

NOT IN FRONT OF THE CHILDREN –CHILD PROTECTION AND ADVERTISING

AN INVESTIGATION BY ALCOHOL CONCERN

(Funded by the Alcohol Education & Research Council)

JULY 2007



Alcohol Concern
Making Sense of Alcohol

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1 Introduction

1.1 The Government's new alcohol strategy, *Safe, Sensible, Social* aims to reduce the number of under-18s who drink and the amount they drink. As part of the previous Alcohol Strategy' Government asked Ofcom to tighten up regulations to ensure that alcohol advertising did not appeal to children. Much of the focus of these revised regulations was on the content of alcohol adverts.

1.2 Significantly, in revising the regulations, Ofcom chose not to consult on the question of the watershed ban. Alcohol Concern has always felt this to be an unhelpful omission, as many children are exposed to alcohol advertising influences as a result.

1.3 Therefore in order to gauge to what extent children *were* being exposed to alcohol advertising, Alcohol Concern decided to investigate the scheduling of alcohol adverts, and in particular to see the extent to which they appear on television before and after the 9pm watershed. We wished to see whether any TV alcohol adverts are placed within programmes aimed at children. We were also keen to investigate whether the current rules on the scheduling of adverts are adequate.

1.4 An investigation was carried out of two separate weeks of broadcasting, analysing when alcohol adverts appeared and within which TV programmes. A small sample of individual programmes were then analysed for demographic breakdowns to elicit the percentage of children viewing at the time. Results indicate that the majority of alcohol adverts actually appear before 9pm and that at least one alcohol advert was placed within a programme which could be considered to be specifically aimed at children.

1.5 This report sets out:

- Background of alcohol advertising and children
- An introduction to the broadcasting and regulatory framework
- Alcohol Concern's research into the scheduling of alcohol adverts
- An analysis of a small sample of adverts linked to programmes with a significant share of children's audience
- Alcohol Concern's conclusions and recommendations

2 Background and Current Research

2.1 Clearly, if alcohol advertising occurs before the 9pm watershed there is a stronger possibility that children may be watching. Placing alcohol adverts within television scheduling when young people are viewing could be one factor for the increase in volume of alcohol consumed by children who drink. The World Health Organisation's European Charter on Alcohol states 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.”¹

2.2 A Brussels study commissioned recently found that exposure to alcohol adverts encourages “youth drinking and increased drinking”. The study exhorted the industry to “cease the production and marketing of products that are attractive to or target children and adolescents”².

2.3 Much of the current research surrounding alcohol advertising is concerned with the question of whether advertising encourages people to start and/or continue drinking or drink to excess. The debate has tended to focus on young people as a vulnerable group, who are thought to be more susceptible to advertising messages and more likely to experience harm as a result of risky drinking behaviour.

2.4 Advertisers insist that their output does not affect total consumption in a country. In their *Submission to the Department of Health on a Strategy to Combat Alcohol Misuse* the Brewers and Licensed Retailers Association (BLRA) argue that: “advertising is a key means by which suppliers make a consumer aware of their products, product innovation, price changes etc. Advertising is an essential element of competition between producers (and other suppliers) and is vital to an efficient market. Companies advertise to increase market share of their products and to protect their brand’s market share against brand switching”.³

2.5 The question at hand is not whether drinks companies *deliberately* target underage drinkers in order to grow their customer base. Rather, it is whether as a result of frequent exposure to advertising on mainstream media, adolescents are more likely to begin consuming alcohol.

2.6 Several studies have shown that young people are increasingly adept at interpreting the cultural messages contained in alcohol advertisements. Researches undertaken at the University of Strathclyde of attitudes to alcohol advertising among 10-17 year olds indicate that:⁴

¹ <http://www.euro.who.int/document/E57528.pdf>

² Sunday Times July 2, 2006 “Alcohol firms face advertising curb in binge-drinking crackdown”
http://www.timesonline.co.uk/article/0,,2087-2252651_00.html

³ Brewers and Licensed Retailers Association (1999) *Submission to the Department of Health on a strategy to combat alcohol misuse from the alcoholic drinks industry*, London

⁴ Aitken, P.P et al (1988) *Television advertisements for alcoholic drinks do reinforce under-age drinking*, British Journal of Addiction, Vol 83, no. 12, pp. 1399-1419

- 88% of 10-13 year olds and 96% of 14-17 year olds were aware of alcohol advertising and 76% of these (across the whole age range) could identify three or more advertisements when the brand name was masked.
- Young people, even 10-12 year olds were adept at interpreting the messages, images and targeting of alcohol advertisements, in the same way as adults.
- 86% enjoyed alcohol advertisements, particularly when shown examples and rates them as being funny, lively, stylish with good music. Proportionately more drinkers than non drinkers had seen alcohol advertisements and appreciated them.⁵

2.7 The authors concluded: "In essence, the more aware, familiar and appreciative young people are of alcohol the more likely they are to drink both now and in the future" These findings confirm individual results from a range of international studies on the effects of advertising on the drinking habits of young people.

