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ALERT



**Licensing Bill:
Government Betrays
Local Communities**

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At the bar

The Licensing Bill, the most significant measure in alcohol policy for almost an hundred years, was announced in the Queen's Speech. Launching the Bill a few days later, appropriately in a London pub, Kim Howells, the Minister responsible for its safe passage onto the statute books made the startling assertion that when it came into force there would be an end to binge drinking and its consequent problems. Dr Howells clearly implied that binge drinking and disorder arising from drunkenness were phenomena which began with the introduction of licensing at the beginning of the last century. This will surprise anyone who knows anything about life in eighteenth century London, for example, or the nature of the mediaeval banquet, to say nothing of those models of moderate drinking, the Vikings, who apparently raped and pillaged fortified by nothing more than a Campari and soda sipped, in the Mediterranean fashion beloved of the Government, over the period of an hour at a pavement café.

What does the Bill actually contain? The intention is to streamline the licensing system for premises selling alcohol and the Bill will abolish fixed opening hours. Alongside this there will be a range of measures intended to reduce anti-social behaviour. According to the Government, the Bill will *"minimise public disorder resulting from artificially fixed closing times and encourage a more civilised culture in pubs, bars, and restaurants."*

It will be an offence to sell alcohol anywhere to people under 18 and the legal age for pub drinking will remain 18. However, it is proposed to give children free access to licensed premises except in special circumstances.

The Bill brings together six existing acts, which, it is claimed by the Department of Culture, Media and Sport, will *"potentially deliver savings of £1.97 billion over the first ten years of operation, sweeping away considerable red*

tape". A whole range of administrative overheads will be removed from businesses as will the need to hold licensing hearings in the *"vast majority of cases"*.

The power to grant alcohol



of the house



Public Protection Executive, said: *“deciding from whom, where and when alcohol should be sold is best done by elected councillors who are accountable*



to their local communities and already responsible for many related functions.” Which rather suggests that Councillor Kemp has not full appreciated

licences will be transferred from the magistracy, which has had responsibility in this area for five hundred years, to local authorities. Local residents, it is said, will be given *“a powerful voice”* in the licensing process, with the right to make representations to the licensing authority about applications for new licences and to call for a review of existing ones. However, these rights are reserved for those who live in the vicinity of the premises in question: everyone else is excluded. Their representatives, whether councillors or MPs are also specifically excluded for doing so on their behalf. Councillor Susie Kemp, the Chairman of the Local Government Association

the limitations, imposed by the Bill and accompanying Guidance, under which local authorities will labour.

In another measure, police, fire, and other emergency and local services will have an input to the applications. Police already have the power to close any licensed premises without notice for up to twenty-four hours.

The Open All Hours? Campaign, sponsored by the IAS and the Civic Trust, which includes local authorities of all political persuasions, has already reported on its findings as to the likely effects of the Bill (see page 6). Two of its recommendations seem already to have been taken up by the Government. The

Office of the Deputy Prime Minister has agreed to look at the implications of the Bill in regard to *“urban renaissance”*. In addition, the Department for Environment, Food & Rural Affairs (DEFRA) has commissioned a study of the problem of noise resulting from the changes brought about by the changes in licensing law. It is interesting that this study of noise is to be conducted by MCM Research Limited led by Peter Marsh. MCM Research appears to work mainly for the alcohol industry in the form of the Portman Group. Marsh appears as an *“expert witness”* in licensing cases on behalf of the industry and was the principal author of a study commissioned by the Portman Group at the opening of the campaign for the liberalisation of the licensing laws. This particular study was condemned by reviewers, as one which would never have survived the process of peer review imposed on serious academic work. The study is virtually the only piece of *“evidence”* cited by the government to support its proposals. ■



The Licensing

Andrew McNeill examines the Bill and its likely effects

The Government's Licensing Bill looks set to achieve the remarkable feat of undermining not merely the national strategy against alcohol misuse before it has even been published but also its own policies for an urban renaissance.

No Government serious about reducing either the abuse of alcohol or of improving the

liveability of town and city centres would countenance introducing a Bill which plays the same role in relation to these two objectives as the Al Qaida network does in the war against terrorism.

Give the Government credit. It has apparently succeeded against the odds in persuading most Parliamentarians that this Bill is basically non-controversial, opposed only by a small minority of cranks and killjoys.

To the gullible it promises that not only can 24 hour drinking be introduced without causing additional problems but even that the simple expedient of abolishing fixed closing times will somehow transform the drinking culture and put an end to binge drinking, a pattern of consumption which has been evident in Britain since before the Vikings and which is an increasing problem internationally.

It is the nonsense about binge drinking that has allowed the Government to convince the ignorant and the credulous that they can be a trendy liberal and David Blunkett simultaneously. On the basis of a highly selective and, to put it mildly, optimistic reading of the evidence the Government has persuaded them that the evils of fixed closing times are such that every lager lout's dream of unlimited public drinking should be introduced as a major contribution to combating yob culture.

The public know better. There is neither a region nor an age-group in this country with a majority in favour of 24 hour drinking – women are particularly strongly opposed – and residents' and amenity groups from town and city centres across the country as well as a growing number of local authorities are now starting to express their opposition to key sections of the Bill. They know from direct experience that as the numbers of licensed premises in city centres has grown and hours of trading have lengthened, the problems of crime, disorder and nuisance have got worse and worse – exactly the opposite of what the Government pretends is the case.

The key consideration is the cumulative impact of concentrations of late licensed premises, resulting in late night activity outstripping the capacity



Bill dissected



of local services, particularly police and transport, to cope.

Local residents and local authorities know that far from improving the situation, the Bill as drafted expressly forbids local authorities to take this aspect into account, thus weakening their ability to deal with the resulting problems.

Even a cursory look at the Bill and, still more, the Guidance accompanying it, reveals the duplicitous nature of Government propaganda.

To local residents the Government says, *“We’re extending trading hours up to 24 hours a day, seven days a week, but don’t worry, we’re giving you a real say in what happens. Look at the White Paper - the whole point of transferring responsibility to local authorities is to encourage local accountability.”*

But to the late night alcohol and entertainment industry the Government says something very different: *“We’re transferring responsibility for alcohol licensing to local authorities, but you don’t need to worry because they are being denied the discretion allowed by the*

present system in regard to the granting of licences and conditions placed on them. We’re making sure that local authorities have to follow the Secretary of State’s Guidance, and that ensures that local licensing policies are devoid of any real content.”

