

Home Office consultation on the Government's Alcohol Strategy – response from Wigan Shadow Health and Well Being Board.

Background

The Home Office in partnership with Department of Health, HM Treasury, HM Revenue and Customs invites views on five key issues set out in the Government's Alcohol Strategy published on 23rd March 2012. This paper outlines a draft response from Borough's Shadow Health and Well Being Board for approval on 31st January 2013.

The five key issues the Government are seeking views on are:

- Minimum Unit Pricing.
- A ban on multi-buy promotions in shops and off licenses.
- A review of the mandatory licensing conditions to ensure that they are sufficiently targeting problems such as irresponsible promotions in pubs and clubs.
- Health as a new alcohol licensing objective for cumulative impacts so that licensing authorities can consider alcohol related health harms when managing the problems relating to the number of premises in their area.
- Cutting red tape for responsible businesses to reduce the burden of regulation on responsible businesses while maintaining the integrity of the licensing system.

This draft response covers the first four issues.

Minimum Unit Pricing

The Government is consulting on the basis of a recommended 45p minimum unit price for alcohol. The Government state that minimum unit pricing is a targeted policy and forms part of a comprehensive package of measures as set out in the Government's Alcohol Strategy. The purpose of minimum unit pricing is to reduce excessive alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products, whilst minimising the impact on responsible consumers. This will be achieved by increasing the price of alcohol sold at very low or heavily discounted prices. As a result the Government estimate that there will be a reduction in the associated crime and health harms, especially the number of hospital admissions, alcohol related deaths and alcohol related crime.

Consultation Question 1: Do you agree that this MUP level would achieve these aims?			
Yes	✓	No	Don't Know

If you think another level would be preferable, please set out your views on why this might be in the box below (keeping your views to a maximum of 200 words).

Wigan Borough Shadow Health and Well Being Board would like to see the Minimum Unit Price for alcohol set at 50 pence per unit. The reason for this is that the ScHARR model (University of Sheffield, 2009) showed that a level of 50 pence per unit would achieve better outcomes than a level set at the proposed 45 pence per unit.

The ScHARR model which is the only UK independently peer reviewed evidence base for minimum unit pricing, found that, after 10 years a 50p price level would achieve the following (compared to a level set at 45 p per unit):

	Deaths	Hospital Admissions	Days absent from work	Crimes
Minimum Unit Price set a 45p.	2,040 less early deaths	66,200 reduction	266,300 less days absent.	24,100 less crimes.
Minimum Unit Price set a 50p.	3,060 less early deaths.	97,700 reduction	442,300 less days absent.	42,500 less crimes.

- The Board is working towards achieving better outcomes for its population as the cost of alcohol related harm to the Borough in 2010-11 is estimated (Drink wise North West 2012) to be £123.97 million with Wigan Borough ranked 9th highest out of 326 local authority areas for rates of alcohol related hospital admissions for 2010/11.

Consultation Question 2: Should other factors or evidence be considered when setting a minimum unit price for alcohol?		
Yes ✓	No	Don't Know

If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).

- We value the on licensed trade industry in Wigan Borough and the economic and community benefits it brings. We work in partnership with the licensed trade to raise standards through initiatives such as Pubwatch and Best Bar None. The British Institute of Innkeeping Survey 2012 found that more than eight in ten pub landlords say that cheap supermarket alcohol is one of the main reasons for the decline in the pub trade and 81% said it should come in at 50p per unit. A minimum unit price will help level the playing field by closing the price gap that exists between supermarkets and community pubs.
- To reduce the amount of counterfeit alcohol available to local residents we will continue to monitor trends and learn from the experiences of others who successfully tackled illicit tobacco supplies.
- Actions that address the availability and affordability of alcohol, such as minimum unit pricing, is an integral part of a wider strategic approach to tackling alcohol misuse and supports the goals of our Local Alcohol Strategy. We believe that responding effectively to the problems caused by alcohol misuse requires a coordinated and partnership approach to achieve greater health and wellbeing outcomes. Some of our partnership initiatives include reducing health inequalities through the Active Case Management Service to using local intelligence to influence cumulative impact policies in our role as a Responsible Authority.

<p>Consultation Question 3: How do you think the level of minimum unit price set by the Government should be adjusted over time?</p>	
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.	

<p>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?</p>		
Yes ✓	No	Don't Know

- Children and young people in the Borough are experiencing harm caused by parental alcohol misuse. The 2008 Northern Ireland Health and Social Services and Public Safety report into parental substance misuse estimates that 1 in 11 of all children in the UK are at risk, which equates to 6,870 children and young people in Wigan Borough. We also know there is a strong correlation between domestic abuse and alcohol misuse. Between November 2011 and October 2012, there were 1,268 domestic abuse crimes across Wigan Borough, 49% of which had an 'alcohol marker' (where alcohol was considered a factor). Any measure that aims to reduce the consumption of harmful and hazardous drinkers will help reduce harm to children and young people.
- Setting a minimum unit price for alcohol, we believe will have an impact on the amount of alcohol children and young people in the Borough consume by reducing the availability of alcohol at very cheap prices. As a partnership, we want confident families including children and young people who fulfil their potential. Having a minimum unit price for alcohol will help to achieve this by reducing the harms associated with alcohol misuse in children and young people (e.g. lower educational achievement, not being in education, employment or training, unprotected sex, anti-social behaviour).