2.8 A recent report by Saffer and Dave examining underage consumption in the United States found that advertising seems to have influenced the pattern of underage drinking. They compared the results of two thorough established surveys of youth behaviour: the 1997 National Longitudinal Survey of Youth Behaviour, which is conducted by the Federal Bureau of Labor (sic) Statistics and the University of Michigan's Monitoring the Future Survey which samples 63,000 secondary school students across the country with detailed reports on the prevalence of alcohol advertising in local markets during the same period.

2.9 Their analysis found that alcohol advertising (the majority of which focuses on beer and spirits rather than wine) had a positive effect on the decisions young people make on whether to drink and how much they consume.⁶

2.10 A long-term national study in the U.S. published in January 2006 concluded that for each additional dollar per capita spent on alcohol advertising in a local market, young people drank 3% more⁷. Significantly, the study confirmed that youth who were younger than the legal drinking age displayed a similar pattern of advertising effects as the entire age range, which is important because there is often a greater policy interest in protecting underage youth from harmful communications than in protecting youth older than 21 years.

⁵ Hastings, G et al (1992) *Is alcohol advertising reaching the people it shouldn't reach?* Health Education Journal, Vol 51, no. 1, pp. 38-42.

⁶ *Alcohol Advertising and Alcohol Consumption by Adolescents* (NBER Working Paper No. 9482: 2004).

⁷ L.B. Snyder, F.F. Milici, M. Slater, H. Sun, and Y. Strizhakova, "Effects of Alcohol Advertising Exposure on Drinking Among Youth," *Archives of Paediatrics and Adolescent Medicine* 160 (2006): 18-24.

2.11 The Academy of Medical Sciences report *Calling Time*⁸ demonstrates a clear link between spending on alcohol advertising and children’s drinking, as can be seen from Figure 1 below.

Figure 1

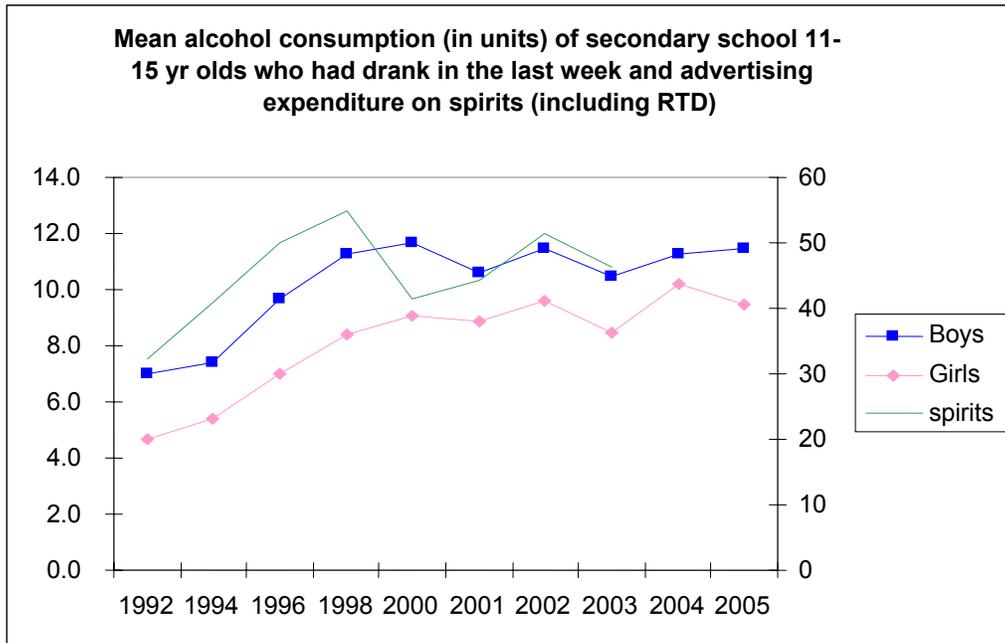


2.12 Figure 2 also shows a strong possibility of a link between the binge drinking levels of 11-15 year old with the annual spend on alcohol advertising for spirits and ‘alcopops’ (RTDs)⁹.

⁸ “Calling Time”, Academy of Medical Sciences, 2004

⁹ Table 3.2 Drug Use, Smoking and Drinking among Young People in England in 2005: Headline Figures, The Information Centre and Drink Pocket Book 2005, ACNielsen

Figure 2



2.13 Interestingly both genders’ binge drinking dips in 2000-01, following a drop in advertising expenditure in 1998-2000; and also around 2003, which is when Ofcom changed their advertising rules to the current stricter ones (see below).

