

## Greater Manchester Fire and Rescue Service

### Response to 'A consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour'

#### Introduction

Greater Manchester Fire and Rescue Service (GMFRS) is committed to protecting and improving the quality of life of the people in Greater Manchester. The service has 6 strategic aims, one of which is to engage with our communities to inform and educate people in how to reduce the risk of fires and other emergencies and do all we can to prevent crime and disorder. As such, GMFRS is working with communities to tackle the factors which commonly contribute to fires and other emergencies. One of those factors is alcohol.

During the period April 2007 to March 2012, alcohol was recorded as a contributory factor in 42% of preventable fire deaths across Greater Manchester. In addition alcohol contributed to 30% of Greater Manchester fire deaths that have traditionally been considered as non-preventable (e.g. arson suicide), although GMFRS now takes the view that all fires are preventable.

Alcohol also impacts on GMFRS because of the impact of drink driving on road safety. During December 2012 Greater Manchester Police arrested 464 people following positive alcohol breath tests, and of those arrested 78 were involved in collisions. GMFRS has a duty under the Fire and Rescue Services Act 2004 to undertake road traffic collision (RTC) rescues and so the implementation of appropriate measures to reduce the consumption of alcohol has the potential to lower the burden on our emergency response directorate and to protect people from injuries and deaths resulting from RTCs.

In light of the impact of alcohol on core Fire and Rescue business described above, GMFRS works closely with partners in public health and Community safety to tackle the harms resulting from alcohol use across Greater Manchester. With regard to the consultation, GMFRS supports the full response submitted by Greater Manchester Directors of Public Health under all the consultation questions.

However, as well as supporting the response from the Greater Manchester Directors of Public Health, additional information is provided below, against questions 1-13 of the consultation, in order to highlight issues specific to GMFRS, which were not identified in the Directors of Public Health response.

Consultation Question 1: Do you agree that this MUP level would achieve these aims?		
Yes    ✓	No	Don't Know
Support the response submitted by the GM Directors of Public Health.		

Consultation Question 2: Should other factors or evidence be considered when setting a minimum unit price for alcohol?		
Yes    ✓	No	Don't Know
Support the response submitted by the GM Directors of Public Health.  The GM DPH response highlighted that 'pubs, bars and other on-trade premises will greatly benefit from a minimum price as it would reduce the differential in prices retailed in the off-trade and on-trade. Evidence suggests that this would result in a shift of drinking patterns to on-trade		

premises which is a safer, regulated environment to consume alcohol.'

With this in mind, and with regard to accidental dwelling fires, the combination of certain activities such as cooking or smoking and consuming alcohol at home can increase risk, and so regulated consumption of alcohol in on-trade premises is welcomed.

Also, if MUP is likely to incur a shift towards increased on-trade alcohol consumption, consideration should be given to any projected increase in drink driving or ASB linked to the night time economy. In particular the provision of efficient public transport systems to ferry people in and out of city/town centres.

Consultation Question 3:

How do you think the level of minimum unit price set by the Government should be adjusted over time?

Do nothing – the minimum unit price should not be adjusted.	
The minimum unit price should be automatically updated in line with inflation each year.	✓
The minimum unit price should be reviewed after a set period.	
Don't know.	

Consultation Question 4:

The aim of minimum unit pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact on responsible drinkers. Do you think that there are any other people, organisations or groups that could be particularly affected by a minimum unit price for alcohol?

Yes ✓	No	Don't Know
Support the response submitted by the GM Directors of Public Health.  Potential for positive effect on Fire and Rescue Services and people whose alcohol consumption increases their risk of fire – In 36% of fire deaths in Greater Manchester between April 2007 and March 2012 alcohol was a contributory factor.		

Consultation Question 5:

Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade?

Yes ✓	No	Don't Know
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Consultation Question 6:

Are there any further offers which should be included in a ban on multi-buy promotions?

Yes ✓	No	Don't Know
Support the response submitted by the GM Directors of Public Health		

Consultation Question 7:

Should other factors or evidence be considered when considering a ban on multi-buy promotions?

Yes    ✓

No

Don't Know

Support the response submitted by the GM Directors of Public Health

As alcohol was a contributory factor in 36% of fatal fire incidents in GM April 2007- March 2012, reduced consumption could contribute to the number of alcohol related fires, fire injuries and deaths.

Consultation Question 8:

The aim of a ban on multi-buy promotions is to stop promotions that encourage people to buy more than they otherwise would, helping people to be aware of how much they drink, and to tackle irresponsible alcohol sales. Do you think that there are any other groups that could be particularly affected by a ban on multi-buy promotions?

Yes    ✓

No

Don't Know

Support the response submitted by the GM Directors of Public Health.

Public services, including Fire and Rescue Services, would benefit, as less people would binge drink, and pre-load, and result in a lower burden on services.

Consultation Question 9:

Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety / public nuisance / prevention of harm to children)? Please state Yes / No / Don't know in each box:

		Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm to children
A.	Irresponsible promotions	Yes	Yes	Yes	Yes
B.	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
C.	Mandatory provision of free tap water	Yes	Yes	Yes	Yes
D.	Age verification policy	Yes	Yes	Yes	Yes
E.	Mandatory provision of small measures	Yes	Yes	Yes	Yes

In answering the questions above, the GMFRS response differs slightly from that submitted by the GM Directors of Health who had entered *No* against some of the licensing conditions with regard to their role in the protection of children from harm. GMFRS consider that each licensing condition contributes to the protection of harm to children by reducing hidden harm through parental alcohol use. With specific regard to fire, where licensing conditions reduce alcohol intake by a parent or guardian, risk of fire to the whole household, including children is potentially reduced.

Consultation Question 10: Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs?		
Yes	No    ✓	Don't Know
Support the response submitted by the GM Directors of Public Health.		

Consultation Question 11: Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety / prevention of public nuisance / protection of children from harm) which could be tackled through a mandatory licensing condition?		
Yes    ✓	No	Don't Know
Support the response submitted by the GM Directors of Public Health		

**Consultation Question 12:**

Do you think the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate?

Yes

No ✓

Don't Know

Support the response submitted by the GM Directors of Public Health.

There is an additional area of concern for GMFRS. Whilst alcohol is in itself a significant contributor to accidental dwelling fires and deaths, its effects can be of particular concern when combined with smoking which was the direct cause of 42% of preventable fatal fires between April 2007 and March 2012. If the balance of licensing conditions placed on the on-trade and off-trade is not carefully considered, and mandatory licensing conditions favour the off-trade, there could be an increase in drinking at home which, in combination with the 2007 smokefree legislation, has the potential to increase the number of accidental dwelling fires.

**Consultation Question 13:**

What sources of evidence on alcohol-related health harm could be used to support the introduction of a cumulative impact policy (CIP) if it were possible for a CIP to include consideration of health?

Support the response submitted by GM Directors of Public Health.

Additionally, Fire and Rescue Service data on alcohol related fires and other emergencies could be utilised, (subject to data sharing restrictions).

**References**

Greater Manchester Fire and Rescue Service, learning from Preventable and Non-Preventable Fatal Fire Incidents 2011-2012

Greater Manchester Police Christmas Drink Drive Results 2012

Greater Manchester Directors of Public Health: Response to '*A consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour*'