Alcohol multi-buy promotions

The Government is consulting on multi-buy promotions particularly in the off trade (e.g. supermarkets and off-licenses). The Government states that there are currently a large number of multi-buy promotions available in the off trade market. They see the purpose of these promotions being to incentivise the purchase of multiple alcohol products by linking price reductions to the amount of alcohol bought. Studies show that this often leads to consumers purchasing and consuming more than they otherwise would. Because of the

health and crime impacts of excessive alcohol consumption, particularly binge drinking, the Government feels it may be necessary to intervene to tackle such incentives.

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

Consultation Question 6: Are there any further offers which should be included in a ban on multi-buy promotions?		
Yes ✓	No	Don't Know

If yes, please specify in the box below (keeping your views to a maximum of 100 words):

- As a general principle, the purchase of any goods should not be linked to the purchase of alcohol at a lower than normal sale price.
- Buying goods and getting alcohol discounted or free which would fall below a minimum unit price of 50p.
- Multi-buy promotions in on-trade premises should end to be consistent with the off-trade.
- There should be consistency of price per volume of a product regardless of the size or quantity of packaging that alcohol is sold in.
- Loyalty point schemes which are in anyway linked to purchase of alcohol.

Consultation Question 7: Should other factors or evidence be considered when considering a ban on multi-buy promotions?		
Yes ✓	No	Don't Know

If yes, please specify in the box below (keeping your views to a maximum of 200 words):

- In a report in the Lancet (Prof Nutt, Issue 9752), alcohol was named as the most dangerous drug in the UK. Unlike illegal drugs, it is easily accessible and costs as little as 12p/unit (Balance 2012).
- Reduced consumption would improve health inequalities as lower income groups suffer greater health harms (Alcohol Concern 2011).
- Multi-buy promotions encourage people to buy more alcohol than they intend resulting in easier access to alcohol in the home environment. We already know that children access alcohol from the home more than any other place (Trading Standards North West, 2011), so a ban would reduce the access to alcohol for children.

- An Alcohol Concern and Balance report of 16-24 year olds found that promotions encouraged more drinking. A multi-buy ban would protect more children and young people.
- There is a far greater impact of the multi-buy ban policy when enforced alongside a minimum unit price of 50p (at 2009 prices) (University of Sheffield 2009).
- Marketing of alcohol should be legislated for ensuring that it does not circumvent the spirit and intention of this legislation.
- Trading Standards needs a strengthened operation to monitor and enforce a multi-buy ban effectively as it is unlikely that relying on consumers policing the ban will be effective enough.

<p>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?</p>		
Yes	✓	<div>No</div> <div>Don't Know</div>

If yes, please specify in the box below (keeping your views to a maximum of 100 words):

There should be a consistency in approach, therefore we would not want to differentiate between groups, however:

- Pubs could benefit as people are less likely to preload on alcohol bought from off-licence premises and shift their consumption of alcohol to on-licence premises.
- Young people will benefit from reduced access and availability of alcohol in the home environment.
- Some of these measures may only be effective alongside minimum unit pricing.
- Public services such as the NHS, would benefit, as less people would binge drink and pre-load and result in a lower burden on services (Department of Health).

A review of mandatory licensing conditions

Under the 2003 Licensing Act, the Secretary of State can prescribe up to nine mandatory licensing conditions in regulations. These are sometimes called the Mandatory Code. In 2010, the “Licensing Act 2003 (Mandatory Licensing Conditions) Order 2010” introduced four mandatory conditions that apply to all on trade premises only and one mandatory condition which applies to both the on and off trade (age verification policy).

The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are:

- A ban on irresponsible promotions.
- A ban on dispensing alcohol by one person directly into the mouth of another.
- A requirement to provide free tap water on request to customers.

- iv. A requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age.
- v. A requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine.

Consultation Question 9:

Do you think each mandatory licensing condition is effective in promoting the licensing objectives (crime prevention/public safety/public nuisance/prevention of harm to children).

		Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm to children
A	Irresponsible promotions	Yes	Yes	Yes	No
B	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
C	Mandatory provision of free tap water	Yes	Yes	Yes	No
D	Age verification policy	Yes	Yes	Yes	Yes
E	Mandatory provision of small measures	Yes	Yes	Yes	Yes

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
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They go some way in having a positive impact; however greater clarity over examples of irresponsible promotions to prevent ambiguity for licensee and responsible authorities is required. The examples do appear to be limited and only capture the more obvious examples and efforts are required to ensure that other less obvious promotions qualify.

Conditions should also require licensees and their employees be adequately trained to a national standard for safe and responsible sale of alcohol; ensuring a consistent approach in tackling alcohol harm etc.

The age verification schemes should be a minimum 'check 25' and include mandatory signage on premises.

