

Overexposed and overlooked

Young people's views
on the regulation of
alcohol promotion



the
Tudortrust



Alcohol Concern
Making Sense of Alcohol

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The impact of alcohol marketing on children and young people: The international evidence

International evidence linking children's and young people's exposure to alcohol marketing with consumption is widely acknowledged. A review of evidence concluded that exposure to alcohol marketing reduces the age at which young people start to drink, increases the likelihood that they will drink and increases the amount of alcohol they will consume once they have started to drink¹. The European Union Alcohol and Health Forum found overwhelming evidence that exposure to "alcohol marketing increases the likelihood that adolescents will start to use alcohol and drink more if they are using alcohol"².

Young people in the UK have by far the most positive expectations of alcohol in Europe and are least likely to feel that it might cause them harm³. This may be influenced by their collective cumulative exposure to alcohol marketing. Evidence shows a strong correlation between the amount spent on marketing and consumption by 11-to-15 year-olds⁴. If young people see and hear repeated positive messages about drinking alcohol, then their expectations of alcohol may well begin to reflect the content of such messages.

"Kids look up to sports stars and celebs – they should not advertise alcohol or wear branded clothing, as it encourages underage drinking"

Female, 15 years-old

Introduction

Most experts agree that children and young people under-18 should be protected from alcohol-promotion exposure, although how and to what extent is hotly contested. There is one group whose voice is absent from this debate; young people themselves.

The Alcohol Concern Youth Policy project surveyed the views of over 2300 children and young people under-18 about if, how, and to what extent alcohol promotion should be regulated in England and Wales. The *Alcohol Ads and You* survey was designed by young people for young people; its findings reveal that young people are concerned about alcohol promotion. The majority of young people surveyed want protection that robustly limits young people's exposure, often supporting stronger regulation than currently exists, but not measures that infringe on advertisers reaching adult audiences. Young people surveyed call for greater government involvement in regulatory decision-making, more extensive health warnings and improved access to health information.

"[Alcohol products] should contain shocking images like the image you see on packets of cigarettes, as you do not actually see how ill people can get from alcohol"

Female, 15 years-old

Crucially, the survey findings suggest that significant numbers of young people fail to recognise non-media alcohol promotion such as festival and football-shirt sponsorship, and advertising on social networking sites that is attracting growing industry investment. Young people can often be adept at criticising advertising, but if they do not recognise alcohol promotion for what it is they will be less able to judge it as a piece of marketing. This needs to be reflected in the regulatory code that is designed to protect young people.

It is estimated that the alcohol industry spends £800 million per year on marketing in the UK⁵. Research both here and overseas points to a link between exposure to alcohol marketing at a young age with the earlier onset of starting to drink and increased levels of consumption⁶. England and Wales record some of the highest binge-drinking levels in Europe, particularly among those aged under-18.⁷ Alcohol consumption by 11-15-year-olds doubled between 1990 and 2007 with a corresponding increase of 32% in alcohol-related hospital admissions for under-18s in England between 2002 and 2007⁸. In the last three years alone, consumption by young girls aged 11-13 years has increased from 4 to 7 units per week⁹.

Findings from this survey and wider research suggest that children and young people in England and Wales are highly aware of alcohol marketing. If the spirit of the regulatory code is founded in protecting young people from alcohol-promotion exposure, then the government needs to ask if current regulations are fit for purpose. Based on the survey findings it may be necessary to explore how the regulatory framework can be strengthened in order to protect young people to the extent that they themselves expect.



Methodology

In early 2011 the Youth Policy project launched the *Alcohol Ads and You* research strategy. *The Voice*, a youth advisory panel comprising a group of eight 13-18 year-olds were involved in the design and drafting of the survey. This group of young people fully reviewed and reworked the questions to make them more relevant to a youth audience. The draft was reduced to one page and the term 'ads' was inserted by *The Voice* to encompass 'marketing', 'advertising' and 'promotion' as the group felt that these terms meant the same thing to most young people. The final survey was approved by members of the group and launched in March 2011.

"The health warnings should be as long as the advert"

Female, 14 years-old

Development and design of the *Alcohol Ads and You* survey aimed to empower *The Voice* to gauge the views of other young people aged under-18, and to create a vehicle for teachers, youth workers and parents to raise the subject of alcohol promotion in order to facilitate discussion and share healthy-living messages. The Youth Policy project specifically chose not to detail the existing alcohol-promotion regulations to *The Voice* or to survey participants, wanting to capture their expectations of alcohol-promotion regulation based on what young people see and hear around them.

