

**Barnardo's Scotland consultation response on proposed  
Alcohol (Public Health and Criminal Justice) (Scotland) Bill**

Barnardo's Scotland welcomes the ongoing efforts by Scotland's MSPs to tackle the scourge of alcohol in Scotland.

Barnardo's Scotland works with more than 10,000 children, young people and their families in 98 specialised projects in communities across the country. Every Barnardo's project is different but each believes in the potential in every child and young person, no matter who they are, what they have done or what they have been through.

Barnardo's Scotland has specialist services that deal with alcohol misuse specifically and substance misuse more generally. The majority of all our services have to deal with the impact of alcohol misuse on children/families. This is an area in which we have considerable experience of and an area where we have specialised expertise and services. It is from this perspective that this response is made.

We believe that an early intervention/ preventative approach to tackling Scotland's alcohol problems and the needs of children and young people should be at the heart of alcohol policy.

Below we have outlined our response to those consultation questions we have a position on, as well as set out our thoughts on a range of issues of concern to us regarding alcohol.

***Question 1) Do you think the further restriction on quantity discounting proposed would be beneficial? What disadvantages might there be? Do you think there is a case for going further?***

In principal we are in favour of greater controls on heavily discounted alcohol products. We believe that to some extent this issue will be resolved by the introduction of minimum pricing.

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

Yes, we believe that ministers should be required to issue guidance on these two licensing objectives.

**Q3) 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. This is a high profile issue and regular reporting to Parliament will ensure scrutiny of the highest level.

Any report should set out the progress the Scottish Government is making against the Alcohol Framework for Action, which was published in 2009.

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

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

In response to questions 4 and 5, Barnardo's Scotland believes that children and young people are too readily exposed to alcohol advertising and branding and that steps need to be taken to curb that exposure.

There is a significant link between alcohol marketing and consumption among adolescents which has been shown in a number of academic studies. A systematic review of those studies concluded that increased exposure to alcohol marketing encourages children to start drinking younger and to drink more when they do. The Academy of Medical Sciences report, *Calling Time*, showed a consistent correlation between consumption levels by 11-15 year-olds and the amount spent on marketing.

The sponsorship of sporting events and teams, as well as youth events, such as T in the Park by alcohol products is not acceptable. Nor is the production by alcohol industry of 'advergames' on the internet and for use on mobile phones, which promote alcohol products.

Barnardo's recently supported Sarah Wollaston MP's Private Member's Bill at Westminster on alcohol marketing and would like to see a similar policy brought to Scotland. However, the responsibility for alcohol marketing is currently reserved.

Barnardo's Scotland supports legislation that would only permit the promotion of alcohol in media that adults use. This would include the print media (90% of readers are adults rather than children), radio and TV after 9pm and films with an 18 rated certificate. It would allow advertising at the point of sale in licensed premises and

at traditional producer events. Every advert would also be required to carry an advisory message about responsible drinking and health. Any other marketing or promotion not specifically permitted would therefore be banned, and this would include pre-watershed television, social media and youth-certified films.

There should be heavy penalties for those that break these rules.

The estimated spend on alcohol marketing is around £800million compared with the Drinkaware Trust's funding by the industry of just £2.6million.

***Q6) 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.***

Yes. We would support the restrictions on pre-mixed caffeinated alcohol products. However, this is unlikely to stop alcohol being mixed with caffeinated soft drinks.

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

Barnardo's Scotland would support further alcohol education and public information campaigns designed to shift the culture of alcohol in Scotland.

A sustained and integrated approach to tackling parental alcohol misuse particularly we would like to see a public awareness campaign. This should include a sustained programme of health education, for example on Foetal Alcohol Syndrome.

Barnardo's would like to see some of the funds raised from the Public Health Levy earmarked for an ongoing public health campaign with a focus on early intervention and education work with all age groups.

***Q8) Would it be beneficial for Ministers to be made directly accountable to the Parliament for their policy in this area, as proposed?***

Yes, ministers should report to Parliament regularly on progress being made in this area.

**Other issues we would like to see addressed**

***Demand for Services***

As the state increases its alcohol interventions it will inevitably create an increase in the number of people needing to use alcohol support services, such as those provided by Barnardo's and other charities. The vast majority of prevention and intervention work in this area is delivered by the third sector and not statutory services.

The Government must ensure there are adequate, appropriate and accessible services available to all children and families affected by alcohol misuse for both the short and the long term.

Barnardo's Scotland believes that the Scottish Government should implement the Social Responsibility Levy (SRL) passed under the 2010 Act to ensure that additional revenue generated by a minimum pricing regime is recuperated by the Government. We believe that revenue raised by a SRL should go towards services needed for children and families affected by alcohol misuse.

### ***Parental Alcohol Misuse***

In *Untold Damage*, published by SHAAP and ChildLine in 2009, the report found that a disproportionately large number of calls received by ChildLine from children concerned about a significant others drinking come from Scotland. It found that parental drinking problems contributed to their own problems and unhappiness. In calls the vast majority of children relate the violence as happening when the parent is drunk or has been drinking. Children also described how family relationships are affected by harmful parental drinking resulting in verbal aggression and conflict. They provide accounts of their own isolation within the home and a general lack of parental attention and care. Parental drinking has a significant impact on their mental health and wellbeing.

The law, at present, doesn't protect children at home regarding parental drinking. A parent can be drunk and in charge of a child at home. We want to see a review of how the law protects children from impact of harmful and regular parental drinking on children.

Barnardo's Scotland would like to see a sustained and integrated approach to tackling parental alcohol misuse. We hope to see this issues addressed as part of the upcoming review of the Getting our Priorities Right.

### ***Linking in***

The Scottish Government needs to ensure that all alcohol work is incorporated into all of the Government's current and upcoming

strategies relating to children and young people for example, the Mental Health Strategy and the National Parenting Strategy.

***Enforce existing laws***

ISD Scotland statistics have found that the three most common sources of buying alcohol for school children were friends/ relatives, shops and off licences.

Among 13-15 year olds the most common way to have bought alcohol was from a friend or relative. Of those pupils who had ever drunk alcohol, one in ten 13 year olds and 17% of 15 year olds had made an attempt to purchase alcohol from a supermarket/shop/off-licence (irrespective of success) in the previous four weeks of being asked by ISD researchers. In both age groups, if an attempt was made, it was more likely to result in a purchase than a refusal. Attempts to purchase alcohol at a pub, bar or club were rarer as 4% of 13 year olds and 12% of 15 year olds who had ever drunk alcohol reported that this had occurred in the last four weeks. Since 1998 the proportion of 13-15 year olds, who had ever drunk alcohol, who bought alcohol from friends and relatives more than doubled. Although there has been a small decline in 15 year olds buying alcohol from pubs and clubs between 1996 and 2008, there has been an increase in the percentage that have bought from supermarkets.

Barnardo's Scotland would like to see the Government focusing on prosecuting those that sell alcohol to underage drinkers with the rigorous enforcement of the of 2005 Licensing Act relating to the sale of alcohol to those under the age of 18.

**For Further Information Contact:**

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