

Cymorth Cymru consultation response

Welsh Government consultation: Setting the minimum unit price of alcohol

About Cymorth Cymru:

Cymorth Cymru is the umbrella body for providers of homelessness and housing related support services in Wales. Cymorth Cymru acts as the 'voice of the sector', influencing the development and implementation of policy that affects our members and the people they support. We work in partnership with members and other stakeholders to prevent and reduce homelessness and improve the quality of life for people who are marginalised or at risk of housing crisis across Wales. Cymorth has approximately 100 members across Wales, made up of third sector organisations, housing associations and local authorities. Our members work with a wide range of people, including people who are homeless, or at risk of homelessness; families fleeing domestic abuse; people dealing with mental or physical health problems; people with learning disabilities; people with alcohol or drug problems; refugees and people seeking asylum; care leavers and other vulnerable young people; and older people in need of support.

Contact:

Oliver Townsend, Policy and External Affairs
Manager
olivertownsend@cymorthcymru.org.uk

Website: www.cymorthcymru.org.uk Telephone:

02920 553687

Twitter: @CymorthCymru

Cymorth welcomes this opportunity to respond on this issue of setting the minimum pricing for alcohol in Wales. We would like to begin by saying we welcome the public health aims of this legislation and the opportunities it presents for opening dialogue surrounding the harms of alcohol. It adds a further tool to the continued public health campaign against the long-term damage done to individuals, and society, by the misuse of alcohol.

We appreciate that the Welsh Government has previously given opportunity through consultation to raise concerns and unintended consequences minimum unit pricing, and that this consultation is focused solely on the price. However, as a membership organisation which represents a wide variety of organisations, and has a keen interest in reducing the impact of policy decisions on vulnerable people, we wanted to ensure certain precautions were being taken.

We will not be commenting on the price set by Welsh Government, other than to make the general point that, perhaps unavoidably, the price currently in the consultation would specifically disadvantage individuals who drink cheaper alcohol. We understand that this is largely by design, but there are issues of equity to consider, where wealthier drinkers will be much less disadvantaged than those with lower incomes. There is a balance to be struck here: those on lower incomes are more likely to struggle with poor health outcomes, and so stand to gain the most from the public health benefits of this policy decision, but unintended consequences need to be managed carefully.

To be as concise as possible please see below five key points in bold with short explanatory paragraphs beneath.

Rent arrears & evictions

Our wider membership have close relationships with the people they support and have raised concerns on rent arrears. There is the possibility that some people who are alcohol dependent may prioritise money for alcohol if the price increases, over other essentials such as rent. The increased price of alcohol coupled with the introduction of universal credit may see more people requiring support with budgeting. We recommend Welsh Government keep this in mind when supporting organisations in preparations for implementation.

‘Switching’ following implementation

We appreciate that the Welsh Government is aware of the issue of ‘switching’ and has commissioned research to provide further evidence and knowledge in the area. This point from ourselves is to highlight our support for additional research, and advocate that any results are shared with the wider sector so all stakeholders can use the information to better prepare for implementation.

Cross border smuggling and Exploitation

In recent years ‘county lines’ has been an increasing issue for our membership who support people in vulnerable and sometimes dangerous situations. Our knowledge in this area and

evidence from members has led us to have concerns that county lines activity may easily translate to similar activity concerning alcohol once a new minimum unit pricing for alcohol is introduced.

We do not foresee this being an issue which affects the general population.

However as mentioned we do see the potential for people in vulnerable situations being exploited by criminal gangs who deal in cross-border smuggling. It is entirely possible that individuals could either be coerced to act as 'runners' bringing alcohol across borders, or by being sold illegally acquired and potentially dangerous alcohol for lower prices.

Early anecdotal evidence in Scotland has suggested this is not such an issue, but our very real concern is that the Welsh borders are much closer to larger English cities than the Scottish borders, and there is already a challenge with running of drugs from Bristol to South Wales, for example, and Manchester / Liverpool to Wrexham. The pathways exist already for criminal activity, and so Wales remains particularly vulnerable to this, *particularly*, as mentioned above, as those who are on the lowest incomes are most affected by this policy change.

Our recommendation is that Welsh Government and partners work closely throughout implementation with police and organisations on the ground to ensure this is monitored closely and solutions put in place.

Unintended withdrawal and rise in referrals

This is an issue raised by the Third Sector Substance Misuse Network for Wales and echoed by our members who work with people who are alcohol dependent. We appreciate and are glad of the news that early indicators from Scotland show limited signs of people entering into unintended withdrawal, and unmanageable rise in need for support services thus far, and hope that this will translate to Wales.

However, there may be less positive reasons why this has *not* occurred which must be considered. For example it may be, as previously stated, that people are prioritising money for alcohol by sacrificing other essentials. Once people begin running out of money that is when we may see a rise in unintended withdrawal and corresponding referrals.

As a result we recommend that Welsh Government encourage providers to prepare for the possibility of an increase in demand for their services and that the people they already support showing signs of unintended withdrawal.

A final consideration with this issue is to ensure as wide a communication of unintended withdrawal and other consequences as possible. Organisations that specialise with alcohol or substance misuse will be aware of the possible unintended consequences of this policy change on the people they support. However, as the representative body for organisations working with a range of vulnerable clients in supported accommodation and / or social housing, it is critical that organisations who support a wider client group have access to high quality information.

These organisations will need information, guidance and support to enable them to support people whose primary need may be mental health, domestic abuse, homelessness, but who may also have specific problems with alcohol.

Psychologically informed approaches

Cymorth Cymru and its membership are advocates, and aim to model the benefits of, psychologically informed approaches. We believe all sectors and models can incorporate psychologically informed approaches to create a more effective experience for all involved.

We recommend that in Welsh Government's communications to services about MUP, that information about acting in a psychologically informed way is provided and that compassion and understanding towards individual circumstances throughout implementation is encouraged.

Conclusion:

We are supportive of the aim to positively impact the public health and wellbeing of people across Wales, through the adoption of a minimum unit price for alcohol. The evidence for the need for this intervention is long, and well, established.

However, as referenced above we have concerns that this could have a disproportionate impact on those on the lowest incomes, and particularly negative impacts could result for those in specific positions or periods of vulnerability, including but not limited to, people who are homeless, or vulnerably housed, people sleeping rough, people with learning disabilities, survivors of domestic abuse, and more. Very real and concerted efforts need to be made to ensure these groups of the most vulnerable people on the margins of society, who are structurally disadvantaged and isolated, are not forgotten about, and that issues that affect them more than other groups are monitored for unforeseen impacts.