

# Review of the Alcohol Sponsorship Guidelines for Scotland

# **REVIEW OF THE ALCOHOL SPONSORSHIP GUIDELINES FOR SCOTLAND**

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Scottish Government Social Research  
2012

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## **EXECUTIVE SUMMARY**

Overall, the Alcohol Sponsorship Guidelines for Scotland were viewed very positively by industry representatives, independent stakeholders and rights-holders. Additionally, the Guidelines, in their current form, are seen as being necessary, worthwhile and effective. The majority of the research participants considered the Guidelines to be clear, concise and easy to comply with.

### **Sponsorship Activity in Scotland**

A mapping exercise was undertaken to establish the range of sponsorship activities undertaken by the alcohol industry in Scotland since the Alcohol Sponsorship Guidelines for Scotland came into effect in 2009. A pro-forma was sent to representatives at 24 companies. Twenty-one companies completed and returned it. Three-quarters of these companies indicated that they undertake sponsorship activity.

A total of 43 sponsorship activities were reported in the pro-forma returns. Almost half of the activities related to sports events, clubs, or teams while a third related to music events or other cultural activities, including book, comedy and film festivals. Half of all the sponsorship activity was undertaken by the whisky sector and around a third accounted for by the beer and cider sector. In keeping with the principles of the Guidelines, all sponsored activities and events were targeted at audiences aged 18 and over. One third were targeted at audiences aged 25 and over and one third were not targeted at any specific age group in particular. None of the sponsored events or activities were aimed specifically at females, with around a third targeted at males and the remainder at both males and females.

### **Knowledge and awareness of the Guidelines**

Self-reported knowledge of the Guidelines was generally high among industry representatives. Scottish Government Alcohol Industry Partnership (SGAIP) members, in particular, tended to report knowing a 'great deal' about them, with non-SGAIP members being more likely to report knowing 'a fair amount'. Knowledge was lower among rights-holders, who tended to say that they could not actually remember seeing the Guidelines document, and were generally unaware of the detail contained within it. However, there was a sense in which rights-holders felt they did not require an in-depth knowledge of the document as their industry partners should, and do, inform them of their obligations in this regard.

While the research was focused primarily on SGAIP member organisations, which tend to be larger national alcohol companies, there was a perception that smaller alcohol companies will have a lower than average awareness of the Guidelines, and thus, may be less likely to comply with them.

## **Interpretation and implementation of the Guidelines**

The review uncovered no major issues with regard to the interpretation of the Guidelines, and very few barriers to compliance were identified. However, industry representatives felt that compliance might be an issue among some smaller alcohol companies and that rights-holders could take on more responsibility for implementation.

Additionally, there were a number of suggestions for enhancing specific principles covered in the Guidelines, the most common of which were:

- clarifying what is meant by a recognisable commitment to community or diversionary activities
- providing more of a steer on what constitutes good practice in respect of the collection of demographic data for sponsored events or activities
- addressing the question of whether or not it is appropriate for children's replica clothing to feature branding for non-alcoholic versions of sponsors' products – among the research participants there was a consensus that this is not in the spirit of the Guidelines
- addressing the growth of online and digital communications in guidelines relating to the promotion of responsible drinking messages
- updating the guidelines on sampling to reflect the move to Challenge 25.

## **Recommendations**

A number of recommendations flow from the research regarding the content of the Sponsorship Guidelines. Specifically:

- SGAIP should consider adding to the Guidelines some case studies to illustrate what is meant by a 'recognisable commitment' to activities that promote diversionary and community activities
- it would be prudent to recommend that companies should avoid sponsoring teams that could potentially comprise a majority of under 18s. In respect of the sponsorship of individuals, SGAIP should be mindful of the view that an under 25 threshold should apply as per the Portman Group and Committee of Advertising Practice (CAP) guidelines, and consider whether this is an area it might review in the future

- there is a need to review in more detail the approaches alcohol companies are taking to collecting demographic data, with a view to identifying good practice that could be included in the Guidelines
- to address the issues of branding for non-alcoholic versions of sponsors' products appearing on replica shirts, the wording of the relevant principle could be adapted as follows: '*alcohol branding or branding for non-alcoholic versions of alcoholic drinks must not appear on replica sports shirts...*'
- the guidelines relating to sampling should be updated to reflect the move from Challenge 21 to Challenge 25
- SGAIP should consider addressing in the Guidelines the growth of online and digital communications. As a minimum, it would be helpful to include a reference to the Portman Group's digital marketing code and recommend that companies follow this.

