

**Home Office Call for Evidence:
Airside Alcohol Licensing at International Airports in England and Wales**

**Submission from the Portman Group on behalf of the
Local Alcohol Partnerships Group**

Introduction

The Portman Group is the social responsibility body for UK producers of alcoholic drinks. Our role is to:

- Encourage and challenge the industry to promote its products responsibly, mainly through the operation of the Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks and the Alcohol Sponsorship Code;
- Lead on best practice in alcohol corporate social responsibility through the Local Alcohol Partnerships Group and the actions of members companies.

Other industry organisations will be better placed to take a view on the potential application of the Licensing Act 2005 to international airports and any ports and hoverports in England and Wales. This is not our particular area of expertise. However, we believe that there is a positive role for existing best practice in ensuring that the provision and sale of alcoholic drinks airside is carried out in line with the high standards of responsibility that apply elsewhere in the country, regardless of whether it is decided to introduce a licensing regime.

The Portman Group champions best practice in alcohol marketing through the industry Code of Practice on Naming and Packaging (the “Code”). The Code has been in operation since 1996 and is designed to ensure that alcohol marketing is responsible. The Code sits alongside the Portman Group’s Alcohol Sponsorship Code; in January 2014, the Portman Group launched the first ever UK-wide Sponsorship Code, which commits producers to promote responsible drinking and/or support diversionary activities as part of their sponsorship agreement.

The Code is administered by an Independent Complaints Panel (“Panel”). The Panel is currently chaired by Jenny Watson CBE. The Panel’s decisions are published on our website and in an annual Code report. The Code has an open and accessible complaints system allowing anyone to make a complaint against a product or promotion that they consider is in breach of the Code. Complaints are ruled on by the Independent Complaints Panel. If a complaint is upheld and a product or promotion is found in breach of the Code, the producer is asked to take remedial action. Retailers, both on and off-trade, play a vital role in ensuring that irresponsible products/promotions are removed from the market.

The Code is regularly reviewed to ensure it remains fit-for-purpose. The Code has just undergone a comprehensive review following a full public consultation and we expect to publish the sixth edition of the Code in March 2019.

To assist companies in complying with the Code, we offer a free Advisory Service. Companies can approach the Advisory Service for confidential guidance in advance of launching a product. Portman Group staff, who provide the Advisory Service, will give their opinion on whether the proposed product or activity raises any potential problem under the Code. We also offer free online and face-to-face training for both the industry and its agencies.

The Portman Group also facilitates the **Local Alcohol Partnerships Group (LAPG)**, which enables collaboration between a range of industry local partnership schemes to maximise their impact on reducing alcohol related harm in local communities and the night time economy. These include Pubwatch, Best Bar None (BBN), Drinkaware Crew, the Proof of Age Standards Scheme (PASS), Purple Flag and Community Alcohol Partnerships (CAP), which work alongside Street Pastors in town and city centres. LAPG is supported by a number of key trade bodies (Association of Convenience Stores, Association of Town and City Centre Management, British Beer and Pub Association, National Association of Cider Makers, Scotch Whisky Association, Wine and Spirits Trade Association, UK Hospitality).

LAPG works with both national and local partners to promote and improve communications between the stakeholders in the night time economy (eg. venues, door-staff, street pastors, street marshals, taxi marshals, police and local authorities), and drive up standards of management in venues and public spaces, taking into account differing approaches and needs in different locations.

The Portman Group co-ordinates a range of activities on behalf of the group, including events and local projects, and provides a central point of contact for local partners looking for support to tackle alcohol related issues in their area. In addition to the schemes, the drinks industry also operates national ID policies such as Challenge 21 and Challenge 25, supported by the Proof of Age Standards Scheme (PASS), which specifically tackle underage drinking and prevent underage sales.

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We are pleased to take this opportunity to respond to specific questions in Sections One and Two of the consultation as follows:

Section One: the scale of the problem of drunk and disruptive airline passengers in England and Wales

Question 5

What other factors, if any, contribute to the problem of drunk and disruptive passengers (e.g. “preloading” landside, in-flight alcohol sales, flight delays, affordability etc.)

We are concerned about the provision of alcohol in executive lounges. Our view is that this should **always** be supervised by a dedicated member(s) of staff. Customers should not be able to serve themselves without robust checks. We feel that current practice in this respect is not a responsible approach to the supply of alcoholic drinks, and contributes to the risk of some passengers drinking too much and under 18s being able to access alcohol.

Section Two: the effectiveness and limitations of the current arrangements to tackle the problem of drunk and disruptive airline passengers in England and Wales

Question 11

How effective is the use of existing statutory and any other instruments, including industry partnerships, in promoting responsible alcohol sales and tackling the problem of drunk and disruptive passengers at international airports in England and Wales?

We believe that there is more that could be done to take a stronger partnership approach to ensure the responsible provision and sale of alcohol at international airports.

