



Alcohol Marketing in Scotland – Youth Engagement Project

Final Report (April 2023)

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PRIORITY SEATS

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Children in Scotland would like to thank Darsan, Ewan, Jay, Jess, Noah, Remy, Roderick and Shuman who took part in our online focus group and without whom this project would have not been possible. We would also like to thank the children, young people and organisations that used our engagement pack and shared findings from their discussions.

In addition, Children in Scotland would like to acknowledge the input from Fast Forward and thank staff for their advice and support with the development of the engagement pack.



Introduction

In November 2022, the Scottish Government launched a public consultation on restricting alcohol advertising and promotion in Scotland. To support children and young people to share their views and opinions about the proposals included in the consultation, the Scottish Government commissioned Children in Scotland to deliver engagement work with children and young people aged between 8 and 17 years old.

The project aimed to support children and young people to take part in the consultation in ways that were understandable, accessible and engaging. It aimed to build upon previous alcohol-related youth engagement projects.^{1 2} Children in Scotland carried out direct work with a group of children and young people and supported the wider involvement of children and young people across Scotland through the production and distribution of accessible consultation materials.

This report brings together key findings from our engagement activity.



Context

About the consultation

In setting out its proposals for restricting alcohol advertising, the Scottish Government has expressed concern about the harms caused by high levels of alcohol consumption, such as the high numbers of hospitalisations³ and fatalities⁴ from alcohol-related illnesses every week in Scotland.

The World Health Organisation has set out three “best buys” – three key cost-effective interventions to prevent and alcohol-related harm across society. One intervention is the restriction of alcohol advertising, sponsorship, and promotion.

The Scottish Government’s consideration of alcohol marketing restrictions is one of the ways it is exploring Scotland’s problematic relationship with alcohol. Our engagement activity has concluded at a time when an evaluation of minimum unit pricing has just been published by Public Health Scotland.⁵

¹ Children’s Parliament (2019). *Children’s Parliament investigates: an alcohol-free childhood for Alcohol Focus Scotland*.

² Young Scot (2020). *Preventing Harm - Alcohol Marketing and Young People*.

³ Public Health Scotland - Alcohol related hospital statistics (2020-2021).

⁴ National Records of Scotland (2021). Alcohol-specific deaths.

⁵ Public Health Scotland (2023). Evaluating the impact of alcohol minimum unit pricing (MUP) on alcohol-attributable deaths and hospital admissions in Scotland.

Children and young people and alcohol marketing

The Scottish Government is particularly concerned about the impact of alcohol marketing on key groups – children and young people, heavy drinkers, and people in recovery and their families.

Evidence has highlighted the connection between children and young people seeing alcohol marketing and the effects on their alcohol consumption and attitudes towards drinking.⁶

The consultation document identifies the ways in which children and young people (under the age of 18) are exposed to alcohol marketing. The Scottish Government hopes that marketing restrictions will reduce the appeal that alcohol has for children and young people and reduce the alcohol harms (both in relation to underage drinking and those linked to continuing to drink into adulthood).

When asked why they thought it was important for children and young people to be spoken to about this issue, the focus group told us how young people are those most likely to be affected by the changes made now and *“if it’s changed, it’s our future it will help”*.



Methodology

To ensure we were able to capture the views of a range of children and young people but also explore some of the proposals in depth, Children in Scotland adopted a two-pronged approach to our engagement activity.

This included working with a small focus group of children and young people across five online sessions and developing an engagement pack to support professionals working with and alongside children and young people to speak to them about the topic.

Findings from both elements of our engagement activity have been synthesised and key themes have been identified in relation to the consultation questions.

Children and young people’s focus group

Recruiting children and young people

In November 2022, Children in Scotland launched recruitment for the focus group. We created an accessible information sheet and short promotional film about the project that was shared online via social media, with our wide membership network, and with organisations we have worked with on other projects.

We reached out to a range of organisations working with children and young people to ensure that the opportunity was promoted to different communities and demographics.

⁶ Alcohol Focus Scotland (2022). *Realising our rights: How to protect people from alcohol marketing*.

The final group included eight young people aged 9-17 from four different local authority areas (City of Edinburgh, Fife, Glasgow, Midlothian and Scottish Borders). Despite a wide range of recruitment activity, it was challenging to recruit young people to the project. This is covered in further detail in the 'Limitations' section of this report.

Developing and delivering the engagement sessions

The group met online across five sessions between January and March 2022. Children in Scotland has an established approach to engagement work with children and young people, which has been adapted to an online environment.

The young people developed a 'group agreement' at the start of the project which helped to create a safe, enjoyable and respectful atmosphere for all participants. This was especially important given the potentially sensitive nature of the issues being discussed. Throughout the project, staff helped to foster trusting relationships using icebreakers, discussions and games.

Our aims for these sessions were to:

- Support the children and young people's knowledge of the issues
- Gather the group's views on alcohol marketing proposals.

Overview of engagement sessions

The content of the sessions focused on the topics featured in the consultation document and the meetings were aimed at making these issues accessible, engaging and enjoyable for the young people. Participants were able to share their views in a variety of ways including group discussion, drawings, independent note-taking, online whiteboards, and sharing comments through the chat facility.

This approach gave structure to the sessions and allowed us to cover a wide range of the topics in the consultation. Many topics including attitudes towards drinking, the content of alcohol-related advertisements, and awareness of alcohol brands came up naturally through the course of our discussions.

Session one focused on getting to know each other and introducing the project. We asked the group to come up with their 'group agreement', a set of rules to abide by to ensure that everyone felt comfortable sharing their views during the sessions. To introduce the topic of alcohol advertising to the group, we asked them to draw the places where they have seen alcohol being advertised. We then discussed their drawings and how frequently they had seen alcohol being promoted in these places.