In addition to these recommendations relating specifically to the Guidelines document, the findings of the review point towards actions that SGAIP might take to help ensure compliance with the Guidelines in the future:

- raising awareness of the Guidelines among all those to whom they are applicable – across all of the participant groups, it was felt that efforts need to be made to ensure that all alcohol companies (particularly smaller companies that are not part of the SGAIP) and rights-holders are fully aware of the Guidelines. There were various suggestions for raising awareness; the most common of which was using relevant existing events, forums or and networks as “conduits for getting the information out there”
- developing a mechanism for identifying and addressing non-compliance – while some participants favoured the continuation of a self-regulatory approach, other participants felt that any monitoring should be conducted by an independent body, suggesting that this would be more credible than self-regulation and consequently may “pre-empt” any potential tightening of the Guidelines
- developing an online portal where the Guidelines and related documentation can be easily accessed – participants felt that an online portal would facilitate cross-referencing of the relevant legislation and codes, and serve as a vehicle for the sharing of ideas, experiences and best practice
- bringing greater cross-national consistency in sponsorship guidelines across the UK and, indeed, between the UK and Europe – while it was

recognised that consistency is complicated by the fact that legislation and policy priorities in respect of alcohol differ in Scotland and the rest of the UK, there was a view, and indeed an aspiration, that the Portman code will be loosely based around the Scottish Guidelines but include “caveats” referencing relevant variation in legislation and practice across the UK.



# 1 BACKGROUND AND CONTEXT

## Policy background

- 1.1 The Scottish Government has sought to liaise closely with the alcohol industry, through the Scottish Government Alcohol Industry Partnership (SGAIP), putting in place a range of measures to tackle alcohol misuse and promote responsible drinking.
- 1.2 One such measure was the Alcohol Sponsorship Guidelines for Scotland, published in 2009. The Guidelines are intended to ensure that: sponsorship is carried out in a responsible way; that sponsorship opportunities are used to promote responsible drinking; and that alcohol sponsorship is not targeted at those under the legal purchase age. In the tradition of self-regulation in the alcohol industry, adherence to the Guidelines is voluntary.
- 1.3 Prior to the Guidelines being produced, no guidelines or legislation relating specifically to alcohol sponsorship agreements in Scotland existed. The Portman Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks (hereafter referred to as the Portman Code) provides a procedural framework for influencing, regulating and controlling industry practice in relation to the naming, packaging and promotion of alcoholic drinks, but does not explicitly cover sponsorship by alcohol companies. Additionally, the Committee of Advertising Practice (CAP) code, administered by the Advertising Standards Authority (ASA), is primarily concerned with the content of marketing communications, for example, prohibiting marketing which suggests that alcohol can enhance mental or physical capabilities or sporting achievements, but again, without referring specifically to sponsorship agreements. These provisions are reinforced by the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks (Scotland), which support the promotion of the broader social responsibilities that go with the sale of alcohol, and underpin social responsibility within the context of licensing laws, again without making explicit reference to sponsorship activity.
- 1.4 Thus the Guidelines were intended to go further than existing relevant codes, requiring a range of commitments and standards on the part of all those involved in sponsorship agreements.
- 1.5 The Scottish Government's Framework for Action, published in March 2009, stated that the Government "will continue to monitor the implementation of the SGAIP Sponsorship Guidelines and consider whether further action is required". As part of this monitoring activity, the Scottish Government, in partnership with the SGAIP, commissioned Ipsos MORI to conduct an independent review of the Guidelines, beginning in the summer of 2011.<sup>1</sup>

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<sup>1</sup> This work was carried out to the international quality standard for market research, ISO 20252

## **Aims and objectives**

- 1.6 The overarching aim of the review was to evaluate knowledge of, and compliance with, the Guidelines by the alcohol industry, with a focus on identifying best practice and examining whether there is a need to enhance and improve the Guidelines, to ensure they remain fit for purpose. The specific objectives of the research were to:
- map the landscape of sponsorship activity across Scotland
  - identify the level of knowledge of the Guidelines
  - review current practice in the way the Guidelines are being interpreted and implemented
  - identify good practice of how the Guidelines are being applied
  - identify areas of non-compliance with the Guidelines, and reasons for this
  - make recommendations, which may include recommendations for enhancing and improving the Guidelines, to ensure they are fit for purpose.

