



Evaluation of the potential impact on alcohol misuse of a “Responsible Off-Licensing Scheme” in Cheltenham

This research was funded by the Late Night Levy Fund, as supported by the Office of the Police and Crime Commissioner for Gloucestershire and Cheltenham Borough Council.

Conducted by a research team from the University of Gloucestershire, School of Natural and Social Sciences

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Review team:

The research was conducted between August 2016 and May 2017 by a research team from the School of Natural and Social Sciences at the University of Gloucestershire, principally:

- **Pete Martin** – Postgraduate Research Student and primary researcher
- **Dr Jonathan Hobson** - Academic Subject Leader in Social Sciences, research oversight

Contacts:

If you have any comments or queries regarding the work, please contact:

Dr Jonathan Hobson:

Academic Subject Leader Social Sciences,
University of Gloucestershire,
Francis Close Hall,
Swindon Road,
Cheltenham,
GL50 4AZ
Email: jhobson@glos.ac.uk

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Section 1: Introduction

1.1 Rationale to the project

Problems related to alcohol misuse are varied and wide ranging, they are often associated with anti-social behaviour, crime and disorder which impacts on communities, business and can reflect poorly on the reputation of localities leading to their decline. The UK Government recognise the need to address the impact of alcohol related problems and it wants to see a radical change in the way the issues are tackled (see: HM Government 2012, Home Office 2013a).

The UK Government argues that the alcohol industry, local agencies and the community all have a social responsibility towards changing drinking cultures and attitudes in relation to alcohol consumption aimed at preventing its misuse perceived to be impacting on local Communities and businesses in affected locations (see: Local Government Association 2015).

The Government states that the drinks industry has a significant role to play in promoting responsible drinking and to reduce the impact of alcohol related issues. It favoured social responsible practice via self-regulation and voluntary schemes for achieving this purpose, primarily to avoid, if possible, any economic effects of statutory regulatory enforcement that may especially impact on smaller businesses. For this reason, the UK Government championed proposals for self -regulation and voluntary approaches through its alcohol harm reduction strategy, one of the key principles of which being good retailing practice (Cabinet Office 2004).

These concerns are reflected in statistics that identify 67% of UK alcohol sales occur in the 52,400 licenced off-trade premises (Institute of alcohol studies 2016). Other research suggests further irresponsible off-license practices that encourage excessive consumption, such as sales of cheap strong alcohol products, sales to underage drinkers either by proxy purchase or poor sales practice, increased home drinking, and issues relating to pre-loading due to 24-hour opening. It is also argued that the off-licence trade is under regulated by weaknesses in the licensing Act 2003, exacerbated by Government cuts to enforcement services undermining regulation and further weakened by ineffective use of existing powers within the licensing Act 2003 and its subsequent amendment (Galloway et al 2007, Forsyth et al 2009, Foster and Charalambides 2016).

These issues are reflected in Cheltenham, where Police statistics for Cheltenham Town Centre up to June 2017 revealed 41.6% of its problems were anti-social behaviour issues that include nuisance, vandalism, street drinking and environmental damage such as littering and human detritus (Police.uk 2017). A needs analysis conducted by

Gloucestershire County Council (2013) identified that from 2008 to 2013 Cheltenham had a considerably higher average rate of hospital admissions related to alcohol misuse (800.56 persons per 100,000) than the South West Region (633.35 persons per 100,000) and the whole of England (638.86 persons per 100,000).

The impact of problem alcohol use in Cheltenham has also been identified by Gloucestershire constabulary, issues around small off-licenses selling alcohol to those underage. Where the local Police assert that:

Many of the sales [to underage drinkers] are associated with local off-licences. This is evidenced by test purchases accrued by the police which revealed that four out of five shops sold alcohol to underage drinkers, adding that alcohol is the biggest cause of criminal activities in the Town and off-licences should take a responsible attitude and approach when selling alcohol.

(Gloucestershire live 2008)

In September 2015 the University of Gloucestershire hosted an ‘Alcohol Summit’ on behalf of the Cheltenham West End Partnership: a strategy group bringing together Cheltenham Borough Council, commissioners and service providers. The summit brought together key stakeholders to discuss the nature and causes of alcohol-related harm in Cheltenham. One of the key issues to arise from this summit were concerns around alcohol related issues on and around Cheltenham’s lower high street area. During the summit, it was identified that the area of the Lower High Street (LHS) and some parts of the surrounding St Paul’s neighbourhood experience a range of alcohol-related issues that differ from those centred in the town centre. These initial discussions identified the following as areas of concerns relating to licensing practice in that area:

- Sale of exceptionally cheap alcohol;
- Sale of significant amounts of high strength alcohol;
- Evidence of sale of illegally-imported alcohol;
- Absentee licensees who may not fully understand or put into practice their legal responsibilities;
- Inadequate measures to ensure no sales are made to underage drinkers;
- Inadequate measures to ensure no sales are made to customers already impaired by drinking.

These should also be considered in the context of other features of the Lower High Street locality including:

- Increase in 24-hour street drinking, and drinking in parks and other public spaces;
- Culture of pre-loading, including amongst students living in the neighbourhood;

- A changing community with increasingly diverse cultures around alcohol use and drinking culture;
- Intimidation of sales staff who may not feel fully supported by absentee licensees.

1.2 objectives and approach

As a response to these concerns, this research was commissioned by the Cheltenham Alcohol Coordination Group, and funded by Cheltenham's Late Night Levy through the Office of the Police and Crime commissioner for Gloucestershire. The project addresses the following three objectives:

- i. To identify the impact of current features of off-licensing practice on problems relating to alcohol abuse in Cheltenham, focusing on the Lower High Street locality as a case study;
- ii. To identify and investigate the features of 'Responsible Off-licensing Schemes' introduced elsewhere, identifying models that could be applied in Cheltenham;
- iii. To make recommendations for the potential introduction of a new "responsible off-licensing scheme" in the Lower High Street locality and its possible application across the town.

Section 2 of this report examines the first of these objectives, using evidence gathered from surveys conducted with representatives from premises in the lower high street, and interviews with key stakeholders working in the area. The data collected for this portion of the analysis included:

- 19 semi-structured interviews with members of the public on the Lower High Street, intended to help understand the scope and scale of issues. Of these: 14 lived on or very close to the Lower High Street; 2 worked on the Lower High Street; 3 were visiting the Lower High Street. from these interview
- Observation of off-license premises in the lower high street area across different days, with a focus on sales activity in relation to underage drinkers
- Six interviews with retailers that have premises on the lower high street. Three of these were with dedicated off licenses
- Four in-depth interviews with key-stakeholder representatives from local advocacy organisation involved in some way with the Lower /high Street and surrounding area. These included: employees of the West End Partnership located in the Lower High Street of Cheltenham, Gloucestershire Crime stoppers, Cheltenham BID, Cheltenham licensing and enforcement agency, Cheltenham Borough Council.

section 3 of the report address objective ii through an examination of five voluntary led retailer schemes from elsewhere in the UK. These schemes rely on voluntary

implementation by the alcohol industry and are aimed at reducing alcohol related harm. The three schemes are:

- i. ***Moseley Community Alcohol Partnership scheme, Moseley Birmingham***: A responsible retailer led partnership introduced in Moseley led by Birmingham City Council and by off-licensing retailers in Shropshire for tackling issues like those identified in Cheltenham, primarily related to alcohol misuse. The aim is to reduce the impact of alcohol related anti-social behaviour, underage drinking and street drinking impacting on communities and the reputation of the local area.
- ii. ***Challenge 25 scheme, Shropshire, Moseley and Ipswich***: Introduced in Shropshire, Moseley and Ipswich. It is an Industry led scheme aimed at reducing underage sales of alcohol via proof of identity when purchasing alcohol.
- iii. ***Reduce the Strength scheme, Ipswich***: Introduced in Ipswich led by Suffolk County Council for tackling alcohol related harms associated with street drinking. The initiative is led by Local Authorities, introduced through voluntary agreement with off-licensing retailers to remove high strength alcohol from sale. This process is implemented via changes to the premises licence.
- iv. ***Best Bar None Scheme, Durham***: For introducing best practice via partnership approaches delivering shared intelligence, skills and effective practices.
- v. ***Local Alcohol Action Agreement***: An initiative for developing multi-agency partnerships and encouragement of local community and business led approaches towards innovative practices that tackle the effects of alcohol misuse.

The report concludes with a Summary and Recommendations section, which addresses the requirements of aim iii to provide some guidance for the application of further alcohol licensing schemes in the lower high street area of Cheltenham and, potentially, other areas of the town.

Section 2: the impact of current features of off-licensing practice on problems relating to alcohol misuse in Cheltenham, focusing on the Lower High Street locality as a case study

2.1 The Lower High Street, Cheltenham

The focus for this research is the Lower High Street area of Cheltenham. For the purposes of this research that area encompasses the High street from Henrietta Street, next to Hollywood bowl, extending to Townsend Street near to the Tesco Store. A map identifies the location used for the case study. Figure 1, below, shows this area in relation to the rest of Cheltenham.

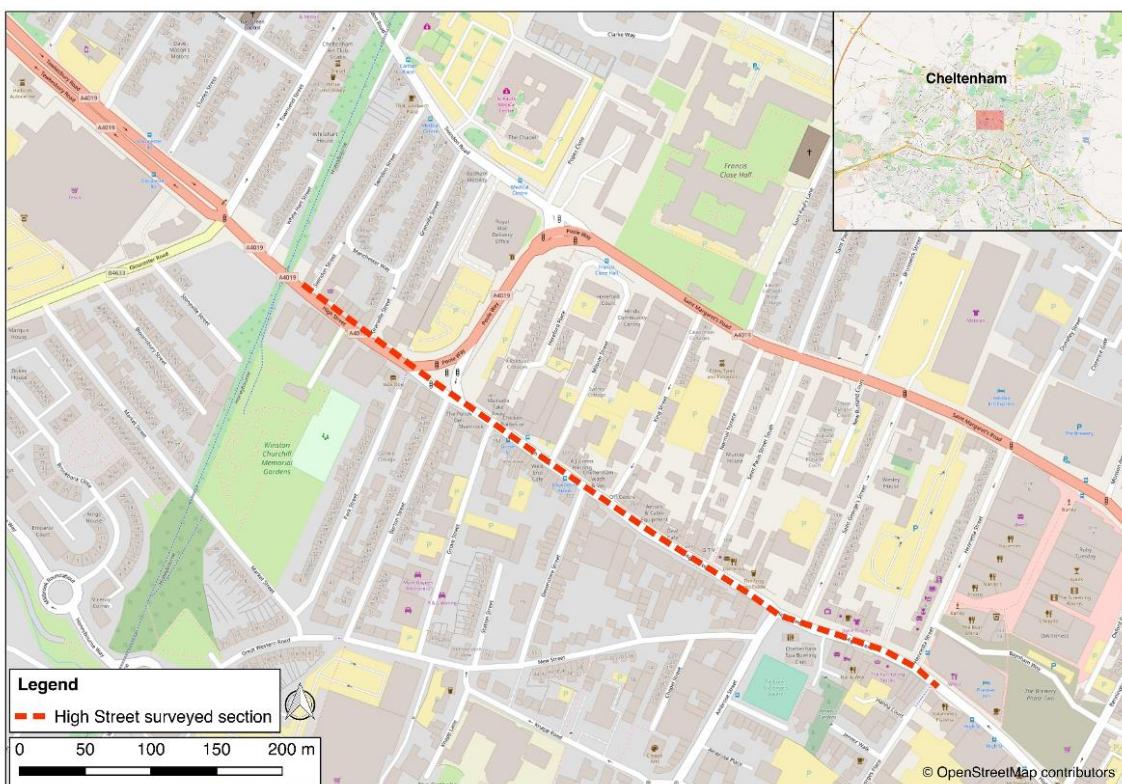


Figure 1: Map of the Lower High Street area of Cheltenham as surveyed in this research

On the Lower High Street there are four dedicated off-licenses selling alcohol. Six small grocery corner type shops that also stock alcohol, a large convenience store located next door to a large linked off-licence store, a large supermarket on the boundary of the Lower High Street. There are also five on- trade premises where alcohol is purchased and consumed on the premises, for instance restaurants and pubs.

[2.2 Key issues on the lower high street](#)

This section of the report considers some of the key issues identified through the on-street surveys, interviews with representatives of premises on the Lower High street, and the in-depth interviews with key-stakeholders from organisations working in the area. The information from the surveys has been organised into four themes, listed a-d:

- a) Alcohol and drug related anti-social behaviour
- b) Sale of alcohol to those underage
- c) Selling of cheap, high ABV (Alcohol By Volume) drinks and street drinking
- d) Sales of alcohol to already intoxicated customers

a) Alcohol and drug-related Anti-social behaviour

From the on-street surveys conducted:

- 15 out of the 19 people interviewed said anti-social behaviour was a problem in the Lower High Street of Cheltenham.
- 13 out of 19 people interviewed said alcohol related behaviours were driving anti-social behaviour.
- 18 out of 19 participants felt that drug misuse was the biggest problem in the Lower High Street.

The problematic behaviours identified in the on-street surveys included:

- Anti-social behaviour driven by drug and alcohol use. This included shouting, abuse and violent behaviour and was generally felt to be worse at night than during daylight hours.
- People loitering or congregating outside of shops and empty shop doorways, where they are consuming excessive amounts of alcohol and/or taking drugs.
- Littering and human waste because of excessive alcohol and/or drug use, in building urine, excreta and vomit.
- Drug related arguments and fighting in the street, particularly at night. This was considered by most to be a greater problem than problematic behaviours related solely to alcohol consumption.

Interestingly, all the participants of the street-survey said they found it difficult to identify any age-related patterns, however more identified those over 21 (in many case 40 and over) as a bigger issue than those under 21.

Of the six retailers on the lower high street who agreed to be interviewed, four recounted how they had been forced to ask overly intoxicated people to leave the premises.

