

STIRLING ALCOHOL & DRUG PARTNERSHIP

RESPONSE TO “SHIFTING THE CULTURE” CONSULTATION

The Stirling ADP (SADP) welcomes the opportunity for further debate and discussion around additional ways of changing Scotland's relationship with alcohol and therefore reducing the harm caused by alcohol to individuals, families and communities. The Stirling ADP recognises the need for further discussion around the points raised at a local level with ADP members, the local Licensing Board and the local Licensing Forum.

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

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?

SADP Response:

The SADP believes that further restrictions on quantity discounting could be beneficial. Scottish people are already drinking far more than their British and European counterparts so any action taken to contribute towards reduced consumption must be beneficial. However, the SADP recognises that this action on its own will not achieve cultural change.

A disadvantage may be the implications that this has for retailers, particularly for smaller businesses. Retailers selling alcohol now have a full range of legislation that they must adhere to which can be particularly difficult and expensive to implement and monitor for smaller, local businesses.

Public Health & Child Protection

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

SADP Response:

Guidance on the two licensing objectives would be beneficial. At a local level, it has been acknowledged that these are the two objectives causing the most uncertainty. Practical guidance may be more useful at a local level as opposed to more legislative guidance.

SADP can see benefits / learning opportunities from there being a requirement for Licensing Boards to report on how they are promoting the licensing objectives at a local level.

Restrictions on Alcohol Marketing

Do you believe that the proposed restrictions on advertising are proportionate or necessary?

SADP Response:

Breaking the cycle of intergenerational substance misuse is imperative and SADP therefore welcomes the recognition in the document of “moving forward on de-normalising alcohol for children”. Evidence from France shows that reducing exposure to alcohol advertisements can reduce consumption. The measures proposed in the consultation appear reasonable although it must be highlighted that a number of alcohol retailers sponsor national initiatives and events. There is clear evidence that the alcohol industry has significantly increased its spending on social media which does have a strong influence on young people. This should be tackled. Furthermore, the recommendations from the Scottish Youth Commission on Alcohol (2010) should be taken into account.

Are there further measures you feel should be introduced?

SADP Response:

The SADP supports the call for a ban on alcohol advertising in all public places but thinks that the biggest impact could be achieved through the ban being extended to cinemas, bars and public paying areas such as football grounds and other sports venues.

The public space approach to alcohol advertising should be the same as the domestic approach to ensure consistency of message. However, in the short term perhaps some restrictions could be put in place to limit the times that alcohol advertising can be shown (i.e. after 9pm).

Caffeine Limit in Pre Mixed Alcohol Products

Do you believe that there should be restrictions on caffeinated alcohol products?

SADP Response:

The proposal clearly outlines the evidence for reducing the level of caffeine however, the SADP would also suggest reducing the amount of alcohol in these products as well. The issue of caffeinated alcohol products is a complex one and the SADP is concerned that the impact of this particular aspect would be limited. It is likely to only affect a very small number of products and does not prevent people from buying alcohol and caffeinated products separately and simply mixing them.

This particular aspect of the proposal warrants further debate and discussion as it is an important but complex issue.

Alcohol Education

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

SADP Response:

Education and a whole population approach should play a role in changing Scotland's relationship with alcohol. The key has to be consistency of message so that people receive the same information from different sources. The level of message could be adapted to be age appropriate but it would mean, for example, that parents at home could reinforce the information learned by children at school.

At a local level, a recent study highlighted that adults had often forgotten the alcohol education they received at school. This suggests a gap and perhaps opportunities should be exploited to regularly reinforce alcohol education throughout adulthood.

Another innovative approach locally has been the Social Norms project that was piloted in partnership with NHS Health Scotland. This approach has been shown to have a positive impact on pre maturation young people and is currently being adapted to look at addressing a number of risk taking behaviours including alcohol and tobacco use.

Would it be beneficial for Ministers to be made directly accountable to the Parliament for their policy in this area?