## **Methodology**

- 1.7 The research comprised three phases: a desk-based mapping exercise; a series of in-depth interviews with industry representatives, independent stakeholders and rights-holders (that is, those who own the rights to a sponsored activity/event, e.g. a football club or festival organiser); and focus groups with industry representatives.

### ***Phase one: mapping exercise***

- 1.8 The aim of the mapping exercise was to establish the level of knowledge of the Guidelines and the range of sponsorship activity undertaken by the alcohol industry in Scotland since the Guidelines came into effect.
- 1.9 The sample for this phase was provided by the SGAIP and therefore comprised primarily SGAIP member organisations. In addition, to provide reassurance that no examples of large-scale sponsorship agreements had been missed, the Ipsos MORI research team trawled the internet for examples of any other alcohol companies who might be undertaking sponsorship activity in Scotland, and of events in Scotland which may be sponsored by alcohol companies. However, no additional companies were added into the sample.
- 1.10 Participants were asked to include in the pro-forma only *commercial* sponsorships with a *value of £5,000 or more* (see below). This means that local alcohol companies, which tend to have smaller production levels, were largely excluded from the research. It should be noted that, as a result of not having been involved in the SGAIP, local alcohol companies, are potentially less likely to be aware of the Guidelines, and therefore perhaps less likely to be complying with them. Although the research is unable to confirm whether

or not this is the case, interviewees did suggest that low awareness among smaller companies is an issue that needs to be addressed.

- 1.11 All alcohol companies in the sample were sent a pro-forma and invited to record in this their relevant sponsorship activities (a copy of the pro-forma is provided in Appendix A). Reflecting on the scope of the Guidelines, and to keep the task manageable, companies were asked to include in the form only commercial sponsorships that were signed in Scotland after 1 February 2009 (and/or activities that were signed before 1 February 2009 but are still active/ongoing) and have a value of £5,000 or more. For each sponsorship, they were asked to record a number of details including: the industry segment of the sponsoring brand; the nature of the event/activity sponsored; and the target population of the event/activity. The pro-forma also included a number of survey style questions to gauge awareness and perceptions of the Guidelines.
- 1.12 The pro-forma was sent to a total of 24 companies; 21 of which completed and returned it. Fieldwork was conducted between 12<sup>th</sup> and 30<sup>th</sup> September 2011. The remaining 3 companies did not return the pro-forma.

### ***Phase two: in depth interviews***

- 1.13 To explore awareness and perceptions of the Guidelines in more detail, and assess current practice in respect of implementation, a series of in-depth interviews were conducted with representatives from the alcohol industry contacted at Phase 1, independent stakeholders and rights-holders (that is, the person or entity that owns the rights to a sponsored activity/event, e.g. a football club or music festival organiser). Table 1.1 summarises the numbers of interviews conducted and the methods used.

**Table 1.1: In depth interviews**

<b>Audience</b>	<b>Method</b>	<b>Number</b>
Industry representatives	Telephone	7
Independent stakeholders	Telephone or face-to-face	3
Rights-holders	Telephone	5

- 1.14 The industry participants were chosen from among the 21 individuals who returned completed pro-formas. They were selected to be broadly representative of the 21 in terms of their sector, self-assessed knowledge of the Guidelines and their sponsorship activity.
- 1.15 The independent stakeholders and rights-holders were chosen by the Project Advisory Group in consultation with Ipsos MORI. The stakeholders represented organisations which campaign on alcohol issues and/or aim to promote good practice in alcohol policy and/or sponsorship. The rights-holders came from the sport and entertainment sectors. Fieldwork took place between 10<sup>th</sup> and 28<sup>th</sup> October 2011.