Clearly, one of these assurances has to be humbug, and there is no question as to which. If you disempower the licensing authority, then by definition you also disempower the local communities it serves. The Guidance makes it clear that even in residential areas local authorities will not be allowed to set general closing times, whatever the views of the local population. Democratic accountability? No wonder the leader of one of the major London Boroughs recently described the Guidance to the Bill as the most pro-industry and anti-resident document he had seen in his time in local government.

We are clearly headed for the fate already reported for Scotland where *“liberalisation has gone too far, meeting the interests of*

the licensed trade and a minority of drinkers at the expense of the wider community.” If there is still any doubt, remember the Government’s message to potential voters before the election. They were not encouraged to vote for a Government because it would end the drunken mayhem making their town centres a no-go area every Saturday night but rather *“If you don’t give a XXXX for closing times vote Labour.”*

One does not need to be a professor of sub-texts to get the message – if you like partying through the night and don’t give a XXXX for the consequences for others, vote for us because we’ve got the Bill for you. What is so alarming local residents and others who have the wellbeing of town and city centres at heart, is that they have. ■

Andrew McNeill is Co-Director of the Institute of Alcohol Studies.

This article also appears in the December 2002 issue of Parliamentary Monitor.



La Lutte Contin

The Open All Hours? Campaign comprises residents' and other groups from all over England who seek improvements to the Alcohol and Entertainment Bill. Whilst the campaign believes that reform is needed to bring alcohol and entertainment licensing into line with modern needs, it argues that the Bill is very unbalanced.

It is important, says Open All Hours?, to distinguish between the 'evening economy' and the 'late night economy'. The evening economy has brought vibrancy to town and city centres by later opening of shops, sports and cultural venues, as well as restaurants and bars, and has been a valuable regeneration tool. Our concern is with the emerging post-midnight 'late night economy', where the costs and benefits to society are more finely balanced.

The night economy is already causing problems of crime and disorder, anti-social behaviour, noise and nuisance for local communities. At night, many town and city centres have become threatening and unpleasant environments, intimidating to those seeking a quieter night out, and

intolerable for long-suffering residents.

Open All Hours? believes that an holistic approach is needed to ensure that town centres are managed in the interests of all. The Bill, far from providing the means for tackling these problems, as the Government claims, is likely to make them worse.

Open All Hours? has recently published its final report which is summarised in three sections: the questionable assumptions which underlie the Bill; how Open All Hours? wants the Bill amended; and how the Government can ensure that the changes work well.

QUESTIONABLE ASSUMPTIONS

The Government claims that there is wide support for licensing deregulation and extended drinking hours; but opinion polls show no region of the country, nor any age-group, with a majority in favour of 24-hour opening. Women are more strongly opposed than men.

It also gives the impression that the existing licensing

regime in England and Wales is uniquely restrictive, and that the Bill will only bring us into line with other European countries, but, in fact, most are not nearly as deregulated as the Government claims.

A feature of the British alcohol scene is that it is particularly characterised by 'mass volume vertical drinking' in which people stand, rather than sit at tables, with consuming quantities of alcohol as an end in itself. This is not, however, a result of restricted hours; deregulation is therefore likely to exacerbate it. A recent research study by the Central Cities Institute into other northern European Capitals found that it is not the length of opening hours which makes a more ordered environment but the drinking culture, combined with a strong regulatory regime and controls over numbers of premises.

HOW DO WE WANT THE BILL AMENDED?

Cumulative Impact

A main problem is 'saturation' - an over-concentration of premises in a locality. On weekend nights especially, the centres of large and small towns attract thousands more than the public service infrastructure can manage. These 'hot spots' cannot be controlled merely by granting every license application, with conditions. It is the number of premises concentrated together which cause unacceptable problems of



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noise and nuisance, by the sheer numbers of people arriving at, leaving and moving between, such venues.

Local licensing committees will only be able to assess an application in terms of whether it will create crime, disorder or nuisance within the premises or its immediate curtilage, not whether it will add adversely to the cumulative impact of premises already in the area.

We therefore recommend adding a fifth licensing objective to those already in the Bill:

'The prevention of licensed premises in a defined area becoming so numerous that the granting of further premises licences will undermine the other licensing objectives.'

Robust Local Licensing Policies

It is essential that Local Authorities be allowed to formulate licensing policies which can respond to local conditions. The Bill replaces local discretion by Ministerial Guidance. Yet there can be wide variations within a single local authority area. Whilst there may be a need to control late night activity in one area, it may be unobjectionable in another. A local authority must be able to set out policies on an 'area by area' basis.

We recommend that local licensing authorities be given sufficient discretion to formulate local licensing policies which respond to local conditions. Non-compliance with an agreed



policy should be a ground for the refusal of the grant of a premises licence or the imposition of a condition restricting the hours.

Locally-set fees to meet locally-generated costs

One of the Bill's aims is to reduce the burden of costs on the industry. Regardless of economic benefits, the 'late night economy' also imposes social costs on local communities and the public purse. The Bill is likely to increase the costs to society, but will not provide the resources for their effective management.

The industry will save costs and pay lower license fees - to be set by central Government. Government will save by abolishing Local Justices Licensing Committees and will gain from extra excise duty. Local Authorities, on the other hand, will have increased costs, which they will have to recoup either from council tax payers or reduced services. The low licensing fees will make no contribution to the extra cleansing, public convenience provision, noise team call-outs, CCTV and policing costs, which can all be expected to increase.

We recommend that fees be set by licensing authorities to meet their legitimate costs. The

'polluter pays' principle should be used to meet the costs to society arising from late-night activity, as in other industries.

HOW CAN THE REST OF GOVERNMENT ENSURE THAT THE CHANGES WORK WELL? Office of the Deputy Prime Minister:

Effective Planning for the 'night-time economy'

The Government's Urban Renaissance agenda has the potential to deliver far more important benefits to society than deregulation of drinking hours and should take priority. Local authorities will need to gear up for the environmental disruption that the Bill will create.

LPA's should also consider the local impact of changes of use from A3 to D2, ensure that resources are in place to meet the anticipated impact before granting consents for long hours, and use Conditions and





Section 106 Agreements to minimise adverse impact.

Before the Bill receives Royal Assent, we recommend that Government issues a new Planning Policy Guidance Note requiring Local Planning Authorities (LPAs) to adopt specific policies, in their local



plans, in relation to the *'night-time economy'* and the need to consider conditions as regards hours and numbers.