Session two aimed to provide some of the context for the proposed alcohol marketing changes with a true or false quiz about alcohol statistics in Scotland. Staff then provided an overview of what the current rules on alcohol marketing are so the young people could understand these and how they could change. We then asked the group to imagine that they were the First Minister of Scotland for a day and asked what they would change about alcohol marketing. We asked them to think about: which groups would benefit from more restrictions and who might be negatively impacted by changes.

Session three focused on shops, public spaces, sports and events. To introduce how alcohol is promoted in shops, we had a 'Spot the difference' activity between pictures of typical supermarkets in Scotland and Ireland (where these restrictions have been put

in place). We then discussed alcohol advertising in public spaces and had a thumbs up/thumbs down activity during which the group could agree or disagree with proposed changes to how alcohol is advertised.

Media-related alcohol advertising was the focus for **session four** and we began with a general discussion of what the group understood media to mean. We then used Jamboard (an online interactive whiteboard tool) to discuss examples of alcohol being advertised online and which of these young people are likely to see and likely to find persuasive. Following this, the group enjoyed a Mentimeter online quiz about television, radio and cinema statistics in Scotland to support discussions about alcohol advertising restrictions in these areas.

We discussed printed media with the group in **session five** and discussed whether alcohol advertisements featured in different types of printed media are likely to be seen by and be persuasive to children and young people. We concluded the project by asking the group what they hope will change because of their work. The group completed a template with sections for their hopes, what changes they would like to see, what impact they thought introducing further restrictions could have on children, young people and families, and any concerns they had about the Scottish Government's next steps.

Creating and promoting the engagement pack

The engagement pack developed helped us to reach a wider range of children and young people and ensure a greater diversity of views were included as part of the consultation.

The pack was designed for use by professionals working with or alongside children and young people (including teachers, youth workers, healthcare professionals and third sector organisations) to support conversations around alcohol marketing.

The activities developed supported professionals to have engaging discussions in a safe and non-judgmental way. The development of the engagement pack was supported by staff at Fast Forward, who have expertise working on similar topics with young people.

The engagement pack included six different activities that professionals could choose to complete with groups they were working with. The activities created were a starting point for engagement and could be adapted to suit the environment in which they were delivered and the preferences of children and young people. We know how important it is to have different types of activities on offer (such as creative and discussion-based activities) and to give professionals and young people choice about how they get involved.

We promoted the pack as widely as possible including sharing it on social media, sharing it with our member network and targeted outreach to various organisations across the country. The engagement pack was launched on 25 January 2023, and we accepted submissions until 10 March 2023. Children in Scotland staff members were available to offer advice and support with delivery of the sessions.



A total of 105 children and young people participated through the engagement pack. They were from a range of schools and local and national organisations across Scotland. We would like to thank these staff and children and young people for their time and input into this work:

- Changing our World (Children in Scotland's Youth Advisory Group)
- Duncanrig Secondary School, Glasgow
- Firhill High School, Edinburgh
- Highland Council
- Includem
- Pilton Youth Project, Edinburgh.

In addition, Barnardo's Scotland adapted the activities in the engagement pack to gather the views of a small focus group of young people in North Lanarkshire. These views were shared directly with the Scottish Government.

[Click here to view the full engagement pack.](#)

Analysis of data and reporting on findings

Children in Scotland staff collated the evidence gathered using the different data collection methods and conducted thematic analysis of the data, exploring the key themes and questions from the Scottish Government's consultation document.

We also reflected on the general visibility of alcohol marketing and participants' attitudes to alcohol marketing and its impacts. This information is included in the 'Findings' section of this report.



Limitations

We are confident that the approaches taken for this engagement work were appropriate and provided an opportunity for many children and young people to share their views about alcohol marketing in Scotland.

However, it should be acknowledged that the project was conducted over a short timeframe and during a very busy time for organisations working with children and young people. There was a short turnaround time for submissions to our engagement pack, which meant that several interested groups could not get involved because staff were unable to build this into their work plans. In particular, this was an issue for school staff who had limited capacity and were experiencing disruption to normal working patterns because of industrial action.

The Scottish Government's consultation on alcohol marketing restrictions is wide-ranging and covers a number of complex issues. It was therefore not possible to cover all areas of the consultation in detail within the limited timescale of the project.

Children in Scotland found it more challenging than anticipated to recruit children and young people to join the focus group. We believe that this is because our recruitment period for this project overlapped with the December school holidays. Additional time in the project set-up phase would have allowed more time for children and young people to apply. Nevertheless, we were pleased with the overall number and geographic spread of children and young people involved in our engagement activity.



Participant data

A total of 113 children and young people participated in our engagement activity.

Table 1: Project participants by engagement activity

Method	Number of children and young people
Focus group	8
Engagement pack submissions	105
Total	113

Table 2: Project participants by age

Age group (years)	Number of children and young people
8-10	1
11-13	71
14-16	36
17-18	5
Total	113

Table 3: Project participants by geographic location

Local authority	Number of children and young people
City of Edinburgh	25
Fife	1
Glasgow	7
Highland	61
Midlothian	1
Orkney	1
Scottish Borders	1
South Lanarkshire	10
West Dunbartonshire	5
West Lothian	1
Total	113



Findings

The data from our engagement work has been analysed and summarised under key themes set out below. Where appropriate, Children in Scotland has identified the relevant questions from the consultation at the beginning of each section.

General thoughts about alcohol marketing and its impact

Focus group

We asked the group why they wanted to be involved in the project and why they thought alcohol advertising was an important issue. Participants spoke about the negative impact alcohol can have on health and how this can have a knock-on effect on other areas of a person's life, such as their employment and relationships. The group was also aware that Scotland has a high number of deaths due to alcohol-related illnesses.

“There's a lot of death due to drinking, it's higher in Scotland than in England... because of our culture.”

The group supported the idea of restricting alcohol advertising. They said that advertising probably has a sway on children and young people as *“it's in the back of your mind...pulls you into stuff”*. They told us that reducing the amount of alcohol advertising would be beneficial for children and young people. They also thought that less alcohol advertising would help those who were experiencing or recovering from addiction by ensuring they do not see alcohol advertised as frequently.

