



**Consumer Focus Scotland's response to
'Shifting the Culture: a proposal for a bill
to bring forward measures to help
change culture in relation to alcohol in
Scotland'.**

About Consumer Focus Scotland

Consumer Focus Scotland started work on 1 October 2008. Consumer Focus Scotland was formed through the merger of three organisations – the Scottish Consumer Council, energywatch Scotland, and Postwatch Scotland.

Consumer Focus Scotland works to secure a fair deal for consumers in both private markets and public services, by promoting fairer markets, greater value for money, and improved customer service. While producers of goods and services are usually well-organised and articulate when protecting their own interests, individual consumers very often are not. The people whose interests we represent are consumers of all kinds: they may be patients, tenants, parents, solicitors' clients, public transport users, or shoppers in a supermarket.

We have a commitment to work on behalf of vulnerable consumers, particularly in the energy and post sectors, and a duty to work on issues of sustainable development.

Consumer Focus Scotland response to the consultation

Introduction

Consumer Focus Scotland welcomes the opportunity to respond to the consultation on the proposal for a member's bill bringing forward measures to help change culture in relation to alcohol in Scotland.

In our previous submissions to the Scottish Parliament on the Alcohol (Minimum Pricing)(Scotland) Bill¹ we welcomed steps to address the health and social costs of Scotland's problems with alcohol. While we support the introduction of minimum alcohol pricing, we have consistently emphasised that this approach should be part of a suite of coordinated measures designed to change behaviour.

Our view is that the following measures should be introduced in addition to minimum pricing:

- Awareness raising and education.
- Continuing support for behaviour change, including social marketing.
- Monitoring of the impact of the legislation.

We are very pleased that the current consultation makes proposals which relate directly to these suggested measures. Although we are not in a position to comment on all of the consultation's proposals, we wish to respond to the questions which relate to our particular areas of interest.

Q7. Is there a role for further alcohol education and public information campaigns in changing alcohol culture?

We agree that there is a role for further alcohol education and public information campaigns in changing alcohol culture. However, education and public information on their own will likely be insufficient to change behaviour. Lessons from other fields show that effecting behaviour change requires a wide range of approaches that include awareness raising, education, legislation and continuing support for behaviour change.

The National Social Marketing Centre (NSMC)² suggests that deploying a mix of social marketing strategies is essential if consumer behaviour is to be changed. The mix of strategies is as follows:

¹ Consumer Focus Scotland's evidence to the Health and Sport Committee on the Alcohol (Minimum Pricing) (Scotland) Bill (2011); Consumer Focus Scotland's follow-up evidence to the Health and Sport Committee on the minimum alcohol pricing mechanism (2012)

² The NSMC was established by Government in 2006, and is the centre of excellence for social marketing and behaviour change in the UK. www.thensmc.com

- **Support:** giving people the means and solutions to adopt the desired behaviour.
- **Design:** changing the environment, physical context and products to support the new behaviour.
- **Inform and Educate:** providing information to advise, build awareness, persuade and inspire.
- **Control:** incentivise or disincentivise - steps to legislate, require, enforce and set standards.

The NSMC has been involved in a number of projects³ cross the UK and has produced a number of publications⁴ which apply these strategies to reducing alcohol consumption. These documents provide a range of principles and tactics that we believe should be incorporated when developing approaches to campaigns aimed at changing behaviour in relation to alcohol in Scotland.

Q8. Would it be beneficial for Ministers to be made directly accountable to the Parliament for their policy in this area, as proposed?

We believe that the impact and effectiveness of alcohol education policies and public information campaigns should be monitored. Any monitoring should operate in conjunction with the review that the Scottish Government has committed to carrying out five years after the implementation of minimum pricing. This was included in the Alcohol (Minimum Pricing) (Scotland) bill at stage two.

However, we strongly believe that long-term, consistent application and appropriate monitoring is crucial in order to ensure that any legislative outcomes have and maintain their intended effects. Behavioural change at a societal level is often achieved only over the longer term. It took around 50 years and 20 years respectively for large scale behavioural change to be seen in relation to smoking and condom use. We therefore believe that the measures should be given time to work and that their efficacy should be determined over the longer term. Any reporting in relation to their effectiveness should operate within this context.

Q10. Do you believe that community neighbours should be consulted and their views taken into account when licences are being renewed or extended or when special licences are being issued?

Q11. Do you believe that the New Zealand model is an appropriate one to emulate, if not what, changes should be made?

³ Alcohol Social Marketing For England (in conjunction with the UK Government Dept. of Health) to reduce alcohol related hospital admissions across England (2010). Largest ever social marketing campaign to tackle alcohol misuse among young adults (2010)

⁴ Value for Money alcohol tool user guide: Tell them about alcohol for love or money (2010). Reducing underage kerbside drinking (2010). Social Marketing Works! - a short guide for the NHS

We agree that community neighbours should be consulted and their views taken into account when licences are being renewed or extended or when special licences are being issued. We have no strong view on whether the New Zealand model is an appropriate one to emulate. However, we believe that it is in the interests of all parties for the consultation process to be developed from the outset in conjunction with the relevant local communities. We also believe that it is in the interests of all parties for local authorities to be seen to be enforcing any license conditions that result from such consultation processes.

However, if consultation is to be successful, it needs to be meaningful. We have published a report⁵ on best practice when engaging consumers in decision making in public services. It sets out seven principles of best practice which were developed by a panel of experts on the basis of existing evidence. This document provides useful guidance and practical examples which could be used as the basis for developing an appropriate engagement strategy in this area.

It is important that local authorities enforce the licence conditions imposed following the period of consultation.

⁵ Consumer Engagement in Decision Making: Best Practice from Scottish Public Services. (2011)

Consumer Focus Scotland
Royal Exchange House
100 Queen Street
Glasgow G1 3DN

Telephone 0141 226 5261
Facsimile 0141 221 9695

www.consumerfocus-scotland.org.uk

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