2.14 The advertising ban in France (The Loi Evin) was upheld by the European Courts of Justice for ‘bi-national’ broadcasts. It ruled the law “reduces the occasions on which television viewers might be encouraged to consume alcohol beverages”. The court stated “it is in fact undeniable that advertising acts as an encouragement to consumption”¹⁰.

2.15 Research on young people’s alcohol consumption rates carried out last year showed a marginal decrease in the numbers of young people who had consumed alcohol in the past week¹¹. However children who *do* consume alcohol are now drinking more units than previously and 11-13 year olds particularly show a startling rise, with 11-13 year old boys drinking 43% more units in 2006 than they did in 2000 and 11-13 year old girls drinking 82% more units in 2006 than they did in 2000¹².

¹⁰ As stated in “Alcohol in Europe – A Public Perspective” Chapter 8, Anderson and Baumberg 2005

¹¹ Information Centre, Smoking, drinking and drug use among young people in England in 2006: headline figures

¹² Glass Half Empty, Alcohol Concern, 2007

3 Broadcasting and the Regulatory Framework

3.1 As part of the 2004 Alcohol Strategy, Government instructed Ofcom to review regulations around alcohol advertising and its impact on children. Ofcom's 2004 research declared much television alcohol advertising (of alcopops in particular) was found to be "*closely aligned to youth culture and of strong interest to underage drinkers*"¹³. As a consequence Ofcom reviewed and updated the advertising rules to combat the following specific promotional techniques:

- Condoning anti-social or self-destructive behaviour
- Linking alcohol with sexual activity or attractiveness
- Appealing to young audiences
- Condoning the irresponsible handling or serving of alcohol.

3.2 As mentioned above, during the revision process, Ofcom refused to consult on banning alcohol advertising before the watershed. Ofcom gave the following reason: "Ofcom remains of the view that this would be disproportionate (given that research indicates that advertising is a relatively small influence on young people's attitudes to drinking compared to other social, family and market factors) and would be ineffective (given that teenagers and most older children watch a significant amount of post-watershed TV)." ¹⁴

3.3 As this report has shown, there is significant evidence that advertising does play a role in influencing children's drinking. As has also been shown above, the greatest increase in quantity of alcohol consumed is between the ages of 11 and 13, and children are beginning to drink at a younger age. The importance of considering a watershed ban has therefore become increasingly pertinent.

3.4 The Advertising Standards Authority scheduling and the Committee of Advertising Practice (Broadcasting) rules dictate no alcohol adverts should be shown during programmes aimed at children:

"(a) The following may not be advertised in or adjacent to children's programmes or programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18:

- (i) alcoholic drinks containing 1.2 per cent alcohol or more by volume"*¹⁵

3.5 Advertising Guidance Note No. 5 from the BCAP states that:

¹³ Ofcom news release "Ofcom revises rules on alcohol advertising after industry debate" July 2004, http://www.ofcom.org.uk/media/news/2004/07/nr_20040719

¹⁴ Ofcom's decisions on revising alcohol advertising rules www.ofcom.org.uk/consult/condocs/AlcAds/decision.pdf

¹⁵ BCAP RULES ON THE SCHEDULING OF TELEVISION ADVERTISEMENTS <http://www.asa.org.uk/asa/codes/> http://www.asa.org.uk/NR/rdonlyres/7F763788-6A51-4A73-B35B-C60346FD5F6C/0/BCAP_Rules_on_the_Scheduling_of_Television_Advertisements_20050227.pdf

“Advertisements for alcoholic drinks, bingo, certain religious matter and for slimming products, treatments or establishments must not be advertised in or adjacent to children’s programmes or programmes commissioned for, principally directed at or likely to appeal particularly to audiences below the age of 18¹⁶.”

3.6 However, while programmes aimed at young (pre-school) children may be simple to classify, it is increasingly difficult to determine which programmes are aimed at children in their mid-teens. There is also an inconsistency in that while the ASA defines children as those under the age of fifteen, the rules applying to alcohol refer more broadly to audiences under the age of 18.

3.7 The Committee of Advertising Practice rules for *non-broadcast* advertising state that:

“No medium should be used to advertise alcoholic drinks if more than 25% of its audience is under 18 years of age.”¹⁷

3.8 This is a much tighter definition. It is unclear why non-broadcast rules are different to broadcasting ones. An alcoholic drinks advert scheduled on television therefore, has fewer restrictions in relation to protecting children than if the same advert was placed in a tube or railway station. It is unclear to Alcohol Concern why there would be different guidelines for broadcast and non-broadcast advertising, and our recommendation would be to bring both sets of regulations into line.