### ***Phase three: focus groups with industry representatives***

- 1.16 Phase 1 and 2 of the research culminated in the production of a set of draft recommendations for enhancing the Guidelines and ensuring compliance. The purpose of the focus groups was to engage the alcohol industry in discussions about the recommendations to ensure that these were deliverable and in the spirit of the Guidelines.
- 1.17 Two groups were arranged to coincide with a SGAIP event on 23<sup>rd</sup> November 2011. All SGAIP members, as well as other key industry representatives who completed a pro-forma (33 individuals in total), were invited to take part and roughly half (13) of them attended on the day.

### **Structure of report**

- 1.18 The next chapter presents an analysis of the data provided in the pro-formas regarding sponsorship activity undertaken in Scotland. Chapter Three explores knowledge and perceptions of the Guidelines among industry, rights-holders and independent stakeholders. Chapter Four reviews how the Guidelines are being interpreted and implemented by alcohol industry sponsors and rights-holders, and also considers participants' suggestions for enhancing the Guidelines and ensuring implementation in the future. The final chapter sets out recommendations for enhancing the Guidelines, to ensure they remain fit for purpose.

### **Acknowledgements**

- 1.19 Ipsos MORI would like to thank all the research participants for taking the time to participate in the study and for their invaluable input.

## 2 SPONSORSHIP ACTIVITY IN SCOTLAND

- 2.1 This chapter looks at current sponsorship activity in Scotland, as reported by alcohol industry representatives who completed a pro-forma. It outlines the number of companies undertaking sponsorship activity, the industry segment of sponsoring brands, the types of sponsorship activities undertaken, and the target population of sponsored events and activities.
- 2.2 As noted in paragraph 1.9, the sample for this phase of the research was provided by SGAIP and thus largely comprised SGAIP member organisations. Additionally, members of the sample were asked to include in the pro-forma only *commercial* sponsorships that were signed in Scotland after 1<sup>st</sup> February 2009 (and/or activities that were signed before then but are still active) and *have a value of £5,000 or more*. All of this meant that the sample was skewed towards larger, national companies, that are likely to be more aware of, and compliant with, the Guidelines than smaller companies.

### Overview

Three-quarters of the alcohol companies that were sent a pro-forma indicated that they undertake sponsorship activity. A total of 43 sponsorship activities were reported by these companies. Almost half of these activities related to sports events, clubs, or teams and a third related to music events or other cultural activities, including book, comedy and film festivals.

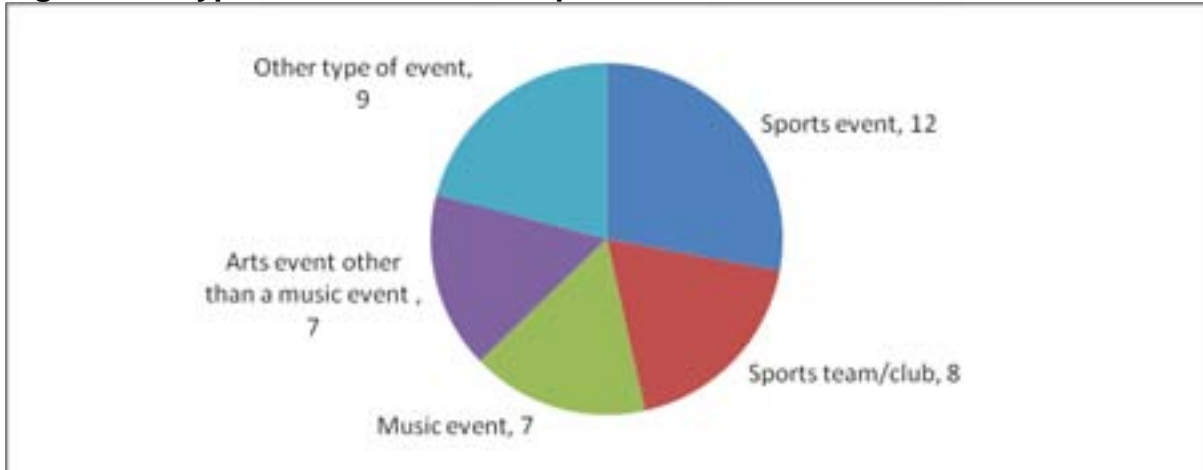
Half of all the sponsorship activity identified was undertaken by the whisky sector with around a third accounted for by the beer and cider sector.

