

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

Respondent details:

- i. Organisation name: Coventry Community Safety Partnership (CCSP)
- ii. CCSP is a Community Safety Partnership (ie. merged Crime and Disorder Reduction Partnership and Drug and Alcohol Action Team). A Community Safety Partnership is a statutory body and the CCSP includes representation from Coventry City Council, West Midlands Police, Staffordshire and West Midlands Probation Trust, NHS Coventry and others (a full list of membership is available at www.safercoventry.org.uk/info/5/about_us/2/members_of_the_community_safety_partnership)
- iii. CCSP operates in the West Midlands

Responses to the consultation

Minimum alcohol pricing	
1: Do you agree that this MUP level would achieve these aims?	<p>Yes <input checked="" type="checkbox"/></p> <p>No</p> <p>Don't Know</p> <p>Comment (200 word limit)</p> <p><i>The Coventry Community Safety Partnership would support a minimum unit price (MUP) of 50p per alcohol unit.</i></p> <p><i>The Coventry Community Safety Partnership acknowledges that the Sheffield Study (2008) indicated the introduction of a MUP of 45p over a 10 year period had the potential to significantly reduce both the number of hospital admissions and alcohol-related deaths especially in those groups of people who are drinking at increasing and high risk. Further, the Coventry Community Safety Partnership recognises that a 50p MUP is recommended by the BMA, the Alcohol Health Alliance UK, RCN and Faculty of Public Health and would increase the impact of the introduction of a MUP - a 50p MUP could reduce hospital admissions by 31,000 (full effect) instead of 24,600.</i></p> <p><i>The Coventry Community Safety Partnership believes that the MUP will have a considerable impact on consumers' awareness of their alcohol consumption and that, as far as practically possible, it would be beneficial to adopt a UK-wide MUP to help amplify marketing messages.</i></p>
2: Should other factors or evidence be considered when setting a minimum unit price for alcohol?	<p>Yes <input checked="" type="checkbox"/></p> <p>No</p> <p>Don't Know</p> <p>Comment: <i>The Coventry Community Safety Partnership believes that a MUP will not penalise moderate drinkers, but instead will have the greatest impact on priority groups including:</i></p> <p><i>Underage drinkers who may be especially sensitive to</i></p>

	<p><i>price because they often have little money of their own</i> <i>Young binge drinkers who are more likely than the general population to choose cheaper drinks</i> <i>Harmful (high risk) drinkers</i></p>
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.</p> <p>The minimum unit price should be automatically updated in line with inflation each year.</p> <p>The minimum unit price should be reviewed after a set period <input checked="" type="checkbox"/></p> <p>Don't know.</p> <p><i>Comment: The MUP should be reviewed to validate the modelling assumptions by monitoring the reduction in hospital admission and alcohol-related deaths. If a review concludes that outcomes are not being achieved over a period of time, it may be appropriate to reconsider the MUP level.</i> <i>Additionally, in order to maintain effectiveness, the Coventry Community Safety Partnership believes the MUP should increase over time in line with inflation.</i></p>
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>Comment (100 word limit): <i>Sheffield University research (2008) examined the impact of various potential pricing policies on health, crime and the wider economy. This concluded that positive benefits would be seen as soon as a pricing policy was implemented and that decreases in violent crime and workplace absence would be among the first effects.</i> <i>The Coventry Community Safety Partnership believes that reducing the availability of low cost alcohol may lead to an increased use of other substances including psychoactive substances (eg synthetic stimulants), their combined use with alcohol and the availability of counterfeit alcohol.</i> <i>Health advice in relation to these should be issued alongside the MUP.</i></p>
Ban on multi-buy promotions in the off trade	
5: Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade?	<p>Yes</p> <p>No <input checked="" type="checkbox"/></p> <p>Don't Know</p> <p><i>Comment: While there is moderate evidence to suggest that point of purchase promotions are likely to affect the overall consumption among key groups, the Coventry Community Safety Partnership is unaware of robust evidence for a ban on multi-buy promotions as currently described within the consultation.</i> <i>The current proposals will ban multi-buy promotions, but will not prevent other forms of discounting and, as such, is likely to be ineffective in reducing the quantity of alcohol consumed in any one purchase. A ban on multi-buy promotions as currently described may cause confusion</i></p>

