Alcohol etc. (Scotland) Bill

Barnardo's Scotland

Introduction

Barnardo's Scotland is a national voluntary organisation providing over 60 services throughout Scotland, working in partnership with almost all local authorities. We provide a range of services to nearly 10,000 children and families across Scotland. Every Barnardo's project is different but each believes in the potential in every child and young person, no matter what they are, what they have done or what they have been through.

Barnardo's Scotland strongly welcomes the Scottish Government's commitment to tackle alcohol misuse and stated policy aim of reducing alcohol consumption. 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. So this is an area of significance for us, an area in which we have considerable experience and an area where we have specialised expertise and services. It is from this perspective that this response is made.

Background

A significant percentage of children throughout Scotland are harmed in various ways and to varying degrees by alcohol. Sometimes the negative effects are caused by alcohol consumption among children and young people themselves. In addition, there is abuse and/or neglect of children resulting from the alcohol abuse of parents or the other adults in their lives.

Barnardo's Scotland would like to highlight two specific areas of concern in terms of the impact of alcohol misuse on children and young people which we feel have not been given sufficient attention.

More focus needs to be given to the extent to which children's lives and life chances have been compromised by exposure to alcohol while still in utero. Foetal Alcohol Syndrome (FAS) is the term used to describe the visible birth defects and the invisible organ/brain/nervous system damage that can result from exposure to alcohol during pregnancy. When the impacts of alcohol on the development of a baby are less immediately apparent to the eye, but are nonetheless potentially damaging, this is referred to as Foetal Alcohol Spectrum Disorder (FASD). Both FAS and FASD are potentially seriously damaging to a child’s development and more so to its long-term life chances.

Another sometimes overlooked issue which, in the experience of our services, has a significant impact on children is the large number of A&E admissions linked to alcohol abuse. Many of those admitted to hospital are likely to be parents or carers of children and young people. Alongside the traumatic impact on the child of witnessing parental injury, and issues around the care
of children during hospital stays, there is a concern about the long-term impact. According to recent statistics, the greatest worry for children phoning ChildLine Scotland about concerns over parental or carer health and wellbeing was alcohol misuse, representing over a third of calls, followed by parental drug misuse (11%) and domestic abuse (7%).

General points

Barnardo’s Scotland supports the main policy objective of the bill, which is to protect and improve public health by tackling alcohol misuse and reducing alcohol consumption. Although some of the specific issues faced by children and young people would not necessarily be addressed by the measures contained in the bill, its adoption would send an important message about society’s attitude to alcohol. The various measures outlined in the bill would target alcohol misuse across a wide range of ages and social circumstances, which would certainly lead to an improvement in the lives of children in Scotland.

We also note the wide support for the measures proposed in the bill, including from the BMA’s Scottish Council, Scottish Directors of Public Health, the UK’s four chief medical officers and the Association of Chief Police Officers in Scotland.

Barnardo’s Scotland has joined with other children’s organisations to produce a joint statement on the bill, which concludes that the children’s organisations “strongly support policies, including minimum pricing, which aim to reduce overall consumption in the population. It is Scotland’s pride that ‘the best interests of the child’ has underpinned the development of child welfare policy and legislation in this country. We call on the Scottish Government and the parliament to ensure that this principle sits at the heart of Scottish alcohol policy in order to ensure that children are protected from future harm.”

However, the measures set out in the bill should not in themselves be regarded as sufficient do deal with a problem as complex as alcohol misuse in Scotland.

In particular steps should be taken in future to:

- Widen awareness of specific health dangers such as Foetal Alcohol Spectrum Disorder and the effects of binge drinking
- Ensure adequate, appropriate and accessible services needed for children and families affected by alcohol misuse are available across Scotland, and that specific guidance is provided for professionals on how to address and support families more adequately.
- Put in place specific measures to tackle problems caused by drinks that combine alcohol and caffeine, such as Buckfast and vodka and energy drinks (for example Red Bull).
Specific points on the main purposes

• *Introduce a minimum sales price for a unit of alcohol (sections 1 & 2 of the Bill).*

Barnardo’s Scotland welcomes this measure and has indicated this support through the joint statement from children and young people’s organisations.

