

Department of Health**Safe, Sensible, Social
Consultation on further action, September 2008****Joint response from the Baptist Union of Great Britain, the Methodist
Church and the United Reformed Church**

The Baptist Union of Great Britain, the Methodist Church and the United Reformed Church¹ are pleased to respond to this consultation and to contribute to the discussion on the reduction of alcohol-related problems. The churches endorse the principle of responsible, moderate drinking and are engaged actively in the promotion of responsible attitudes to drinking, as well as fully supporting those who chose to abstain from alcohol.² Furthermore, the churches have a long history of supporting those who suffer directly or indirectly from alcohol misuse. To this end, we support policies that enable people to drink sensibly and prevent irresponsible practices from causing harm.

1. How might a new code be made effective in stopping licensed premises from engaging in practices that encourage people to drink excessively and irresponsibly?

The research by KPMG reviewing the alcohol industry's voluntary standards shows that the current standards are not operating as hoped. They are not consistently applied nor are they effective in promoting good practice. This shows that the industry is not capable of effective self-regulation. In the light of this finding, we agree with the Government's initial belief that the voluntary standards should be revised and made mandatory. With this action we wish to ensure that a code of conduct will result in reduction of alcohol related harm. A mandatory code should mean that there are penalties when it is breached.

¹ The three denominations are the largest of the Free Churches in Britain. They work together on public issues through the Joint Public Issues Team (www.jointpublicissues.org.uk). There are some 150,000 members of Baptist churches associated with the Baptist Union of Great Britain. The Methodist Church has about 295,000 members and 800,000 people are connected with the Church. The United Reformed Church comprises about 150,000 adults and 100,000 children.

² For example, see www.mocktails.org.uk, and www.methodist.org.uk/downloads/pi_onetoomany_0106.pdf

2. If there continues to be slow progress in implementing a voluntary labelling scheme, should the Government take the next steps to make it a legal requirement to include health and unit information on all bottles and cans?

Yes. It is very important that people are able to make an informed decision on alcohol use. Health and unit information on bottles and cans make it possible for people to know how much they are drinking, and what risks this can cause them. Knowing the safe limits would encourage people to cut down excessive alcohol use.

The alcohol industry agrees that this is good practice. However, after 10 years of a voluntary agreement there is still little evidence of commitment to implement the labelling scheme by all alcohol producers. We ask that the Government should take the next steps to make the labelling a legal requirement. This will guarantee that all in the alcohol industry will follow and implement an effective labelling scheme. The Methodist Church has called for labelling of drinks in the past.³

3. What are the most important issues that need to be addressed in an alcohol retailing code?

The three churches would like to see the alcohol retailing code include practical actions to promote responsible drinking that can be easily monitored and implemented.

We are especially concerned about stopping irresponsible promotions, including supermarkets and other retailers selling alcohol with a loss. We believe that this practice is especially harmful for young people and heavy drinkers as low prices affect these groups more than moderate drinkers (as the consultation paper states at paragraph 2.19). Therefore we call for price-related actions to reduce alcohol harm. We note that the Scottish Parliament is looking into setting a minimum price for alcohol, and would welcome further research to determine whether this is a useful method to deter irresponsible drinking.

Other measures are also needed. For instance, happy hour promotions could be limited to just one hour, instead of lasting for several hours, which currently happens in some places. The code could also address the availability of different glass sizes making both small and large choices available, with 125ml for wine and 25ml for spirits being the standard measure. One of the most important issues that needs to be addressed is enforcing more training of staff in shops and venues to recognise and refuse alcohol to underage or drunken customers. Responsible advertising would also be a necessary part of the code.

³ <http://www.methodist.org.uk/index.cfm?fuseaction=opentogod.newsDetail&newsid=213>

- 4. Should the same restrictions be applied to:**
- **all premises selling alcohol;**
 - **all premises with some exemptions;**
 - **only certain types of premises**
 - **all premises within an area experiencing problems; or**
 - **a combination of these?**

Certain restrictions should apply for all. However, we appreciate that different situations require different approaches. High-risk areas should be subject to additional restrictions, such as those outlined in paragraph 3.10 of the consultation paper. It may be more appropriate to include these restrictions as a condition of licensing, and allow the local authority to determine what would be the most appropriate response. A new mandatory code of conduct should establish clear standards for responsible retailing. It may be confusing if there are different restrictions in the code of conduct depending on whether the premises is in a high-risk location or not.