Department for Environment, Food and Rural Affairs:

Controlling Public Nuisance

Public nuisance takes many forms. The behaviour that can accompany the *'late night economy'* can impair quality of life of both local residents and other visitors.

We recommend that DEFRA issue advice for controlling and minimising noise from late night entertainment.

We recommend powers to deal with noise nuisance within premises and on the street, and to reduce ambient noise levels in central areas where they exceed recommended levels.

The Bill should put licensing authorities under a duty to place conditions on licenses to control noise both from the premises and from patrons outside them. Section 106 Agreements should be used to ensure provision of public conveniences, litter bins and extra street cleansing, or a contribution towards them.

Home Office:
Tackling Crime and Disorder

These terms are imprecisely defined in all legislation seeking to control *'disorder'*, *'nuisance'* and *'anti-social behaviour'*, so that no-one knows what is and what is not *'acceptable'* behaviour. The Home Office must clarify this.

Lord Chancellor's Department:

Protecting Residents' Rights

The Bill puts an unfair burden on the local community by

placing the burden of proof on individuals who will be affected by, rather than on those who will profit from, the activity. Local residents will have to take on the might of the entertainment industry and prove, in advance of a premises opening, that the new licence will cause intolerable problems justifying refusal or conditions. We are also concerned that residents will only have the right to object if they live in the vicinity of the proposed venue. We are aware that residents can be affected even if they do not live in the immediate vicinity. A hearing will further increase this inequity; lay people will have to sustain their objections against expert lawyers, specialist consultants and technical experts presenting the applicants' case.

It is unrealistic and unfair to expect residents to make a convincing case before the premises have even opened. This should be the role of local licensing policies and Government guidance must allow the general application of conditions to protect residents from nuisance, crime or disorder.

The licensing authority must be able to consider fully an application and the burden should be on the applicant to show that, on balance, a venture trading late into the night will be unlikely to breach licensing objectives. This would encourage applicants to build in mitigation measures. ■

Planning and the Licensing Bill



Simon Milton

There seems to be collusion between the Government and the drink industry over many aspects of the new Licensing Bill. One is the vain search of local authorities to find where their alleged control over licensing in their areas will lie once the Bill passes into law. On the crucial subject of density of outlets, we are

told by the Government that that this is a planning not a licensing matter, and controllable through that planning system. On other occasions, the opposite is stated.

Simon Milton is the Leader of Westminster City Council and argues that planning legislation is ineffective in dealing with the cumulative effects of licensed premises.

Introduction

Local authorities with experience of managing a late night economy recognise that a concentration of late night licensed premises in a particular area causes a number of problems including noise on the streets, disorder, crime and nuisance such as litter and street urination. These impacts make city centres unattractive to visit after dark for anyone who is not part of the late night drinking scene. The Government recognises these problems in its regulatory impact statement accompanying the Licensing Bill but its guidance makes clear that local authorities will not be able to take the cumulative impact of granting additional licenses into

account in determining license applications. Instead, the Government states that these issues should be dealt with through the planning system.

There are three reasons why this approach cannot work:

1) Use Classes Order

Planning legislation defines categories of activity into use classes. Within these use classes, planning permission is not required. Bars and pubs currently sit in the same use class (A3) as restaurants and coffee bars. Nightclubs fall within D2 class along with cinemas, theatres, bingo halls etc. This means that there is nothing in planning law to prevent a restaurant becoming

a bar and a cinema becoming a nightclub. Yet the impacts of these different uses are very different. Moreover, planning permission is not required for an existing A3 or D2 use to increase capacity or open for longer hours. So planning cannot contain growth. Planning permissions last for ever, unlike licences, and so cannot be reviewed when local circumstances change. And even in those cases where planning permission is required, a prospective increase in crime and disorder is not normally regarded by the Planning Inspectorate as a proper reason for refusing planning permission,

Case Study: a bar operator has recently acquired two small restaurants in Soho adjacent to each other. One of them shares a party wall with a block of flats. This part of Westminster is designated as a stress area where the police and council believe that saturation of late night drinking establishments has been reached. The restaurants were typical Soho establishments serving people in the West End for the theatre or cinema and closing around 12.30am. The bar operator has knocked the two units into one and opened a bar accommodating 700 people and has applied for a 3.00am license. The police, council and local residents have opposed this

application in the licensing magistrates yet in planning law this operation does not even require permission despite the very different local impact that the operation will have. The only way of safeguarding this significant additional impact is through the licensing system but under the new legislation, the licensing authority would not be able to take into account the impact of this new bar on the area.

2) Unitary Development Plans (UDPs)

Local councils can only make planning decisions in line with their UDP policies or else see their decisions overturned on appeal. To use the planning law to prevent undesirable concentrations of late night activity, local authorities must establish new policies in their UDP, which must then go to public inquiry. A dynamic late night economy requires a more flexible and dynamic response than is available through the planning policy process. Many A3 uses have been granted in the past on the basis that their hours could be controlled through licensing. Unless these existing premises are required to seek a new planning permission (which is inconceivable), the authority will have no ability to prevent a significant increase in late night drinking from these premises in areas that already face significant crime and disorder issues.

Case Study: Westminster City Council is currently updating its UDP, which is being considered by a planning inquiry. In line with Government suggestions it is designating stress areas where it believes there is already too

great a concentration of late night licenses. One of the principal objectors to this policy is the licensed trade, which is arguing in its submission that these are matters for licensing rather than planning policy!

3) Planning Enforcement

The powers to enforce against planning breaches are far weaker than in breaches of license conditions. If a premises changes use without planning permission, for example by changing from a shop into a bar, the local authority can serve a notice on the owner. But the premises may trade quite lawfully nevertheless. The notice can be appealed, or the premises can seek retrospective planning permission and then appeal a refusal to issue consent. By playing the system it is perfectly possible for premises to stay in business for eighteen months before the process reaches its conclusion, trading lawfully all the while. Under the new Licensing Bill, such a premises would also be entitled to a 24-hour license regardless of the planning position.