Research from Switzerland demonstrates that the alcohol consumption among young Swiss people was particularly likely to be affected by changes in price and several other studies show that the price of beer is a significant factor when targeting young people, especially young males.

However, we recognise that minimum pricing will not solve all the problems in Scotland’s relationship with alcohol and must be viewed as one measure among many. We note that certain types of drinks, such as those that combine alcohol and caffeine mentioned previously, may not be affected by minimum pricing and will therefore require further measures.

It is crucially important that post-legislative scrutiny of any minimum pricing regime is carried out, to ensure that there is proper assessment of the impact of this measure.

• *Introduce a restriction for off-sales on supply of alcoholic drinks free of charge or at a reduced price (section 3).*

Barnardo’s Scotland supports this measure.

We welcome moves to restrict the promotion of alcohol in ways that provides a financial inducement to buy more than intended

• *Make provision in law with respect to the sale of alcohol to those under 21 years of age (section 8).*

This is a difficult issue that requires careful consideration and on balance, we remain unconvinced by this measure. The removal of a young person’s rights (particularly when they can join the armed forces and marry at 16) must be fully justifiable and underpinned by a robust evidence base.

Barnardo’s Scotland therefore believes the government should focus on the prosecution of those selling alcohol to underage drinkers rather than targeting young adults who can legally drink. We therefore welcome the proposed requirement for licence holders to operate an age verification policy and see this as a more appropriate measure.

We are concerned that the possible introduction of a higher minimum age for purchasing alcohol on a licensing board by licensing board basis will create confusion and inconsistency and may generate a sense of persecution among young people who have their rights to purchase alcohol taken away. We are also concerned about young people travelling to different licensing board
areas where they can purchase alcohol and the negative effects this may cause.

Barnardo’s Scotland recognises that any reduction in alcohol consumption will have long-term health benefits. We also acknowledge the evidence presented in the alcohol plan which points to the number of very young (13-15-year-old) underage drinkers who obtain their drink through third parties, typically via off-sales. However, many older adults consume excessive amounts of alcohol purchased through off-sales too.

Therefore, while we welcome the government’s commitment to change the culture of Scotland’s attitude to alcohol, we remain concerned that, unlike other measures in the bill, this proposal does not challenge the excessive alcohol consumption of the whole population but instead seems to penalise young adults.

• Restrict the location of drinks promotions in off-sales premises (section 4).

Barnardo’s Scotland supports this measure.

• Introduce a requirement for licence holders to operate an age verification policy (section 5).

Barnardo’s Scotland supports this measure.

We welcome moves to restrict the availability of alcohol to underage drinkers and believe that a requirement to operate an age verification policy will help to achieve this.

• Make provision in law for a social responsibility levy on licence holders (sections 10 & 11).

We welcome this proposal, but would like to see further exploration of how these provisions could help support the services needed for children and families affected by alcohol misuse. Provision of these services is currently patchy and it is crucial that all those affected by alcohol misuse have access to adequate, appropriate and accessible services.

We note that the Scottish Government does not plan to set out nationally the uses to which a social responsibility levy should be put, leaving local authorities to determine priorities in their areas and identify new or enhanced services, initiatives or projects where the use of additional money could best contribute to the achievement of the licensing objectives.

However, we are concerned that much of this discussion about the levy has focused on its use in providing additional policing or street cleansing. We feel it would be useful to ensure that there is clarity around the breadth of possibilities for this levy. In the case of off-sales, where there may be less of a geographic remit, wider alcohol misuse services may be a particularly appropriate destination for funds raised by the levy.
Conclusion

Barnardo’s welcomes the bill as it focuses on an area where there have been long-standing concerns. We would be happy to provide oral evidence to the Committee if this were thought to be useful.

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