Significant issues identified in these retailer interviews included:

- The sale of cheap, often high ABV, alcohol (particularly larger), which was identified by most participants as a driver for problematic behaviour. Interviewees described how cheap alcohol is either being drunk on the street, drunk in shop doorways, or seen carried in quantities in plastic bags in the Lower High Street. For instance, one interviewee said that groups of people drinking this kind of cheap beverage were a common sight on the Lower High Street in early morning.
- That anti-social behaviour linked to drug and alcohol misuse was deterring some people from visiting the Lower High Street. In particular, they felt that shouting and fighting outside of shops was frightening potential customers
- There was a clear feeling that anti-social behaviour was largely due to drug and alcohol problems in the area, however five out of the six retailers interviewed also said that they did not feel there was a link to off-licenses on the Lower High Street selling alcohol to those causing the issues.

From the four in-depth interviews with key-stakeholders in local advocacy organisations, there was a clear message that many of the issues faced in the lower high street were related to alcohol and drug consumption. Some of this was linked to cultural and local aspects, for instance that binge-drinking cultures were a predominant problem in Cheltenham. There were mixed views on how such issues might be tackled, with education and behaviour change in relation to binge-drinking as well as targeted schemes aimed at reducing issues with accessibility of cheap, strong alcohol. For instance:

Drugs are mainly responsible for the violence on the streets, some stabbings here since January linked to drug gangs fighting and arguing. Gangs loitering in shop doorways drinking and drug taking, they have bags of cans with them and can be seen.

(Quote from participant)

There are language problems, but better education about safe drinking would help via alcohol aware schemes. Binge drinking is an issue and is linked to homeless people visiting the area for shelter, they will buy in bulk to drink through the night.

(Quote from participant)

b) Sale of Alcohol to those underage:

Under sections 145-154 of the Licensing Act 2003, order 2010 there is a mandatory licensing condition for those who sell or supply alcohol to have an age verification policy. Selling to under 18 year olds is illegal and proxy purchase in relation to people buying alcohol for people below this age is on the increase.

Although the majority of those that responded to the street survey identified that those over 21 years old were responsible for problems relating to both drug and alcohol misuse, there were mixed feelings about whether they could accurately measure people's age. For instance:

- Whilst eight participants said young people congregated around outside of off-licence shops drinking alcohol, they also said they found it difficult to accurately gauge their ages.
- Nine of the participants from the street interviews revealed they didn't think off-licenses selling to underage young people were a problem, arguing that drugs were the biggest issue in the area.

Two business operators asserted that mixed age groups were responsible for the problems and it was a mix of drugs and alcohol easily available from certain local shops and a pub, it's those places where the issues start.

From the retailer-surveys, there were many issues identified around the efficacy of current practises. One of the common themes identified issues with age verification policies:

- When asked on voluntary practices in relation to underage drinking one off-licence did not know what an age verification policy was, but did know that there should not be any sales to people below the age of 18.
- Another respondent from an off-licence said the laws were difficult to understand and thought better guidance and help from the Council and Police would help to deliver better practice.
- One off-licence participant expressed concern around how off-licence outlets were expected to know whether a person buying alcohol is under age. Although this participant felt everything was being done to combat this problem, they argued that there was still a risk that someone else would come in the shop and buy alcohol on behalf of those underage and that once alcohol leaves the shop it is no longer the vendors responsibility.

As well as identifying issues with the sale and consumption of Alcohol to those underage, the retailers we interviewed also made some suggestions for ways in which practices might be improved:

- Three retailers felt that better guidance and training on sales practices would be beneficial. This included some consideration of language barriers as there are both retailers and problem drinkers for whom English is a second language.
- Three retailers felt better relationships with enforcement agencies would help to improve practices regarding underage sales of alcohol.
- Reducing the range and/or availability of cheap, high ABV alcohols was also felt to be a potential solution. One retailer described how a problem outside a premises had reduced since the retailer had stopped selling individual cans of strong lager: “*The ABV of drinks is too high, it needs lowering, singular cans of lager was being sold but has since been stopped and has improved the problems*” (Quote from participant).

The Retail Alcohol Standards Group (RASG 2014b) developed schemes to tackle problem and underage drinking. The under 21 and 25 voluntary schemes are self-regulatory schemes where the off-licence trade is promoting socially responsible practice often in partnership with the Police, the Local Authority, and trading standards (see figure 2, below). However, during this research process it was noted that no shops selling alcohol in the Lower High Street were showing signage that indicated they were participating in



Figure 2: Drink aware voluntary signage for self-regulatory off-licensing practice

It is worth noting that during the in-depth interviews with key stakeholders with local advocacy organisations, one participant discussed how conditions have already been applied to some establishments in Cheltenham to operate the challenge 21 scheme.

The Challenge 21 (or equivalent) scheme shall be adopted, so that any customer attempting to purchase alcoholic liquor who appears to be under the age of 21 shall be asked for an accredited, PASS-approved card and that a sale shall not be made unless this evidence is produced.

(Taken from a premises inspection record)

c) Selling of cheap, high ABV (Alcohol By Volume) drinks and street drinking

Alcohol by Volume (ABV) identifies alcohol drinks by its strength, often associated with cheap lager and cider that range above the 6.5% level. The practice of selling high volume alcohol drinks and irresponsible promotion in relation to this activity is often found in off-licence premises (BMA board of Science 2008). Research carried out by the Local Government Association shows how such practices can have significant impacts on groups:

Low price high-strength products are most commonly associated with street drinkers and rough sleepers, and are therefore linked to some of the specific issues experienced by these groups and the communities where they are based.

(Local Government Association 2016, p6).

From the street-surveys conducted for this research, there were a range of issues identified in relation to problems on the Lower High Street:

- Nine participants identified that it was the presence of a range of charity and support organisations on or around the Lower High Street that was attracting problem drink and drug users. They felt that most of the problems occur when the charity organisations are open and would consequently not like to see any more introduced in this area.
- Nine participants identified lager as the alcoholic beverage they most commonly witnessed people drinking. Strong lagers were clearly identified by the researcher in off-licences on the Lower High Street.

Similarly, three of the key-stakeholders from advocacy organisations expressed concern about cheap, high volume alcohol being sold by off-licenses in this area. One organisational advocacy worker with a focus on drugs and alcohol identified that some of the violent incidents occurred outside of or close to Edmondson House and Grove Street supported housing organisations located close to the High Street area. They argued that cheap, high ABV alcohol content mixed with soft drinks does seriously impact on young vulnerable

people without them knowing it's happening, and identified issues with how some of the schemes targeted at under 21 were not addressing such issues.

During the data collection, one off-licence store in the lower High Street of Cheltenham was observed to have the point of sale displays for alcohol close to the door, including cheap, high ABV alcohol that was visible from the street.

An inspection record offered by a different off-license showed a stipulation that alcohol, except wine, shall not be displayed within 5 metres of any entrance door in regular use by customers. It is uncertain whether the previous premises are subject to this condition, however, two of the interviewees from retail premises felt that stronger conditions applied (or enforced) across the board would help tackle problems related to alcohol misuse.