Case study: a Class A1 retail premises in Soho began operating in breach of planning control as a Class A3 cafe/restaurant in 1998. Following warnings from the planning enforcement team the business closed down. The A3 use then later reopened under new owners but again closed promptly following threats of enforcement action. When it reopened a third time under yet more new owners in January 2000, these owners said they proposed to bring the operation within a sandwich bar use which would fall within the lawful Class A1 use. They submitted an

application for a Certificate of Lawfulness for a Proposed Use in order to establish beyond doubt that what they proposed would constitute an A1 use. After some negotiation a Certificate was issued. However they did not operate in accordance with the certificate but continued to operate as a Class A3 cafe/restaurant. When threatened with the issue of an enforcement notice they submitted applications to keep the cafe/restaurant use and for tables and chairs outside the premises. The applications were refused and authority to issue enforcement notices against both matters was obtained at the same time. The owners appealed however and a decision is expected in December this year. Despite enforcement action, for the greater part of the period 1998 to date the unauthorised use has traded in breach of planning control.

Conclusion

It will be seen that planning legislation alone currently provides little protection for authorities seeking to manage the late night economy. Until there is a change in Use Classes Orders to categorise bars and nightclubs as a use in their own right separate from restaurants and other entertainment uses, and without far more effective enforcement powers, local authorities must be able to rely on a cumulative impact policy as part of its local licensing statement to ensure safe and attractive town centres. Even then, planning will only provide controls over new premises in new locations rather than the thousands of existing premises to which new licensing hours will apply. ■

Let's all consult again

Andrew Varley looks at the Consultation Document for the National Alcohol Reduction Strategy

So the National Alcohol Strategy for England and Wales has found its way to the Strategy Unit of the Cabinet Office having been unceremoniously prised out of the dilatory hands of the Department of Health. Perhaps it is only a matter of time before it finds its way, like licensing legislation, into the Department for Culture, Media and Sport – known to at least one senior civil servant there as the Department of Fun. (See Alert, no.2 2002).

The new consultation is now under way and the Strategy Unit is eager to hear your views.

The Foreword to the consultation document begins with the mantra, now familiar from all government statements on the subject and which appears to have been copied from the drink industry's Portman Group: *"Most adults in England drink and the majority drink sensibly. For them, drinking is part of a pleasurable social experience which causes no harm either to themselves or to others."*

Government has no need to intervene in this enjoyable aspect of life." The authors of the document appear to believe that no-one has a problem with alcohol unless they are in the last stages of cirrhosis, a condition which only a small minority even of chronic alcoholics achieves.

In its anxiety to offend no-one, especially the drink industry, and in its determination to avoid any accusation of perpetuating the nanny state, the government

undermines the whole process by minimising the problem. It would have been a far more effective exercise had it used some of the facts set out by Alcohol Concern in its State of the Nation report (see page...)

We do not, however, have too long to wait before the bad news because *"there is another, less pleasant side. For some people the misuse of alcohol brings serious consequences for the drinkers themselves, for their families and friends, and for the community as a whole. And this is a legitimate area of concern for a responsible Government."* The tone will be familiar to all those who are of an age to remember the sort of condescending school books written for ten year olds thirty or forty years ago. The consultation document continues:

"Misuse of alcohol generates complex problems which need a co-ordinated response. The Government is committed to producing a national strategy for England to tackle the harmful effects of alcohol. The strategy will offer a clear and coherent way forward:

- *to identify and where possible prevent the consequences of alcohol misuse;*
- *to help those who suffer the consequences of alcohol misuse; and*
- *to manage the consequences, for example tackling disorder and*

antisocial behaviour on the streets.”

The Government has shown its commitment by taking nearly five years to get to this stage. It has dithered as to who is responsible for the production of the strategy, it has made it plain that the drink industry will play a major rôle, and it has now gone back to the beginning and is asking elementary questions, the answers to which have been available for years.



Health Minister
Hazel Blears

Health Minister Hazel Blears says in her Foreword to the consultation document: *“The Prime Minister has asked me to*

act as the sponsor Minister for a Strategy Unit project on tackling the problems associated with alcohol misuse. In line with the Unit’s normal approach the project will bring a cross-cutting perspective and a rigorous analytical approach to the difficult issues raised by alcohol misuse. Over the coming months the Strategy Unit will be working closely with the Department of Health and other Government Departments to develop a national alcohol harm reduction strategy.

“This consultation is a critical first stage in the development of the



national alcohol harm reduction strategy.”

Cheered as we all must be at the prospect of “a cross-cutting perspective”, we might reflect that this “critical first stage” has been gone through before. There already has been an exhaustive consultation process which got us nowhere other than this rerun sponsored by the Strategy Unit. There are mountains of evidence already gathered. According to a spokesman for the Strategy Unit all this will merely be part of the data taken into consideration. The work done over the years by the Department of Health, it appears, will just be one piece of evidence having no more status than the representations of the drink industry. The representatives of the industry were prominent at the launch of the strategy and the session given over to a discussion of its rôle as a “key stakeholder” was chaired by Andrew Cunningham, the senior civil servant at the Department of Fun (his expression) who is the prime mover behind the new Licensing Bill. That Bill, of course, is seen by many as operating primarily in the interests of the industry.

Hazel Blears, like a schoolmistress explaining their task to a recalcitrant group of adolescents, patiently explains that “this document poses a number of questions about alcohol misuse. We would like you to consider and answer these questions, and over the next three months to give us:-

- your views on whether we have identified the key issues;
- your ideas and solutions for future action;
- your thoughts on current practice – what has worked well and what could work better.”

And with these words we return to the drawing board. There is a ritual repetition of the mantra – “92 per cent of men and 86 per cent of women in Britain drink alcohol, and drinking plays a mostly enjoyable part in our culture” – and we proceed to the Introduction of the consultation.

“The Government believes that there is a rôle it can play to reduce the harm associated with alcohol misuse, for example by providing information, education and advice about the risks of drinking.” It is interesting that this is the first thing which occurs to the authors and it reflects the influence of the industry itself and of its mouthpiece, the Portman Group. The industry is an eager proponent of alcohol education for the simple reason that it is one of the least effective means of dealing with alcohol problems. The most effective – control of density of outlet, statutory regulation, taxation, lower drink drive limits – have already been eschewed, presumably because they are anathema to the industry.

“The Government has therefore made a commitment to implement a National Alcohol Harm Reduction Strategy by 2004.” Seven years – the drug strategy took a fraction of that time. *“This strategy will need to acknowledge the complex nature of the problems caused by alcohol misuse, and recognise that effective action to tackle these problems will need to involve not only Government, but also key organisations such as the police, local authorities, the NHS, Drug and Alcohol Action Teams, voluntary organisations, employers,”* and, of course, *“the drinks industry”*.