3.9 The device used in television programming to protect children from content unsuitable for them is the watershed. The rules form part of Ofcom’s regulations. A section from these regulations¹⁸ is set out below.

Section 1 - Protecting the Under-Eighteens

Principle

To ensure that people under eighteen are protected.

Rules

Scheduling and content information

1.1 Material that might seriously impair the physical, mental or moral development of people under eighteen must not be broadcast.

1.2 In the provision of services, broadcasters must take all reasonable steps to protect people under eighteen. For television services, this is in addition to

¹⁶ Committee of Advertising Practice Audience indexing: identification of television programmes likely to appeal to children and young people - Advertising Guidance Note No.5

¹⁷ The British Code of Advertising, Sales Promotion and Direct Marketing (Eleventh edition March 2003)

¹⁸ These rules can be viewed at the Ofcom website www.ofcom.org.uk/tv/ifi/codes/bcode/protectingu18

their obligations resulting from the Television Without Frontiers Directive (in particular, Article 22, see Appendix 2).

1.3 Children must also be protected by appropriate scheduling from material that is unsuitable for them.

Meaning of "children":

Children are people under the age of fifteen years.

Meaning of "appropriate scheduling":

Appropriate scheduling should be judged according to:

- *the nature of the content;*
- *the likely number and age range of children in the audience, taking into account school time, weekends and holidays;*
- *the start time and finish time of the programme;*
- *the nature of the channel or station and the particular programme; and*
- *the likely expectations of the audience for a particular channel or station at a particular time and on a particular day.*

1.4 Television broadcasters must observe the watershed.

Meaning of "the watershed":

The watershed only applies to television. The watershed is at 2100. Material unsuitable for children should not, in general, be shown before 2100 or after 0530.

On premium subscription film services which are not protected as set out in Rule 1.22, the watershed is at 2000. There is no watershed on premium subscription film services or pay per view services which are protected as set out in Rule 1.22 and 1.23 respectively.

.....

1.6 The transition to more adult material must not be unduly abrupt at the watershed or after the time when children are particularly likely to be listening. For television, the strongest material should appear later in the schedule.

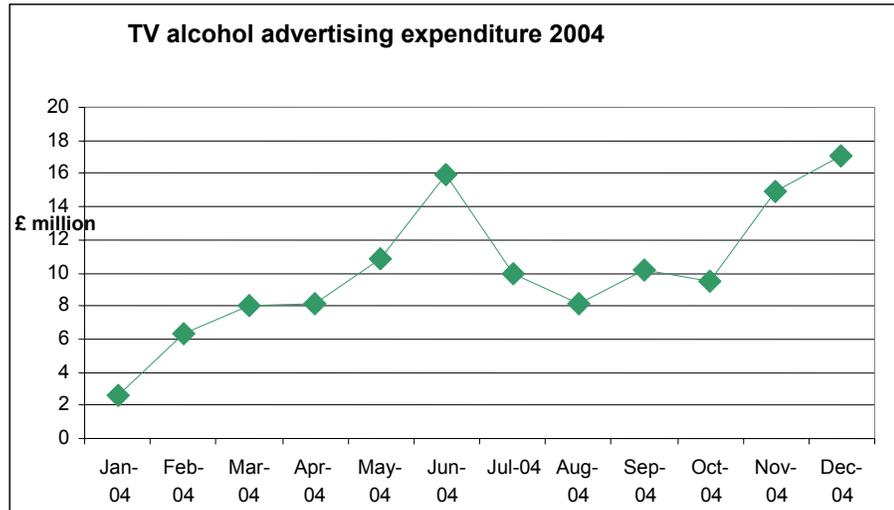
3.10 These regulations are very clear in relation to the content of programmes that children should be protected from in order to safeguard their wellbeing. As set out above, the evidence of a link between alcohol advertising and children's consumption is strong. It would be highly desirable therefore, to extend the current protections for children from alcohol advertising by imposing watershed restrictions on advertising, as well as programme content.

4 Alcohol Concern Research into Alcohol Adverts and Scheduling

4.1 Alcohol Concern has carried out unique research into alcohol adverts in two separate weeks (11th – 17th December 2006 and 19th – 25th March 2007) to ascertain how many alcohol adverts featured before the 9pm watershed, which TV programmes these were placed during and the age breakdown of a small sample of programmes potentially aimed at children.

4.2 By choosing two separate weeks to collect data, a comparison could be made. Expenditure on television alcohol advertising is very seasonal; there is a huge push in alcohol advertising in early summer and just prior to Christmas. Figure 2 demonstrates that alcohol advertising expenditure in March 2004 was below average at £8m compared to December 2004 at £17m.

Figure 3



Graph from ASA website¹⁹

4.3 A week from each of these two months was chosen for analysis, one in the run up to Christmas 2006 when many brands have a peak in advertising, and a comparison week in March 2007.

