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Where we are now: the current rule

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Kings Chambers

The existing mandatory condition requires:

- An age verification policy at every licensed premises
- Anyone appearing under 18 (or older, under Challenge 21/25) to show ID before being served
- ID bearing a photograph, date of birth, and either a hologram or an ultraviolet feature

The problem: that wording assumes a physical document. A digital credential has no hologram.

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What the Draft Regulations Do

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Two changes to the condition:

- Physical ID stays exactly as it is — nothing is taken away
- A new option is added: a policy **may** permit digital ID as well

Key word: **may**

- No licensee is forced to accept digital ID
- A premises can stick to physical ID and remain fully compliant
- Digital is an additional choice, not a replacement



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Verification by Service, not by Sight

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Digital ID is not "showing your ID on a phone"

- A customer holding up an app, a QR code or an image on a screen does **not** satisfy the condition
- Lawful acceptance depends on a secure check through an approved provider
- The security is in the verified check — not in what appears on the screen



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The Key New Player - the DVSP

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DVSP = Digital Verification Services Provider

- A provider on the Government's official DVS register (under the Data (Use and Access) Act 2025)
- To accept digital ID, a premises must have an agreement with a registered DVSP
- The DVSP confirms the customer's age through a secure process
- Only registered providers count — the register is the legal test

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How it works at the point of sale

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The sequence:

1. Customer chooses to present a digital credential
2. Staff trigger a secure verification (as they would ask for a card)
3. The registered provider confirms: is this person old enough, and is the credential really theirs?
4. A clear result comes back — and the sale proceeds or not

Quick, secure, consistent — no manual photo comparison required



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Limits of the SI

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No age *estimation* — this is about verified digital identity, not age estimation technology

No change to the criminal offences or their defences

No compulsion — physical ID and Challenge 25 continue as now

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Enforcement and Due Diligence



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For regulators and licensees alike:

- A verified digital check creates a clear, auditable record
- The due diligence framework is unchanged: policy, training, supervision, records still matter
- Digital ID does not remove liability — it is a regulated way of taking reasonable steps
- The offence of selling to under-18s is untouched by this draft
- Conditions may need revisiting

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Guidance



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Thank You

Questions & Discussion

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