One participant, an advocacy worker in drugs and alcohol argues that binge drinking is associated with high ABV levels of alcohol and street drinking, unfortunately voluntary schemes may not necessarily address issues such as ABV and safe levels of alcohol strength. This conclusion is partly shared by the Local Government Association (2016) who identify that "*street drinkers often consume high strength alcohol*".

The licensing Act 2003 was introduced to regulate the sale and supply of alcohol, also for offenses in relation to alcohol and connected purposes. It provides a focus on four objectives: The prevention of crime and disorder; Public safety; The prevention of public nuisance; and Protection of children from harm.

It provides a regulatory framework which empowers Licensing authorities to make decisions and enforce them in relation to the sale and supply of alcohol, also encouraging community involvement in the process. Section 182 is a guidance provided to Local Authorities for promoting best practices. (Home Office 2013b)

Certainly, a consistent approach to licensing powers is encouraged in section 182, however, a balance in relation to the impact of statutory enforcement on local economies and enforcement of regulation can be a difficult. Consideration on pricing, particularly of high ABV drinks is an important part of such discussions, and the Daniels Report (Daniels, 2004) clearly identifies "*that price plays a part in encouraging excessive drinking and in particular irresponsible promotions, usually accompanied by deep price discounting*".

d) Sales of alcohol to already intoxicated customers

In accordance with the licensing Act 2003, section 141, it is an offence to sell or allow the sale of alcohol to someone intoxicated. However according to Foster (2016) a person must

be proven to be drunk to break the Law. This makes prosecution and enforcement difficult and legal action is often avoided for this reason.

Of the three off-licences interviewed as part of the retailer group, none said they had received training on how to deal with drunken persons attempting to buy alcohol. When asked what they do in such circumstances, a common response was they would simply “*tell them to get out or we'll call the Police*” (Quote from a participant).

There were no intoxicated people observed during the researcher's time in the High Street during the field work, none that were visibly under the influence of alcohol, however, many people carrying cans of alcohol were evident. A key-stakeholder from one of the local advocacy groups interviewed said that “*early mornings were the worst time to see drunks walking the streets, often in possession of bags of alcohol*” (Quote from a participant). They believed that they had purchased the alcohol locally and that this was very likely to have been sold to them when they were already drunk.

A further key-stakeholder, an advocacy worker for an alcohol and drugs organisation, described how “hardened drinkers” who generally consume on the streets will buy alcohol in bulk to keep them going through the night and they may not necessarily be drunk or appear to be drunk when the alcohol is purchased.

There is no evidence to support that the alcohol had been purchased from off-licenses in the Lower High Street, however, there is an accumulation of small off-licence outlets in this location and a supermarket close by holds a 24-hour licence. Therefore, there is clearly a market for the sale of alcohol in this location. It is also apparent from inspection records offered by one retailer that the licensing Authority is trying to apply conditions in accordance with guidance under Section 182 of the Licensing Act, 2003 (Home Office, 2013b).

Section 3: ‘Responsible Off-Licensing Schemes’ that could be applied in Cheltenham

Gaps in the licensing Act 2003 mean that there is a lack of tools and strategies for regulating off-licenses in the UK. This is compounded by difficulties that Police and Local Authorities face from budget restrictions and limited resources.

One response by the UK Government is to employ a self-regulatory system for promoting responsible drinking and adopting responsible retailing schemes for addressing the harms associated with alcohol misuse. The responsibility deal, requires the alcohol industry to commit to actions that reduce harms related to the consumption and sale of alcohol.

This is a partnership approach where the alcohol industry is committed to delivering on voluntary pledges that include industry led voluntary retailer schemes as an alternative more favourable choice for tackling alcohol misuse over regulatory enforcement.

Such voluntary and self-regulating schemes are thought by the UK Government and the alcohol industry to offer an “important role in improving standards of social responsibility”. (Joseph Rowntree Foundation 2006, p6). There are, however, critics who argue that self-regulation frameworks lack the “ability to enforce rules and effectively sanction those who break them” (Joseph Rowntree Foundation 2006 p 3). The Joseph Rowntree foundation, identifies many problems with the wide variety and scope of such schemes:

Despite the attempt to introduce national industry-wide standards for social responsibility, self-regulation remains fragmented. Separate codes govern different sectors, such as the off-licence trade, pubs and bars, the Scottish whisky industry, packaging and marketing by producers, broadcast advertising, and non-broadcast advertising. In addition, the larger producer and retail companies have their own internal codes of practice. There is some confusion about how these codes relate to each other, despite the recent efforts to create a single national code. There are substantial variations in these self-regulatory systems according to their scope, inclusiveness, independence and lay input, proactive monitoring, sanctions and public accountability.

(Joseph Rowntree Foundation 2006 p3)

The Retail of Alcohol Standards Group has introduced 65 schemes since 2005 across the UK and many case studies have provided evidence that support their effectiveness. Following are five schemes identified as relevant to the Cheltenham context: **Moseley Community Alcohol Partnership scheme**; a **Challenge 25 scheme** in Shropshire, Moseley and Ipswich; a

Reduce the Strength scheme in Ipswich; a **Best Bar None Scheme** in Durham; and a **Local Alcohol Action Agreement**.

[3.1 Moseley Community Alcohol Partnership, Moseley, Birmingham](#)

The Mosley Community Alcohol Partnership (MCAP) is based on a set of principles and actions collectively agreed by community partners to tackle problem drinking. It is closely associated with a challenge 21 and 25 scheme, and the scheme operates in conjunction with Public Space Protection Orders to prevent drinking in parks and open spaces. The MCAP scheme has shown significant positive impacts for the local community, including:

- 78% decrease in attempted purchases by under 18's.
- 45% increase in retailers reporting improved relationships with the Police and trading standards.
- 66% decrease in retailers reporting young anti-social behaviour
- 20% decrease in calls to the Police in relation to anti-social behaviour.

(ABIC Ltd 2014)

Moseley, Birmingham has a population of 25669. Although Cheltenham has a larger population 116500, the case study area (Lower High Street) is similar in scale and size. The population makeup of Mosely is also similar to the Lower High Street area of Cheltenham, including mixed Eastern-European residents (Office of National Statistics, 2011).

The Community Alcohol Partnership scheme has been developed in Moseley to tackle a range of issues that are like those in Cheltenham's Lower High Street, including:

- issues associated with underage drinking,
- sales to intoxicated drinkers,
- sales of cheap, high ABV drinks,
- street drinking
- and anti-social behaviour

In addition, the MCAP has been combined with the challenge 21 and 25 schemes run by residents and business owners, including off-licenses, these two schemes have an existing resource pool, which was combined with the CAP scheme to develop a socially responsible approach to tackling alcohol related problems.