4.4 The following channels were monitored for alcohol adverts:

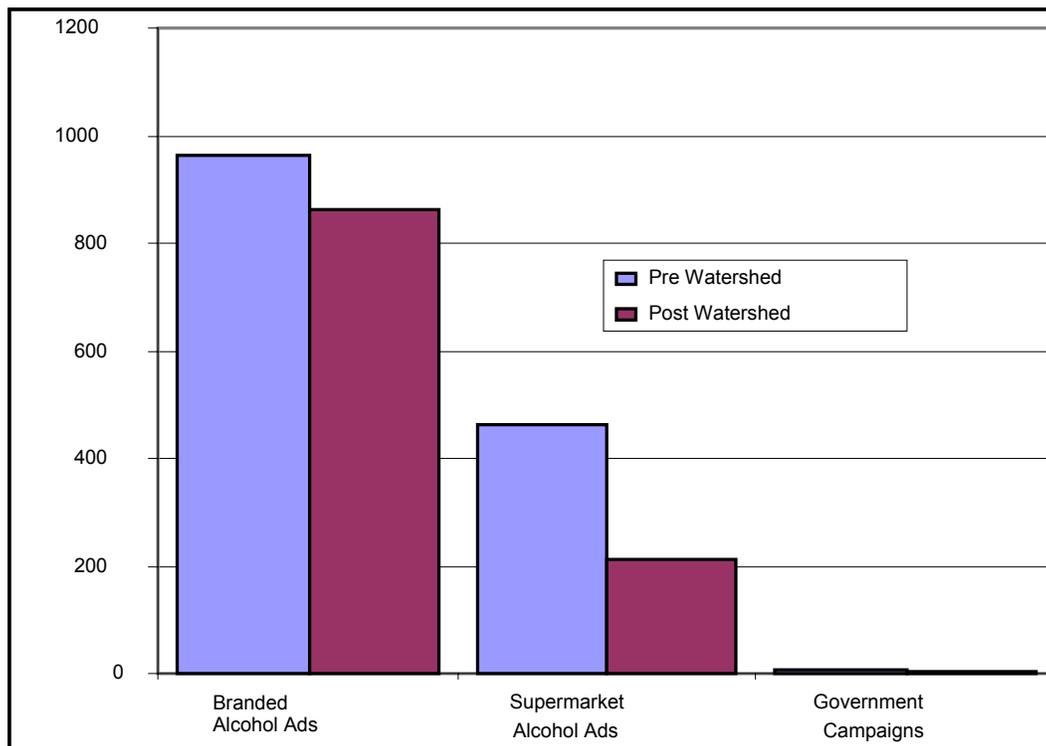
- ITV (including 14 regional channels)
- ITV2
- Channel 4
- Channel 5
- Sky One
- Sky Sports
- Sky News
- MTV

¹⁹ http://www.asa.org.uk/NR/rdonlyres/CC8127C7-D1AE-4092-99B0-335FE2F2A221/0/alcohol_research_2005.pdf

4.5 Figure 4 shows the distribution of alcohol adverts before and after the 9pm watershed in a 7-day period in December 2006. It is to be expected that there are more adverts in the run up to Christmas but our study showed the majority of alcohol adverts were shown before the 9pm watershed. There were also twice as many supermarket alcohol adverts shown before the watershed than after. The number of Government sensible drinking campaign adverts (Know Your Limits) was also analysed during the same week.

