

IAS analysis of responses to the Home Office Consultation on minimum pricing

Executive Summary

In its analysis of submissions to the Alcohol Strategy Consultation, the Home Office stated that the majority of respondents opposed the policy proposal to introduce a 45 pence minimum price per unit of alcohol (MUP)¹. However, this conclusion failed to distinguish between those responses that were against the principle of introducing a minimum unit price at any level and those that wanted a minimum unit price higher than the one proposed by the government (45p per unit). The Institute of Alcohol Studies (IAS) has conducted an independent analysis of the consultation responses published online by the Home Office in order to investigate the levels of support for MUP at 45p and above.

Results of IAS analysis found:

- Many respondents who were noted by the Home Office as against a 45p per unit minimum price were actually in favour of a higher minimum price of at least 50p per unit
- When accounting for this discrepancy, the proportion of respondents for and against the measure was split fairly evenly (45%:46% respectively), contrary to the Home Office figures (34%:56%)
- Thousands of responses from members of the public collected by Balance North East, expressing support for a 50p minimum unit price, were omitted from the published responses and Home Office calculations, whilst other submissions from individuals appear to have been accepted.
- A lack of clarity about the purpose of the consultation; whether it was designed to seek views on the **level** or the **principle** of MUP and it is unclear what role the consultation responses played in the decision-making process to delay the introduction of MUP.

Introduction

Following the publication of the Government's Alcohol Strategy in March 2012, a public consultation was launched on 28 November 2012 to seek views on how best to deliver the policies outlined in the Strategy intended to cut alcohol fuelled crime and anti-social behaviour². One such policy was minimum unit pricing (MUP) and the consultation sought views on setting a MUP level at 45p.

In an announcement to the House of Commons on 17 July 2013, the then Minister of State for Crime Prevention Jeremy Browne (Taunton Deane, Liberal Democrat) stated that: "34% of people favoured a 45p minimum unit price, but 56% disagreed with that proposal" and that this was one of several significant factors in the Government's decision not to press ahead with minimum unit pricing at the current time (see Fig 1).³

¹ Home Office (July 2013), '[Analysis of responses to the consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour](#)'

² *ibid*

³ House of Commons Debates (17 July 2013), '[Oral Answers to Questions - Prime Minister: Alcohol Strategy Consultation](#)', c1117

Fig 1: Home Office figures showing number of responses for and against a 45p MUP

Response	Number of respondents	Percentage
Yes	395	34%
No	638	56%
Don't know	112	10%
Total responses:	1,145	

Source: Home Office (July 2013), *'Analysis of responses to the consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour'*, Table 1: summary of responses to Question 1, p. 6

However, in the subsequent debate on the issue, Dr Julian Huppert MP (Cambridge, Liberal Democrat) – raised the question of how many respondents thought that minimum unit price “should be higher, for example 50p”, to which Mr Browne MP answered that “we do not know whether the majority disagreed because they thought it should be twice as high or half as high; they just disagreed with the figure they were given”.⁴

The Home Office released the full list of submissions to the consultation on 6 November 2013. Now that this information is publicly available, IAS intends to answer the above question directly by analysing all the responses to provide a complete breakdown of the relevant positions taken up in support of and against minimum unit pricing.

Methodology

Responses to the Alcohol Strategy Consultation were of two kinds, written and online. Answers to the questions on minimum unit pricing were classified following the order of the questions set by the Home Office in the consultation document.

IAS analysed all responses that answered “YES” to the question: *'Do you want to answer questions on minimum unit pricing?'*. Responses were then categorised based on their answers to both parts of Question 1:

- A. *Do you agree that this minimum unit price level (45p) would achieve these aims?*⁵
[categorised as YES, NO or DON'T KNOW]
- B. *If you think another level would be preferable please set out your views on why this might be in the box below...*
[This sub-question gave respondents the opportunity to recommend an alternative minimum unit price. If they did so this was noted.]

In order to produce a comparable dataset to the Home Office, IAS considered only those responses which gave clear answers (yes, no or don't know) and the numbers of responses are actual numbers and have not been weighted.⁶ The IAS analysis also

⁴ House of Commons Debates (17 July 2013), ['Oral Answers to Questions - Prime Minister: Alcohol Strategy Consultation'](#), c1119

⁵ 'These aims' being: an estimated 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.

⁶ Home Office (July 2013), ['Analysis of responses to the consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour'](#), p. 4

eliminated duplicates from the final figures, thereby reducing the risk of double-counting.

There was a discrepancy between the number of published responses that met this criteria as recorded by IAS (1,298) and by the Home Office (1,145). However, as no data sets or results tables were published alongside the responses on the Home Office website, it is difficult to determine what may have caused this difference in numbers. In order to address this limitation, the results of both the IAS and Home Office analyses would need to be compared.

Results

Having taken the steps outlined above, the results produced are as follows:

Fig 2: IAS figures showing number of responses for and against a 45p MUP

Response	Number of responses agreeing that a minimum unit price of 45p is targeted and proportionate whilst achieving a significant reduction of harm	Percentage
Yes	446	34%
No	707	54%
Don't know	145	11%
Total responses:	1,298	

Institute of Alcohol Studies, December 2013

We found a total of 1,298 responses to question 1 in the Alcohol Strategy Consultation compared to the Home Office total of 1,145, of which 446 (34%) agreed that a 45p minimum unit price would be targeted and proportionate whilst significantly reducing harm, and 707 (54%) disagreed (Fig 2).