<p>Consultation Question 11:</p> <p>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?</p>		
Yes	✓	<p>No</p> <p>Don't Know</p>

If yes, please specify in the box below (keeping your views to a maximum of 200 words):

There are a number of other issues relating to the licensing objectives that could be tackled through mandatory conditions that would be welcomed. These include:

- a ban on irresponsible drinks promotions and this should also be applied to the off-trade premises
- Soft drinks should be priced cheaper than the cheapest alcoholic drink
- Sales and marketing approaches within premises that encourage increase alcohol consumption e.g. offering shots of spirits away from the bar area should be banned. This should also include events and promotions such as 'happy hour', 'ladies nights', 'entry fee and free drinks all night', where there are discounted, free drinks promotions.
- Requirements on licensees to have a responsibility for public nuisances such as litter from customer cigarette stubs, discarded premises advertisement flyers etc.
- Efforts should be made to ensure that links to national and local anti-social behaviour strategies are made.
- There should be greater emphasis on safeguarding and minimum standards should be set for premises holding events such as 'under 18 events' and 18th birthday parties. standards should include safety measures, underage policing measures, requirement for CRB checks for employees (i.e. bar staff) coming into contact with children.

<p>Consultation Question 12:</p> <p>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?</p>		
Yes	No	<p>✓</p> <p>Don't Know</p>

If no, please specify in the box below (keeping your views to a maximum of 100 words):

- There should be the necessary number of mandatory conditions enforced to tackling the root cause as well as helping to avoid any ambiguity.
- Need to extend the ban on irresponsible drinks promotions to cover off-trade to create consistency across the on- and off-trades.
- Given supermarket alcohol sales now account for approximately 70% of off-trade sales and can sell alcohol at discounted prices. Stopping these irresponsible promotions would help to tackle pre-loading and binge drinking of alcohol purchased from the off-trade.

Health as a new alcohol licensing objective for cumulative impacts

The Government are consulting on introducing a health related licensing objective linked specifically to cumulative impact policies. The Government state that recent evidence shows levels of health harm can be linked to the density of licensed premises. Local areas can introduce cumulative impact policies (CIPs) to limit density, but only based on the existing licensing objectives, which exclude health harms so licensing authorities cannot consider the full range of impacts from alcohol, including chronic health harms. The objective is to enable licensing authorities to consider all alcohol related health harms (including liver disease, alcohol related deaths or hospital admissions) when considering cumulative impact. This would enable local areas to use CIPs to restrict the number of new premises selling alcohol if there is significant local alcohol related health problems.

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?

Please specify in the box below, keeping your views to a maximum of 200 words.

The health related objectives for alcohol licensing relating solely to CIP is narrow and should be more integral in overall licensing considerations. Public health should perhaps be a licensing objective in its own right and rather than – as the consultation proposes - tied to cumulative impact policies.

There are a numerous data sources that would be beneficial in gaining a true assessment. The Joint Strategic Needs Assessment would provide an ideal opportunity to draw the data together for a consistent approach. Data sources include:

- Ambulance and paramedic data
- Acute Trust Sources – A&E, TIIG, specialist treatment, other hospital admissions data NI39 e.g. specific (drunkenness) and non specific (cancers), admissions for under 18s
- Primary Care sources- GP, Walk in centre data, demand for alcohol treatment
- National Data Sources – LAPE (local alcohol profiles for England), Alcohol related mortality (including suicides and self harm), Mental health and wellbeing indices, Foetal Alcohol Spectrum Disorders data
- Local intelligence Sources - Synthetic estimates for drinking behaviours
- Community asset data – alcohol charities, help lines
- Crime/Police - Domestic abuse data including child protection issues, Road Traffic Collisions, drink driving, alcohol related sexual offenses, Home Office Statistics
- Fire Service Sources.

Consultation Question 14:

Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health harms? (Please select one option):

Yes ✓

No

Don't Know

If yes, please specify in the box below (keeping your views to a maximum of 200 words).

It would be advisable for all responsible authorities to be able to object to an application therefore widening the opportunity to consider health data and the impact on health harms.

Consideration on density of premises needs to consider both the local level (e.g. SOA, Ward) as well as overall authority area when making decisions.

Consultation Question 15:

What impact do you think allowing consideration of data on alcohol-related health harms when introducing a cumulative impact policy would have if it were used in your local area? Please specify in the box below, keeping your views to a maximum of 200 words. Please provide evidence to support your response.

- It would provide added value and positively contribute to the control of alcohol related crime and violence, as well as supporting the development and implementation of local policies e.g. domestic abuse
- Robust knowledge and intelligence is essential to provide a coherent and an effective evidenced based approach to tackling the consequences of excessive alcohol consumption. Capturing and utilising local knowledge and intelligence sources from all key licensing authorities is vital and ensuring that stakeholders are working in partnership
- It also has the potential to impact on local health profiles to improve population health and wellbeing and reduce health inequalities within communities, improving both peoples physical and mental wellbeing.
- It also has the ability to positively contribute on the local economic prosperity from reducing the number of incidents of crime and violence, as well as reducing impact on local services such as on the local health economy, from less alcohol related admissions and treatments.