Figure 4

Number of alcohol adverts during the 7 day period in December 2006

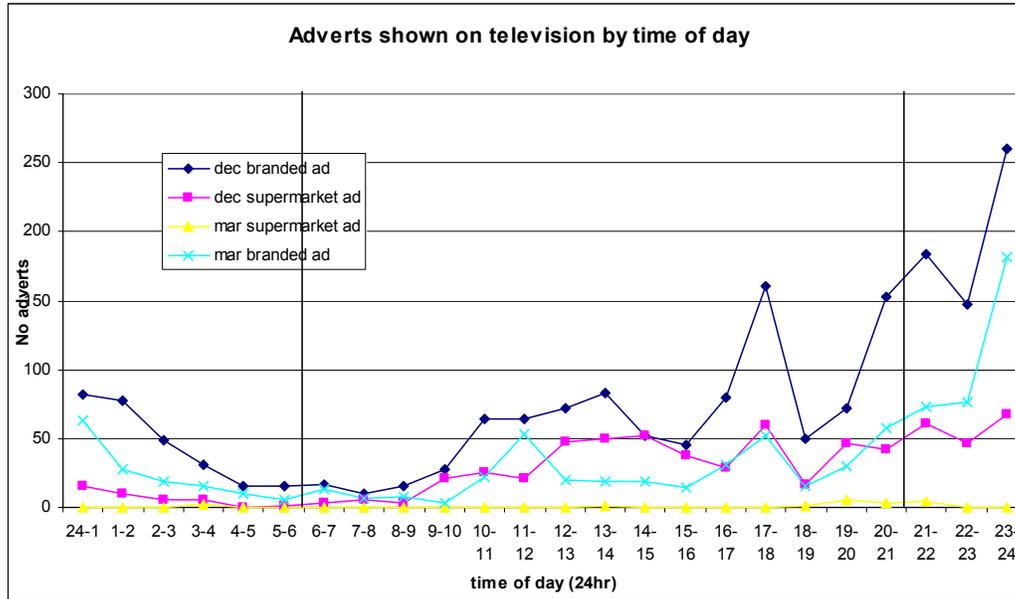


Alcohol Concern 2007: TV Adverts Shown before and after 9pm watershed

4.6 Figure 5 below shows the number of alcohol adverts on television in the selected two weeks by an hourly time code. It has been broken down by the two weeks studied (11th – 17th December 2006 and 19th – 25th March 2007) and whether the advert was for an alcohol brand or a supermarket advertising alcohol. This clearly illustrates a large peak after 9pm but a larger *number* of adverts prior to the watershed, especially in the December timeframe. There is also a rising number of alcohol adverts shown from 3pm to 5pm. This

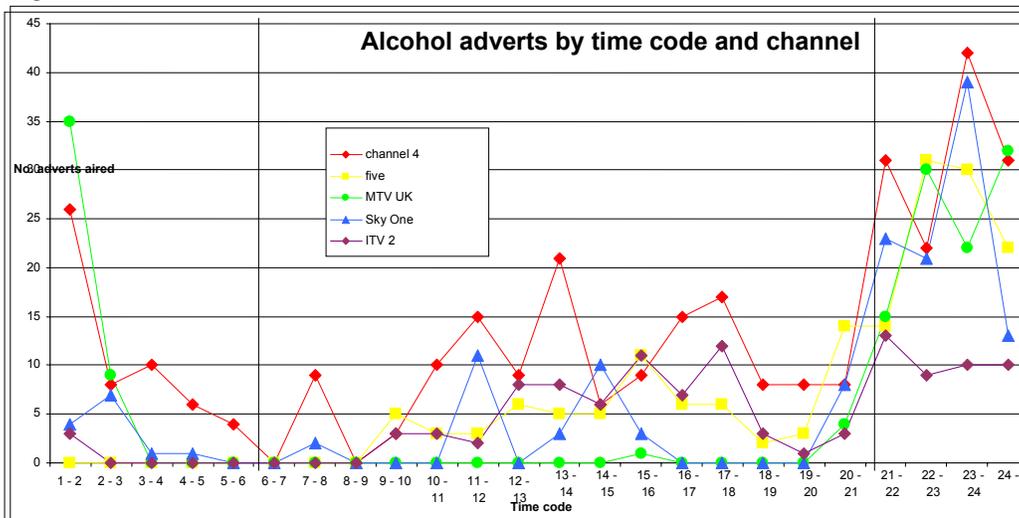
coincides with the time when most children return from school. It would be a reasonable assumption that most people in employment will not have returned home until after 5pm. Therefore the marked spike in alcohol advertising between 3pm and 5pm is at the very least puzzling.

Figure 5



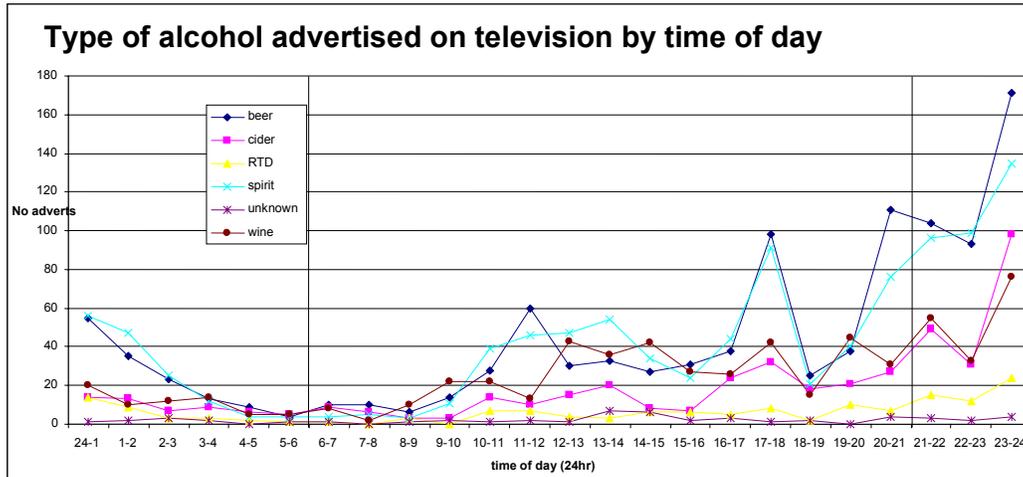
4.7 Figure 6 below shows both example weeks again by time code, but this time split by channels (not including SkySports 1, Sky News and ITV regional). Of the channels illustrated below, it seems Channel 4 shows the majority of alcohol adverts throughout the daytime hours.