In keeping with the principles of the Guidelines, all sponsored activities and events were targeted at audiences aged 18 and over. One third were targeted at audiences aged 25 and over and one third were not targeted at any specific age group in particular. None of the events or activities were aimed specifically at females, with around a third targeted at males and the remainder at both males and females.

### Detailed analysis

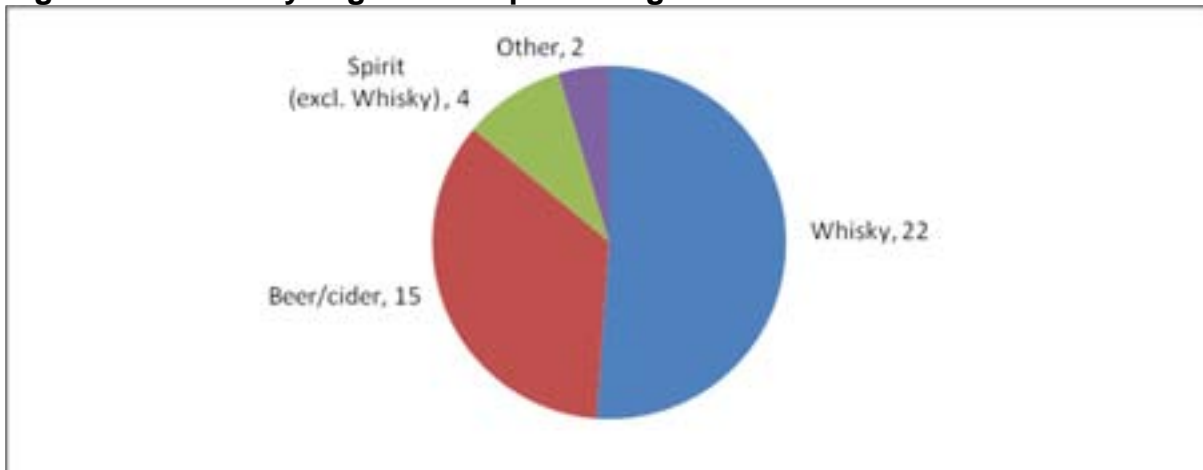
- 2.3 From the 24 pro-formas sent out, we received 21 completed pro-forma returns from alcohol companies, 18 of which reported undertaking sponsorship activity. As illustrated in figure 2.1, a total of 43 sponsorship activities were reported. Almost half of these involved sponsorship of sports events, teams, or clubs, while a third related to music and other arts events, including music, comedy, book and film festivals. The remainder involved sponsorship of 'other' types of event, primarily industry and independent awards ceremonies and dinners.

**Figure 2.1: Type of activities/event sponsored**



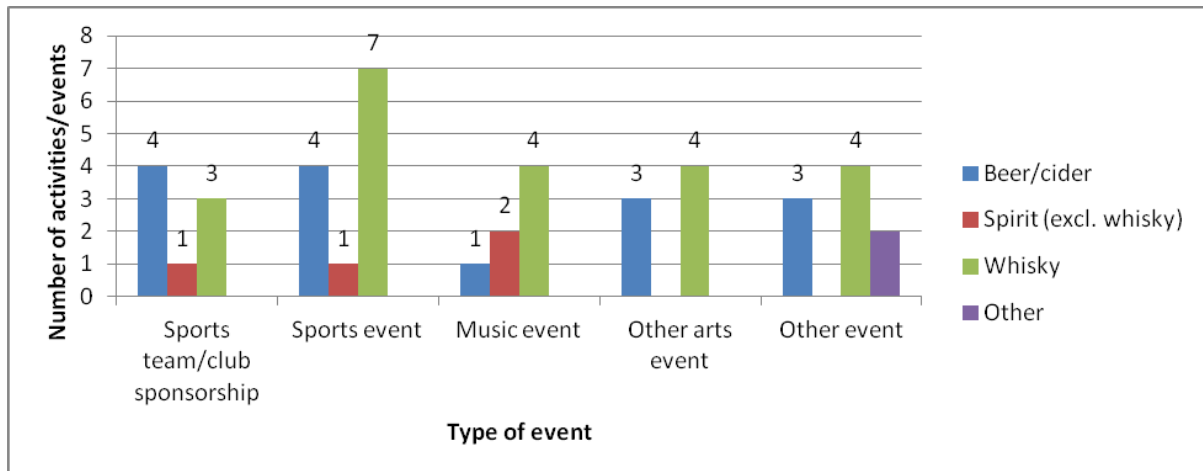
2.4 As figure 2.2 shows, half of the reported sponsorship activity was being conducted by the whisky sector (22), while around a third was being undertaken by the beer/cider sector (15). Very few activities were sponsored by other sectors (6).