Some participants suggested that children and young people should be more aware of the risks of alcohol and that this should be a consideration for the Scottish Government.

All members of the group were in favour of restricting alcohol marketing across different areas, which will be covered in greater detail in the respective sections of this report. When asked who they thought would be negatively impacted by increased restrictions, the group spoke about pubs and shops due to a potential reduction in sales. They also spoke about the negative impact this could have for breweries and other alcohol producers because they could receive fewer orders, which would have negative implications for the economy generally. The group also thought that if restrictions lead to price increases to make up for a decrease in sales, this could affect those who are currently struggling with drinking as they may have to spend more money on purchasing alcohol thereby increasing their likelihood of experiencing poverty.

Engagement pack groups

Many of the young people who shared their views through the engagement pack also pointed out how alcohol use is embedded in Scottish society and how this encourages alcohol consumption, often to excessive or harmful levels.

“Alcohol use is deep in our culture.”

Many young people were generally supportive of restricting alcohol advertising, in different areas. However, there was not a consensus about whether restricting alcohol advertising would reduce alcohol consumption and alcohol-related harms.

Some young people felt that advertising is a factor in young people's attitudes to alcohol and alcohol consumption, but that this is also dependent on a young person's circumstances and the other people in their lives. Participants identified that friends and peer pressure are very influential for young people. One young person said that they would not change advertising rules as it would not make a difference to how much alcohol people drink, it only persuades people to choose particular brands of alcohol.

"No, I don't think it's advertising that encourages – it's your friend group and who you hang around with."

Recommendations:

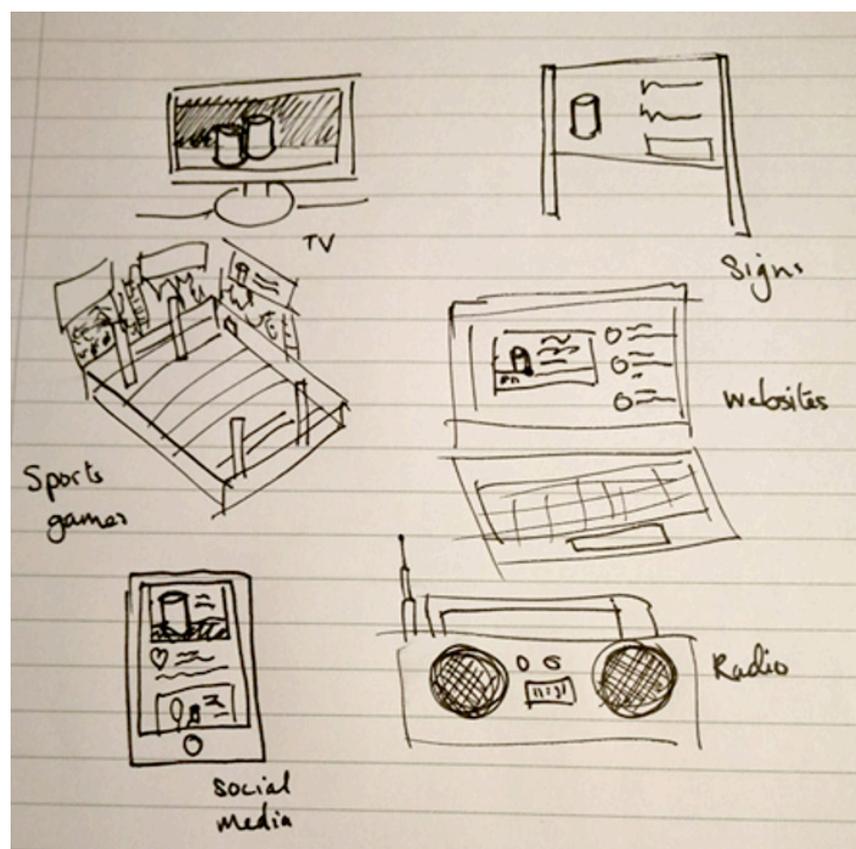
1. The majority of the children and young people who shared their views generally supported restricting alcohol advertising.
2. If further restrictions are introduced, the Scottish Government must consider the potential impact on businesses.
3. More public awareness campaigns should be made about the risks of alcohol so that children and young people are aware of these issues.

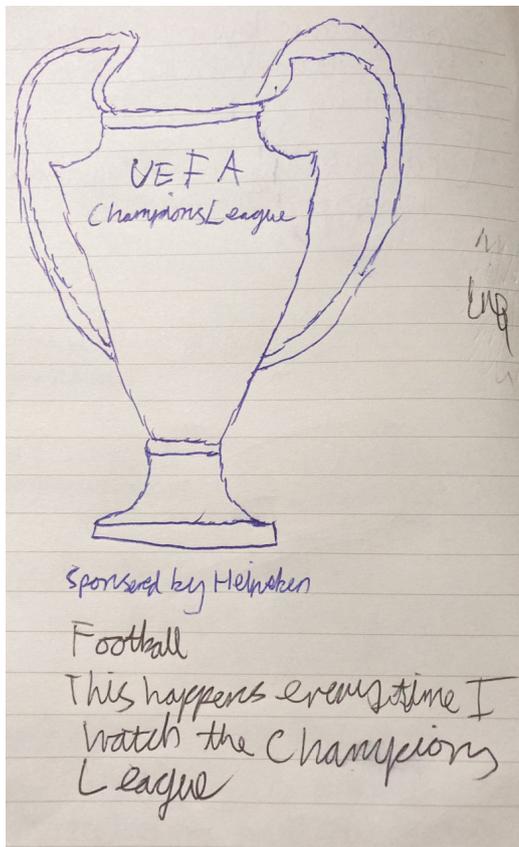
Children and young people's exposure to alcohol marketing

Focus group:

Many of the young people who shared their views through the engagement pack also pointed out how alcohol use is embedded in Scottish society and how this encourages alcohol consumption, often to excessive or harmful levels.