- 5. Should an alcohol retailing code be made mandatory through further legislation? If so, how should it be applied?**

Yes. The three churches encourage action that makes certain the retailing code will be implemented by all premises selling alcohol and not only by those premises that are already committed to maintaining good standards of social responsibility. As there is no evidence to suggest that a strengthened voluntary code would have a significant impact, the retailing code should be made mandatory through further legislation. The voluntary code should be the basis for a set of minimum standards, which would be applied to all premises selling alcohol. Local Authorities should be encouraged to use the licensing powers they have to set mandatory conditions for premises in areas experiencing alcohol related problems and to respond to specific challenges in their areas.

- 6. Should a mandatory code, if introduced, cover proportionate and necessary actions to prevent health harm as well as crime and disorder?**

Yes. The effects of alcohol dependency on mental and physical health of the drinker, as well as their family and friends, is an important factor when considering alcohol misuse. The health and well-being of individuals as well as society as a whole needs to be taken into account. Problems associated with alcohol are much more than crime or anti-social behaviour related.

There is more evidence revealing the extent and cost of alcohol related harm, and we are only beginning to understand the real extent of the problem. Therefore we should act now to prevent future damage to individuals and the society. For this reason a mandatory code should contribute to safeguarding public health instead of just preventing crime and disorder. This might mean taking action against loss-leading promotions, discouraging preloading, or limiting happy hours, to lessen the opportunities for binge drinking.

7. Do you think there is enough advice available for those who want to drink less? What other kinds of help are needed and who should provide them?

On the question of whether there is sufficient advice available we are not in a position to offer an informed comment. Our alcohol advice and treatment services are not co-ordinated centrally

We welcome the recent Government campaigns highlighting the number of units in alcohol. High-profile awareness raising is very valuable.

We have general concerns that although sources of advice are easily available and accessible, many people who do not drink sensibly do not access it. More research is needed to find out whether services reach those who need it the most – people at risk of serious dependency problems.

8. Should alcohol advertising include health and unit information? How could this be achieved?

The three churches would welcome more research on the effectiveness of prevention messages in advertising and the difference they make. In recent changes to the Committee on Advertising Practice / Broadcast Committee on Advertising Practice codes for gambling advertisements, a consultation document proposed not including warning messages as research has shown that authoritative warning messages included in advertisements can be counterproductive.⁴ For this reason any information included should be considered carefully. One possibility would be to add information on units only. This would help to raise awareness and could maximise the effectiveness of current marketing campaigns for responsible drinking.

9. In addition to providing alcohol treatment for the small number of drinkers with a serious dependency problem, what else could be done, and by whom, to support people who find it difficult to cut down on their drinking?

As mentioned in our response to question 7, we do not hold data on the efficacy of treatment and support programmes.

We note the response to this consultation of Alcohol Concern, and we support the principles in their reply to this question.⁵

The different actions take by the Government have been very positive and should be commended. We believe that it is ultimately the responsibility of the

⁴ http://www.asa.org.uk/NR/rdonlyres/8A5F8BE4-EA76-4290-A712-0D101D67DC9A/0/CAP_BCAP_Gambling_Consult_20060718.pdf

see pages 18-20

⁵ http://www.alcoholconcern.org.uk/files/20080901_150813_Alcohol%20Concern%20Response%20to%20DH%20Consultation%20on%20SSS%20-%20August%202008.doc

Government to provide rehabilitation and other services for people with serious dependency problems. These services should reflect the different needs people have depending on the gravity of their problem. We also want to commend the efforts of the alcohol industry to promote responsible drinking through variety of campaigns, projects and the Drinkaware Trust. We want to see these actions result in less people suffering from serious dependency problems and more people getting help when needed. We would support their continuation and expansion.

David Bradwell
Policy Adviser / Policy Officer
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bradwelld@methodistchurch.org.uk

Baptist Union of GB
Baptist House
PO Box 44
129 Broadway
Didcot
Oxon OX11 8RT

The Methodist Church
Methodist Church House
25 Marylebone Road
London NW1 5JR

The United Reformed Church
URC House
86 Tavistock Place
London WC1H 9RT