

Shifting the Culture: Proposed Alcohol (Public Health and Criminal Justice) (Scotland) Bill

Evidence from YouthLink Scotland – June 2012

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Introduction

YouthLink Scotland is the national agency for youth work. It is a membership organisation and is in the unique position of representing the interests and aspirations of the whole of the sector, both voluntary and statutory.

YouthLink Scotland champions the role and value of youth work, challenging government at national and local levels to invest in the development of the sector.

Our vision is of a youth work sector for Scotland which offers sustainable, dynamic and accessible youth work opportunities that support young people to become successful learners, confident individuals, effective contributors and responsible citizens.

This response does not claim to be the position of any one individual member or of all member organisations. Individual organisations may hold views which differ from the opinions presented here.

General comments

Overall, we welcome the recognition that there is a need to tackle underlying causes of alcohol misuse, rather than just treating the symptoms. This is entirely in line with the preventative spending agenda, which the Christie Commission supported and which the youth work sector agrees is the key to achieving positive outcomes. We endorse the view that a holistic and joined-up approach involving a diverse range of partners is required in order to achieve attitudinal and behavioural change.

As the national youth work agency, we are primarily interested in the impact on young people and those who work with them, and our response reflects this. We are pleased to note that the Bill acknowledges that elements of alcohol misuse such as over-consumption and binge-drinking are not confined to, or even predominant among, young people.

In YouthLink Scotland's response to the Alcohol (Minimum Pricing) (Scotland) Bill consultation, we argued that, while important, minimum pricing alone will not achieve the cultural shift and attitudinal change towards alcohol that is required. We agree that a wider framework including educational work targeted at different audiences and using a variety of appropriate delivery methods is required. Work with different generations and communities is essential as young people do not exist in a bubble. Their attitudes towards alcohol are shaped by their families and the communities they live in. The national parenting strategy, which is likely to form part of the forthcoming Children and Young People Bill, should take address these issues. If it is to be

effective, the parenting strategy will need to start early and be embedded in the Curriculum for Excellence and in non-formal education approaches.

We agree that any such framework should include provision for a social levy to raise funds for this educational work and to address the social costs of alcohol more generally. For this reason we would encourage the Bill to include proposals to drive forward the Social Responsibility Levy which was proposed under the Alcohol etc. (Scotland) Act 2010. This hypothecated tax could be used to fund youth work provision. As well as delivering alcohol education programmes and messages, youth work provides young people with positive activities as an alternative to drinking. More profoundly, it also helps boost personal development, skill attainment and other positive factors which encourage individuals to make healthy life choices.

With regards to marketing, we would support measures such as those undertaken in France (the “Loi Évin”) to control advertising of alcohol and would urge the Scottish Parliament to explore options for this with the UK Government, as broadcasting is a reserved matter.

Consultation Questions

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

We agree that the proposed restrictions would be beneficial as they would close a loophole in the existing legislation.

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

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

Yes, we agree that guidance should be issued on the promotion of public health and the protection of children and young people from harm in order to provide clarity for Licensing Boards on how these objectives should be taken forward.

Ministers should be required to report to Parliament once per session. The report should cover the wider issues of the harm caused to children and young people by alcohol misuse. We recognise that the licensing objectives in section 4 of the Licensing (Scotland) Act 2005 include protecting children from harm, however this has tended to focus on issues around the availability of alcohol to under 18s rather than the broader issues of alcohol's impact on young people.

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

5. Are there further measures you feel should be introduced?

The evidence from France on the impact of the Loi Évin suggests that restrictions on alcohol advertising in public places could help reduce levels of problematic drinking. The *Changing Scotland's Relationship* discussion paper notes that France has seen a reduction in alcohol consumption over the past 20-30 years. Although there are many factors implicated in this reduction, advertising restrictions have been identified as contributing to the decline. The French legislation aims to protect children and young people by banning alcohol promotion on television before 9 pm, and also

restricts internet adverts which feature disguised alcohol marketing. We believe that the Scottish Government should pursue the issue of devolving powers in relation to alcohol advertising with the UK Government. Broadcasting is a reserved matter, but as tobacco and food safety are already devolved under the Scotland Act, there is potential for alcohol advertising to be devolved as well.