The local alcohol partnership schemes work well in the night-time economy, alongside the existing licensing regime, and there is potential to replicate a similar, co-ordinated partnership approach within airports which would not necessarily rely on the introduction of a legal framework for licensing.

The alcohol industry has been committed to tackling crime and disorder and underage sales for many years. Based at the heart of local communities and an important economic driver for many towns and cities, it has worked hard to raise standards in licensed premises and improve the local social environment for the benefit of the community as a whole. Over the years, the industry has developed and funded various partnership approaches with local authorities and police forces to great effect.

In the absence of a licensing regime airside, the following schemes and initiatives could have a real impact on managing alcohol-related issues, and provide an excellent starting point for closer partnership working within airports to tackle alcohol-related issues:

- (a) **Pubwatch** is an effective network of licensees working together to tackle crime, disorder and anti-social behaviour in towns, cities and local communities. It is a long-established initiative run by licensees and supported by the Police. The scheme works by bringing together licensees, enabling them to take action against individuals through collective banning from Pubwatch member premises; provide an early warning system; developing good working relationships between licensees and other partners (e.g. the police, local authorities);
- (b) **Best Bar None** is an accreditation scheme which drives up management standards in pubs and nightclubs. The scheme is endorsed by the Home Office, and aims to improve standards in local night-time economies by promoting management best practice in licensed premises; reducing alcohol related crime and disorder; building positive relationships between the licensed trade, the police, local authorities and private sector.

We understand that following discussions between Best Bar None and the Manchester Airport Group (MAG), which operates three airports (Manchester, Stansted and the East Midlands), it has been agreed in principle to run a pilot scheme beginning in March/April 2019. A similar pilot has previously been developed at Edinburgh Airport. A set of standards criteria has been produced specifically for airports, with input received from airport retailers at Gatwick and Manchester airports, the Airport Police in Manchester, and the Scottish Business Resilience Centre (including the Head of Counter Terrorism at SBRC). Following the completion of the pilot, this will be available as a UK wide model for all airports.

- (c) **Challenge 21 and Challenge 25** are aimed at preventing young people gaining access to age restricted products including cigarettes and alcoholic drinks.

http://www.pass-scheme.org.uk/wp-content/uploads/2014/06/2014_Challenge-21-cropped.pdf

http://www.pass-scheme.org.uk/wp-content/uploads/2014/06/FINAL_c25-poster-enga-1_WSTA.pdf

Customers attempting to buy age-restricted products are asked to prove their age if in the retailer's opinion they look under 21 or 25, even though the minimum age to buy alcohol and cigarettes in the UK is 18. These initiatives can be further supported by staff training, posters, badges etc, often within the context of a Pubwatch or Best Bar None scheme.

(d) A **Not Serving Drunks** poster campaign has been developed by the British Beer and Pub Association, working alongside Drinkaware, National Pubwatch and Best Bar None, to raise awareness of the laws on buying alcohol for a drunk person, or knowingly selling alcohol to a drunk person. The posters can be viewed here: <https://beerandpub.com/campaigns/the-law-on-serving-drunks/>

In the absence of a legal regime airside, these materials could potentially be adapted to convey the message that customers who are drunk will not be served.

(e) Drinkaware has designed **Alcohol Vulnerability Awareness Training** for in-venue and on street staff, and has partnered with Network Rail to deliver vulnerability training for customer service staff and station managers to support customers who may become vulnerable in station environments as a result of excess drinking.

Question 12

To what extent is training provided to, and competence assessed of, airport and airline staff on the responsible sale of alcohol, managing drunk and disruptive passengers, and exercising their statutory or other powers?

We would take this opportunity to highlight the availability of useful training films available from National Pubwatch to support staff dealing with these issues in a pub environment, including “Can’t Get Served” and “Conflict Management”. These are available on the National Pubwatch YouTube Channel (<https://www.youtube.com/channel/UCs3-ezOef7I360UiheYGq8A/videos>).

Guidance is also available from the Retail of Alcohol Standards Group on Responsible Retailing and Proxy Purchasing at <http://rasg.org.uk/about-rasg/#top>.

A range of qualifications for licensed hospitality is available from the BII Awarding Body (<https://www.biiab.org/qualifications/>).

The Portman Group developed Sampling Guidelines for producers to share with their sampling teams. It sets out, amongst other things, how to carry out responsible sampling activity, what responsibility messaging should be visible, size and number of serves and how to age-check consumers. More information on this can be found at www.portmangroup.org.uk.

We hope that our comments will prove helpful as part of this Call for Evidence. We would be pleased to discuss our response further with you. If it would be helpful, we would be happy to help facilitate a roundtable discussion with interested partners, including airports and airlines, local partnership schemes and trade bodies, to discuss the role of voluntary schemes and initiatives in the management of alcohol-related issues airside.