The Prime Minister has asked the Strategy Unit to play a



key role in developing the National Alcohol Harm Reduction Strategy. The Strategy Unit's approach is to conduct a rigorous analysis of the evidence base, and apply creative and innovative thinking to new ways of tackling problems. It is able to bring a cross-cutting perspective to areas which span several parts of Government. The danger of

leaving it with the Department of Health was that the finished article might, heaven forbid, have been too biased towards public health rather than the interests of the industry.

"The objective of the Strategy Unit's project will be to develop a vision, principles and framework for a strategy on harm reduction for England, working closely with the key Government departments

and a range of key stakeholders inside and outside Government. The strategy will then be implemented by the Department of Health, in conjunction with other Government Departments. The project will be completed by the summer of 2003."

Finally, the document asks the question, "What do we want to know?"

Our first task is to determine whether the correct issues have been identified. This consultation is a key part of that process. The responses will be used to clarify the areas of work to be covered, and to help to shape the direction and outputs of that future work.

In addition to developing the principles that should underpin the strategy, we have identified the following areas of enquiry:

- i) the cultural and behavioural issues around alcohol use and misuse
- ii) health: prevention, treatment and the impact on the NHS
- iii) crime, disorder and anti-social behaviour: the effects on our surroundings and community
- iv) the implications for vulnerable groups, including children
- v) education and communication
- vi) the shape of the market and market-based solutions
- vii) the economic costs and benefits of alcohol

For all these we want to bring together information on:

- Key facts and figures: what evidence is available? Where are the gaps?
- Trends: which factors created the current situation? What are the likely trends and scenarios for the future?

- Current approaches, both in terms of policy and in terms of delivery of services on the ground. What works well? What could work better? Where are the gaps? How well do policies and organisations join up and what are the barriers to more joint working?
- International comparisons. What can we learn about what to try and what to avoid? How well do these lessons read across to English culture?

Joined up Government? Is the Cabinet Office unaware that there is a strategy already in operation for combating alcohol-related crime? Perhaps they should ask the Home Office. Has the Department of Health kept the effects of alcohol on the NHS a closely guarded secret?

The Strategy Unit has set out to reinvent the wheel. A brief look at some of the questions which form the consultation emphasises this:

“Why should the Government get involved in managing the harmful effects of alcohol misuse? At what point does Government intervention become justified?”

If we are still at the stage of asking basic philosophical questions as to the extent of Government intervention, then the strategy will never appear in the lifetime of this parliament.

“How far is alcohol misuse a matter of individual responsibility and when does Government have a responsibility to intervene, whether through services, legislation or persuasion?”

Questions of this nature provide an excellent platform for the drink industry and allied libertarians to distance themselves from any



responsibility

“Reinventing the wheel” may exaggerate the level of development the Strategy Unit has reached when questions such as the following are considered:

“How do you define alcohol misuse? What factors do you take into account?”

Were we not assured otherwise, it would be easy to believe that the sole aim was to delay the appearance of a strategy beyond the Crack of Doom.

“What drinking patterns should an alcohol harm reduction strategy seek to affect? How susceptible are such patterns to change? Where should Government concentrate its efforts in prevention?”

Look, no-one expects the bright boys and girls of the Strategy Unit to be experts on every one of the knotty

problems thrown their way after proving too intractable for ordinary mortals, but they might have discovered that there were answers to the most elementary questions.

Here’s another one for the drink industry to get its teeth into:

“How do you define harmful drinking? What factors do you take into account in deciding whether heavy drinking has become problematic drinking?”

And, of course, it is important to mention *“health benefits.”*

“How clear is the evidence both for the health costs and the health benefits of alcohol? Are there key pieces of research of which we should be aware? Where are the gaps in the evidence?”

The evidence on both sides has been in the public domain for years. Is the Government,

the Department of Health, and the Strategy Unit unaware of this? It is very disturbing that this “back to basics” approach is taking place. What has been happening for the last five years? Is there such a profound ignorance of the subject within the Government? Or do we come back to the conclusion that the industry was simply not being given enough of a say?

When the questions turn to crime and disorder, the likely effects of the new Licensing Bill come to mind. “The most visible effect many of us see from alcohol misuse”, says the preamble to this section of the consultation, “is in our town and city centres: pavements littered with broken bottles and streets too intimidating to pass through. Links between alcohol and disorder are as much a matter for concern as are links between alcohol and crime.” This is another curious manifestation of joined up government. The measures which are being enthusiastically promoted by the Department of Fun and the drink industry in the Licensing Bill are precisely those which will lead to an increase in all the unpleasant phenomena listed above. There is a fundamental contradiction between licensing deregulation and the aims of a coherent alcohol strategy.

“What evidence is there about the links between alcohol and crime and the links between alcohol and anti-social behaviour? Are there key studies or pieces of evidence you think we should be aware of?”

The implication, of course is that the Strategy Unit is unaware of any such studies or evidence. Both abound and have been available to the Government for many years.

“To what extent can alcohol convincingly be demonstrated to be a factor in criminal and disorderly behaviour? How much is perception and how much is reality? What fuels the perceptions and are they accurate?”

The industry, abetted by the Portman Group, the body which appears to have the most influence with Government, has long attempted to question the evidence which links alcohol to crime and to disorderly behaviour. This sort of question invites them to renew their attack on the abundant evidence.

“Should we be encouraging different drinking patterns – in terms of time spent drinking, location of drinking etc – in order to tackle alcohol-related crime and disorder?”

Presumably this is a reference of the “Mediterranean style” drinking patterns beloved of the Government and

promoted as an aim of licensing deregulation. Ministers may understandably want to recreate the atmosphere of Tuscany in Newcastle or Leicester, but they fail to understand that these patterns are the result of hundreds of years of cultural development, climate, social organisation, and a whole host of intricately related factors far beyond the powers of licensing laws to influence.

“One person’s good evening out can be another person’s sleepless night. Are there principles to guide the balance of individual rights and responsibilities?”

Yes and they are being ignored in the Licensing Bill.

“Drink-drive policies are generally acknowledged to have been successful. What can we learn from them?”

We can learn that the Government’s refusal to lower the limit to 50mgs, contrary to their promise, costs lives.