	<i>and deliver mixed messages to consumers.</i>				
6: Are there any further offers which should be included in a ban on multi-buy promotions?					
7: Should other factors or evidence be considered when considering a ban on multi-buy promotions?	<i>Comment: The introduction of a minimum unit price will help deter the sale of the cheapest forms of alcohol which are more commonly associated with drinking among young people and those consuming at higher risk levels. The Coventry Community Safety Partnership believes that the MUP is a considerably more powerful tool to address problematic drinking than bans on individual forms of discounting. The impact of the MUP should be evaluated prior further actions to address pricing-related interventions.</i>				
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?	<i>Comment: The Coventry Community Safety Partnership is unaware of robust evidence for a ban on multi-buy promotions as currently described within the consultation.</i>				
Reviewing the mandatory licensing conditions					
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)?		Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm from children
	Irresponsible promotions	No	No	No	No
	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
	Mandatory provision of free tap water	No	No	No	No
	Age verification policy	Yes	Yes	Yes	Yes
	Mandatory provision of small	No	No	No	No

	measures				
	Rationale: <i>The mandatory licensing conditions ensure that free tap water and small measures are available; however, these are broadly ineffective as, in general, they are not well promoted within premises and knowledge of their availability is poor among consumers. The wording of the legislation in terms of irresponsible promotions makes any prosecution difficult as each and every one of the elements of the legislation must be proved. Home Office guidance differs in a number of respects from the Secretary of State's guidance under s182 of the Licensing Act 2003.</i>				
10: Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs?	Yes No Don't Know	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	Comment: <i>While mandatory conditions do prevent some premises from irresponsible promotions they do not go far enough to ensure full compliance for the reasons stated in Question 9. Low levels of reporting of breaches of these conditions make enforcement action difficult to achieve.</i>		
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	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	Comment: <i>Irresponsible promotions within the off-licensed trade could be tackled through mandatory licensing conditions. Two areas of intervention could include:</i> <ul style="list-style-type: none">• <i>Conditions limiting overall discounting of alcohol by shops and supermarkets and the physical (ie. not limited solely to multi-buy offers)</i>• <i>Conditions curtailing the visibility of alcohol. Discounted alcohol is commonly promoted heavily within the entrance to shops and supermarkets.</i>		
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	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	Comment: <i>Much of the off-trade has no restrictions on irresponsible promotions.</i>		
Health as a licensing objective					
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?	Comment: <i>Health-based CIPs should be implemented on commonly agreed boundaries; ie Local Authority Wards or Local Authority areas. Data sources could include LAPE (North West Public Health Observatory) profiles and local data on hospital admissions (including Ethanol poisoning, mental/behavioural disorders due to use of alcohol, alcohol-related hospital admissions).</i>				

<p>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?</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No</p> <p>Don't Know</p> <p><i>In recognition that the health impact of alcohol consumption is population-wide, rather than specific to neighbourhoods or individual streets, it should be accepted that health-based CIPs should be implemented on commonly agreed boundaries; ie Local Authority Wards or Local Authority areas, unless there is evidence to suggest otherwise.</i></p> <p><i>Increasing the geographic scale of CIPs (to a population-wide approach) may require additional safeguards; and health-based CIPS should be updated annually.</i></p>
<p>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 provide evidence to support your response.</p>	<p>Comment: <i>It is unlikely that health data will contribute effectively to the development of 'traditional' CIPs within small or custom-defined areas which are saturated with alcohol outlets and which aim to reduce crime and anti social behaviour.</i></p> <p><i>Health data reflects the overall consumption of alcohol rather than problems caused by a density of intoxicated individuals within a small geographic area. Hence health data is likely to contribute to CIPs covering a much larger geographic area. Reducing or limiting the density of outlets may lead to an increase in size of existing outlets and may further help deter discounting due to reduced competition.</i></p>