

The Salvation Army
United Kingdom Territory
(with the Republic of Ireland)



“Shifting the Culture”

Response from The Salvation Army to
The Alcohol (Public Health and Criminal Justice)
(Scotland) Bill
A Member’s Bill Consultation
by Dr Richard Simpson MSP and Graeme Pearson MSP

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Ecumenical Statement

Alcohol is no ordinary commodity¹. Some Churches since their earliest days have used wine historically, symbolically and with theological significance for occasions of celebration; however, we recognise that alcohol can be used abusively and as such, can cause damage to human relationships. A longstanding commitment to the wellbeing of the Scottish people leads us to recognise the importance of a holistic approach to tackling the harm caused by a culture of alcohol abuse in Scotland. We welcome the provisions of the Alcohol etc. (Scotland) Act 2010, and the proposals for Minimum Unit Pricing in the Alcohol (Minimum Pricing) (Scotland) Act 2012. Viewed together with the existing objectives as set out in the Licensing (Scotland) Act 2005, these measures demonstrate the leading role taken by Scotland in taking steps to reduce this harm, and we urge that further action in this area be placed above party political differences for the benefit of all in Scotland.

The Salvation Army appreciates the opportunity to submit a response to this consultation.

We welcome any initiative that is aimed at reducing the level of alcohol related harm across the communities in Scotland. We firmly believe that alcohol is “no ordinary commodity” and would be supportive of any programme or policy that seeks to bridge the knowledge gap around alcohol. Recent years have seen the dawning of a “new consciousness” about alcohol and its impact on our society and we would seek to build on this awakening by challenging the Government to ensure that tight control is evidenced across all aspects of alcohol marketing and promotion. Addressing affordability and availability remain the most effective levers to effect the significant change in drinking culture that we seek and we consider a consistency of approach to be a key feature of any plan or policy crafted in this area.

Consultation questions:

1. Tightening Quantity Discount Ban in Alcohol etc. (Scotland) Act 2010

¹ Barbor, T.F., Caetano, R., Casswell, S., et al (2003) *Alcohol: No Ordinary Commodity – Research and Public Policy*, Oxford and London; Oxford University Press

Do you think the further restriction on quantity discounting proposed would be beneficial? What disadvantages might there be? Do you think there is a case for going further?

We support the intent to end quantity discounting, however we remain firm in our belief that the most effective method of reducing consumption across the population is to set an appropriate minimum unit price. This minimum unit price will be applicable across all products, including multi-packs, and establish a baseline price for the retailer. Any proposed “quantity discounting” will have to take cognisance of the unit price.

2. Public Health Interest and Child Protection:

Do you believe that Ministers should be required to issue guidance on these two licensing objectives?

We welcomed the recommendations of the Nicholson Report and their subsequent enactment within the Licensing (Scotland) Act 2005. The “promotion of public health” and “the protection of children from harm” are ground breaking principles that must be fully implemented in order for the intent of the law to be effected. We would be supportive of any intent to ensure that these principles are fully understood and implemented by Licensing Boards.

Do you believe that Ministers should be required to report to the parliament once per session, and what should a report be required to cover?

We would expect any guidance issued by the Government in relation to the principles of the Licensing (Scotland) Act to be reviewed regularly. We have no comment on the mechanism for such a review.

3. Restrictions in Alcohol Marketing:

Do you believe that the proposed restrictions on advertising are proportionate or necessary? Are there further measures you feel should be introduced?

We believe that any and all measures that substantially reduce exposure to alcohol marketing, which normalises drinking and links it with social aspirations, should be pursued². We are encouraged by the intent of the consultation but believe that it does not go far enough. We would call for a total ban on alcohol advertising in public places including the sponsorship of sports events and festivals³.

We further believe that cognisance needs to be taken of the fast growing media channels (including mobile technology) that target alcohol marketing at young people. Alcohol producers can use diverse and increasingly sophisticated media as a powerful means to interact and engage with consumers. The use of new media marketing is not simply replacing traditional alcohol marketing but it is rather extending the scope of alcohol marketing activities⁴. In light of this we would encourage a review of the current advertising codes of practice ensuring that the protection of children and young people is prioritised.

² WHO Global Strategy to Reduce Harmful Use of Alcohol

³ ALICE RAP Policy Paper Series – Policy Brief 1. Alcohol-The Neglected Addiction

⁴ Address by Commissioner John Dali; DG SANCO to European Alcohol Health Forum; September 2011

4. Caffeine Limit in Pre-mixed Alcohol Products:

Do you believe that there should be restrictions on caffeinated alcohol products? If so do you believe the proposed caffeine limit of 150mg/litre on pre-mixed products is appropriate?