“Some people may be more vulnerable to the harmful consequences of using alcohol,” the document continues. “Certain groups of young people in particular are at higher risk of developing a range of difficulties that include alcohol-related problems (for example children in social care, those excluded from school and youth offenders). Families and carers can play an important role in protecting young people from problems but it is important to recognise that living with a parent or carer with an alcohol problem can itself become a source of vulnerability.”

As the authors laboriously enunciate hitherto unrevealed truths. They demonstrate just how new the subject is to them. As one eminent clinician put it, “They are asking questions about which libraries full of books have been written.”





In the section called “*The shape of the market and market-based solutions*”, the authors say: “*The drinks industry is a major part of the national economy. It provides large numbers of jobs both in supply and distribution; it influences trends and fashion through its advertising; and it provides a substantial portion of tax revenues. Understanding how that market works, what drives it and how it responds to demand is essential to producing an effective strategy.*”

Is it simply a question of studying how the industry

operates? Is there not a question about relating its activities, especially in the promotion of its products to vulnerable groups?

“*Do you have any thoughts on the likely evolution of the alcohol industry over the next decade?*”

An entire session at the launch of the consultation on the National Alcohol Strategy was given over to this question.

“*How far do you foresee research and development creating innovative market-led solutions to the problems of alcohol misuse?*”

I should think it as likely as turkeys voting for Christmas.

“*How best can Government work with the alcohol industry to reach consumers? What approaches have been shown to be effective in England, the devolved administrations and further afield?*”

It is a source of wonder on the continent – where, you will remember, ministers perceive

idyllic drinking patterns – that our Government is so hand-in-glove with the industry. But this is the voice of the Portman Group, whose influence was recently deprecated by a major House of Lords committee.

The document does draw attention to the costs of alcohol, pointing out that these are significant “*for the economy. It costs the NHS and the police. It costs business money because of lost productivity and in some cases the need to repair alcohol-related damage. And it can be expensive for individuals who drink heavily and may find themselves unable to hold down a job. But it also has benefits. It brings in tax revenue and contributes to GDP. And it contributes to personal and social wellbeing for many. Part of the work on the project will be to form a clear picture of these costs and benefits.*”

So that’s all right then.

One final question asked in the consultation document raises so many questions about the suitability of the Strategy Unit to be carrying out this work:

“*Alcohol misuse can increase absenteeism and decrease productivity, whilst moderate consumption of alcohol may be beneficial in terms of reducing stress and tension and facilitating networking in the workplace. What in your view are the links between alcohol use and educational and occupational attainment?*”

We actually have an authoritative document, heralded as the “*first*” step towards a national alcohol policy and so presumably the basis for finding the solution to the many problems associated with alcohol, which advocates and endorses workplace drinking. But perhaps they only had Whitehall in mind. ■

How to respond to the consultation:

You can send comments to:

SU/DoH Consultation
Room 4.6, Admiralty Arch, The Mall, London SW1A 2WH
E-mail: su-dohconsultation@cabnet-office.x.gsi.gov.uk
It would be helpful to receive comments by e-mail where possible.
The deadline for responses is 15 January 2003.

Copies of the consultation document can be ordered from:

Department of Health Publications
PO Box 787, London SE1 6XH
Telephone: 08701 555 455. Fax: 01623 724 524
E-mail: doh@prolog.uk.com

The document is also available in electronic format at:

<http://www.strategy.gov.uk/2002/alcohol/consultationdoc.shtml>
<http://www.doh.gov.uk/alcohol/alcoholstrategy.htm>

If you have any comments about the consultation process please contact Paul Greening.

paul.greening@cabnet-office.x.gsi.gov.uk
Paul Greening
Cabinet Office, Head of Consultation Policy Team, Strategy Unit, Room 1.30, Admiralty Arch, The Mall, London SW1A 2WH

The State of the Nation

Just over a quarter of adults aged 16 to 74 are hazardous drinkers, says Alcohol Concern in its annual State of the Nation report. The highest proportion (42 per cent) of these is aged 16 to 24 years. "This means that in the last year one in four adults will have experienced immediate problems as a result of their drinking, such as loss of memory after a night's drinking, injuries to themselves or another, failure to do what was expected of them, such as turning up for work the morning after."

The State of the Nation says that 1 person in 13 is dependent on alcohol in Britain - twice as many as are hooked on illegal drugs and prescription drugs.

Alcohol Concern emphasizes the burden placed on the National Health Service by alcohol. It accounts for twelve per cent of all Accident and Emergency attendances, with 6.8 per cent of this group having attended more than once. The two-month study at the Royal Liverpool University Hospital, cited in the State of the Nation, assessed every admission to see if alcohol was involved.

Nationally, the number of non-fatal alcohol-related home accidents increased from 13,262 in 1990 to 33,345 in 1998 and to 35,757 in 1999, an increase of 169 per cent. The number of non-fatal alcohol-related leisure accidents increased from 33,266

in 1990 to 71,050 in 1998 and to 78,135 in 1999, an increase of 134 per cent.

Furthermore, one in six of all people killed on the roads, and one in seventeen people injured, are involved in drink-drive accidents. At the same time, the number of drink-drive accidents has risen over the last few years - from 10,100 in 1998 to 11,780 in 2000 and to 12,030 in 2001 - a 19 per cent rise. As far as the number of alcohol-related fatalities on the roads are concerned, these rose from 460 in 1999 to 520 in 2000 and fell in 2001 to 480 - but this still gives a 4 per cent rise since 1999. The number of casualties has also increased over the last three years from 15,590 in 1998 to 18,030 in 2000 and to 18,420 in 2001 (a 18 per cent rise). (All figures for 2001 are provisional).

The alarming statistics pile up as Alcohol Concern's report



progresses. The cumulative effect of bringing them all together in the State of the Nation stresses the magnitude of the problem as the Government's Policy Unit works towards a national Alcohol Strategy for England and Wales. The report, for instance, shows that about 920,000 children are living in a home where one or both parents misuse alcohol. Childcare and social work teams estimate that at least 50 per cent, and up to 90 per cent, of parents on their caseload have alcohol, drug or mental health problems, or a combination.

The situation among youth continues to deteriorate. 11-15 year olds who drink alcohol consumed nearly twice as much in 2001 (9.8 units a week) as they did in 1990 (5.3 units a week). In 2001, nearly one fifth (19 per cent) of 11 to 16 year olds drank alcohol at least once a

week. Drinking is more widespread among older adolescents with nearly half of 15 to 16 year olds drinking at least once a week.