The survey was disseminated via a targeted email (to youth groups, schools, local-authority youth services and interested individuals) and published on the Alcohol Concern website and on Twitter. Participants were able to complete it online at Survey Monkey, in an interactive PDF or in hardcopy. Respondents were asked to self-certify their age, with safe guarding measures in place to identify and remove any invalid samples from the final data-sets. Hardcopies were returned in large quantities directly from schools and youth groups, whilst electronic surveys were received individually from young people. The results of the online and hardcopy surveys were then compared with little variation between data sets.

Three variable relationships were determined at the start of the survey: *age*, *gender* and *point of last exposure*. In analysis, age was further broken down to reflect young people's transition through several stages of experience and understanding of alcohol. The following phases were defined: 11-years-and-under; 12-13 years-old; 14-15 years-old; and 16-17 years-old.

"Teach children earlier in school to make the right choices"

Male, 13 years-old

The survey questions were designed to cover three domains of interest relevant to the promotion and regulation of alcohol in England and Wales: *traditional media channels* (Q2-5); *sponsorship and new media channels* (Q6, 7 and 11); and *information and regulatory oversight* (Q8-10). Table 1 summarises the demographic characteristics of the 2362 participants. Slightly more males (51%) than females (49%) completed the survey, with a mean age of 14-and-a-half years*.



Tables of survey variables

Table 1: Characteristics of survey participants in England and Wales March-May 2011

Age	Number	Percentage of full sample
11-and-under	139	6%
12-13	533	23%
14-15	903	38%
16-17	787	33%
Gender	Number	Percentage of full sample
Male	1208	51%
Female	1154	49%
Total	2362	100%

Table 2: Point of last exposure to alcohol marketing

Point of last exposure	Number	Percentage of full sample
TV	1697	71.8%
Radio	68	2.8%
Cinema	41	1.7%
Billboard/Poster	225	9.9%
Internet	115	4.8%
Sporting or cultural event	68	2.8%
Other	86	3.6%
Blank	62	2.6%

"After a certain time [the watershed] use images of what [alcohol] can do to your body over time"

Female, 14 years-old

"Both my parents are alcoholics. You should put them in an ad so nobody would drink."

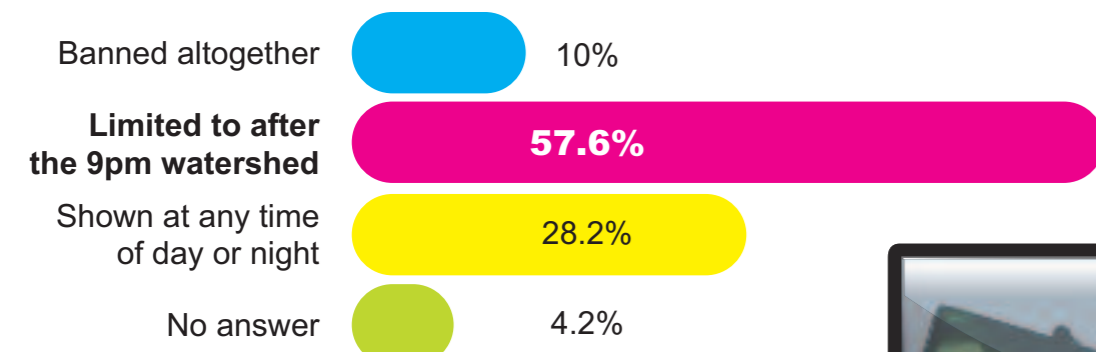
Female, 15 years-old

"Alcohol warnings should be visible around schools"

