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Dear Colleagues,

**National Alcohol Harm Reduction Strategy - Consultation Document**

We write in response to this consultation. The Radio Authority is the statutory body for the regulation of programming and advertising on all non-BBC radio. We were not included on your original list of Consultees, but we note that your Q41-50, especially Q50 (“Do you have any views on the current regulation of advertising?”) is wholly relevant to our remit. As the statutory body with powers both to implement any government policy relating to radio advertising without further legislation and also to pull unsuitable advertising instantly, please can you make sure we are added to your list of Consultees?

The Radio Authority was set up by the Broadcasting Act 1990 and is the sister body to the Independent Television Commission. Section 93 of the Act requires the Authority, in consultation with appropriate parties, to draw up a Code governing standards and practice in advertising, including prohibitions. Our Advertising and Sponsorship Code can be found on our website ([www.radioauthority.org.uk](http://www.radioauthority.org.uk)), where Section 3 Rule 11 deals specifically with advertisements for Alcoholic Drinks, working also with the general rules in Sections 1 and 2.

We require that all advertisements under Rule 11 are centrally cleared by the Radio Advertising Clearance Centre, a body funded by the radio industry to clear all ‘special category’ (sensitive) advertising. The Radio Authority, working with the RACC, is able to control all advertising for this sector, also ensuring that any advertisement which appears to breach the Code or the Act can be withdrawn within the hour if problems are raised. Additionally, our Programme Code, Rule 4.7 Smoking and Drinking, prohibits the endorsement of excess drinking, alongside other statutory requirements and general rules about not inciting to crime etc.

Our Advertising and Sponsorship Code makes clear that we regulate the advertising, not the product. We are a small body and we strive to work in partnership with other relevant regulators or agencies, such as the Financial Services Authority for financial advertisements or the Medicines Control Agency for medicines, to determine policy in subject categories where we are not expert ourselves nor see it as appropriate for us to be so.

This is the case with the National Alcohol Harm Reduction Strategy. It seems to us that input from the broadcasting regulators, currently the ITC and the Radio Authority who will both be replaced later this year by Ofcom, will be of best use to you later in your consultation process, when you are ready to discuss how advertising and programme content regulations can assist and reinforce your Strategy.

The Ofcom Content Board, who will be responsible for establishing standards concerning the content of all radio and television broadcasting, will also be able to implement any government directives on these matters. In addition, they may also carry out research about these issues themselves (to complement their statutory obligation to consult on them) and form their rules around the consumption of alcohol according to the results. It may also be worth noting that commercial radio is largely a local/regional, tightly targeted medium and, if needs in different parts of the UK or in different age or ethnic groups vary, that it will be media regulators, working with those with an interest in alcohol strategy, who are likely to be best placed to oversee media strategies which respond to this.

The purpose of this letter, then, is simply to register with you our interest in this matter, to tell you what we do and how we do it, and to flag up how the broadcast content regulators may want to work with you on this matter in the future. Meanwhile, please can you ensure we stay on your mailing list?

We are content that this response be made public. Many thanks and best wishes,

Yours sincerely

**JANET LEE**

Deputy Director of Programming and Advertising

cc Andy Wilson, Consumer Policy Manager, Programmes & Advertising Group, Independent Television Commission