

ASSOCIATION OF DIRECTORS OF SOCIAL SERVICES

RESPONSE TO NATIONAL ALCOHOL HARM REDUCTION STRATEGY CONSULTATION

General Comments

The ADSS very much welcomes this Strategy, which has been long and anxiously awaited by those in the field. We also welcome the very open approach adopted in the Consultation and the evident willingness to look broadly and consider the widest implications of alcohol use.

One of the reasons this Strategy is so much welcomed is that many people responsible for substance misuse services believe strongly that alcohol misuse is productive of significantly more social harm even than drug misuse, and that national effort in this field has become quite unbalanced in recent years: levelling up rather than levelling down being now the key consideration.

Set out below are responses to the groups of questions posed in the Consultation. However, we do have equally strong views about the processes to be adopted and next steps from here on.

The involvement of the Strategy Unit in this initiative is appreciated, in ensuring a cross-departmental approach, and strong governmental ownership. But after the construction of the Strategy, the Strategy Unit will exit the field in the summer. We are keen to know how the baton is to be passed on, and very willing to play our part in assisting a smooth passage to implementation.

Aside from Departmental lead arrangements, we question what will be the role of the National Treatment Agency in implementation. Will it be expected to lead? If so, what about those elements of the Strategy other than treatment?

Locally, the recent decisions to require closer alignment between DATs and CDRPs will assist with the balancing of the treatment, criminal justice and prevention agendas. Where they have not already done so, DATs should also be expected formally to take on an alcohol remit. (Equally, the NTA should take on an alcohol remit.)

We trust that lessons will have been learnt from the early difficulties of the first draft strategy, such as setting over-ambitious targets without establishing a baseline. The broad and inclusive approach adopted by this Consultation gives some reassurance here.

Deliverability will therefore be key to the Strategy, and so it is vital that those responsible for implementation locally are closely involved. The generous funding available for tackling drugs has resulted in a growing disparity between services for drugs and alcohol. Alcohol treatment has received no specific central government funding in recent years. As a result, we have the

challenge of managing 'combined' services in many parts of the country. These have for the most part made little distinction between drug and alcohol cases and have tried to respond on the basis of clinical risk and priority. The differential funding streams for drugs and alcohol impact awkwardly on this service system and lead to a growing gap which threatens to produce 'two-tier services' tasked with a rapid response to drug referrals at the expense of alcohol referrals for which there are as yet no published response times.

As all your Consultation responses will doubtless say, the key issue therefore is that adequate resources are made available to redress this atrophy of alcohol services.

We would also urge that central government work closely on implementation with a coalition of local interests and representative organisations.

Specific Consultation Questions

The Principles that should underpin the Strategy

Questions 1 to 5

As the government benefits in implementing public policy from the revenues raised through alcohol taxation, it must have some roles and responsibilities in regard to alcohol misuse. In particular these are:

- Prevention and ensuring that there are education programmes that warn young people of the dangers of alcohol misuse.
- The government should ensure a harmonisation between the drug strategy and any potential alcohol strategy by ensuring that the National Treatment Agency [NTA] is tasked with overseeing the implementation of the strategy.

The cultural and behavioural issues around alcohol use and misuse

Questions 6 to 13

- The majority of the adult population use alcohol with little or no harm to themselves, significant others or their communities. Therefore the cultural issue is not *de facto* to reduce the amount of alcohol consumed by this majority but rather to reduce the harmful effects for those whose use of alcohol is problematic.
- There should be efforts made to bring about a change in the well-established pattern of weekend binge drinking particularly by young men. If there is a greater relaxation brought about by government in the licensing laws, this could contribute to a change in this pattern.
- The problematic use of alcohol for both younger men and women needs to be addressed through more effective education programmes.

- The negative behavioural manifestations associated with the excessive use of alcohol in young cohorts, particularly on Friday and Saturday nights, with the concomitant violence and disorder present real challenges for which there are no short-term answers. The longer-term solutions are thought to be associated with attitudinal change to be brought about by education and more liberal licensing legislation.
- The positive attributes associated with the use of alcohol and its cultural importance are also recognised.

Health: Prevention, treatment and the impact on the NHS

Questions 14 to 22

- The prevention agenda should be delivered through the personal, health, citizenship and education programmes in schools. The alcohol prevention agenda should continue to be monitored through the young people's substance misuse planning process.
- There is a definite role for various parts of the NHS to ensure both early assessment and intervention. These include primary care, accident and emergency staff, and general nursing and medical staff. There is also a potential training requirement to ensure that these occupational groups feel confident to deal with those whose problems are manifestly associated with excessive alcohol use.
- The Models of Care framework is as relevant for the implementation of alcohol services as it is for drug services. The NTA should have unequivocal responsibility for the alcohol strategy when published and there should be substantial new resource allocation for effective implementation.
- The discrepancy in funding for drug and alcohol services means that there is insufficient resource for alcohol treatment services in spite of the much more significant numbers of problem alcohol users compared to problem drug users.

Crime, disorder and anti-social behaviour: the effects on our surroundings and community

Questions 23 to 35

- The problem use of alcohol is a significant concern for local citizens. However, the Home office Community Against Drugs [CAD] allocation cannot be used for alcohol related disorder. The Home Office should allow more flexibility with the use of this money in line with local need.
- Much needs to be done in relation to the issue of town centre drinking and anti-social behaviour during weekend evenings.

Suggested strategies for this could include:

Proactive use of CCTV

Higher visibility policing

More transport opportunities for home going at closing time – perhaps a late-night transport levy on club admission prices

Broader choice of venues to attract to more mixed population of drinkers and club/pub custom

Better engagement and integration between planners and planning departments and community safety partnerships in creating less problematic town centre environments

The implications for vulnerable groups

Questions 36 to 40

- The cohorts of young people who are known from research to be vulnerable should already benefit from the targeted education and intervention programmes that are delivered as part of substance misuse prevention and education.
- Those cohorts who are diagnosed with mental health problems but who use or misuse alcohol with negative consequences need to benefit from integrated substance misuse and mental health services.

Education and communication

Questions 41 to 50

- The need to provide effective education for young people about alcohol and the potential for harm is key.
- Attitudes to use of alcohol and driving are clearly subject to change given that most young people do not drink and drive.
- Information about alcohol needs to be balanced, relevant, truthful and appropriate if it is to be effective. It also needs to be age, gender and culturally specific.

The shape of the market and market-based solutions

Questions 51 to 55

- The alcohol industry must have a social responsibility in advertising and marketing alcohol beverages, particularly those aimed at the younger people's market

- The government has a role to ensure that the industry exercises this responsibility appropriately and to respond accordingly should it fail to do so.

The economic costs and benefits of alcohol

Questions 56 to 61

- The costs, which are associated with the harmful aspects of excessive alcohol use, must be funded through a comprehensive alcohol strategy that addresses prevention, community safety and treatment.

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