

# Alcohol strategy consultation

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## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

*Please specify which organisation, licensing authority or police force you represent in the box below:*

NHS Southampton (Southampton CCG)

Score

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Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Consultation has taken place through the Alcohol Operational Group (representatives from multiple agencies, including providers, ambulance as well as public health, police and service user representatives), Board members and senior management teams.

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

South East England

Score

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Q6. If you are responding as a member of the public, what is your gender? Please select one option.

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No Response

Score

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Q7. If you are responding as a member of the public, what is your age? Please select one option.

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No Response

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Page Score

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## Page 2: A minimum unit price for alcohol

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Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

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Yes

Score

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Page Score

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## Page 3: A minimum unit price for alcohol

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Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

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Yes

*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):*

Minimum Unit Price (MUP) is an important step in the work needed to reduce alcohol related harm. It should not sit in isolation and should be supported by measures to address excessive purchasing of alcohol, in particular bulk buys and promotional campaigns. While we would support the introduction of the MUP, we believe there needs to be clear information provided both locally and nationally during the

period of change, about the impact the change may have on individuals and families, especially where it may result in potential unplanned withdrawal or financial pressures. When introducing MUP attention should be given to the impact it may have on quality or available alcohol, especially the potential for increased sales of illegal alcohol. We would support a review of MUP after a period of 3 -5 years, combined with more detailed studies and monitoring of impact

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The government should consider the impact other legislative measures have had on improved culture change alongside improved health and wellbeing, for example the increased legislative approach to smoking. This should support the proposals set out in this consultation being seen as a first step towards reducing the harm caused by alcohol. Should also consider evidence from other countries who have introduced MUP

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

The minimum unit price should be reviewed after a set period

Score

0

Q12. 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? Please select one option.

Yes

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

MUP will help many groups who experience alcohol related harms, including families experiencing parental alcohol misuse, domestic violence and acts of abuse & violence in acute, community and home settings.

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## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. The aim of a ban would be to stop promotions that encourage people to buy more than they otherwise would, making it cheaper (per item) to purchase more than one of a product than to purchase a single item. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute

to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single can of lager in the shop, a case of wine sold cheaper than the individual price at which the same bottles are sold in the shop, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

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Page Score

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## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

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Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

We welcome the proposal to ban multi buy promotions, however the proposal stops short of the full benefits we feel could be realised. The ban should be extended to include • A ban on all promotions, including half price offers and discounts • A ban on promotions that are excessively prominent and located in front entrances of stores. We feel a ban that only focuses on only the multi buy offers listed, will allow sufficient scope within the industry to achieve the same level of 'promotion' using other mechanisms. We have also received very strong feedback from service user groups that the location of promotions is a key concern. Allowing promotions to be presented at store entrances is considered, by service user representatives and professionals, to be a significant contributor to the purchasing of excessive amount of alcohol alongside the 'multi buy' or other promotions that accompany the displays. To reduce excessive consumption steps need to be taken to address the drive to sell alcohol in large quantities. This includes all promotional offers linked to price, location of products and over time, advertising and sponsorship should be considered. We also feel the current proposal around multi buys will generate confusion in the first instance, which promotions are/ are not included, and as a result of many offers still being available, result in having little or no impact on people's behaviour. As well as the views expressed in response to question 5, we would wish to see the ban on irresponsible promotions to be extended to include promotions that are focused /located around events for young people, such as Freshers weeks and sports events. As all license conditions are contributors to the licensing objectives to some degree, either directly or indirectly and therefore should remain.

Score

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Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Score

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Q17. 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? Please select one option.

Yes

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

The following groups would benefit from the changes - Low income groups benefit from reduced drinking levels and therefore improved health. - Front line staff – suffer from abuse and violence following pre loading behaviours - Families and children

Score

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Page Score

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## Page 6: Reviewing the mandatory licensing conditions

Q18. In its response to the 'Rebalancing the Licensing Act' consultation in 2010, the government committed to review the impact of the current mandatory licensing conditions. More recently, the alcohol strategy made a commitment to review these mandatory licensing conditions to ensure they are sufficiently targeting problems such as irresponsible promotions in pubs and clubs. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. 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 a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

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Page Score

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## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
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<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

*If no, please state what more could be done in the box below (keeping your views to a maximum of 100 words):*

They do not go far enough, and should seek to better address the - Impact on population levels of consumption encouraged through promotions and - Events for population cohorts, leading to pressure on health system such as Carnage nights for students

Score

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Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Should be greater promotion of healthy approaches to drinking – cheaper soft drinks, smaller measures, health benefits of not drinking/ pre loading

Score

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Q22. Do you think that the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate? Please select one option.