The focus group was asked to draw the different places where they see alcohol advertised. A selection of their drawings can be seen below.





Individuals identified numerous places where they had seen alcohol advertised. Both inside and outside shops were the first places most of the young people mentioned. Members of the group said they saw this all the time. This included both local shops and larger supermarkets. One member of the group pointed out how there are **“so many gin, wine and whisky adverts”** in supermarket catalogues that children can see.

They also mentioned several examples of public spaces, such as the rolling adverts at bus stops, train stations and large-scale billboards.

Many members also remembered seeing alcohol advertising linked to sporting events, either on television or in-person. Football and rugby were two of the key sports where alcohol advertising was popular. The group commented on how often it is seen linked to sports and one young person stated, **“Everything to do with sport has alcohol sponsorship”**.

The group frequently saw alcohol advertising online – this included social media posts, games, pop-up adverts and adverts before video streaming.

Television was also identified by many members of the group. Many of the young people were able to remember specific wording or scenarios from alcohol adverts and sponsorship.

Several other sources including cinema and radio were mentioned by one or two members of the group.

In our discussions, the group told Children in Scotland staff that it was **“quite easy”** to come up with places they had seen alcohol advertising. They were surprised by the amount of advertising they had all seen and the array of places that came up in their discussions.

“You don’t think about how much you are seeing... you don’t notice the amount until you think about it.”

Participants reflected that it was regular part of their life and that they see alcohol marketing day in and day out travelling to and from school.

Each of these topics will be covered in greater detail below.

Engagement pack groups:

Similar to the focus group, the children and young people who participated through the engagement pack had seen alcohol advertising online, at sport events, in shops and on public transport. They talked about the different places they had seen this online such as Instagram, Facebook, TikTok, YouTube and Snapchat. They also discussed how common it is: **“you’re just always going by it, and you don’t even notice it.”**

Several additional sources were identified including video games (such as Grand Theft Auto) and hotels or bars where young people attended family parties.

Sport and events sponsorship

Relevant questions in the consultation:

Q1: Do you think we should prohibit alcohol sports sponsorship in Scotland?

Q2: If sports alcohol sponsorship was to be prohibited, what types of marketing do you think should be covered by a prohibition?

Q3: What, if any, sporting activities or events do you think should be excepted from a prohibition on alcohol sports sponsorship?

Q4: Do you think we should prohibit alcohol events sponsorship in Scotland?

Focus group:

“Everything to do with sport has alcohol sponsorship.”

Across several meetings of the focus group, participants highlighted the strong connection between alcohol marketing and sporting events. Group members were

able to list numerous examples of alcohol sponsorship from memory such as Guinness' involvement with the Six Nations Championship and Heineken sponsoring the Champions League.

The group discussed how there is a big drinking culture in sport and how the level of alcohol sponsorship might encourage this. We explored some of the different places where alcohol marketing was seen including on players' shirts, on the pitch and on signage all around the ground. Participants pointed out that many young people see these advertisements through watching matches, either in-person or on TV.

"It's just part of sport. People go to the pub, get a pint and watch the game."

Participants also discussed concerns about children and young people's involvement in sport and the connection of sport to the alcohol industry.

"Young people are often heavily involved in sport, so it doesn't seem right that there is so much alcohol advertising."

The group was worried about how reducing this sponsorship could affect sports teams, especially smaller clubs that might rely on sponsorship from alcohol companies. They said that alcohol advertising helps the teams.

Despite these concerns, all members of the group felt that alcohol sponsorship should either be reduced or banned completely, but that this should be done in a way that was fair to sports clubs. Most felt that a phased reduction and then an eventual ban was the right approach. This would ensure "it doesn't have a sudden hit" on the clubs affected. The ban would include all forms of advertising and branding including shirts and pitch-side advertising. Although they were realistic about its limitations, they hoped banning alcohol sponsorship and marketing at sporting events would have some impact on the culture of drinking linked to sport. They also thought it would stop normalising drinking for children and young people who watch sport.

The group also discussed alcohol marketing and sponsorship at events. Most of the group told us that it was not as noticeable to them at big events such as festivals or gigs.

Engagement pack groups:

These groups also discussed the numerous examples of alcohol advertising at sports events they had seen, one young person talked about the ***"Heineken and Budweiser billboards and posters everywhere"*** at a football match they had been to. Others mentioned how alcohol company logos are often on players' kits.

Some groups were against alcohol being shown in sport. One group discussed how important drinking seems to the whole football experience and how they want to enjoy sport without alcohol being involved. Others were against alcohol companies sponsoring events as this could result in young children with shirts or products that were branded with alcohol companies' logos. However, there was not a consensus about whether this should be restricted or not as another group thought there was no issue with alcohol being shown at sporting events.

Alcohol sponsorship and promotion at events was not widely discussed in the group submissions. This suggests that the profile of advertising at these events is not as high for young people and is less of a priority area for them.

Recommendations:

4. Alcohol advertising and sponsorship linked to all sports teams and sports events should be significantly reduced or completely prohibited. This should be done in a phased manner working alongside sports teams and organisations to ensure the negative impact is minimised.

Outdoor and public spaces marketing

Relevant questions in the consultation:

Q8: Do you think we should prohibit alcohol marketing outdoors, including on vehicles, and in public spaces in Scotland?

Q9: What do you think should be covered by a prohibition on alcohol marketing outdoors on vehicles and in public spaces?

Focus group:

Participants talked about how frequently they see alcohol promoted in public spaces. One member said, *"I see it every time I go to school. It's everywhere really"*. Another commented that *"It seems to be never-ending. It's one of the main places that kids see alcohol"*.

Everyone in the group believed that more should be done to limit alcohol advertising outdoors and in public spaces as this would be effective in reducing how often young people see it. They also felt it would prevent children being exposed to it early in life.