Figure 6



4.8 Figure 7 illustrates the type of alcohol more popularly advertised throughout the various time codes. This graph clearly shows beer and spirits are most commonly advertised throughout the day and are also responsible for the peak from 3 pm to 5pm.

Figure 7



5 Analysis of Alcohol Advertising with a Significant Share of Children's Audience

5.1 Alcohol Concern analysed the audience demographic breakdown for four individual airings within programming that may appeal to children. Programmes investigated included those that in Alcohol Concern's understanding:

- May appeal to children
- May appeal to a young audience where children may be viewing
- Popular soaps prior to the watershed where family viewing, including children may occur

Table 1 - Analysis of Alcohol Advertising with a potentially significant share of Children's Audience

Advertiser	Alcohol Product	Channel	Time / Date	Programme
William Morrison's (supermarket)	Special Offers - 2 Packs Of Grolsch For £16	Channel Five	6.13pm 11 th December 2006	Home and Away
William Morrison's (supermarket)	Reason 306 - Carlsberg £9.99	Channel 4	6.17pm 12 th December 2006	The Simpsons
Lidl (supermarket)	Fine Wines & Low Prices 3	ITV	7.46pm 15 th December 2006	Coronation Street
William Morrison's (supermarket)	Special Offers - 2 Packs Of Grolsch For £16	ITV	1.53pm 17 th December 2006	The X Factor - The Final

Source: Mediametrie / Xtreme Information 2007

5.2 The demographic breakdown for the audience share of 14-19 year olds for each programme is as follows:

Table 2 – Demographic Breakdown of Share of Audience

Programme	Percentage of 4-19 year olds viewing (share of audience)	Total Number of 4-19 year olds viewing
The Simpsons	34.78%	821,500
The X Factor	18.18%	6,000
Home and Away	12.67%	237,300
Coronation Street	11%	1,126,000

Source: Eurodata TV. / BARB / TNS UK

5.3 The scheduling of the William Morrison’s’ Carlsberg alcohol advertisement during The Simpsons, a programme very likely to appeal to children, appears to violate BCAP and ASA rules and guidance. Had the rule that applies to non-broadcast advertising that “No medium should be used to advertise alcoholic drinks if more than 25% of its audience is under 18 years of age.” been in force in relation to broadcast advertising, then this scheduling of the William Morrison’s Carlsberg alcohol advert would clearly have been a breach of the regulations.

5.4 In relation to broadcast advertising, there are regulations that state that if a programme is determined to be ‘likely to appeal to children’ then alcohol advertising should not be scheduled alongside that programme. A programme is considered to be of ‘particular’ appeal to children if the proportion of children watching is 20% greater than the proportion of children in society. In addition viewing figures will presumably fluctuate, with popular programmes such as soaps attracting higher audiences for well publicised story lines, which will inevitably attract children as well as adults.

5.5 The viewing figures of 4-19 year olds watching the Coronation Street episode highlighted in Table 2 are of particular concern, with over 1 million children watching at that time. This demonstrates that even when the 4-19 year old share of the audience is as low as 11%, significant number are exposed to alcohol adverts. Even with a programme like Home and Away, hundreds of thousands of children are being exposed to alcohol advertising on a regular basis.

5.6 In addition it is worth pointing out that the figures quoted above are national viewing figures, and that there are regional variations which could mean that in parts of the country, higher proportions of children are watching these programmes and therefore being exposed to alcohol advertising. In our view this strengthens the case for a pre-watershed ban on alcohol advertising as the simplest way of protecting children across the country.

5.7 In Alcohol Concern's view our analysis of alcohol advertising scheduling strengthens the argument for a pre-Watershed ban. This is the only clear and simple way of ensuring that children are protected from alcohol advertising.

5.8 In researching this report, it came to light that the process for monitoring the scheduling of adverts in relation to under 18s programming is opaque. The general public and regulators are likely to have different understandings of the term "likely to appeal to children", given the high benchmark that Ofcom sets for defining a programme as likely to appeal to children. As a parent, it is reasonable to expect that your children will be protected from the undue influence of alcohol advertising, especially when watching what parents would expect to be "juvenile" programming. The 20% rules means that there will be occasions as identified in this research where parents' assumptions will not necessarily be reflected in schedulers decisions. The opaque nature of the process will also make difficult for the public to make complaints.

