alcohol-related posts by Instagram influencers popular among adolescents and young adults. *Frontiers in psychology*.