There were mixed views about whether it should be banned completely. The group was in favour of not allowing alcohol to be advertised on billboards or posters near schools and playgrounds. They thought the Scottish Government could implement a measure prohibiting alcohol marketing within a particular zone around schools and nurseries.

"It shouldn't be near primary schools and high schools."

The group also agreed with the proposal to cut down the amount of alcohol advertising that is shown on public transport. They thought this would be an effective way to limit the amount of alcohol advertisement children and young people see daily.

"Definitely cut down on bus advertising. Most young people have a Young Scot card and get free bus travel, so they use the bus a lot."

As highlighted above, some members of the group were in favour of completely banning alcohol advertising in public spaces, while others talked about restricting it. When we discussed possible restrictions, the group members talked about restricting the locations (for example, not near schools, playgrounds and toy shops) and changing the style of the advertisements to make them less eye-catching and glamorous.

Engagement pack groups:

The young people who contributed through the engagement pack also discussed how they often see alcohol advertising, *"You just see it all the time"*, and gave billboards and posters as specific examples. Some of the young people did not oppose alcohol

advertisements being shown in public, whilst others said it should not happen as it was likely to appeal to children and young people: *“it’s like vaping, children are going to be interested in the colours. It just shouldn’t happen.”*

Recommendations:

5. **The Scottish Government should ban alcohol advertising near schools, nurseries, and playgrounds.**
6. **The Scottish Government should consider banning or restricting alcohol advertising in other public spaces, including public transport. Restrictions should include the consideration of limiting the content of alcohol advertisements to make them less eye-catching and appealing to children and young people.**

In-store alcohol marketing

Relevant questions in the consultation:

- Q11:** Do you think we should further restrict the visibility of alcohol in retail environments, giving reasons for your response?
- Q12:** Do you think we should consider structural separation of alcohol in Scotland to reduce the visibility of alcohol in off-trade settings (e.g. supermarkets)?
- Q13:** How do you think structural separation of alcohol in Scotland could operate? (e.g. with barrier, closed display cases)

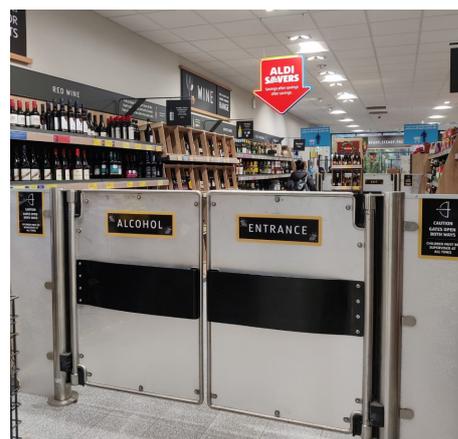
Focus group:

The focus group explored the visibility of alcohol in shops which included discussions about smaller, local shops and larger supermarkets. The participants said they often saw alcohol in shops. This often included the product itself, advertisements throughout shops and promotional offers on special displays or at the end of aisles. The group reflected that it was hard to go into a shop – either a local shop or a supermarket – without noticing alcohol. They also said that children see alcohol in shops from a very young age.

“If you are walking from the shampoo to the frozen aisle, you go past it. Kids can walk by and see all the alcohol.”

“Sometimes displays are in the middle of the aisles, and you can’t get by without noticing.”

As part of these discussions, we showed the group pictures of typical supermarkets in Scotland and Ireland (where similar restrictions to the ones suggested in the consultation have been put in place).



The group liked the gates that separated the alcohol aisle as they thought this barrier would limit the number of children and young people seeing alcohol. They also thought this would allow people more choice about whether they want to see alcohol and advertisements for it in shops, which would support people recovering from alcohol addiction. Participants talked about how alcohol was often in a very prominent position in shops and keeping it out of the way at the back of shops or in its own section was a good idea.

The group liked that children and young people would have to be supervised if going into the alcohol section. The said doors or barriers to an alcohol section might stop young people peeking in. Other options suggested by the group included keeping alcohol behind the till or in a section with plain wall panels, similar to the approach used for cigarettes.

One participant said, ***“the less visible it is, the less young people will think about buying it.”***

A few members of the group did say that hiding the alcohol behind big doors could make it more noticeable and it could make more children and young people curious about it.

Although the group supported measures in shops, they highlighted the importance of making sure that these were feasible for smaller shops to implement and not challenging to put in place. The focus group identified reducing the visibility of alcohol advertising in shops as a priority action for the Scottish Government as they believe this would be one of the most effective ways to limit children and young people’s exposure to alcohol products and marketing.

Engagement pack groups:

Young people who engaged with the focus groups had a similar perspective about the visibility of alcohol and alcohol advertising and promotions in shops. Some identified the direct impact this had on them: ***“Don’t see it being advertised much but I see nice colourful displays of Dragon Soop in shops that makes me what to buy it.”***

Young people pointed out that alcohol is sometimes displayed right beside checkouts in some shops and others create displays where alcohol is coupled with other products, e.g. cheese and wine. Some of the young people agreed that they should be less visible in shops. One said ***“yeah, cos the displays are massive.”***

Participants liked the idea of a barrier sectioning off the alcohol aisle in supermarkets. One commented, ***“It’s better having the gate in front and maybe a wee guy stopping younger people from walking through or only let through if supervised by adult.”***

Several young people thought things should not change, pointing out that other factors were more likely to encourage young people to drink. One participant pointed out that alcohol being so visible would pose difficulties for those suffering from addiction: ***“I think it’s fine being able to see them, but if you’re drinking too much then it makes it harder to stop.”***

Recommendations:

7. The Scottish Government should ban alcohol advertising near schools, nurseries, and playgrounds.
8. The Scottish Government should put in place similar restrictions to those introduced in shops in Ireland (including barriers separating off alcohol aisles) to prevent more children and young people seeing alcohol products, promotions and advertising.
9. The Scottish Government should support smaller shops to implement new measures. Measures may need to vary between larger and smaller shops.