One in eight (13 per cent) of pupils excluded from school were suspended for drinking. Excluded adolescents are more likely to drink regularly than school pupils, with 28 per cent drinking at least once a week, compared to 19 per cent of those in school. Given the relative time available to these two groups, it is perhaps more worrying that the figure among those actually attending school.

How do underage young people acquire alcohol so easily? A survey of young people found that there were a number of sources: 48 per cent are given alcohol by their parents, 29 per cent get alcohol from a friend's house, 23 per cent get someone older to buy it for them and 18 per cent buy it in a shop or off-licence. As with adults' drinking, there are regional differences in young people's drinking habits. The table below shows the percentage of 11 to 16 year olds in each region that drank at least once a week:

Again, like adults, young people's drinking habits impinge on other spheres of activity and cause problems. Another survey quoted in the State of the Nation and carried out among 14 to 20 year olds found that 20 per cent of young men and 13 per cent of young women cited alcohol as a main reason for first sex. The figures are particularly interesting in that many people might have assumed that the proportion was higher among girls.

A comparative European study of drinking among 15

REGION	% that drank at least once a week
North East	26%
Yorkshire and Humber	21%
North West	20%
West Midlands	20%
South West	19%
East Midlands	19%
South East	19%
Eastern	18%
Wales	17%
London	12%

Youth Justice Board 2002

to 16 year olds showed that the UK has one of the highest rates of alcohol consumption in Europe. Sixteen per cent of this age group had drunk at least ten times in the previous month, 56 per cent had engaged in binge-drinking (over 5 units of alcohol) on a single occasion in the previous month and 30 per cent had engaged in binge drinking at least three times in the same period.

The report moves on to crime. In 40 per cent of violent

crimes, victims say that the perpetrators were under the influence of alcohol. A study looking at rates of drunkenness among 169 people arrested and brought into city centre custody suites overnight showed that 59 per cent were assessed as being intoxicated and about 75 per cent told custody staff they had been drinking. Of those drunk when arrested, 60 per cent were taken into custody for alcohol-specific offences, such as being





drunk and disorderly or drink driving). A further 20 per cent were arrested for public order offences and 12 per cent for assault

The report notes that many prisoners have problems with alcohol. Among sentenced prisoners, 63 per cent of males and 39 per cent of females drank at hazardous levels in the year before imprisonment. This compares to 38 per cent of men and 15 per cent of women in the general population. Use of alcohol and drugs is a major

issue among young offenders, with over 50 per cent of female and 66 per cent of male prisoners aged between 16 and 20 having a hazardous drinking habit before imprisonment. Furthermore, 58 per cent of prisoners released in 1997 were re-convicted within two years of these, 38 per cent received another prison sentence. Research shows that alcohol and drug misuse are significant factors in re-offending.

The cost to the nation of these diverse problems

associated with alcohol is immense, says Alcohol Concern. It is estimated that alcohol misuse costs between two per cent and five per cent of a country's annual gross national product. Taking the lowest estimate of two per cent and a GNP for England of £542,700 million for 1999, Alcohol Concern calculates that alcohol misuse costs England at least £10.8 billion that year.

Individual UK studies show that alcohol misuse costs the NHS between 2 per cent and 12 per cent of total NHS expenditure on hospitals – in other words up to £3 billion a year on hospital services. A further £3 billion a year is lost to employers in sickness and absenteeism at work, premature deaths, accidents and alcohol-related crime.

All these surveys, figures, and estimates beg the question of what the Government is doing about the problem. Just over £1 million is spent on alcohol prevention and treatment - compared to £91.45 million on illicit drugs.

According to a MORI poll, over 80 per cent of the public agree that "the government does not do enough to highlight the risks of drinking alcohol". 58.2 per cent either "strongly agree" or "tend to agree" with the statement that "alcohol misuse is a more serious social problem than drug abuse" and 80.2 per cent either "strongly agree" or "tend to agree" that "the Government does not do enough to highlight the risks of drinking alcohol".

And eventually we might have a national alcohol strategy.



Women behaving badly

Ten per cent of women have drunk themselves unconscious, according to a survey conducted by *Company* magazine. This provides further confirmation of the increasing problem of the "ladette" or "girls behaving badly" syndrome.



The survey also shows that a third of what is known as the Bridget Jones generation admits to having unprotected sex while inebriated. Among women aged between 16 and 34, 40 per cent said they had become so drunk

they had no memory of what had gone on the night before. The figure rose to 57 per cent among those younger than 24. One

thousand women were surveyed and one in seven had had a fight while drinking and twenty per cent had lost keys or valuables during a drinking binge. Half of the women had walked home alone while drunk. The findings strengthen further the perception that binge drinking is common among young women who are more likely to be single, have available cash, and have more spare time than their older counterparts.

Many young women in this category become so drunk, often at least once a week, that they are unable to make responsible decisions about matters such as sex, nor are they able to ensure that they are not vulnerable to attack. David Blunkett, the Home Secretary, has recently proposed changes to the laws which are aimed at convicting date rapists. The drinking habits of the young women described in the survey put them in particular danger of such offences

Under the reforms, a defendant will have to show that he took reasonable steps to establish consent.

Circumstances under which it will be presumed that consent was absent will include a woman being unconscious through drink or sleep.

It is a medical fact that women cannot drink like men although it appears that many try to do so. These are putting themselves at considerable risk.

Sam Baker, the editor of *Company*, said women should go out having made a few simple preparations such as establishing cab numbers.

"Young women should be able to go out and enjoy themselves and a drink whenever they like and fortunately it is easy to prevent contributing to these alarming statistics," he said.

"With a few simple preparations; cab numbers for example or a plan to alternate water and wine anyone can have a fantastic night out knowing that they'll be safe and healthy at the end of it!"

Mr Barker's suggestions in his magazine are sensible in part, although it does not seem wise to encourage young women to drink to any excess they choose as long as they have arranged for a taxi or drink the occasional glass of water. Besides all the risks which remain and which are made plain in the survey, women are more susceptible than men to medical problems arising from alcohol. Researchers recently showed that heavy drinking among women was associated with the development of breast cancer. ■



Mud, Sweat and Beers: A Cultural History of Sport and Alcohol

Tony Collins & Wray Vamplew:
Berg, 2002

Reviewed by Andrew McNeill

“Football is a fascination of the devil and a twin sister of the drink system”, an Anglican vicar declared in 1893. The authors of this useful monograph concede that he was half right: football, and sport more generally, has always enjoyed a mutually supportive relationship with drinking. There was never a time when the two activities existed entirely separately. Most sporting trophies are, after all, cups the original idea of which was to facilitate the alcoholic celebrations of the victor.

