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13 January 2003

Dear Sirs

### **National Alcohol Harm Reduction Strategy**

Six Continents Retail is the leading operator of pubs, bars and restaurants in the UK and manages approximately 3% of the industry's pubs, bars and pub restaurants. However, as our outlets are significantly larger than the industry average, they represent approximately 9% of the industry's sales. We employ approximately 40,000 people in the UK.

We have been at the forefront of the industry's efforts to ensure it has effective policies on alcohol and social responsibility. We introduced our own policy, which is publicised externally on the Internet ([www.SixRetail.com](http://www.SixRetail.com)) and throughout the company to our own employees, three years ago. It was based upon the Portman Group's policy (Six Continents Retail is a retail member of the Portman Group) as well as laying down company guidelines not covered in general industry guidance. The British Beer & Pub Association has subsequently published its own guidance on promotions.

Six Continents Retail, as an active supporter of the British Beer & Pub Association and other trade bodies, supports the submission made to the National Alcohol Harm Reduction Strategy on behalf of the industry's trade associations.

In particular, we welcome the emphasis on the "harm caused by the misuse of alcohol". We also support the need for innovative thinking about ways to tackle problems such as drinking by the young. As a company, we have supported arguments for a national proof of age card that would be carried by a large proportion of younger people, thus helping licensees and their staff to reduce the risk of under 18's obtaining alcohol in licensed premises.

We have answered a selection of the questions posed in the consultation. For many other questions, we have endorsed the response from the industry's trade associations.

## **RESPONSES TO SPECIFIC QUESTIONS:-**

**Q1.** Six Continents Retail welcomes the Government's involvement in managing alcohol misuse. While the majority enjoy alcohol and cause little or no harm to themselves or others, it is necessary to manage the harmful effects of alcohol. Given that this harm can affect wider society as well as those abusing alcohol, it is reasonable for the Government to intervene in the form of policies and programmes aimed at those whose behaviour causes problems.

**Q4.** The industry and companies within it want to be part of the solution. We support the Portman Group, which works in this area, and Six Continents Retail has an active Alcohol & Social Responsibility policy that is enforced within the company.

**Q5, 6 and 7** - we fully support the industry's response. In particular, we would support the point in the industry's answer to Q7 that sale of alcohol by "smugglers" (resulting from the Duty difference between the UK and France) is an issue that needs to be addressed. These are sales completely beyond the controls that both the "off trade" and, in particular, the "on trade," exercise with their customers.

**Q8.** Six Continents Retail has much experience of the changing social roles with, for example, All Bar One, one of the company's brands, in the forefront of "female friendly" bars. Similarly, the massive growth in the student population has produced a demand for more student friendly pubs where, again, we have been market leaders.

As in the industry response, we suspect the changes in alcohol consumption amongst these groups, women and students, is largely a reflection of changing lifestyles. With women, for example, the change to a later "marrying age" and "first child" age has been dramatic in the past decade as well as the fact that some 50% of the working population is now female.

**Q9** - we support the industry's response.

**Q10.** The British pub has changed dramatically in the past decade. Food sales in Six Continents Retail's outlets has risen from 8% to 30% of our sales. There have also been increases in sales of soft drinks and rising wine sales so that the British pub is far less focused on beer sales than used to be the case. Enjoying a drink, and often now a meal, is part of a modern, healthy lifestyle. There is also, as pointed out in the industry's response, evidence that drinking moderately and socialising in pubs can help to reduce stress. It is certainly an important part of this country's pattern of socialising that many other countries envy.

**Q11, 12, 13** - we support the industry's response. In Q12, we would point to the success of our company's Alcohol & Social Responsibility policy which acts as a clear guideline to what promotional activity can take place. We believe that promotions are a valuable tool, as long as they are carried out responsibly. There are promotions, unfortunately carried in some instances by companies as well as individual bars (such as paying an entry fee and then being able to consume as much as you wish), which attract negative headlines and can tempt some other operators in to trying to compete. Such promotional activity can lead to public order problems and should therefore be discouraged.

**Q14 - 20** - we support the industry's response. In some of these areas, we are not qualified to comment, particularly questions 17, 18, 19 and 20.

**Q21.** Good management of licensed premises can play an important part in minimising alcohol related assaults. Our managers' and staff training schemes include guidance on managing potential conflict situations. Properly trained and selected door staff helps. We have also introduced toughened glassware, in line with the rest of the industry.

In practice, many injuries take place not on licensed premises but after closing. We believe, as do most others, that the planned reform of licensing, and in particular more flexible closing hours, will reduce both binge drinking and the surge of people on to the streets at the same time with the resulting pressure on bus queues, taxi ranks, fast food outlets and night club queues

**Q22 - 24** - we support the industry's response.

**Q25.** We operate very few pure rural pubs. Those that we do operate are largely "food led" and have very few problems.