Print advertising

Relevant questions in the consultation:

Q19: Do you think we should prohibit advertising of alcohol in newspapers and magazines produced in Scotland?

Focus group:

When asked about print marketing, the group highlighted examples such as supermarket catalogues, leaflets, and magazines. Although the group was able to identify examples, many young people didn't list it as one of the places that they saw alcohol advertising, suggesting it wasn't one of the main places where they saw alcohol being advertised.

The group believed that these advertisements are more likely to appeal to children and young people if they are bright and colourful. One young person drew the comparison with vapes which are advertised with bright colours and appeal to young people – *“kids are easily coerced – bright and colourful things are appealing – it's like vapes.”* One young person said, *“We always get a Tesco catalogue whenever we go in because we like to look at the food. There's about ten pages for alcohol, including cocktails, which are really colourful.”*

The group suggested different ways of limiting print advertising of alcohol such as limiting the colour palette and the lifestyle associations of the advertisements – *“enforce a law to make adverts more drab.”* Another suggested that, *“they could only use specific colours – like they did with cigarettes.”*

They also suggested printing two different versions of supermarket catalogues: one that features alcohol and one without. The group suggested that as newspapers are most likely to be read by adults, there was less of a need to limit alcohol advertising in them.

In general, whilst young people were seeing different types of print advertising, the focus group didn't see this area as a priority for action.

Engagement pack groups:

When discussing how persuasive printed alcohol advertisements are likely to be to children and young people, one group said that peer groups are more influential: *“it's your friend group and who you hang around with.”* Therefore, printed materials were less of a focus for the young people.

Recommendation:

- 10. The Scottish Government should consider restrictions on the content of alcohol advertisements in newspapers and magazines so they are less appealing to children and young people.**

Online marketing

Relevant questions in the consultation:

- Q21:** Do you think we should restrict alcohol branded social media channels and websites in Scotland?
- Q23:** Do you think we should restrict paid alcohol advertising online in Scotland?
- Q24:** What types of paid alcohol advertising do you think should be covered by any restrictions?
- Q25:** What, if any, exceptions do you think should there be to restricting paid alcohol advertising online?
- Q26:** Do you think we should restrict alcohol companies from sharing promotional content on social media (e.g. filters, videos or posts) – whether this is produced by them or by consumers?
- Q27:** What, if any, exceptions do you think there should be from restricting alcohol companies from sharing promotional content on social media (e.g. filters, videos or posts) – whether this is produced by them or by consumers?

Focus group:

Online alcohol marketing was deemed a priority area for the focus group due to how widespread it is and how influential it can be to children and young people.

The focus group participants identified seeing alcohol advertised online in many different ways including on social media, messaging apps, video streaming platforms, on websites and through pop-up adverts on online games.

The different types of advertisements on social media and messaging applications included sponsored adverts, filters created by alcohol brands, and celebrities and influencers being paid to advertise products.

The focus group spent quite a bit of time discussing the impact of product endorsements by famous people. They felt that children and young people were often exposed to alcohol adverts after following their favourite celebrities or content creators on social media.

“I like their movies so I follow them and see the adverts [for alcohol].”

“Famous people like Ryan Reynolds and The Rock sponsor brands through posts on Instagram.”

When considering how likely young people are to be influenced by this type of celebrity endorsement, the group gave the example of Prime, an energy drink created and advertised by two social media personalities that has become extremely popular.

“If they have a big following, more kids will see it – it’s like Prime. Two famous people made the drink, and everyone will try it.”

The group explained that some young people want to feel like they are supporting celebrities they like and do not want to feel they are missing out on a popular product that their peers are talking about. Although Prime is a non-alcoholic drink, one young person said, *“If KSI and Logan Paul had created an alcoholic drink it would’ve had the same influence”*, emphasising the effect celebrity endorsement can have on children and young people. The group explained how children and young people want to be like the celebrities they see as they are rich, glamorous, and famous and if they are advertising alcohol, this can be persuasive. As one member put it, *“They are selling a lifestyle. It plants the thought in your head.”*

Participants said that online adverts often feature glamorous locations or people at parties to make it look good. This is covered in more detail in the ‘Restrictions on content of advertisements’ section.

The group also discussed social media filters. Most of the young people had seen them and thought they should be banned or restricted. They highlighted that these were often seen as a bit of fun and were particularly attractive to younger children.

“I’ve seen alcohol filters come up a lot on my phone... even younger kids mess around with them.”

“You’re on your device every day so you see it a lot.”

The group was keen for the amount of alcohol advertising shown online and on social media to be reduced, but not prohibited. They thought alcohol advertising should be made less obvious, especially on applications that are targeted towards younger children.

One young person highlighted that the algorithms on social media should allow them to ban alcohol-related content being shown to young people under 18. He said, *“they target ads at people so can’t they make it that no-one over 18 years old sees the ads.”*

They acknowledged the difficulty of implementing these ideas due to the difficulty of regulating online content. They thought that the Scottish Government may not have the power to make and enforce certain laws in this area.



Engagement pack groups:

Those who discussed online alcohol advertising all said that the volume of this should be reduced.

For one group in particular, the main place young people said they see alcohol advertised is online. They gave examples including Instagram, Snapchat, TikTok and YouTube. They shared how sometimes they are watching a video clip that has nothing to do with alcohol and then they scroll onto the next video which could be about anything, including alcohol. This seems to be a particular problem with TikTok and YouTube Shorts, as young people scroll through many short videos in a 'For you' section. This leads to children and young people viewing content which is not appropriate for them, nor is it content they want to see. This group said it was hard from them to avoid this as the videos are short, and by the time they notice what the video is about then have seen almost all the video.

One young person from another group stated, *"It shouldn't be advertised as if it's extremely normalised as it might give the idea that drinking all the time is a good and normal thing."*

Recommendations:

- 11. The Scottish Government should put measures in place to limit the amount of alcohol advertising online. This includes restricting alcohol branded social media channels and websites and paid alcohol advertising.**
- 12. The Scottish Government should introduce restrictions to only allow those over 18 years of age to be shown alcohol advertising on social media websites and apps.**

Television and radio advertising

Relevant questions in the consultation:

Q28: Do you think we should explore prohibiting alcohol advertising on television and radio completely (e.g. like Norway or Sweden)?

