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Brendan Allen

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19 November 2025

Dear Mr Allen

Prevention of Future Deaths Report regarding the death of Leonardo Machado

Thank you for your Report to Prevent Future Deaths dated 18 September 2025 regarding the death of Leonardo Machado (the “**Report**”). Firstly, we wish to offer our condolences to Leo’s family and loved ones for their loss.

In the Report you raised concerns that children under the age of 18 may be renting food delivery accounts. You are concerned that this might place children in a vulnerable position where they are working alone at night and on motorised vehicles at risk of a traffic collision and potential death.

Riders must be aged 18 or over to carry out deliveries for Deliveroo. We have strict controls to prevent individuals aged under 18 from onboarding and creating delivery accounts - these are detailed further below. Riders may allow others to use their account (substitution is a feature of self-employment in the UK) but account holders are not permitted to share their delivery accounts with individuals who are under 18 years old. This is clear in our Rider Supplier Agreement and on our rider website.

You might be aware that over the course of this year, we have been working closely with the Home Office and other food delivery platforms to enhance compliance with right to work legislation by food delivery couriers. We have significantly strengthened checks and processes that we already had in place to ensure that rider accounts are only being used by

authorised individuals. Although your concerns do not relate to right to work specifically, the work being carried out in this area strengthens our processes to prevent riders operating on our platform without our authority or knowledge. This includes individuals who are under 18 years old, who are prohibited from accessing our platform under the terms of the app.

In preparing our response, we have reflected on our internal procedures, including changes made to the way we operate following engagement with the Home Office. As summarised below, we are confident we have a robust framework designed to reduce the risk of unauthorised riders accessing our platform and we trust you find the response helpful.

Measures to prevent unauthorised platform access

Deliveroo takes this matter very seriously and has a framework of safeguards in place to reduce the risks of unauthorised access to our platform, including by those who are under 18. In particular:

1. It is a requirement that any rider engaged with Deliveroo is at least 18 years old.
2. As part of our onboarding process, we take steps to establish the identity of our riders to ensure we know who we are engaging and verify their right to work. As part of that process, all riders are required to provide an official document that evidences their date of birth. This might be a passport, driving licence or birth certificate for example. These documents are checked before the rider is granted a delivery account. **A delivery account will not be granted to an individual unless their documents show they are over 18 years old.**
3. Once a rider has access to a delivery account, as is the case for all self-employed individuals in the UK, they are allowed to substitute their services to other people. However, we require all substitute riders to be registered with us before they can provide services on behalf of the main account holder. As part of this, all registered substitutes must complete the same process to establish their identity and their right to work, meaning that they provide evidence of their date of birth in the same manner as the main account holder. Substitution is explained in more detail below.
4. We run facial recognition checks to ensure that the person using an account is either the main account holder or a registered substitute and to detect and prevent unauthorised use of the platform. These checks are run at least daily for all riders in the UK. This process requires the rider to submit a live video selfie, which is then checked by our third party supplier to make sure it matches the ID they provided during onboarding. If riders do not pass, their accounts are placed out of service, meaning that they cannot accept orders until they have passed a check.
5. Facial recognition checks are triggered in various different scenarios. The checks are designed to detect unauthorised riders in the areas of most common abuse on our rider app.
6. We have recently increased the frequency and sophistication of these checks, including randomising the frequency of intra-day checks to make it harder for people to predict the checks.
7. Our facial recognition technology identifies any failed checks that indicate someone other than the main account holder, or registered substitute, may have been trying

to conduct a facial recognition check on their behalf, or where there is other evidence of fraud. These are reviewed by our teams and where we find evidence of unauthorised account sharing, we terminate the supplier agreement with the riders.

8. We also have other measures in place to enable us to identify suspicious activity or if an unregistered substitute is attempting to use our platform. Where we identify breaches of our processes, we take appropriate action, including terminating supplier agreements with riders where necessary.

We stop working with riders who allow an unregistered substitute to use their rider account and will not work with those riders in the future. We have processes in place to enable us to identify whether a rider applicant has previously had a supplier agreement with us terminated for allowing an unregistered substitute to provide services on their behalf.

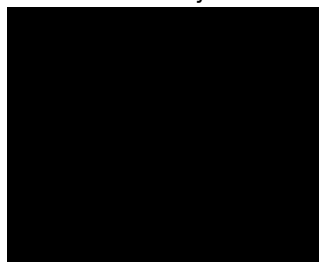
Substitution

You refer to the renting of food delivery licences. Deliveroo engages riders on a self-employed basis; we do not operate food delivery licences. We understand that when using this term you may be referring to substitution - where one rider completes a delivery on another rider's behalf. Substitution has always been, and continues to be, a common feature of self-employment. It is not specific to Deliveroo, nor our sector. Individuals with a Deliveroo rider account are able to arrange for a substitute to provide the delivery services on their behalf. As mentioned above, substitutes must also be registered and pass the same identity checks as a main account holder to provide services to Deliveroo. Self-employment and substitution provides riders with the flexibility to choose when, where, how and if they want to provide their services to us. This is a valuable way of working for self-employed individuals, including riders.

We continue to monitor interaction with our app to further enhance our security checks and features to prevent abuse, so our platform remains safe and secure for the riders who work with us and our wider communities.

We trust that this helps to allay any concerns you may have had.

Yours sincerely



Deliveroo VP European Operations
For and on behalf of Roofoods Ltd (t/a Deliveroo)