Of the responses either against or undecided on the first question, 138 (10% of total responses) thought that a higher minimum unit price would be preferable or more effective. The majority of these responses explicitly favoured a 50p minimum unit price. This meant that there were 594 responses (46% of total responses) that were against minimum unit pricing at any level (Fig 3).

Fig 3: IAS figures showing number of responses against or undecided that a 45p MUP would be effective, but supported higher level

Response	Number of responses against or undecided that a 45p MUP would be effective, but supported higher level
Yes	138
No	594
Don't know	120
Total responses:	852

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In sum, of all responses to Question 1 and its sub-question, 45% (584) expressed support for a minimum unit price of 45p or above, whereas 46% (594) were against, and 9% (120) didn't know whether a minimum unit price would make a positive difference as a policy measure (Fig 4).

Fig 4: IAS figures showing all published responses for and against a MUP of 45p and above:

Response	Number of responses expressing support for minimum unit price of 45p or above	Percentage
Yes	584	45%
No	594	46%
Don't know	120	9%
Total responses:	1,298	

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Discussion

This IAS analysis concludes that 45% of responses to the Home Office consultation were in favour of a minimum unit price for alcohol set at 45p and above as a targeted and proportionate policy to reduce alcohol-related harm. By analysing the responses that said 'no' or 'don't know' to a 45p MUP, IAS was able to discover that a significant number of responses were in favour of a higher level, providing an alternative interpretation to the Home Office data.

Another important finding from this analysis is that a significant number of submissions from members of the public in support of minimum pricing were not published or included in the final analysis performed by the Home Office. The submissions from individual members of the public that *were* listed amongst responses and published by the Home Office often took the form of emails to MPs that were then passed on to the Department.

However, the details of approximately 15,000 members of the public in favour of a 50p minimum unit price, submitted to the Home Office (and also to relevant MPs depending on their constituency) as part of the response from Balance, the North East of England's Alcohol Office, were not present amongst the published responses and therefore not included in the final calculations. These public supporters signed postcards agreeing with the following statement:

"I support a minimum unit price for alcohol of at least 50p a unit. I think it's a price worth paying to save lives and cut crime. I understand that by providing my details, my signature will be forwarded to the national consultation on the level at which a minimum unit price is set."

It is odd that these postcards were not taken into consideration, when other emails from individuals to their MPs were. Inclusion of these additional responses from members of the public would have had a significant impact on the analysis of levels of support for minimum pricing, with the proportion of respondents in favour of a 45p level or greater rising to approximately 95%.

A pressing issue arising from the Home Office response to the alcohol strategy consultation is the lack of transparency about what role the submissions played in the

decision-making process to delay the introduction of MUP. The consultation document stated that its purpose was to seek views on the **level** at which a MUP would be set. It was not consulting on the **principle** of MUP itself:

"In the 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."

However, in his statement to parliament, Jeremy Browne repeatedly cited the 'lack of support' for a 45p MUP from respondents to the consultation when defending the Government's position not to press ahead with its plans to introduce the policy. Cabinet Office guidance on the principles that Government departments should adopt for engagement with stakeholders when developing policy state that the purpose for all consultations must be made clear, as should the role that responses play in formulating policy:

"The purpose of the consultation process should be clearly stated as should the stage of the development that the policy has reached. Also, to avoid creating unrealistic expectations, it should be apparent what aspects of the policy being consulted on are open to change and what decisions have already been taken."

"...To encourage active participation policy makers should explain what responses they have received and how these have been used in formulating the policy. The number of responses received should also be indicated".

However, there appears to be disparity between the intentions outlined in the consultation document, and the way in which the results were presented by the Home Office. As this analysis shows, a significant proportion (10%) of respondents disagreed with a 45p MUP, but stated a preference for a higher level. This form of response may have been elicited from the design of the consultation itself, as respondents were asked the sub-question directly underneath the question on whether they agreed with 45p MUP: *"If you think another level would be preferable please set out your views on why this might be"*. Given that the consultation was designed to seek views on the level and not the principle of MUP, and indeed that respondents were invited to suggest alternative levels, it is odd that the results were not presented in a way that would take this into consideration.

This problem may have been eradicated if respondents were instead consulted on whether they agreed with minimum unit pricing in principle. Indeed, a consultation on the principle of MUP as opposed to the level may have generated a greater number of responses from those who remained silent in this instance, confident that the Government had already committed to introducing the policy, as stated in the Government's Alcohol Strategy.

Conclusion

This paper provides an independent analysis of all published submissions to the Home Office consultation on minimum unit pricing. It shows that the proportion of published responses for and against were split fairly evenly, with 45% of respondents in favour of a minimum unit price of 45p or above, and 46% respondents against this policy. This is an alternative way of presenting the results to that adopted by the Home Office. Home Office figures only looked at respondents who favoured a MUP 45p (not higher), and as a consequence the proportion for and against this measure was 34%:56% respectively.

The IAS analysis also acknowledges that a significant number of responses from members of the public were not incorporated into the Home Office calculations, and raises questions about the reasons for this exclusion, when other individual submissions seem to have been accepted. Including the 15,000 public responses collected by Balance North East in the analysis would mean that 95% respondents supported a MUP of 45p or above.

An important consideration when presenting the results of this consultation is that it sought views on the **level** not the **principle** of minimum unit pricing. Therefore, the responses cannot be used to accurately portray levels of public support or opposition for the policy in general. Had the consultation been on the **principle** of MUP, it may have evoked a different level of response.

If public support is a major determinant of the Government's decision to introduce minimum unit pricing, then this paper suggests that a more considered approach to gauging public opinion be used to inform discussions.

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