The glamorisation of alcohol through sponsorship in sport, music and other forms of entertainment which appeal to young people should be tackled by the Scottish and/or UK Governments. Some of the most obvious examples of sponsorship by alcohol companies include Carling's and subsequently Tennent's sponsorship of both Old Firm teams and Tennent's sponsorship of the T in the Park festival.

Sarah Wollaston MP raised a Private Members' Bill on alcohol marketing which failed to progress after the first reading in the House of Commons. The Bill made provisions for reducing the exposure of children to alcohol marketing and there are measures in the Bill around sponsorship which we believe would this proposed Bill should look at.

Dr Wollaston's commented that: '[The] World Health Organisation hit the nail on the head when it said: "In such a profoundly pro-drinking environment, health education becomes futile."

'We currently have an absurd situation where advertisers are not supposed to link drinking with social or sexual success or portray drinkers as youthful or vigorous, but they can regularly sponsor major sporting and youth events.'¹

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

We would support this measure and would agree that following the Danish limit would seem an appropriate way of restricting these products. We note that the minimum unit price proposed by the Scottish Government will not have an effect on the cost of the particular brand of caffeinated alcohol which has become heavily associated with youth crime in particular.

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

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

We strongly support the development of public education programmes which aim to tackle attitudinal and behavioural change. We agree that simply providing information is insufficient and believe that approaches which have the greatest impact are likely to be those that engage with young people and adults on their own terms, using youth work and community education methods, and which are embedded in the Curriculum for Excellence and other relevant national strategies such as the proposed national parenting strategy. In this way alcohol education can take a holistic, joined-up approach and not just treat alcohol as a stand-alone issue. Alcohol use does not exist in isolation but is embedded in relationships with friends, families etc. However we reiterate the point above that spending on such programmes is dwarfed by the spending on alcohol marketing, which we would argue helps create a

¹ Hansard <http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm110330/debtext/110330-0002.htm#11033062000001>

culture of normalisation of alcohol. Measures to restrict alcohol marketing along with pursuing the proposal for a social levy on alcohol may help redress this imbalance.

According to a study by the Joseph Rowntree Foundation of 5700 young people aged 13-16², the most significant factors in young people's drinking patterns are: peer influence; family influence (lack of parental supervision and witnessing family drinking/drunkenness); attitudes and expectations (positive attitudes towards drinking); easy access to alcohol (most young people surveyed accessed alcohol in the home); and the local context (social norms about excess drinking and drunkenness). This evidence clearly demonstrates the significance of family, friends and community, along with cultural attitudes and behaviours, on young people's drinking habits.

The proposed national parenting strategy must substantially address alcohol in an honest and frank manner which is not stigmatising, in order to resonate with the widest possible audience. It is important to promote parental responsibility and positive role-modelling in order to foster a healthy attitude towards alcohol among children and young people. The impact of the strategy will be limited if it is only targeted at the antenatal stage. Educational work on parenting should start early, be embedded within Curriculum for Excellence and use a variety of delivery methods including a youth work approach which engages with young people on their own terms.

More generally, youth work opportunities for young people must be provided and funded at an adequate level so that all young people in Scotland have equal access to positive activities that are appealing and engaging, and that can help equip them with the skills they need to develop their self-esteem and confidence. In turn, this will help them to build positive relationships with their peers and stand up to negative influences. Youth work can provide young people both with positive alternatives to drinking, and with the capacities they need in order to help build a healthy attitude towards alcohol consumption.

We agree that it would be beneficial for Ministers to be made directly accountable to Parliament once per session. We agree that there should be requirements about what the statement should include, with a focus on the impact on children and young people.

9. 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?

We agree that legislation should not discriminate against young people and that it is unfair to target all 18-21 year olds, the majority of whom drink responsibly. We agree that there should be a ban on Licensing Boards requiring off-licenses to only sell to a restricted adult age group. We support the view that existing measures, such as test purchasing, challenge 25 and powers for local authorities to ban drinking in public places/disperse those who continue to do so, are sufficient. Retailers and police need to continue to work together to ensure that under-18s are not able to purchase alcohol.

10. Do you believe that community neighbours should be consulted and their views taken into account when licenses are being renewed or extended or

² <http://www.jrf.org.uk/publications/young-people-alcohol-and-influences>

when special licenses are being issued?

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

Yes, community neighbours should be consulted and their views taken into account.

For further information please contact Barbara Schuler, Policy Officer
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