Q29: Do you think we should introduce a watershed for alcohol advertising on TV and radio (e.g. like Ireland), and if so how would this work?

Focus group:

To start this conversation, Children in Scotland staff created a multiple choice online quiz pulling out statistics from the consultation. We talked about when children and young people tend to watch television, how many listen to the radio, and some of the figures relating to young people's cinema attendance.

The focus group participants reported seeing a number of alcohol advertisements on television when watching popular programmes and said, *"it's too much"*. They thought these adverts are likely to affect children and young people as they are viewed repeatedly and often *"get stuck in your head"*. Young people in the focus group were able to recall brands or scenarios from alcohol advertisements even though they are not the target market.

“I see adverts for alcohol every time I watch the Great British Bake Off on TV.”

“You often see adverts on repeat – Taskmaster has a Coors Light ad all the time.”

In addition to seeing these on live television many said they had seen alcohol adverts on ‘on demand’ television apps.

We discussed the approach in Norway and Sweden. However, the group was unanimous in a preference to limit, as opposed to prohibiting, alcohol advertisements on television.

The majority of the group liked the idea of a watershed. One member said, *“Most kids won’t watch past 9pm”* and the group thought this would be an effective way of limiting the amount of alcohol promotion children and young people see on television. There was some discussion about what the best times for a watershed would be, including having different times during the week and at weekends. One suggested 8.30pm-4.30am saying *“who’s going to be up at 3am?”* Another suggestion put forward was aligning this watershed with that put in place for explicit language on television and radio (i.e. 9pm to 5.30am). It was felt this should apply to both live television and ‘on demand’ television apps.

The focus group participants said they spent more time watching television than listening to radio. They thought that the rules for a television watershed should also apply to alcohol advertising on radio.

Engagement pack groups:

Some of the young people who contributed through the engagement pack said that they would prohibit alcohol advertising during popular family programmes, such as *Britain’s Got Talent*. There was also support for a watershed for alcohol advertising, as young people are less likely to be watching television at this time.

Recommendation:

13. The Scottish Government should introduce a watershed for alcohol advertisements on television and radio.

Cinema advertising

Relevant questions in the consultation:

Q30: Do you think alcohol advertising should be restricted in cinemas?

Q31: If alcohol advertising was restricted in cinemas, what, if any exceptions (e.g. products in scope, times of day or specific movie ratings) do you think should be considered?

Focus group:

We discussed current rules around advertising with the group. One person said, *“I thought it would be only for films age 15 and above”* and was surprised by the current rules. The group felt the current rules mean a lot of children will see advertisements for alcohol when they go to the cinema.

Most participants felt that alcohol advertising should be linked to the age certification of the film. Several made comments like, “[they] shouldn’t be showing it for under 18 films” and “it should be for certificate 15 up” with people split between certificate 15 and certificate 18 as the cut off for alcohol advertising being shown.

The suggestion of a watershed (similar to their television or radio proposals) was not supported by the group.

Engagement pack groups:

Alcohol advertising in cinemas did not feature in any of the submissions received.

Recommendations:

14. **The Scottish Government should make it illegal to advertise alcohol at cinemas for films rated 12A and under.**
15. **The Scottish Government should consider whether alcohol advertising should be prohibited at films rated age 15.**

Restrictions on content of advertisements

Relevant questions in the consultation:

Q32: Do you think that the content of alcohol marketing in Scotland should be restricted to more factual elements?

Q33: Do you think we should only allow alcohol marketing to include elements set out in a list, like in Estonia? This would mean all other elements not on the list would be banned from adverts.

Focus group:

Participants said that alcohol advertisements often feature glamorous locations or people at parties to make it look appealing. They pointed out how many young people are already thinking about wanting to be adults and are likely to find products that seem more “*mature*”, interesting and something they want to experience. One person said, “*It influences you more when you are a teenager.*”

Members of the group felt the main goal of these advertisements is to make alcohol seem glamorous or exciting. One participant compared the marketing to that associated with other lifestyle products such as perfume.

“Perfume ads are the same as alcohol ones – fancy looking women, sophisticated, blurred backgrounds. They are often dark and mysterious.”

As highlighted in previous sections of this report, the group also stressed how bright colours, lifestyle-related advertising, and slick editing appeal to children and young people. Members of the group said on several occasions that they wanted the Scottish Government to take action to address this.

Participants also discussed packaging of alcohol products. They said, “*good packaging definitely helps grab people’s attention*”. One member of the group talked about the

warnings that were introduced on cigarette packets and suggested this could be a consideration for Scottish Government in the future.

The group discussed the approach to alcohol marketing in Estonia (as highlighted in the consultation document), where there are strict limits on what is allowed to be shown in alcohol advertisements. Many members of the group seemed to like this approach. They felt removing people from advertisements and making them more factual would reduce the appeal to children and young people.

“[Alcohol advertisements should be] toned down and made less attractive.”

Engagement pack groups:

One group thought that more should be done to change the packaging and names of alcohol, so they are less likely to appeal to children and young people.

“The problem is they do all these kids’ flavours, like Red Kola. There are huge adverts and packaging aimed at weans – like Dragon Soop. At first, I thought it was an energy drink, but it’s got alcohol in it - it’s like 7%.”

“Alcohol could come with a health warning, like a packet of cigarettes.”

Several groups said that the side effects of drinking should be discussed more on the advertisements, so young people are aware of the risks. They thought it was important that alcohol advertising was not directed towards children and young people.