5.9 Alcohol Concern would argue that further work needs to be done to tighten up the monitoring of alcohol advertising scheduling, as well as work to communicate to the public what the rules are, how they are monitored and how to complain if they feel a breach of the rules has occurred.

6 Conclusion and recommendations

6.1 In terms of the research carried out by Alcohol Concern, the findings presented in this paper can be summarized as follows:

- i. The majority of TV alcohol advertising is scheduled prior to 9pm
- ii. There is a particular spike in alcohol adverts shown between 3pm and 5pm
- iii. A number of programmes where a significant share of the audience included children contained alcohol adverts, including Home and Away, The X-Factor and The Simpsons
- iv. The Simpsons was watched by a high proportion of children which, had non-broadcast rules applied, would have been in breach

6.2 There are several issues that arise as a result of the findings presented in this paper, and as a result of the examination of regulations concerning the protection of children from alcohol advertising on TV, and the way these are implemented at monitored.

6.3 In spite of Ofcom, BCAP and ASA guidance and regulations, it appears that the large majority of TV alcohol adverts appear before 9pm, when it is more likely that children will be watching. In particular, there is a spike between 3pm and 5pm when children's programming is often scheduled and when most children are returning home from school.

6.4 Supermarket advertising appears to particularly aim to reach audiences prior to 9pm, with double the amount of supermarket alcohol adverts appearing before 9pm. However during the 3pm-5pm slot, branded adverts spike at around 250 adverts shown, with the number of beer and spirit adverts particularly rising in this period.

6.5 There is a difficulty in defining programmes "likely to appeal to children" within the CAP Broadcasting rules. The CAP *non*-broadcast regulations define this as media where under-18s make up more than 25% of the audience. Had the non-broadcast rule applied to broadcast advertising, the scheduling of Morrison's' Carlsberg alcohol advertisement during The Simpsons would have been a violation. The demographic breakdown of the audience viewing The Simpsons (with children making up more than a third of the audience) means that schedulers and advertisers must be aware that placing alcohol adverts within the programme will lead to large numbers of children viewing.

6.6 Similarly The X Factor and Home and Away are clearly programmes viewed by children and likely to appeal to a young audience. The 20% rule which says that only when the proportion of children watching is 20% greater than the proportion of children in society will a programme be deemed unsuitable for carrying alcohol advertising is not only unnecessarily complicated, it also means that hundreds of thousands of children are regularly being exposed to alcohol advertising in this country.

6.7 In some popular soaps programmes such as Coronation Street, there is likely to be more than one million children watching the programme. Although the share of the audience for 4-19 year olds in this case was 11% and the programme may not be judged as “likely to appeal to children”, the large numbers of children viewing is of great concern.

6.8 The Advertising Standards Authority is responsible for dealing with public complaints about advertising but the system used for assessing whether a programme is suitable for alcohol advertising is complex and not well publicised, and this therefore makes it difficult for the public to complain.

6.9 It is not clear why the Committee for Advertising Practice’s Non-Broadcasting regulations, stating that alcohol adverts should not be shown where under-18s make up more than 25% of the audience, are tighter than Broadcasting regulations concerned with programmes “likely to appeal to under 18s”. It could be argued that all of the programmes analysed by Alcohol Concern are likely to appeal to under-18s.

7.0 Under the current set up it therefore appears that in spite of various codes and regulations, alcohol adverts do appear in programmes that appeal to large numbers of children and where the share of the audience of under-18 year olds is significant.

Recommendations

1. In light of the findings presented, Alcohol Concern recommends that there should be no alcohol advertising (either branded or supermarket) from 6am through to 9pm regardless of the predicted age of audience of a programme. In other words, there should be no alcohol advertising before the watershed. In our view this is the only sure way to protect the majority of children from alcohol advertising.
2. In programmes which run after the watershed but are still likely to appeal to some children, e.g. sporting events, alcohol adverts should not appear where more than 10% (1 in 10) of the audience are/ are likely to be children.
3. The regulations covering alcohol adverts should state clearly who is responsible for monitoring scheduling and what sanctions exist when these are contravened. This information should be publicly promoted.
4. Inconsistencies between the CAP Non-Broadcast and Broadcast codes should be resolved, with a clear definition of programming likely to appear to children identified and promoted.

Appendix 1 Acknowledgements and contacts for research purposes:

We would like to thank Xtreme Information Ltd and Mediametrie for their assistance in this project.

This report was prepared by Don Shenker, Srabani Sen, Frank Soodeen and Emily Diment.

BARB
Central Office of Information
Ofcom
ITV (duty office, marketing dept, customer services)
Channel 4,
Advertising Standards Agency,
Committee of Advertising Practise,
TNS media monitoring service
Institute of Practitioners in Advertising
ITC