The MCAP established a set of principles, devised in collaboration with community organisers and local businesses including off-licenses in the location. Devising these principles was a collective project, allowing those with a stake in the community to contribute to a potential solution. The key principles that were devised for the Mosely context included:

- Free training for off-licence operators, managers and owners to improve understanding of the Laws and voluntary scheme principles. This was found to be particularly useful in relation to reducing underage sales.
- The introduction of “refusal books” to record those underage seeking to buy alcohol. This aided in both keeping a record of the problem, and in developing a better understanding of the requirements for tackling this problem.
- Addressing sales to intoxicated drinkers through agreement with off-licenses operating in the area to cease the sale of alcohol drinks over 6.5 ABV. This helped to reduce the number of problem drinkers in the area.

The MCAP was described as very successful in tackling the issues faced in the area. A survey carried out by Birmingham City Council identified that 58% of respondents felt that a Community Alcohol Partnership Scheme in operation in Moseley helped to reduce both anti-social behaviour and 47% of respondents felt there were fewer street drinkers. One of the respondents we spoke to attribute the success of the scheme to the following:

- The co-regulation of the MCAP with statutory Laws and other schemes already in operation in the area, such as the challenge 25. Collectively, these schemes worked well towards delivering successful outcomes, particularly in reducing alcohol sales to younger and underage drinkers. The efficacy of this association does, however, require significant co-ordination between schemes and maintaining good levels of buy-in from community partners.
- The success was largely due to local community stakeholders choosing to sign-up to the schemes rather than it being imposed on them. This gave a significant element of community ownership to the project and drove commitment towards its implementations. It was a partnership arrangement led by the community, with the Police offering targeted to tackle criminal activity. (ABIC Ltd 2014)

The success of the MCAP findings were further supported in a Birmingham City Council s222 survey, completed by (ABIC Ltd 2014). Section 222 of the Local Government Act 1972 provides Local Authorities with the power to prosecute or defend legal proceedings which are proven to be in the interests of inhabitants, this also related to public protection orders within part four of the anti-social behaviour Crime and Policing Act 2014 (Dobson 2009).

The evaluation survey found that 47% of respondents felt there were ‘far fewer’ street drinkers; nearly a quarter (23%) thought that there were ‘fewer’; and another 23% felt there were ‘about the same number’

(ABIC Ltd 2014)

In terms of specific issues that had been identified previously as problematic:

- 84% of those surveyed said they thought there were ‘fewer street drinkers/beggars’.
- Over half (58%) of respondents thought there was less general anti-social behaviour than before, including 17% who said there was ‘much less’, whilst 29% felt there was about the same amount.
- *Half of the respondents felt that there was either ‘less’ (43%) or ‘much less’ (7%) alcohol related litter (e.g. bottles) in the area.*

(ABIC Ltd 2014)

In terms of more specific groups, there MCAP showed a positive impact for local businesses, amongst whom in the survey:

- *33% thought there were less street drinkers buying alcohol*
- *20% thought that there was less anti-social behaviour related to street drinkers*
- *40% had observed fewer arguments amongst street drinkers*
- *40% thought that they/their staff had experienced less aggression from street drinkers*

(ABIC Ltd 2014)

There were also significant positive impacts for the local community:

- *57% of respondents to the evaluation survey said they felt safer going out during the day (12% strongly agreed)*
- *41% said they felt safer going out in the evening, whether it was light or dark (no ‘strongly agree’ responses)*
- *26% said they felt safer going out after dark (2% strongly agreed)*
- *43% now use local shops and facilities more than before (12% strongly agreed)*
- *64% said that there are no longer any areas in Moseley Village they avoid (12% strongly agreed)*
- *81% said that they felt the reputation of Moseley Village has improved (21% strongly agreed)*

(ABIC Ltd 2014)

There were further benefits to the scheme, particularly in relation to issues such as substance misuse. The ABIC report (2014, p1) included a comment regarding the Safer Communities Team, who

...confirmed that support for street drinkers to address substance misuse and related problems has impacted positively on reoffending rates. There was some

anecdotal evidence which suggested that drinkers are however continuing to drink locally, albeit in much smaller numbers and/or that the problems may have moved indoors within some of the local social housing.

(ABIC 2014 p 1)

Such comment tally with responses from one of the interviews in Cheltenham, who highlighted that outreach work to support substance abusers was crucial to developing processes that worked in conjunction with voluntary schemes and practices. Moseley recognised this complex requirement and by using s222 chose to adopt this as a positive option for impacting on street drinking and reducing anti-social behaviour.

Overall, the MCAP scheme has provided a range of benefits for the local community. This was largely through a combination of efforts including complex service provision, along with practices developed to help off-licenses taking a responsible approach when selling alcohol.

[**3.2 Challenge 25 scheme: Shropshire, Moseley, and Ipswich**](#)

This voluntary scheme was introduced by the Retail of Alcohol Standards Group (RASG) who were formed by the off-trade retailers following the Governments alcohol misuse enforcement campaign, initiated following continued poor test purchase results in relation to underage sales of alcohol in England and Wales. The scheme is designed to be an age verification policy to encourage people over the age of 18, but look under the age of 25 to carry identification if they intend to purchase alcohol.

Test purchasing is a process where under age people are purposely employed to buy alcohol for assessing whether retailers of alcohol are effectively managing the preventative process. The Community Alcohol Partnership found that 10000 test purchases in relation to sales by the off-trade each year showed a 13% failure rate.

The impact of the challenge 25 scheme in Moseley Birmingham and Shropshire on reducing the impact of abuse towards sales staff and underage sales by the off-trades in those areas is lost within the overall analysis of both the Community Alcohol Partnership scheme and other statutory regulation used in the process of tackling alcohol misuse. However, it is argued by one participant from Birmingham City Council and one from Shropshire Council that in conjunction with the CAP scheme the challenge 25 initiative has proved to be very successful in addressing the issue of underage sales.

It is argued that around 11 million people have been challenged through the 25 schemes and that off-trade test purchase analysis has shown a pass rate of 79% in comparison to 69% in relation to the on-trade, showing a significant improvement in tackling underage sales. Furthermore, a fall by 18% of alcohol purchases by young people since the challenge 25

scheme was introduced is showing it to be a successful approach towards reducing harms related to alcohol misuse (Retail of Alcohol Standards Group 2014a).

The Challenge 25 scheme is not just about an age verification policy, it also has many other qualities including components that make the scheme effective. Some of those components include:

- Training of staff in applying Challenge 25.
- Displaying of posters to advertise challenge 25 is operational.
- Staff support to ensure their decisions are not undermined by management.
- Record keeping such as refusal book to identify the number of failed purchases because of no identification or challenges by sales operators.
- Clarity on acceptable identification.

Shropshire Council has encouraged the use of challenge 25 scheme in several its Market Towns, introducing it in new licence applications and amended licenses, however, the scheme was combined with CAP and the Shropshire Council participant, an officer within the Shropshire drug and alcohol team, confirmed that the challenge 25 initiative is successful in tackling underage sales and proxy purchases, but was unable to provide any data to support this assertion.

Birmingham City Council also encouraged the use of this scheme by off licenses in Moseley, again the challenge 25 scheme operates in conjunction with the CAP scheme, therefore, individual analysis of the challenge 25 initiative is not available in either of these areas.