Male, 15 years-old

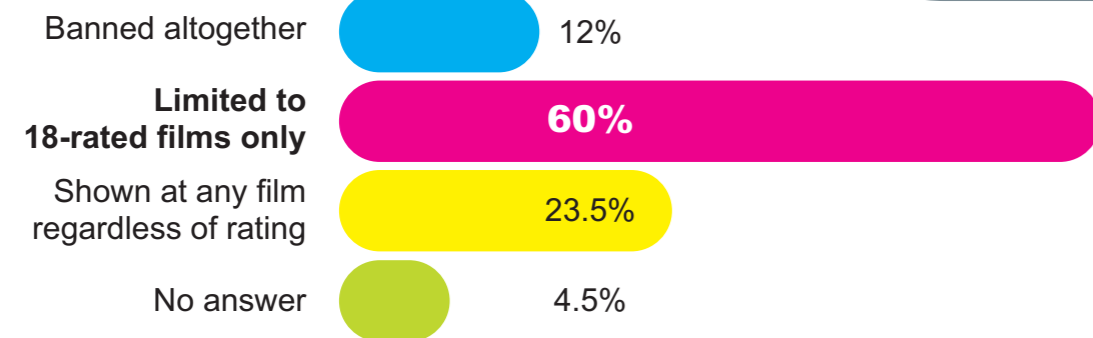
YOUNG PEOPLE'S VIEWS ON THE REGULATION OF ALCOHOL PROMOTION

Alcohol ads on TV should be:

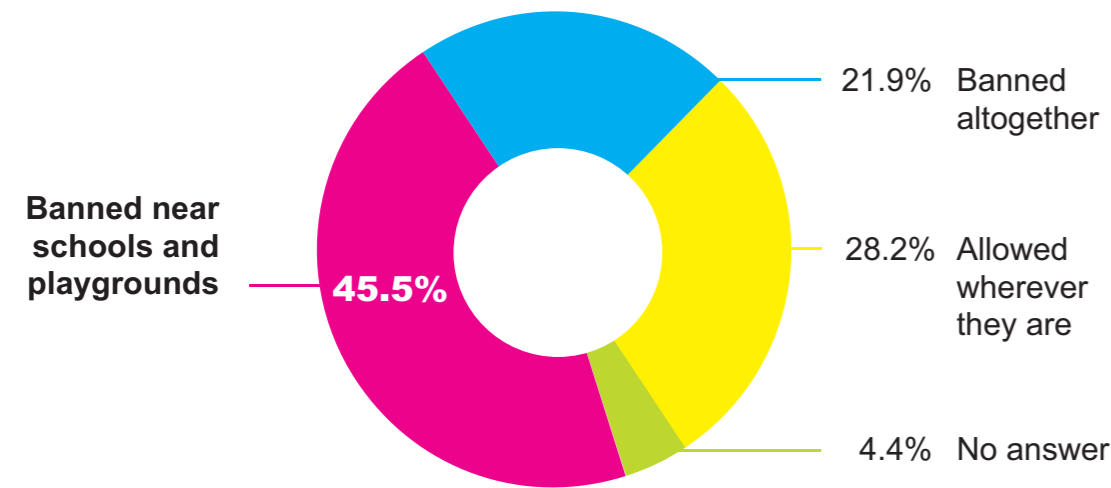


63.1% of females would like to see alcohol ads limited to after the watershed

Alcohol ads in the cinema should be:

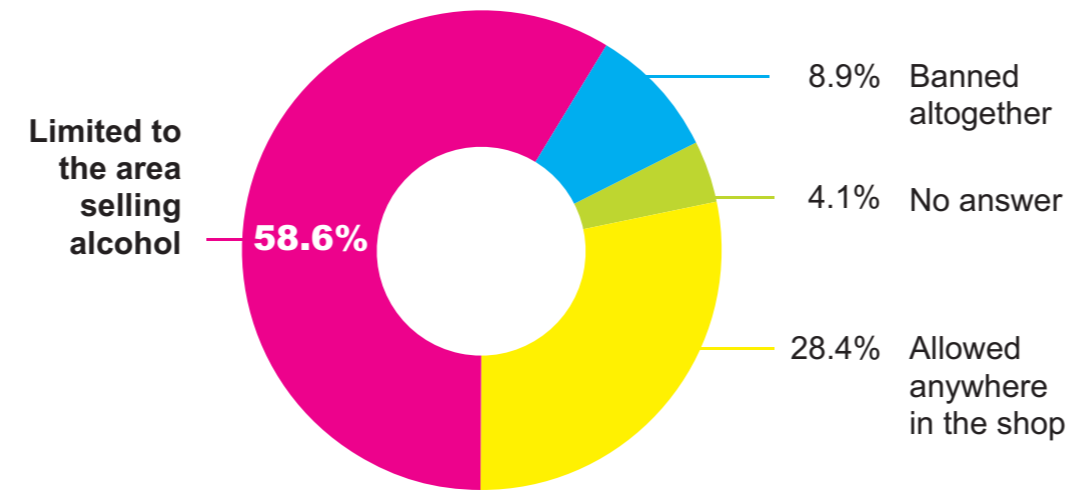


Alcohol ads on public billboards and posters should be:



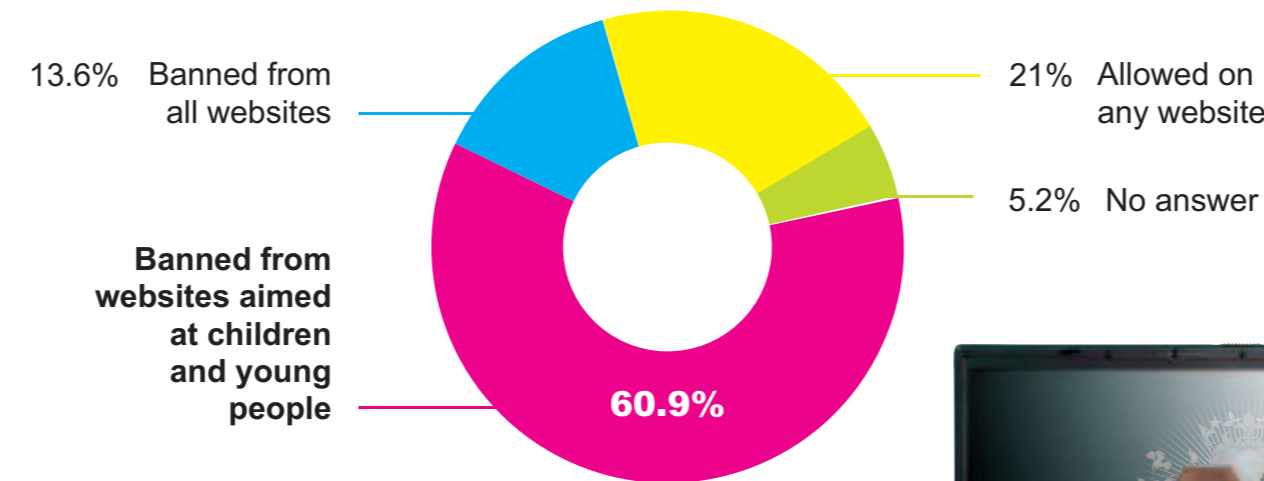
34.5% of 11-and-unders would like to see a full ban.

Alcohol ads in supermarkets and off-licences should be:

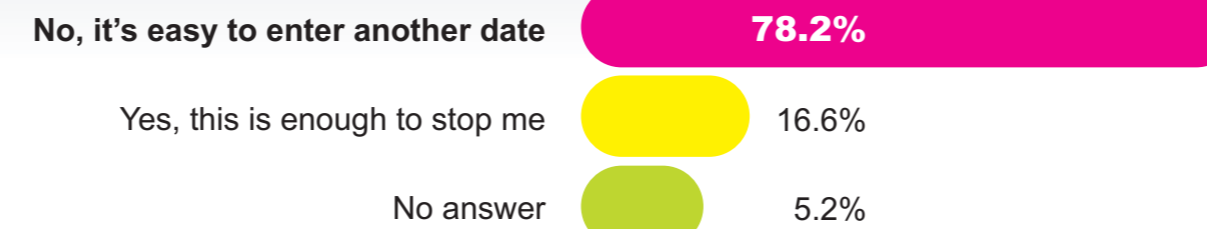


64.6% of females and **66.2%** of 11-and-unders would like to see in-store alcohol promotion limited only to the area selling alcohol.

Alcohol ads on the Internet should be:



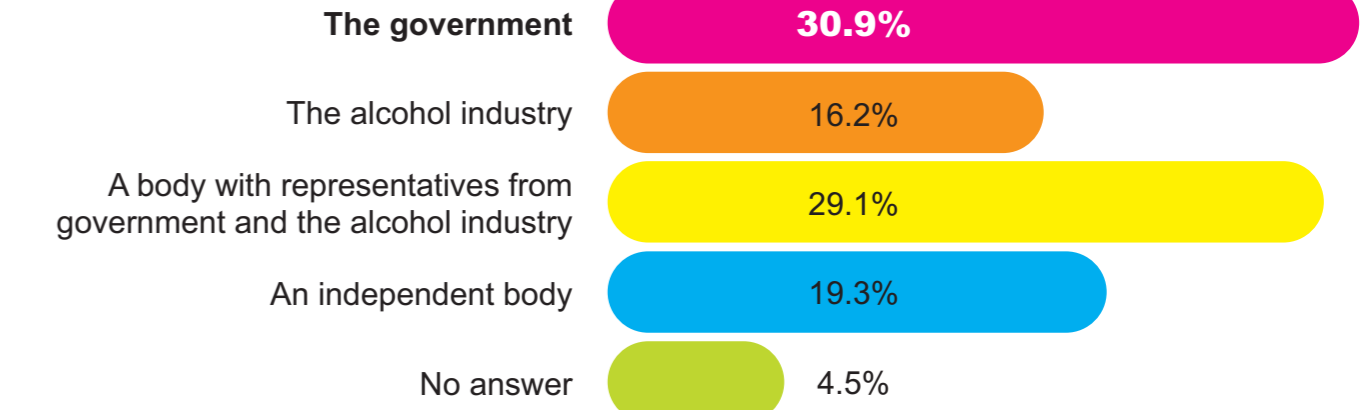
Alcohol websites ask you to enter a date of birth to prove you are not under-18. Is this enough to stop under-18s from visiting these sites.



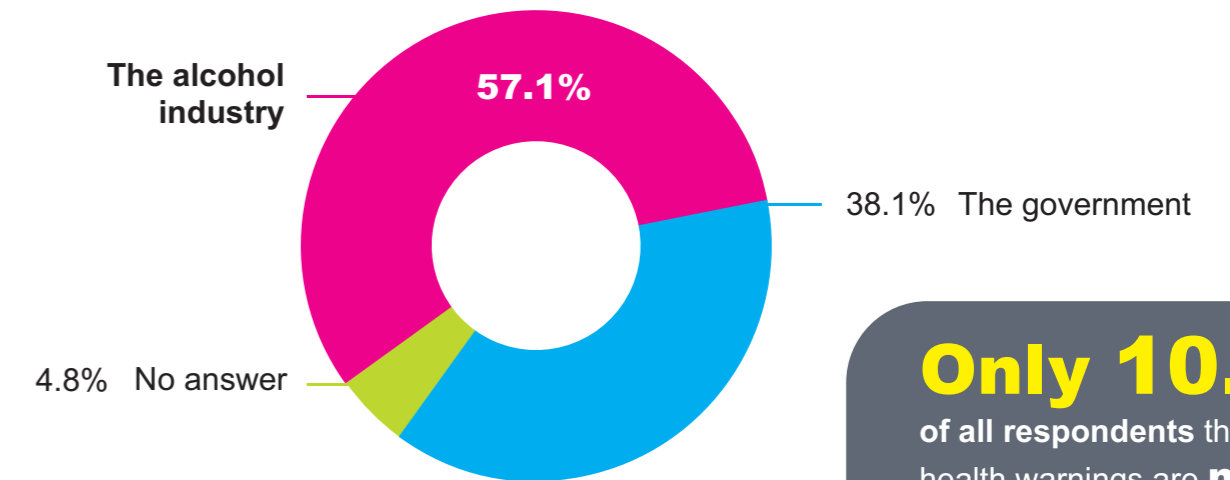
Recognising alcohol advertising



Who should be responsible for deciding what alcohol ads can and can't say:



Who should be responsible for paying for health messages about alcohol:



Only 10.1% of all respondents think that health warnings are **not** necessary.

70.2% of all females and **76.2%** of 11-and-unders would like to see clear labels with information about health risks on all bottles and cans.

69.8% of 11-and-unders support a short health warning at the end of each TV, radio and cinema advert.

Key findings

From analysis of the survey results, five key findings emerge based on young people's experiences and expectations of alcohol-promotion regulation:

1 Young people surveyed support stronger regulation of alcohol advertising on traditional media channels such as television, cinema and in-store promotion.

The clear and consistent majority of young people surveyed support moderate regulatory measures that robustly limit the exposure of under-18s to alcohol advertising, but that do not infringe on advertisers' access to adult audiences. For example, a majority of young people support a pre-watershed television ban on alcohol advertising and restricting advertising in cinemas to 18-certificate films. We did not ask young people to judge the existing regulations, in part because of the complexity of many of the current arrangements. However, the significant majority of young people surveyed support regulation that is more robust than that which currently exists.

