

Institute of Alcohol Studies (IAS) response to consultation on Review of the RSHE statutory guidance

Summary and recommendations

The current draft guidance does not reference the commercial determinants of health, which are a significant driver of the consumption of unhealthy commodities, including alcohol, tobacco, and food and drinks high in fat, salt and sugar (HFSS). Many of the materials used in schools are provided by organisations with direct links to the alcohol industry. Independent academic research has found that these materials present alcohol and alcohol harm in an industry-friendly way and even disseminate misinformation.

The guidance should:

1. Advise teachers and teaching staff to teach Secondary School students about the commercial determinants of health.
2. Advise teachers and teaching staff to check the provenance of teaching materials to ensure there is no link between the alcohol industry and the organisation that provided the materials.
3. Signpost teachers and teaching staff to materials made by organisations independent of the alcohol industry, including to PHE's 2016 alcohol evidence review.

Commercial determinants of health

The current guidance is very focused on the direct health harms of unhealthy commodities, advising that students leave Secondary School knowing *“the physical and psychological risks associated with alcohol consumption and what constitutes low risk alcohol consumption in adulthood”* as well as *“the physical and psychological consequences of addiction, including alcohol dependency”*. These are of course important areas of knowledge and a good basis for understanding alcohol harm. However, the guidance should be more specific and include the Chief Medical Officers' advice that there is no safe level of alcohol consumption.¹ A more accurate statement would be: *“the harms caused by alcohol use such as cancer and heart disease, the risk of injuries, violence, and mental ill-health, and that the Chief Medical Officers' advise that there is no safe level of alcohol use.”*

These statements also crucially neglect focus on the key external drivers of the consumption of unhealthy commodities, and therefore focus too much on individual responsibility.

The commercial determinants of health refer to the influence of business, industries, and commercial practices on public health. Key components relating to the alcohol industry include: product branding and marketing that appeals to young people, pricing strategies that influence the accessibility and consumption of alcohol, and the lobbying and advocacy of industry – particularly trade groups – in ways that prioritise profits over public health.

Overly focusing on individual harm and not on industry influence leads to responsibility for alcohol harm being seen as solely that of the person drinking. Focusing on individual responsibility is an overt industry tactic used to delay or prevent the introduction of evidence-based policies that would reduce alcohol harm across the UK. At a time of record high alcohol deaths, such policies are critical.

On page 36 in the 'Drugs, alcohol tobacco and vaping' section, we recommend that the guidance includes the following point: *'Pupils should know the key external drivers of the consumption of unhealthy commodities, including alcohol, tobacco, and unhealthy food and drink, focusing on the social and commercial determinants of health.'*

‘Developing a curriculum, choosing resources and working with external agencies’

In the draft guidance section on choosing resources and working with external agencies, there is currently no mention of wariness over the provenance of teaching materials, only a focus on the credentials of external trainers, seeking the views of parents, and materials being appropriate for the age and maturity of pupils.

There is evidence in the UK that the alcohol industry – and organisations funded by the alcohol industry – use teaching materials in schools to frame alcohol and alcohol harm in an industry-friendly way. A 2022 publication found that such materials emphasised personal responsibility and moderate drinking, framing the problem as individual choices, especially among children.ⁱⁱ These materials often blamed peer pressure and bad decisions for youth drinking, rarely mentioning alcohol industry marketing, which is known to have a causal effect on children’s drinking.ⁱⁱⁱ They portrayed alcohol as a normal adult product that children should learn to use responsibly when older. This approach aligns with the alcohol industry’s messages, downplaying harms and using vague terms like “responsible drinking”. The materials did not discuss alcohol marketing, pricing, availability, or its impact on social inequalities.

One example relates to materials provided by Drinkaware – a charity that is almost solely funded by the alcohol industry – with the study stating that the materials include:

“...the advice: “[i]n small doses alcohol can make you relaxed and happy, but too much of it can increase anxiety and stress, rather than reduce it”. This information is to be provided to students by the teacher alongside a presentation slide with the statement “[d]rinking alcohol makes you happy” and a marketing-type image of young adults smiling, having a meal together, and drinking what appears to be wine (Introducing alcohol, secondary level presentation). The deployment of similar positive framings and mixed messages is also commonly identified in alcohol industry CSR materials directed at adults.”

Materials provided by Talk About Trust (which has received funding from Heineken, Diageo, and Pernod Ricard) and Drinkaware taught children specific drinking skills, such as how to pour a standard drink and the different types of alcoholic drinks and how they are made. Talk About Trust remains active in schools. Drinkaware removed their materials from their website after the publication of the independent study, but the extent to which the Drinkaware materials are still possessed by and used in schools is unknown given there was, to our knowledge, no formal re-call of the Drinkaware materials from schools.

To protect children, youth education programs must be free from industry influence and aligned with international standards. The RSHE guidance should advise teachers and teaching staff to check the provenance of teaching materials to ensure there is no link between the alcohol industry and the organisation that provided the materials.

In ‘Annex B Government resources’ the Department for Education should signpost teachers to [Public Health England’s 2016 evidence review on alcohol and alcohol control policies](#). This gives a clear explanation of the issues of industry involvement in public health, including that: *“The delivery of education messages by the alcohol industry has no significant public health effects.”*

ⁱ Department of Health, UK Chief Medical Officers’ Low Risk Drinking Guidelines, 2016.

ⁱⁱ van Schalkwyk, M. C., Petticrew, M., Maani, N., Hawkins, B., Bonell, C., Katikireddi, S. V., & Knai, C. (2022). Distilling the curriculum: an analysis of alcohol industry-funded school-based youth education programmes. *PLoS One*, 17(1), e0259560.

ⁱⁱⁱ Sargent, J. D., & Babor, T. F. (2020). The relationship between exposure to alcohol marketing and underage drinking is causal. *Journal of Studies on Alcohol and Drugs, Supplement*, (s19), 113-124.