

**Shifting The Culture Member's Bill Consultation
(Dr Richard Simpson MSP and Graeme Pearson MSP)**

ADSW Substance Misuse Standing Committee response

Edited responses from the ADSW Substance Misuse group in respect of the impact on Children and Young people

Public Health Interest and Child Protection:

Q2) Do you believe that Ministers should be required to issue guidance on these two licensing objectives?

A: The inclusion of public health and child protection objectives in the Act are to be commended and a move we strongly support. However, there may be some confusion about exactly how licensed premises should fully implement the principles of these objectives. Further guidance on these objectives would be a positive move.

Restrictions on Alcohol Marketing:

Q4) Do you believe that the proposed restrictions on advertising are proportionate or necessary?

Q5) Are there further measures you feel should be introduced?

A: We would support the statement on page 15, "*we believe that we should begin by moving forward on de-normalising alcohol for children*". We support the proposed ban on advertising in public places but feel that this needs to go further to achieve the aim of reducing exposure of children to alcohol advertisements. A ban should involve venues where children are likely to be present eg cinema foyers, sports events such as football/rugby matches. The process of dismantling the connection between the alcohol industry and their sponsorship of sport should begin now if we seriously wish to "de-normalise alcohol for children".

However one of the main routes of advertising alcohol to young people and children is via the internet. Attention must be focused now on how to reduce the amount of alcohol advertising children are exposed to via social network sites or indeed consider if it is possible to ban alcohol advertising on such sites.

Scottish Government should lobby to ensure that the regulation alcohol advertising should be demonstrably independent of the alcohol /advertising industries.

Caffeine Limit in Pre-mixed Alcohol Products:

Q6) 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?

A: We support the proposal to restrict pre-mixed caffeinated alcohol products and the proposed limit of 150g/litre seems sensible.

Given the statistics in relation to offences, this would be a positive step forward. However it may be necessary to undertake a study to identify if this reduction has any impact in relation to alcohol related offences. It may also be worth considering the packaging of caffeinated alcohol products, and moving away from glass bottles which have in the past been used as weapons.

Alcohol Education:

Q7) Is there a role for further alcohol education and public information campaigns in changing alcohol culture?

A: There is a good body of evidence which persistently demonstrates the failure of school based alcohol education to alter drinking behaviour. There is little evidence to support the impact of public campaigns in facilitating prolonged behaviour change.

There may be a role for robust research in fully testing the effectiveness of targeted health education although this would require funding.

We believe that there is still a role for such campaigns but that these campaigns need to take a fresh approach and embark on using social media to try and get safe drinking messages across. Recent data from the SALSUS study shows that a large percentage of children get their alcohol from their family or an older friend. Perhaps campaigns need to highlight the family as well as just the child.

Q9) 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?

A: We support this proposal and believe that full implementation of the Challenge 25 approach should suffice to tackle under age sales. However, as previously noted, SALSUS figures suggest a lot of children get their alcohol from family or older friends thus bypassing the need to buy alcohol themselves. This is an area that needs to be addressed and supported from a national level.

We feel that not allowing people 18-20 years old to buy alcohol in off-licenses is discriminatory, especially for those in that age bracket who use alcohol responsibly. We also feel that this would have a greater impact on young people in the lower socio-economic groups as they would be less likely to be able to afford to use alcohol on licensed premises therefore increasing their experience of social exclusion.

National Licensing Forum:

Q12) 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?**

A: The idea of a National Licensing Forum could be a positive move if the national forum were to give support and guidance to local forums. We feel that local forums have been created but that despite the good will of their members they still lack clarity of purpose and we feel that this is an area that needs urgently addressed at a national level. It is important to attempt to avoid creating a cluttered landscape of national groups overseeing alcohol and drug policy development, implementation and progress. Perhaps there is some opportunity to combine the functions of the increasing number of groups?

We believe that its membership should be appointed by Scottish Ministers and should comprise reps from:

- Alcohol Focus Scotland
- Licensing Boards
- Police forces
- Health board reps
- Legal expertise from the Law Society of Scotland including the Judiciary
- Licensed Trade Organisations
- Local authorities including Education and Social Work
- Association of Directors of Public Health
- Scottish Consumer Council
- Youth Organisations
- Scottish Council for Voluntary Organisations

A national forum would be accountable to Parliament and one of their main roles would be to bring clarity and purpose to local forums.

Funding should be central.

We should ensure use of video conferencing to reduce costs and ensure an inclusive response.

Drinking Banning Orders:

Q16) Should drinking banning orders be introduced in Scotland? If so should they be piloted in one Sheriffdom?

A: We would agree that a pilot and robust evaluation is required and would suggest two pilots- one urban and one rural.

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