One young person said that alcohol was *“extremely normalised”* in society and that alcohol advertising *“might give the idea that drinking all the time is a good and normal thing.”*

Recommendation:

- 16. The Scottish Government should introduce restrictions to make the content of alcohol advertisements less appealing to children and young people. This could include implementing similar restrictions to Estonia, where permitted elements are set out in a list.**

End questions

Relevant questions in the consultation:

Q38: Do you think the Scottish Government should look to introduce a comprehensive package of restrictions across a number of marketing channels? If so, what do you think this package should include?

Focus group:

The young people we worked with directly were in favour of restricting alcohol advertising across a range of different channels as this would limit how often they were seen by children and young people as well as their appeal.

In particular, the focus group felt alcohol advertising online, in public spaces, in shops, on TV and at sports events were the main priorities for action. Whilst they are keen

for the Scottish Government to introduce restrictions they also voiced concerns that if restrictions were taken too far or introduced too quickly this would affect small businesses like shops, pubs, breweries and alcohol producers, and sports teams.

The group also hoped that alcohol advertising could be toned down in the future and made less attractive to younger audiences.

The group hoped that implementing a range of changes would lead to **“happier and healthier people”** and that there would be less of a strain on the NHS. They believed that implementing new measures would lead to a decrease in alcohol use, and fewer people suffering from alcohol abuse and addiction.

They hoped that changes would prevent children and young people from seeing so much alcohol advertising and products at a young age. They thought this would be good for children and young people but they also highlighted that parents may worry less too.

The young people in the focus group were concerned the Scottish Government might not act and that their views might not be listened to. They were also worried that restrictions on alcohol advertising could take a long time to implement.

The group hoped that children and young people would be kept involved in this work. They suggested linking with more schools and involving children and young people through online and in-person sessions and through online surveys.

Engagement pack groups:

The majority of the young people were generally supportive of restricting alcohol advertising in different areas, especially online.

“I see things on TikTok all the time, depending on who you follow and the target audience. Young kids could be seeing it. It’s not right.”

Others were more focused on restricting the level of alcohol promotion on television or restricting alcohol advertising and sponsorship in sport. It’s clear that different individuals and groups had slightly different priorities for action.

“I would stop alcohol from being shown in ads for shows like Britain’s Got Talent as people tend to watch those as a family.”

“Alcohol ads shouldn’t be linked back to sporting events and community as it could encourage underage drinking”.

However, a proportion of young people voiced doubts about whether restricting alcohol advertising would impact young people’s attitudes to alcohol and the alcohol consumption levels of young people and adults. One young person said that they would not change advertising rules as it would not make a difference to how much alcohol people drink, it only persuades people to choose certain brands.

“I wouldn’t change advertising rules, as I don’t think it makes much of a difference. I think advertising just sways people to particular brands.”



Conclusion and recommendations

We are grateful to have had this opportunity to engage with children and young people to gather their views on alcohol marketing. The amount and quality of the data we have gathered demonstrates that this is an issue which interests children and young people, and that they can effectively engage with the topic if conversations are carried out in a safe, fun, accessible and non-judgmental manner.

The priority areas for change for the children and young people were the quantity and prevalence of alcohol advertising and promotion in shops and public spaces, online and on television, and at sports events, so we hope that the Scottish Government focuses on these key areas in any legislation it brings forward.

Young people also had a lot of important reflections on the content of advertisements and suggestions about restrictions that could be put in place to make alcohol marketing less appealing to children and young people.

The significance of how deeply embedded alcohol is in our culture and lifestyle cannot be overstated when aiming to address alcohol-related harm. Many young people felt that restricting alcohol marketing would not make a difference because alcohol use is so deeply engrained in our society.

It is important to note that restricting alcohol advertising is a complex issue and limitations may have significant implications for businesses of different sizes, alcohol producers and distributors, and sports teams. We were really impressed by the focus groups' holistic thinking when coming up with suggestions on what they think should happen.

We hope that the Scottish Government will continue to engage with children and young people on this issue. The young people we work with told us that they hope that their work on this issue will make sure ***“things will actually change and we help people.”***



Full list of recommendations

1. The majority of the children and young people who shared their views generally supported restricting alcohol advertising.
2. If further restrictions are introduced, the Scottish Government must consider the potential impact on businesses.
3. More public awareness campaigns should be made about the risks of alcohol so that children and young people are aware of these issues.
4. Alcohol advertising and sponsorship linked to all sports teams and sports events should be significantly reduced or completely prohibited. This should be done in a phased manner working alongside sports teams and organisations to ensure the negative impact is minimised.
5. The Scottish Government should ban alcohol advertising near to schools, nurseries, and playgrounds.
6. The Scottish Government should consider banning or restricting alcohol advertising in other public spaces, including public transport. Restrictions should include the consideration of limiting the content of alcohol advertisements to make them less eye-catching and appealing to children and young people.
7. The Scottish Government should further restrict the visibility of alcohol in shops.
8. The Scottish Government should put in place similar restrictions to those introduced in shops in Ireland (including barriers separating off alcohol aisles) to prevent more children and young people seeing alcohol products, promotions, and advertising.
9. The Scottish Government should support smaller shops to implement new measures. Measures may need to vary between larger and smaller shops.
10. The Scottish Government should consider restrictions on the content of alcohol advertisements in newspapers and magazines, so they are less appealing to children and young people.
11. The Scottish Government should put measures in place to limit the amount of alcohol advertising online. This includes restricting alcohol branded social media channels and websites and paid alcohol advertising.
12. The Scottish Government should introduce restrictions to only allow those over 18 years of age to be shown alcohol advertising on social media websites and apps.
13. The Scottish Government should introduce a watershed for alcohol advertisements on television and radio.
14. The Scottish Government should make it illegal to advertise alcohol at cinemas for films rated 12A and under.

15. The Scottish Government should consider whether alcohol advertising should be prohibited at films rated age 15.
16. The Scottish Government should introduce restrictions to make the content of alcohol advertisements less appealing to children and young people. This could include implementing similar restrictions to Estonia, where permitted elements are set out in a list.



Poster created by a participant from one of the engagement pack groups