



c/o
Scottish Health Action on Alcohol Problems
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16 December 2024

Richard Leonard MSP
Convenor
Public Audit Committee
The Scottish Parliament
Edinburgh
EH99 1SP

Dear Convenor

We have been following with interest the Public Audit Committee's work on the Audit Scotland report into Alcohol and Drug Services.

Ahead of Thursday's meeting we thought it might be useful to set out our view of the points made in relation to recommendation 1 of the report, in the letter sent by Caroline Lamb, Director-General Health and Social Care and Chief Executive of NHS Scotland to the Auditor General, which she has forwarded to the Committee.

In response to recommendation 1, i.e., that the Scottish Government "work with key stakeholders to identify and agree actions to increase focus and funding for tackling alcohol-related harm, while continuing to tackle drug-related harm", Ms Lamb lists a number of actions that are/have been underway to address alcohol harms:

- the introduction of Minimum Unit Pricing;
- a PHS review of evidence on protection children and young people from alcohol marketing;
- the incorporation of UK-wide clinical guidelines for alcohol treatment services into a National Service Specification for alcohol and drugs services;
- the National Mission's increase in residential rehabilitation capacity resulting in increased rehab capacity for people with alcohol problems; *and*
- work with organisations such as ourselves on raising awareness of the link between alcohol and cancer and guidance on alcohol death reviews.

Whilst all of these pieces of work are welcome, it is our view that this is an inadequate, piecemeal approach and the actions simply do not add up to a coordinated plan to respond to the alcohol harms "public health emergency" which the Scottish Government itself declared in 2021. Indeed, many of the actions listed have been planned or underway for some time and others represent a delay. Work on alcohol marketing is actually a step back



from the Scottish Government's original commitment to bring forward a consultation on this matter.

In the Committee's session on 21 November, the Auditor General stated "necessary interventions such as the provision of drug services and the creation of the national mission have, in part, come at the expense of a focus on alcohol deaths and alcohol services" and that "we have not got the right balance between taking an interventionist approach and a preventative approach".

We would be very interested to hear views from both panels on Thursday as to how the actions listed in the letter from Ms Lamb, and the recently announced Draft Scottish Budget – which indicates a real terms cut to the Alcohol and Drugs Policy budget line – square with recommendation 1 and the comments made by the Auditor General. It's clear to us that a co-ordinated and adequately-resourced plan is urgently overdue and would be a much more suitable response to the lack of focus on alcohol harms highlighted by Audit Scotland, and we hope the panels have chance to discuss this.

Yours sincerely,

Dr Alastair MacGilchrist
SHAAP Chair

Laura Mahon
AFS Acting Chief Executive