We accept the research quoted within the consultation document and would support the proposed restriction on caffeinated alcohol products. We would defer to other experts on the pre-mixed concentration levels.

5. Alcohol Education:

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

We believe that there is a role for further alcohol education and public information however, such “education” and “information” should be aimed at correcting the knowledge gap around alcohol and should not, therefore, be influenced by the alcohol industry. Most science-based assessments of alcohol now categorise it as the most harmful of all drugs in terms of its impact on health and well-being in society⁵. The mixed messages which emanate from policy makers around “safe levels” and “responsible drinking” have contributed to the current levels of alcohol related harm. Alcohol education, taken seriously, must address the knowledge gaps.

Would it be beneficial for ministers to be made directly accountable to Parliament for their policy in this area, as proposed?

We would consider accountability to Parliament for the effectiveness of an “alcohol education policy” as an appropriate mechanism. It would be vital to ensure that those charged with evaluating any such policy be seen as independent “honest brokers”, independent of the industry.

6. Alcohol Discrimination Against Under-21 year olds in Off Sales:

Do you support a ban on Licensing Boards requiring off-licenses to restrict sales on age-grounds alone, or are there circumstances where this could be justifiable?

No substantive comment

7. Community Involvement in Licensing Decisions:

Do you believe that community neighbours should be consulted and their views taken into account when licenses are being renewed or extended or when special licenses are being issued? Do you believe that the New Zealand model is an appropriate one to emulate, if not, what changes should be made?

No Substantive Comment

8. National Licensing Forum:

⁵ ALICE RAP Policy Paper Series – Policy Brief 1. Alcohol-The Neglected Addiction

Do you believe that there is a role for a National Licensing Forum in addition to the existing local forums? If so:

Should it be funded through licensing fees or central Scottish Government funding?

What would its membership be, and who would appoint them?

To whom would it be accountable?

What would its functions be?

No substantive comment

9. Alcohol Bottle Tagging:

Is there sufficient evidence to justify legislation allowing Licensing Boards to make participation in a bottle tagging scheme a license condition, or are current voluntary arrangements adequate?

No substantive comment

10. Alcohol Fine Diversion:

Should Fine Diversion be made available, on a statutory basis, throughout Scotland, if the further pilot is successful?

From the information available we believe that this initiative is worthy of further investigation.

11. Alcohol Arrest Referral:

Do you believe that Arrest Referral schemes for Alcohol (as well as Drugs) should be a statutory requirement within each Community Justice Authority area?

We believe that Arrest Referral schemes for Alcohol have the potential to provide immediate access to treatment for individuals whose problematic consumption has brought them into contact with the Criminal Justice System. The success of the scheme will be dependant upon the quality of the treatment options made available, particularly as diversionary schemes are 'coercive' by nature.

12. Drinking Banning Orders:

Should drinking banning orders be introduced in Scotland? If so should they be piloted in one Sheriffdom?

No substantive comment

13. Alcohol and Drug Treatment and Testing orders (ADDTO)

Do you believe extending DTTOs to become ADDTOs would add value to the existing range of disposal? What difference of context between drugs and alcohol would need to be taken into account?

We believe that this proposal has some merit, however access to appropriate treatment options is vital. While this initiative sits within the Criminal Justice section of the consultation, we believe that ADTTOs, if enacted, should be about access to recovery based treatment rather than 'disposal'. In this context we would advocate for "alcohol specific" interventions (ATTO's). This would require a significant increase in the number and availability of recovery based treatment centres/programmes.

14. Alcohol Offences Information Sharing:

Do you believe that notifying a GP about a patient's conviction for an alcohol related offence would be beneficial? Should it apply only in cases of conviction or in other circumstances as well?

No substantive comment

15. General Questions

Do you support the general aim of the proposed bill? (as outlined above). Please indicate "yes/no/undecided" and explain the reasons for your response.

We would support any policy or programme that is aimed at reducing the alcohol related harm caused to the people of Scotland.

Are there further legislative (or non-legislative) changes that you would recommend, beyond those outlined in this consultation, in order to further its general aims of tackling Scotland's culture of excessive alcohol consumption?

No substantive comment

What is your assessment of the likely financial implications (if any) of the proposed bill to you or your organisation? What (if any) other significant financial implications are likely to arise?

No substantive comment

Is the proposed bill likely to have any substantial positive or negative implications for equality? If it is likely to have a substantial negative implication, how might this be minimised or avoided?

No substantive comment

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