Don't know

Score

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## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. A CIP introduces a rebuttable

presumption that all new licence applications and variations in that area will normally be refused if the licensing authority receives a relevant representation stating that the application will add to the cumulative impact. However each application must still be considered on its own merits and the licensing authority may still grant the application if it is satisfied that the application will not contribute to the cumulative impact. We are proposing that licensing authorities will be able to take evidence of alcohol-related health harm into account in deciding whether to introduce a CIP and the extent of that CIP. This would be a discretionary power and not an obligation. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It will allow local health bodies to fully contribute to local decision making and mean licensing authorities can restrict the number of licensed premises in the local area on the basis of robust local evidence. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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 inclusion of health in the new licensing objectives is a welcomed step forward, whether this is in relation to cumulative impact assessments, or the issuing and renewal of license applications. In taking this forward there needs to be cross Government departmental working to ensure all sectors are developing mechanisms to collect and provide suitable and meaningful information to support the increased focus on health related issues. Examples of where we think further work and development is needed, both locally and through Government departments are

- Establishing routes to link under 18 hospital presentations to local test purchasing. This will require police and trading standards to have access to local hospital data, but also routes to ensure hospitals are required to prioritise the collection and provision of this information (among the myriad of other reporting requirements they have).
- Hospitals and ambulance services have suitable (and nationally consistent) sources of information incorporated into their data collection systems. This will be essential to support robust information to inform a wide range of health related inputs to the licensing process. National consistency is essential given the large geographical areas that Ambulance services and hospitals serve.

Taking these recommendations and proposals forward, we would request national guidance on the extent to which different sources of information relating to health, can and should be used to influence licensing decisions. This would include the two areas listed above: under 18 drinking and demands on health services such as ambulances and hospitals.

Q25. 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

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

See response to question above

Score

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Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Locally we have started to improve our understanding and evidence of the relationship between certain locations and the following areas of impact

- Impact on health economy – use of ambulance, Emergency departments and night time economy services linked to postcode areas and number & type of outlets, time of incidents etc.
- Local deprived populations where there can be focused levels of premises selling alcohol.
- Links between underage drinking and test purchasing activity.

As stated elsewhere, there remain a number of challenges in gathering the evidence to support the decisions.

Page Score

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## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

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0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business, providing they meet certain qualification criteria for limited or incidental sales? Please select one option in each row.

No Response

Score

0

Q29. If special provisions to reduce licensing burdens on ancillary sellers were to include a list of certain types of business, do you think it should apply to the following? Please select one option in each row.

	Yes	No	Don't know
Accommodation providers, providing alcohol alongside accommodation as part of the contract		X	
Hair and beauty salons, providing alcohol alongside a hair or beauty treatment			X
Florists, providing alcohol alongside the purchase of flowers			X
Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket			X
Regular charitable events, providing alcohol as part of the wider occasion		X	

Score

0

Q30. Do you have any suggestions for other types of businesses to which such special provision could apply without impacting adversely on one or more of the licensing objectives? Please write your suggestions in the box below, keeping your views to a maximum of 200 words:

No

Q31. The aim of a new 'ancillary seller' status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs alongside the provision of a wider product or service, while minimising loopholes for irresponsible businesses and maintaining the effectiveness of enforcement. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

**Please use the space below to provide further comments (keeping your views to a maximum of 200 words):**

This proposal is inextricably linked to the technical detail around which it is implemented. For example, we would support the proposal where the 'specific list' was clarified in more detail, or maximum level of sales was defined. The areas set out in question 17 offers some categorisation and feel groups B,C and D could be easily acceptable, groups A and E are open to such a range of variation it is not possible to provide a single answer for these groups. While supporting the idea in principle, we would want to see further consultation on 'what the right balance' would be, before being able to support a more relaxed approach.

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

	Yes	No	Don't know
Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed			X
Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder			X

<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X
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Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives?  
Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation? Please specify in the box below keeping your response to a maximum of 200 words:

Where clearer and more informed technical detail was set out and provided, we would support the approach offered in Option B.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. Do you agree that licensing authorities should have the power to allow organisers of community events involving licensable activities to notify them through a locally determined notification process?  
Please select one option.

No

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

**No Response**

Score

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Page Score

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## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

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## Page 14: Freeing up responsible businesses

Q39. Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways? Please select one option in each row.

*No Response*

Score

0

Q40. Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment? Please select one option.

No

Score

0

Q41. Please describe in the box below any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words).

Potential purchasing of alcohol en route to events.

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges		X	
Remove or simplify requirements to renew personal licences under the 2003 Act		X	

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. Do you think that the following measures would impact adversely on one or more of the licensing objectives (see glossary)? Please select one option in each row.

*No Response*

Score

0

Q45. In addition to the suggestions outlined above, what other sections of or processes under the 2003 Act could in your view be removed or simplified in order to impact favourably on businesses without undermining the statutory licensing objectives or significantly increasing burdens on licensing authorities? (Please keep your views to a maximum of 200 words.)

There should be no removal of any areas currently covered by licensing objectives

Page Score

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## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. Do you think that the impact assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals? Please select one option in each row.

	Yes	No	Don't know
Minimum unit pricing			
Multi-buy promotions			
Health as a licensing objective for cumulative impact		X	

Ancillary sales of alcohol			
Temporary event notices			
Late night refreshment			
Removing the duty to advertise licence applications in a local newspaper			
Sales of alcohol at motorway service stations			
Personal licences			
Score			
0			

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

Impact Assessment: Health as an objective for cumulative impact  
The Impact assessment for Health relates to Cumulative Impact assessment and misses the importance of wider input and influences the role of health information and involvement can have on other aspects of licensing.

Page Score
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## Scoring Summary

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