The RASG (2014b) survey results show that 8 of the 11 regions in the UK want to see the challenge 25 scheme mandatory. It further revealed that 54% of people in the West Midlands would prefer to see alcohol education as a top priority and 48% said they would like to see the challenge 25 as a mandatory application for tackling underage drinking.

A report produced by the RASG (2014b) provided statistics for successes of the challenge 25 scheme. It argued that 11 million people were challenged by the scheme about their age when purchasing alcohol. 23% have been asked to produce identification. 75% of 18-25-year olds were challenged and 55% of 25-34-year olds were challenged. 51% strongly support in the UK the adoption of challenge 25. It revealed that in the last week under age sales had fallen 18% since the challenge 25 scheme was introduced.

Although Shropshire and Birmingham have praised the work of the challenge 25 scheme, one of the major problems remains that there is a “lack of universal application which creates disparity” (RASG 2014b, p19) between the off-licensing trade who adopt it and those who do not, it is recognised that a mandatory approach to inclusion in licensing applications would significantly impact on this problem (RASG 2014b).

[3.3 Reducing the Strength Scheme: Ipswich.](#)

The Reducing the Strength Scheme is an initiative led by Suffolk County Council to tackle alcohol related harm associated with street drinking. The Reduce the strength campaign was a voluntary scheme aimed at reducing high ABV, low cost alcohol products on sale in off-licence outlets, thereby hopefully reducing alcohol related problems associated with street drinking including anti-social behaviour. The initiative involved asking off-licenses to remove from sale alcohol products of ABV levels above 6.5% from sale.

The initiative was initially introduced in Ipswich, which according to the 2011 census has a population of 133384, and close to Cheltenham in population size and scale. For the initiative, off-licence outlets were asked to voluntarily stop selling cheap, high ABV drinks, the consumption of which was perceived as having a negative impact on local communities and businesses. Out of 130 130 off-licence stores in the area, 53 stopped selling cheap, high ABV drinks as part of the initiative.

The initiative involved an investment by Suffolk County Council in outreach workers in the area, whose job it was to help direct those with substance abuse issues to suitable support and treatment facilities through multi-agency working partnerships, between the NHS, Police and outreach teams.

The Reducing the Strength Scheme produced some positive results. During the period of the initiative, Police statistics identified that:

- Street drinkers dropped from 78 to 38 in one year
- In the first six months, there was a drop in ASB incidents of concern from 191 to 94 when compared to the previous year.

The success of the general approach taken by the Reducing the Strength Scheme has led to its use elsewhere in the UK. Newcastle has adopted a voluntary scheme for targeting minimum price on alcohol drinks through effective promotions. Ealing and Watford have imposed conditions on off-licence sales in relation to reduced stocks of high ABV products during 24-hour opening, in addition, have imposed conditions that ban the sale of high strength alcohol when licences were up for review or during suspension. If applying such rules, however, it is important that clear record keeping of problems are maintained to justify such restrictions are effective solutions to alcohol related anti-social behaviour. This approach was shown to be successful in Suffolk where similar schemes were introduced for tackling the issues relating to strong, cheap alcohol.

Although there are positive results from such schemes, more work is required if they were to be considered for introducing in Cheltenham. One interviewee for this research who is an

advocacy worker for a Cheltenham-based alcohol and drug related addictions spoke about the role that dependency issues play in the problems in the Lower High Street, and the use of further outreach workers would offer support to any voluntary schemes introduced.

[**3.4. Best Bar None Scheme, Durham: For establishments other than off-licence premises in the Lower High Street area.**](#)

Best Bar None is a national award scheme supported by the Home Office and is aimed at promoting responsible operations and developing best practice of alcohol licensed premises. The purpose of the scheme for Cheltenham would be to encourage establishments other than off-licenses located in the Lower High Street, such as, restaurants and pubs to embrace the scheme for driving and encouraging good practice, partnering with off-licenses for reducing the impact of alcohol misuse.

The main benefits would be shared practice and building positive relationships between off-licence trades and on-trades. The scheme will aim to achieve the following in the Lower High Street area:

- Reduce alcohol crime, disorder and anti- social behaviour.
- Improve knowledge of enforcement regulation agencies and bar staff
- Responsible owners can share good practice with others.
- Build positive relationships.

The combination of schemes, including CAP and Challenge 25 provide opportunities for skills to be developed through effective local partnerships and improve guidance through experience and intelligence exchanges. This approach also encourages sustainable methods of tackling the problems associated with alcohol misuse via education, and outreach services that provide support and help to reduce alcohol misuse impacting on health and wellbeing of the local communities and other businesses (Home Office, 2016).

The Home Office and Police statistics suggest that there has been a 10-48% reduction in crime in areas since the BBN scheme was introduced. The Police argue that there is 70% less call outs to BBN accredited pubs and clubs in Durham since the scheme was introduced in this location (Home Office 2016).

There has been a 37% drop in alcohol related crime since the BBN and CAP schemes were introduced in Durham in 2008, 9% drop in the number of young people trying to buy alcohol has shown a significant reduction in antisocial behaviour. Furthermore, incidents of crime and violence dropped by 35% and by 2010-11 it had dropped by 87%, a significant impact on anti-social behaviour related to alcohol misuse.

3.5. Local Alcohol Action Area programme: (LAAA) programme.

The UK Government and the alcohol industry fully support and encourage partnership schemes for developing best practices that impact on alcohol misuse. However, the Government believes that more can be done to combat local problems affecting communities across the UK.

It argues that partnerships with the Police and Crime Commissioners, licensing authorities, health agencies should work more closely with local communities, businesses and the voluntary sectors, asserting they are best placed to identify and better understand solutions to the alcohol related problems in their area.

Local Action Areas will be required to demonstrate that they are developing and introducing initiatives that pursue stronger partnership arrangements, better enforcement combined with business led initiatives and improved evidence in relation to a reduction of anti-social behaviour, crime and disorder associated with alcohol misuse. This was supported by participants in this research:

Shropshire has been successful in becoming part of the second phase of the LAAA programme which aims to help prevent alcohol related crime and disorder and reduce alcohol related health harms through strong, sustained and effective partnership working. Utilise data collected to develop a meaningful public health response to incoming licensing applications.

(Quote for a participant)

Schemes such as Best Bar None, Purple Flag, Community Alcohol Partnerships, Pub watch and Business Improvement Districts across the country have shown that a thriving and growing night time economy can operate where excessive drinking is tackled consistently and robustly by business, the police and local authorities working together.

(Institute of Alcohol Studies 2013)

The LAAA programme was set up by the modern crime prevention strategy introduced by the Home Office. The purpose of the programme is to develop partnerships that include Local Authorities, health bodies and the Police for tackling alcohol related problems. Its aims are to work with the alcohol industry towards introducing partnership schemes that tackle alcohol related problems.

The Portman Group who coordinate local partnership schemes fully support this approach and commented as follows:

We warmly welcome the second round of the LAAs; and the opportunity to support local communities in reducing alcohol-related harm and creating safe and thriving night time economies. Drinks producers and retailers have an important role to play and are committed to reducing the harms related to alcohol misuse through their support of the Local Alcohol Partnership schemes; a range of

initiatives that work to make local communities safer and create great places for people to live, work and socialise.