- on television, by far the most frequently cited medium of last exposure, 57.6% of young people surveyed want alcohol advertising limited to after the watershed (9pm) and a further 10% support a total ban
- in cinemas, 60% want alcohol promotion restricted to 18-certificate films only; a further 12% want adverts banned entirely, indicating a strong resistance to this form of marketing
- 58.6% want alcohol promotion limited to the areas of supermarkets and off-licences selling alcohol, suggesting concern with the existing prevalence of alcohol promotion in retail outlets.

2 A significant proportion of young people surveyed do not recognise 'below the line' alcohol-marketing strategies such as festival and sports sponsorship or alcohol marketing via social networking sites online.

The survey findings suggest that large numbers of young people regularly do not recognise alcohol marketing when it is channelled through

sponsorship, product merchandise or via social networking sites – non-media channels known as 'below the line' promotion. Approximately half of young people do not consider alcohol promotion via such mediums as 'marketing', a finding which is consistent across both genders and all ages. This is of particular concern because investment in such strategies is increasing and is central to the alcohol industry's efforts to associate with youth culture. Further research is required to establish precisely the extent of and reasons for this lack of recognition.

- 51.4% do not recognise official alcohol product Facebook groups as marketing
- 51.7% do not recognise alcohol branded events, such as festivals, as marketing
- 49.6% do not recognise alcohol sponsorship of football team shirts as marketing
- 49% do not recognise alcohol product merchandise as marketing.

3 Young people overwhelmingly reject age-affirmation pages as an adequate mechanism for preventing those aged under-18 accessing alcohol-brand websites.

Young people surveyed communicate a clear and unequivocal message about the limitations of existing industry-standard mechanisms for preventing underage access to alcohol-brand websites. Less than 2 in 10 young people surveyed consider age-affirmation pages adequate in preventing under-18s from accessing such sites.

- 78.2% consider existing industry-standard age-affirmation mechanisms to be inadequate in preventing underage access to alcohol-brand websites.

4 Age and gender affect one's views on the regulation of alcohol promotion and the desire for information.

In answer to all relevant questions in the survey, a clear majority of children and young people support the moderate regulatory option: robustly protecting under-18s from exposure but not

significantly impacting adult exposure. This majority is broadly consistent across the age spectrum. Within minority support for stronger or weaker regulation, an interesting trend emerges. The survey findings show a polarisation of views as young people grow older – moving from support for stronger regulation towards support for weaker regulation. Throughout the survey, children aged 11-and-under are the greatest supporters of the strongest regulation, i.e. a complete advertising ban. Older respondents are the greatest supporters of weaker regulation; 16-17 year-olds are more likely than other ages to support removing advertising regulation altogether. However, the majority consistently support regulation that protects young people from exposure, often to a greater extent than currently exists, but which allows alcohol companies to reach the adult market.

- 34.5% of 11-and-unders want alcohol advertising banned from billboards and posters in all public places, compared with just over 19% of 16-17 year-olds
- 25.2% of 11-and-unders want alcohol advertising banned from cinema screens, compared with only 9.3% of 16-17 year-olds
- 26.7% of 11-and-unders want alcohol advertising banned from television altogether, compared with only 7% of 16-17 year-olds. 33.5% of 16-17 year-olds support alcohol advertising on television being shown at any time of the day, compared with only 15.1% of 11-and-unders. However, almost 57% of 11-and-unders and 56% of 16-17 year-olds support limiting alcohol advertising on television to after the watershed (9pm). A similar pattern of majority support for a limited ban – albeit largely more robust than regulation that currently exists – is seen across the age spectrum for all mediums of alcohol promotion.

Young women are consistently more supportive than young men of more extensive health warnings and want improved access to health information about the risks of alcohol across different mediums. Younger survey participants are also more supportive of health warnings and keener to receive health information than older survey participants.

- Over 70% of all females compared with just under 54% of all males, and over 76% of 11-and-unders would like to see clear labels with information about health risks on all bottles and cans
- Under 5% of all females believe that there is no need for health warnings at all; of all males this figure is 15.2%
- Almost 70% of 11-and-unders support short health warnings at the end of TV, radio and cinema adverts, compared with 45.1% of 16-17 year-olds.

5 Most young people believe that government should have greater oversight of alcohol-promotion regulation, and that the alcohol industry should pay for health messages about alcohol.

A significant majority of young people support a sole or shared role for government in the formulation of alcohol-promotion regulation. The survey did not ask young people their views on the existing self-regulatory model that operates in the UK. However, young people surveyed clearly expect greater government oversight of regulation than currently exists. Less than 1 in 5 respondents think that an independent body with no government involvement should be responsible for deciding what alcohol advertising can and cannot say – effectively the model in operation today. Only 16.2% believe this should be left solely to the alcohol industry to decide. Yet, in contrast, a clear majority believe that the alcohol industry should be solely responsible for paying for health messages.