**Q28.** There many ways to influence the environment, including a greater emphasis on food, providing civilised amenities, good design etc. We would not want to see plastic glasses. Good design and good management are far more important. Our experience with suburban pubs such as Ember Inns, is that a very civilised environment encourages good behaviour

**Q29.** We fully support the industry's Crime & Disorder partnerships initiative as an example of good practice.

**Q30 - 33** - we support the industry's response.

**Q34.** We should never take for granted the long term success of UK policies on drink drive. The UK has been more successful than other countries with lower BAC limits but less strict enforcement and lighter penalties. Many lessons can be learnt in regard to high profile government advertising, an appropriate blend of enforcement and penalties and accepting that such strategies do take time to change public attitudes.

**Q35 - 40** - we support the industry's response.

**Q41 - 50** - we support the industry's response on education and communication.

**Q51.** We expect most of the trends in the pub, bar and restaurant industry to continue with a trend towards more food, more wine, more soft drinks and more emphasis on entertainment. However, just as in the past decade, new products will appear and have an impact on sectors of the market. For the majority of consumers, market leading ales, lagers, spirits and soft drinks will continue to dominate. We do expect to see wine sales and food continuing to grow in the "on trade."

**Q52 - 55** - we support the industry's response.

**Q56 - 59.** The alcohol industry is a major contributor to the UK economy. In spirits manufacture, the UK is probably the world leader. In brewing, it is one of the few manufacturing industries where the bulk of consumption is by UK owned and based companies. Distillers and brewers are massive purchasers of grain from the UK agricultural industry. In retailing, pubs, bars and restaurants are one of the largest employers and the

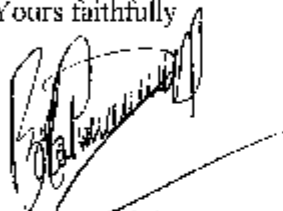
industry has been expanding the numbers employed in recent years. Six Continents Retail alone employs 40,000.

The industry makes a massive economic and social contribution to the UK economy, taxation and culture. The contribution to the economy is £37 billion, or 4% of GDP. Direct tax revenue is over £12 billion meaning that over a third of sales over a typical bar goes in taxation.

**Q60 - 61.** We operate an alcohol policy aimed at employees that is supportive. As we have stated in other responses above, we operate an Alcohol & Social Responsibility Policy (copy attached) which determines the way we use promotions as well as reminding our managers of their key responsibilities under the law by not serving alcohol to those who are intoxicated or are under 18 years of age.

If we can supply any further information, we will gladly do so. We welcome the Government's consultation and will co-operate in whatever way possible. We believe it is in everyone's interest to have a successful alcohol industry that behaves responsibly. Thank you for the opportunity to be involved in the National Alcohol Harm Reduction Strategy.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Bob Cartwright', written over a horizontal line.

Bob Cartwright  
Director of Communications  
Six Continents Retail

## Six Continents Retail - Alcohol and Social Responsibility Policy

Drinking and eating out of the home is an important and enjoyable part of life for the majority of people. We want customers to enjoy visiting our pubs and bars and for them to be a safe and welcoming environment; one that neither encourages or condones excessive drinking and all the social issues that can result.

Six Continents Retail therefore has clear policies that help to ensure that we sell and promote alcohol responsibly with clear guidelines on promotions and pricing. In summary:-

1. We will at all times observe the law with regard to the sale of alcohol and all other products by:-
  - Not serving customers who are intoxicated
  - Not serving alcohol to under 18's (and we will always ask for proof of age where there is doubt). We are working with the rest of the industry to persuade the Government to introduce a nationally recognised Proof of Age card
  - Observing all other conditions of licensing law
  
2. All promotional activity for alcohol will comply with the Portman Group policy on commercial communications and should therefore avoid:
  - association with anti-social behaviour
  - purchase by or sale to under 18's
  - appealing particularly to under 18's rather than to adults
  - suggestion of sexual success or prowess
  - association with illicit drugs
  - encouragement of illegal, irresponsible or immoderate consumption
  
3. Any promotional activity must also observe the following Company guidelines:-
  - any time limited cut price promotion must last at least two hours and, ideally, be longer
  - we will not undertake any of the following promotions:
    - any promotion that involves an initial payment to obtain reduced price alcohol
    - promotions that involve drinking games, such as 'yard of ale'
    - promotions involving larger quantities, such as '5 drinks for the price of 4'
    - promotions that involve quantities of 'free drinks' that are redeemed immediately or in one session
    - promotions which involve driving in any way, including cars as prizes
  
4. Any promotion of draught beer at under £1 a pint must have Company approval.
  
5. Designated driver and other anti drink/drive activities should be encouraged by highly competitive soft drinks prices at all times.
  
6. We are ensuring that price lists with ABV's are on display in all our outlets.
  
7. Six Continents Retail is steadily increasing the amount of toughened glass used in our outlets.

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