(Portman Group 2017)

The Local Alcohol Partnership schemes supported the first round of Local Alcohol Action areas and are active in many communities across the UK. There are currently:

- **650** registered Pub watches
- **80** Community Alcohol Partnerships (over 120 having been launched)
- **74** Purple Flag accredited areas
- **36** Best Bar None schemes
- **1.449 million** Proof of Age (PASS) cards in circulation, challenge 21-25 schemes.

Official government statistics (ONS and HSCIC) show significant and sustained falls in rates of binge drinking (down 19%), alcohol-related violent crime (down 41%) and underage drinking (down 38%), during the last decade. Closer partnership working between industry, police and local authorities continues to be a key factor in tackling alcohol harms across the UK" (Retail of Alcohol Standards Group 2014b).

There are many initiatives that have proved successful in all areas discussed above towards impacting on alcohol misuse and associated problems. Again, Shropshire like Birmingham found the CAP scheme to be the most effective, but argued that the challenge 25 scheme played a crucial part in the process in terms of off-licenses dealing with underage sales. Further arguing that improving local intelligence and local partnership approaches are the best options for developing ways of tackling problems related to alcohol misuse (Home Office 2016).

4. Summary and Recommendations:

4.1 The benefits of Community Alcohol Partnership schemes

Much research has been conducted in relation to the links between an off-licence and anti-social behaviour and the effects are limited as to what real impact an off-licence is having on the local environment and communities for reasons related to weaknesses in Law in tackling alcohol related problems once it leaves the off-licence store. The British retail consortium stated as follows:

Retail stores cannot be held responsible for the anti- social behaviour once customers have left the premises and are outside their direct control and it must be recognised that licensing law is not a mechanism for the general control of anti-social behaviour

(quoted in Scottish Parliament, 2005)

Although there might be limited direct evidence linking anti-social behaviour to off-licence practices, irresponsible sales can be related to alcohol misuse which is associated with anti-social behaviour, these include practices that encourage under age sales, selling and promoting cheap high-volume alcohol, selling to already intoxicated drinkers and 24-hour sales that exacerbate issues associated with anti-social behaviour problems. This might include increased night time violence on streets, where pre-loading with alcohol at home before going out at night are commonly linked to anti-social behaviour and criminal activity.

This was recognised by the UK Government in 2004-5 where it argued that 61% of the UK population felt that alcohol misuse contributes to increased violence on the streets and that 43% of women and 38% men felt that drinking on the street is a problem to communities. (House of Commons 2005).

The impacts of alcohol misuse are certainly felt in Cheltenham's Lower High Street area, where four key problems were identified:

- a) Alcohol and drug related anti-social behaviour
- b) Sale of alcohol to those underage
- c) Selling of high ABV (Alcohol By Volume) drinks and street drinking
- d) Sales of alcohol to already intoxicated customers

As one potential solution to the problem, CAP schemes have a good record of success, and this report has provided some evidence in this regard. Further successes include CAP

schemes: in Durham, which reduced alcohol related anti-social behaviour by 25% and 50% during school holidays; and in Mid Devon, where a test purchases programme showed that the CAP scheme had resulted in a drop from 34% to 14% in illegal sales of alcohol to underage drinkers (Mid-Devon 2011).

Although there are many schemes identified as successful, it is important to note that not all schemes are able to evidence positive impacts. For example, Hindley Green in Wigan, adopted a CAP scheme and whilst they experienced some successes, they could not provide conclusive evidence that confidently supported its effectiveness in tackling alcohol related problems. There were also missed responses:

Unlike the previous two indicators, it is hard to be certain that the CAP has impacted on anti-social behaviour. The key statistical indicators used do not confirm a fall (nor do they show a worsening). Stakeholder perceptions were positive but this is not confirmed in the resident survey. Retailers provide some indications of success in reducing intimidation by young people.

(Alcohol Concern 2015, p3)

Nevertheless, CAP schemes are becoming increasingly popular as methods for reducing alcohol-related issues. **Robert Crow** and **Professor Steve Hall**, from the Social Futures Institute at Teesside University, conducted an evaluation of one such scheme, and argued that:

For a small project in its initial stages CAP has punched way above its weight and should be regarded as an exemplary model for the future...What CAP does effectively is to demonstrate that there exists, in a developmental phase, a potentially more ambitious, effective, grounded and enduring strategy for reducing underage drinking and its many deleterious effects on the health of the individual and the community. This strategy operates underneath simple economics and law, dealing with the vital cultural context, attempting to effect a permanent change in the normal everyday relationship between retailers and consumers. So far, the indicators revealed by this evaluation show that long term success is possible.

(Community Alcohol Partnerships 2016, p10)

This research identifies that CAP schemes are more effective in combination with other voluntary schemes, for instance those that require age checks at 21 or 25 years and those that involve reducing the sale of cheap, high ABV drinks. Such schemes encourage co-regulation and have a positive impact on business, local communities, and, potentially, on those who struggle with alcohol-related issues themselves. These schemes rely on

community interaction and strong partnerships, especially voluntary agreement. Whilst CAP schemes are often aimed at off-licence practices, there is also the potential for expanding such schemes to other outlets that sell alcohol.

Furthermore, education and outreach work are primary partners in delivering a sustainable approach for reducing alcohol related issues in communities. Although often carrying a financial cost, a holistic approach that deals with the sale and regulation of cheap, high ABV drinks as well as helping individuals who suffer with alcohol-related issues is most likely to be effective.

4.2 Recommendations in the Cheltenham context

This research identifies that CAP schemes are more effective in combination with other voluntary schemes, for instance those that require age checks such as challenge 21 or 25, and those that involve reducing the sale of cheap, high ABV drinks. Such schemes encourage co-regulation and have a positive impact on business, local communities, and, potentially, on those who struggle with alcohol-related issues themselves and could offer a potential section to some of the alcohol-related issues identified on Cheltenham's Lower High Street. This report recommends further discussion amongst local partners on developing such a scheme.

Effective CAP schemes rely on community interaction and strong partnerships, especially on voluntary agreement from off-licenses. They also often rely on a good relationship with local police and licensing informant. The Lower High Street in Cheltenham has a strong base in that respect, with effective community agencies working closely. Furthermore, the active role taken by the Cheltenham Alcohol Coordination Group, the Local Council, and the Late Night/Cheltenham Levy group offer opportunities for support and community links. This would be particularly useful in engaging the off-licence premises on the Lower high street in discussion around adopting CAP schemes.

Whilst CAP schemes are often aimed at off-licence practices, there is also the potential for expanding such schemes to other outlets that sell alcohol. The presence of other such schemes in nightclubs and other outlets in Cheltenham offers a potential avenue for conversations around opportunities for developing further CAP schemes.

Finally, education and outreach work are primary partners in delivering a sustainable approach for reducing alcohol related issues in communities. Although often carrying a financial cost, a holistic approach that deals with the sale and regulation of cheap, high ABV drinks as well as helping individuals who suffer with alcohol-related issues is most likely to be effective.