- Almost 31% believe government should be solely responsible for determining alcohol-promotion regulation and a further 29.1% believe government should be involved with other bodies in making such decisions. Combined, 60% in total believe government should have a greater role than it currently plays in shaping what alcohol marketing can and cannot say
- Over 57% believe that the alcohol industry should be responsible for paying for health messages about alcohol.

Conclusion

Today's young people grow up in a highly active media environment – one in which television and cinema promotions, billboards, shop displays, sporting and cultural event sponsorship, brand ambassadors, Internet campaigns and social networking sites are routinely employed to promote positive drinking messages. The World Health Organisation (WHO) stipulates that “all children and adolescents have the right to grow up in an environment protected from the negative consequences of alcohol consumption and, to the extent possible, from the promotion of alcoholic beverages”¹⁰. Ultimately government has the power to decide how and to what extent we choose to shield children and young people from exposure to alcohol marketing across these different mediums. The evidence suggests that these policies will help shape how young people drink once they have entered adulthood, and therefore how society more widely consumes and relates to alcohol. The survey findings suggest that the majority of young people accept the principle of alcohol promotion – there is little appetite for a complete ban – but that they want regulation which robustly protects children and young people. In many instances this requires stronger regulation than currently exists.

The existing regulation of television advertising is overseen by the Advertising Standards Authority. It uses a complicated formula to assess whether the predicted proportion of children in the audience of a television programme would classify that programme as unsuitable to show alcohol advertisements. Research shows that this formula is wholly inadequate and has allowed millions of children to be exposed to alcohol advertising on television – for example, over 1.6 million children and young people aged 4-15 years-old were exposed to alcohol advertising during a single game of televised football at the last World Cup¹¹. Young people surveyed – over 70% of whom identified television as the last place they saw alcohol advertising – support a clear watershed ban; regulation that is likely to be more robust than that which currently exists. Alcohol advertising for non-broadcast media,

such as cinema and outdoor advertising, can only be shown if the proportion of children in the audience is less than 25%. However, research on one single film, *Batman Returns* (certificate 15), showed that this failed to prevent nine alcohol adverts from being shown to almost 1.4 million children across cinemas in 2008¹². Young people appear to support a restriction on alcohol advertising in cinemas to films with an 18-certificate. This is the only way to ensure an adult audience.

There is a growing trend away from traditional forms of direct advertising towards ‘below the line’ activities such as sponsorship, competitions, merchandise, special promotions, online media and via mobile phones. It is of concern that large numbers of young people appear not to recognise or be able to identify ‘below the line’ advertising strategies, as recognising marketing for what it is must contribute toward resilience. For example, evidence shows that young people who own alcohol brand merchandise – such as T-shirts and baseball caps – are more than 1.5 times more likely to try drinking alcohol than those who do not¹³. Certain alcohol brands clearly target aspects of youth culture, such as festival sponsorship (e.g. The ‘Carling Weekender’ festival), allowing the company to build a brand relationship that they hope will translate into lifelong sales. The effectiveness of this type of promotion is reflected by growing industry investment. The area of digital alcohol promotion in particular has grown exponentially over recent years. Given the huge numbers of young people using social networking sites, it is of concern that such a high proportion of those surveyed do not recognise official branded alcohol pages as ‘formal’ marketing. Furthermore, young people clearly tell us that they view age-affirmation pages as ineffective in preventing under-18s from accessing alcohol-brand websites. Further investigation is required to find more effective ways of restricting access.

Young women and younger survey participants in particular are calling for more extensive health warnings attached to alcohol advertising and wider access to health information. This is

poignant, given the recent rise in incidents of alcohol-harm in young women – 28% more young women than young men were admitted to hospital via Accident and Emergency for alcohol specific conditions between 2004 and 2009¹⁴. Currently the industry spends £153 encouraging drinking per £1 contributed to Drinkaware to promote sensible drinking behaviour. There must be greater balance if we expect young people to take on board safe drinking messages, and the young people surveyed believe it must be paid for by those who profit – the alcohol industry.