SADP Response:

Ministerial accountability would ensure that the policy area remains a priority and introducing such an accountability would emphasise Government's commitment to change the way we use alcohol.

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?

SADP Response:

The SADP believes Licensing Boards should be supported to use the powers available to them in a meaningful way and to look to partnerships such as ADPs for advice on local issues / trends in relation to alcohol. It is likely that there are already enough ways to minimise the risk of underage purchase of alcohol (i.e. Challenge 25). The key is ensuring that these policies are fully implemented and adhered to.

Community Involvement in Licensing Decisions

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

SADP Response:

Advice from Police colleagues is that the current notification and consultation processes are sufficient. One perceived difficulty for members of the public is that Licensing web sites are not always particularly user friendly.

At a local level, SADP has recently been added to the formal consultee lists and now receives formal notification of new and renewal licence applications. The Partnership is then able to use it's collective expertise to consider the impact of the licence and any potential need to object or highlight issues to the Licensing Board.

National Licensing Forum

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

SADP Response:

In theory, a national Licensing Forum could be beneficial in terms of sharing learning and knowledge. However, care must be taken to ensure it does not become dominated by possible vested interests of trade representatives. On balance, a risk is that a National Licensing Forum may not be of much practical use.

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

SADP Response:

The SADP does not have a strong opinion on this element although the partnership is aware the licence trade is becoming increasingly affected by fees in an economic downturn. The worry is that this then impacts on the quality of service provided to customers.

Justice

Alcohol Bottle Tagging.

SADP Response:

SADP are supportive of measures that restrict the availability of alcohol to those under the legal age. However, it is not clear from the document if the resource and time required to implement a bottle tagging scheme is proportionate to the perceived success. Bottle tagging is limited in the evidence of harm that it provides. It may identify the source of the alcohol but does not confirm who bought it and if it was related to anti social behaviour for example. In addition, research shows that many parents purchase alcohol for their under age children. Education must address this perhaps more so than bottle tagging.

Alcohol Fine Diversion

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

SADP Response:

The SADP would welcome further information and consideration of the effectiveness of a fine diversion scheme. Current approaches have had a limited impact on alcohol related offending so perhaps a different approach is required.

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?

SADP Response:

Across Forth Valley, an Arrest Referral scheme is available in the local custody settings. This service is already offered for both alcohol and drug issues as there is recognition of the impact of both. This scheme works well for those individuals whose alcohol use is causing an issue. Therefore, the SADP would be supportive of this approach across Scotland.

Drink Banning Orders

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

SADP Response:

From the evidence in the proposal, the SADP does not feel there is enough information to have a definite view on this aspect. Perhaps a pilot should be considered and learning shared.

Alcohol & Drug Treatment and Testing Orders (ADDTO)

Do you believe extending DTTOs to become ADDTOs would add value to the existing range of disposal?

SADP Response:

SADP would welcome further discussion on this matter. The reality is that DTTO services will already be addressing alcohol use with their existing service users. The capacity of services to offer ADDTOs would need to be seriously considered although there is full acceptance of the damaging consequences of excessive alcohol misuse.

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 cases as well?

SADP Response:

SADP requests more information on what GPs would then be expected to do with the information. Further consultation would be required on this matter as the efficacy of the information sharing is not clear at this stage.

General Questions.

Do you support the general aim of the proposed Bill?

SADP Response:

SADP welcome intervention to reduce the harm caused by alcohol and also welcomes the opportunity for further debate. As has been highlighted, some of the proposals require further information and discussion.

Are there further legislative changes that you would recommend?

SADP Response:

As highlighted earlier, the area of alcohol marketing is vitally important. Action is required at a Scotland, UK and international level to limit the exposure of individuals and communities to alcohol advertising.

Is the proposed Bill likely to have any substantial positive or negative implications for equality?

SADP Response:

The impact of alcohol misuse is disproportionate on the most deprived communities within society. Therefore, a who population approach and effective alcohol policies should have a positive impact on health inequalities and the health and well being of the most disadvantaged people.