5. Bibliography

ABIC Ltd (2014) Evaluation of the Moseley Community Alcohol Partnership Executive Summary prepared for Birmingham City Council.

<http://www.moseleycdt.com/sites/default/files/MCAP%20Exec%20Summary.pdf>

Alcohol Concern (2007) A Glass Half Empty? Alcohol concern's review of the impact of the impact of the Alcohol Harm Reduction Strategy, Alcohol Concern, London.

<https://alcoholconcern.wordpress.com/2007/04/27/a-glass-half-empty-alcohol-concerns-review-of-the-impact-of-the-alcohol-harm/#>

Alcohol Concern (2015) Evaluation of the Hindley Community Alcohol Partnership, final report. Suffolk County Council

http://www.communityalcoholpartnerships.co.uk/images/EvaluationReports/Hindley_CAP_Evaluation_Report_Final.pdf

BMA board of Science (2008) *Alcohol misuse, tackling the epidemic. British medical association*, <http://www.dldocs.stir.ac.uk/documents/Alcoholmisuse.pdf>

Cabinet Office (2004) Alcohol Harm Reduction Strategy for England
<http://www.ave.ee/download/Alcohol%20England.pdf>

Community Alcohol Partnerships (2016) *Impact Report. 39-45 Bermondy Street, London.*
http://www.communityalcoholpartnerships.co.uk/images/Impact_Report_2016 /CAP_Impact_Report_2016_WEBLO-RES.pdf

Dobson. N (2009) Local Government Law-ASBO's injunction and anti-social behaviour, Pinsent mason, Leeds.

DCMS, Home Office and ODPM (2005) Drinking Responsibly: The Government's Proposals.
<http://alcoholresearchuk.org/wp-content/uploads/2014/01/odpm-drinking-responsibly-january-2005.pdf>

Daniels, P (2004) *Off-sales in the Community*. Scottish executive, St Andrews House, Regent Road, Edenborough.
<http://www.gov.scot/Publications/2004/02/18764/31732>

Forsyth A, Davidson N (2009) Community off-sales provision and the presence of alcohol related detritus in residential neighbourhoods. The Glasgow centre for the study of violence: Glasgow Caledonian University.

<http://www.sccjr.ac.uk/publications/community-off-sales-provision-and-the-presence-of-alcohol-related-detritus-in-residential-neighbourhoods/>

Foster.J, and Charalambides. L (2016) *The Licensing Act 2003 Its uses and abuses 10 years on*, <http://www.ias.org.uk/What-we-do/IAS-reports/Licensing-Act-2003-Its-uses-and-abuses-10-years-on/Documents.aspx>

Galloway J, Forsyth A, Shewman D, (2007) *Young people's street drinking behaviour: investigating the influence of marketing and subculture*. Glasgow Centre for the Study of Violence: Glasgow Caledonian University.

http://www.sccjr.ac.uk/wp-content/uploads/2008/11/Young_Peoples_Street_Drinking_Behaviour.pdf

Gloucestershire County Council (2013) Understanding Cheltenham, strategic needs analysis team. Gloucestershire County Council.

<https://inform.goucestershire.gov.uk/get>ShowResourceFile.aspx?ResourceID=130>

Gloucestershire Live (2008) Cheltenham police say they will continue to fight underage alcohol sales

<http://www.glocestershirelive.co.uk/cheltenham-police-say-continue-fight-underage-alcohol-sales/story-11927452-detail/story.html>

HM Government (2012) *The Government's Alcohol Strategy*.

<https://www.gov.uk/government/publications/alcohol-strategy>

House of Commons (2005) Anti-social behaviour, fifth report, session 2004-5, Volume 1

<https://publications.parliament.uk/pa/cm200405/cmselect/cmhaaff/80/80.pdf>

Home Office (2010) Selling Alcohol Responsibly Good Practice Examples from the alcohol Retail and Hospitality industries.

<https://www.westsomersetonline.gov.uk/getattachment/Environment/Licensing/Licensing-Act-2003/Mandatory-Licence-Conditions/Selling-Alcohol-Responsibly---Good-Practice-Examples.pdf.aspx>

Home office (2013a) Next steps following consultation on delivering the Governments alcohol strategy, alcohol sales and misuse.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/223773/Alcohol_consultation_response_report_v3.pdf

Home Office (2013b) *Amended guidance issued under s182 of the Licensing Act 2003*.

<https://www.gov.uk/government/collections/amended-guidance-issued-under-section-182-of-the-licensing-act-2003-previous-versions>

Home Office (2016) Modern Crime Prevention Strategy.

<https://www.gov.uk/government/publications/modern-crime-prevention-strategy>

Home Office (2017) Local Alcohol Action Areas will tackle alcohol related harms, alcohol sales and misuse and crime prevention.

<https://www.gov.uk/government/news/local-alcohol-action-areas-will-tackle-alcohol-related-harms>

Institute of Alcohol Studies (2013) Crime and Social impacts of alcohol factsheet.

<http://www.ias.org.uk/uploads/pdf/Factsheets/Crime%20FS%20HM%20May%202013.pdf>

Joseph Rowntree Foundation (2006) Finding-informing change: Alcohol Strategy and the drinks industry; a partnership for prevention.

https://www.jrf.org.uk/file%2F37315%2Fdownload%3Ftoken%3D_AlwWJf%26filetype%3Dfindings&usg=AOvVaw16oiGLfY_Hcq-ncguH0o8t

Local Government Association (2016) Reducing the strength guidance for local councils considering setting up a scheme.

<https://www.local.gov.uk/sites/default/files/documents/reducing-strength-guidance-795.pdf>

Local Government Association (2015) *Tackling the cause and effects of alcohol misuse*.

<https://www.bl.uk/collection-items/tackling-the-causes-and-effects-of-alcohol-misuse>

Mid-Devon (2011) Community Alcohol Partnership, first year activity report. Devon County Council.

http://www.devon.gov.uk/cap_report_first_year_81211.pdf

Office for National Statistics (2011) *2011 Census*

<https://www.ons.gov.uk/census/2011census>

Police.UK (2017) Detailed statistics for Cheltenham Town Centre

<https://www.police.uk/gloucestershire/AB2/crime/stats/>

Portman group (2017) Portman group welcomes Government strategy to tackle alcohol – related crime through partnership with drinks companies and local businesses. Conduit Street London.

<http://www.portmangroup.org.uk/media/news-details/2016/03/23/portman-group-welcomes-government-strategy-to-tackle-alcohol-related-crime-through-partnership-with-drinks-companies-and-local-businesses>

Retail of Alcohol Standards Group (2014a) Guidance for responsible retailing of alcohol in England and Wales.

<http://www.wsta.co.uk/images/Committees/RASG/2013workstreams/guidance/RASGguidanceFINAL.pdf>

Retail of Alcohol Standards Group (2014b) Rising to the Challenge, a report into the application and impact of challenge 25.

<http://www.wsta.co.uk/publications-useful-documents/65-rising-to-the-challenge-a-report-into-the-application-and-impact-of-challenge-25/file>