In this survey we did not ask young people directly their views on self-regulation of alcohol promotion. However, a clear majority of young people support greater government oversight of alcohol-promotion regulation than currently exists. Allowing the alcohol and advertising industries to evaluate, interpret and enforce standards – juggling public and private interests – does not appear to produce a regulatory framework in line with what young people and indeed Alcohol Concern view as responsible or effective. The WHO identifies the strongest model for limiting alcohol-related

harm as one in which public health policies concerning alcohol are formulated by public health interests without interference from commercial interests¹⁵.

Although the evidence suggests that a total ban on alcohol advertising would significantly reduce youth drinking¹⁶, the majority of young people surveyed are not supportive of such strong regulatory intervention. Young people consistently support regulation that robustly protects children and young people, often to a greater extent than the regulation that currently exists, whilst not infringing on advertisers' efforts to reach adult audiences. If one of the true aims of alcohol-promotion regulation is to protect children and young people from cumulative exposure, then government needs to ask itself whether current regulation is fit for purpose. The challenge is for government, the alcohol industry, health advocates and regulatory bodies to include young people's voices in regulatory decision-making and to develop a framework of protection from alcohol-promotion exposure that more accurately reflects what young people themselves deserve and expect.

Footnotes and references

* Children aged 11-years-and-under calculated as 11-years-old

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- 11 Alcohol Concern Briefing Report (2010) *Overexposed Alcohol Marketing during the World Cup 2010*
- 12 See Alcohol Concern response to the Code Review Consultation for the Committee of Advertising Practice, July 2009
- 13 McClure, A.C. et al (2006) *Ownership of Alcohol-Branded Merchandise and Initiation of Teen Drinking*, American Journal of Preventative Medicine, 30 (4), pp.277-283
- 14 Hospital Episodes Statistics – gender analysis (unpublished data)
- 15 The World Health Organisation (WHO) (2006) *Framework for Alcohol Policy in the WHO European Region*, online, available from: www.euro.who.int/_data/assets/pdf_file/0007/79396/E88335.pdf [accessed 17 June 2011]
- 16 Saffer, H. and Dhaval, D. (2006) *Alcohol Advertising and Alcohol Consumption by Adolescents*, Health Economic, 15 (6), pp.617-637

Recommendations

Based on the views of young people surveyed, this report makes the following recommendations:

- A clear pre-watershed ban should be imposed on television alcohol advertising.
- Alcohol advertising in cinemas should be restricted to films with an 18-certificate.
- In-store alcohol promotion should be restricted to the areas selling alcohol.
- Age-affirmation pages should be made more stringent to prevent the access of under-18s to alcohol-brand websites.
- There should be greater prominence of health warnings on alcohol advertising, and wider access to health information. This should be paid for by the alcohol industry.
- There should be greater government oversight of, and involvement in, the regulation of alcohol promotion.

Alcohol Concern believes that:

- With children as young as 11 regularly exposed to alcohol promotion, government needs to consider whether the spirit as well as the letter of the existing regulatory codes is being adhered to. If government is serious about protecting children and young people from cumulative exposure, then it needs a regulatory framework that is fit for purpose – as recommended by the National Institute for Health and Clinical Excellence (NICE). Government should commission a review of the efficacy of existing alcohol-promotion regulation. Where existing regulation is failing to protect children and young people from exposure, it needs to be strengthened. This may require a review of the entire model of regulation to ensure that it is as robust as is necessary.
- Young people's vision of a regulatory framework that protects children and young people from exposure whilst allowing alcohol advertising to reach adult audiences is currently missing from the debate. Mechanisms of consultation should be established so that the views of young people are systematically fed into alcohol promotion regulatory decision-making.



Overexposed and overlooked

Young people's views on the regulation of alcohol promotion

The Alcohol Concern Youth Policy project surveyed the views of over 2300 children and young people under-18 about alcohol-promotion regulation in England and Wales. Designed by young people for young people, the survey findings reveal that the majority of young people, whilst not wanting to stop advertisers reaching adult audiences, are supportive of robust regulation that protects under-18s from exposure. In many instances this requires stronger regulation than currently exists. The challenge is for government to systematically include young people's voices in regulatory decision-making and to develop a framework of protection from exposure to alcohol promotion that more accurately reflects what young people themselves deserve and expect.

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Alcohol Concern, 64 Leman Street, London E1 8EU

Tel: 020 7264 0510, Fax: 020 7488 9213

Email: contact@alcoholconcern.org.uk

Website: www.alcoholconcern.org.uk



Alcohol Concern
Making Sense of Alcohol