In Britain, pubs and publicans were central to the early development of sport just as today sport is central to the marketing strategies of many of the major drinks companies. By the C16th the ale house was already well established as the main arena for staging skittles, quoits, bowls, wrestling, tennis, cricket and a large number of events involving animals, such as cock-fighting. To attract the crowds, the publican became the main promoter of sports, arranging matches, providing the prize money and being the bookmaker.

No sports had closer associations with the pub than prizefighting and cricket. Publicans were the principal

promoters, stagers and administrators of prizefighting, and many fighters were publicans in waiting, taking up a tenancy of a pub when they retired. As the authors point out, if the violence of the sport did not do for them, alcoholism often did.

The origins of cricket, too, were inseparable from drinking places. The first known publication of the laws of the game was the 1755 ‘New Articles of the Game of Cricket’, sub-titled ‘Particularly that of the Star and Garter in Pall Mall’. The support of the old brewing families for cricket and horse racing in the C19th was a precursor of modern alcohol sports sponsorship.

In view of their special

importance to the marketing strategies of contemporary alcohol companies, – as the authors conclude, sport, football in particular, offers a unique avenue for the drinks industry to reach its most lucrative target audience of young males – it is perhaps an oddity that unlike many other sports, soccer and rugby were not children of the drinking house, originating in the public schools. Thus, rather than football being an adjunct of the pub, the pub almost became an adjunct of football. In the earliest days of the modern, professional game, licensees and breweries provided frequent updates of matches in progress to ensure that football would attract customers rather than by providing an alternative pursuit, taking them away – an approach even more evident now than it was then.

Sport’s importance to the marketing of alcohol, beer in particular, was shown most strikingly by the role played by the brewers in financing the ‘football boom’ of the 1890s and early 1900s. The huge growth in crowds spurred by the formation of the Football

League in 1888 meant that many clubs needed substantial capital investment to improve their grounds. The financial support of the breweries was crucial. Aston Villa, Barnsley, Watford, Liverpool, Manchester United, West Bromwich Albion, Oldham Athletic, Wolverhampton Wanderers are all examples of clubs which depended on backing from the local brewer to finance their expansion during this period, and later, during the depression of the 1930s, to stay afloat. Hard economic calculation no doubt played its part, but brewers could also act from sentiment, being supporters in the sense of fans as well as bankers.

Of course, temperance campaigners opposed the many connections between alcohol and sport. They tried to develop non-alcoholic sporting alternatives, and objected to drinking by athletes and also to alcohol advertising which fostered the idea that alcohol improved sporting performance.



Ironically, in view of the deep, mutually supportive relationship that developed between alcohol and football, both William MacGregor, the founder of the Football League, and C.E. Sutcliffe, its first Secretary, were committed teetotallers. Other teetotallers included Charles Clegg, Sheffield Wednesday's chairman and Arnold Hills, who created a works team that later became West Ham United. Hills once offered to clear the club's debts if it picked only teetotallers in the team. Under Clegg the Sheffield Wednesday board took a dim view of any player whose drinking or visits to pubs were deemed inappropriate, and there was a pretty restricted view of what was appropriate. But generally, temperance and non-temperance people achieved a kind of peaceful co-existence for the good of the game.

The book also examines the influence of alcohol on the fans and on sportsmen. The chapter on alcohol and sports practitioners includes some history of their attitudes towards alcohol and the drinking practices of sportsmen, some information on modern scientific findings on the impact of alcohol on sporting performance and a discussion of drinking problems in sportsmen, particularly footballers.

As far as drinking by fans is concerned, the authors are keen to debunk the notion that alcohol is a cause of football violence and hooliganism. Leaning mainly on a research report produced for the alcohol industry, they conclude that alcohol was never more than a scapegoat. They are particularly offended by the double standard whereby drinking, they say, is

less likely to be subject to draconian restrictions at sports events popular with the middle rather than the working classes. They complain that the Sporting Events (Control of Alcohol etc) Act of 1985 was misnamed as it was directed entirely at working class soccer and made no reference to any other sport. The authors' argument here is not altogether consistent. They may be right in saying that professional darts proves that the consumption of even vast quantities of alcohol does not necessarily result in crowd violence, but these crowds, whose drinking is on their own account unrestricted, are hardly drawn from the middle classes.

But then consistency is not the authors' strong point. They assert that the real cause of English football hooliganism was political rather than alcoholic. They invent an entity called 'the English Empire' and suggest that its decline from the mid-1950s caused an upsurge of chauvinism and racism which took expression on the football terrace. Alcohol was no more than a useful pretext for the Thatcher government which, despite sharing the nationalistic and xenophobic world-view of the football hooligans, was determined to repress them because they were working class.

It is a shame that this convoluted and politically inspired rubbish, unworthy of a serious academic study, discredits a book which would otherwise have been a perfectly good introduction to the subject. ■



Further publications available from the Institute of Alcohol Studies

Counterbalancing the Drinks Industry

Counterbalancing the Drinks Industry: A Report to the European Union on Alcohol Policy

A response to a report published by the European drinks industry and a defence of the WHO Alcohol Action Plan for Europe.

Alcohol Policy and The Public Good

Alcohol Policy and the Public Good: A Guide for Action

An easy-to-read summary of the book written by an international team of researchers to present the scientific evidence underpinning the WHO Alcohol Action Plan for Europe

Medical Education

Medical Education in Alcohol and Alcohol Problems: A European Perspective

A review of educational programmes on alcohol and alcohol problems in European medical schools, identifying gaps in provision and proposing guidelines for a minimal educational level within the normal curriculum of under- and post-graduate medical students.

Alcohol Problems in the Family

Alcohol Problems in the Family: A Report to the European Union

A report produced with the financial support of the European Commission describing the nature and extent of family alcohol problems in the Member Countries, giving examples of good practice in policy and service provision, and making recommendations to the European Union and Member Governments.



Marketing Alcohol to Young People

Children are growing up in an environment where they are bombarded with positive images of alcohol. The youth sector is a key target of the marketing practices of the alcohol industry. The booklet depicts the marketing strategies of the industry and shows how advertising codes of practice are being breached.

alcohol



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