**Figure 2.2: Industry segment of sponsoring brand**



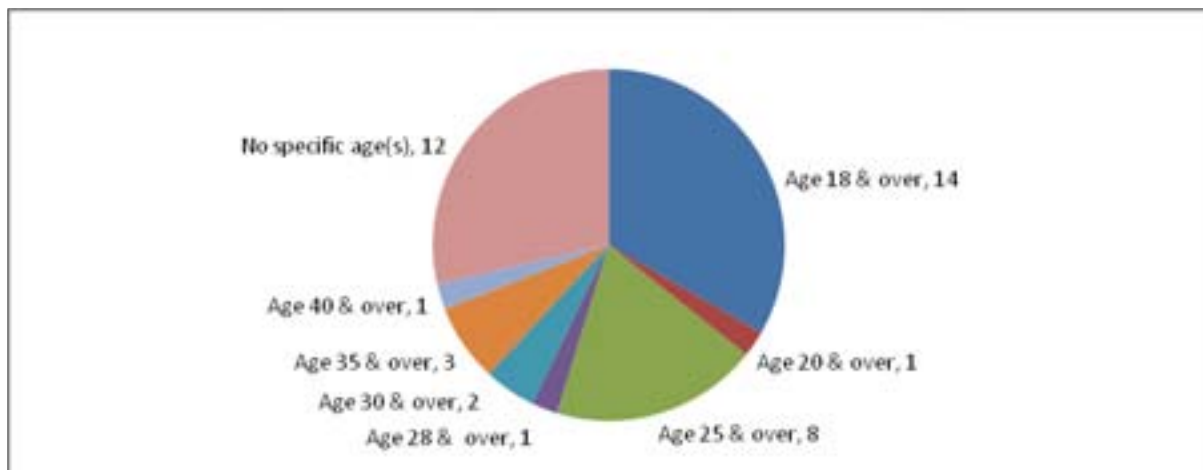
2.5 The whisky and beer/cider sector were involved in sponsoring all of the main categories of activities and events. Sponsors from the spirits sector (excluding whisky) were involved only in sports and music events and activities (figure 2.3).

**Figure 2.3: Type of sponsorship activity, by industry segment of sponsoring brand**



2.6 The pro-forma included a question about the target age ranges of the sponsored events and activities. The question was open-ended in style to ensure that the data was accurately captured. This resulted in a variety of age groupings being mentioned and thus figure 2.4 is based on the youngest age mentioned. As can be seen, in keeping with the principles of the Guidelines, none of the sponsored events and activities were targeted at people under the legal drinking age. It is worth noting, however, that a third of all sponsorships included 18 year olds within their target age range.

**2.7 Figure 2.4: Youngest age targeted by sponsorship activity**



2.8 Around two thirds (28) of the events and activities being sponsored by the industry were targeted at both male and female audiences, and another third (15) were targeted specifically at males. No activities were targeted at a female only audience.

2.9 Activity targeted at males and females tended to relate to other cultural events, while activity targeted solely or primarily at males tended to relate to sporting sponsorships.

### 3 KNOWLEDGE AND PERCEPTIONS OF THE SPONSORSHIP GUIDELINES

3.1 This chapter looks at knowledge and perceptions of the Guidelines among industry representatives, rights-holders and other stakeholders, drawing on findings from both the pro-formas and in-depth interviews.

#### Overview

Self-reported knowledge of the Guidelines was generally high among industry representatives. SGAIP members in particular tended to report knowing a 'great deal' about the Guidelines, with non-SGAIP members being more likely to say they knew 'a fair amount'. There was a perception that smaller alcohol companies perhaps have a lower than average awareness of the Guidelines.

The five rights-holders involved in the research tended to say that they could not actually remember seeing the Guidelines document, and were generally unaware of the detail contained within it. However, there was a sense in which they felt they didn't require an in-depth knowledge of the document as their industry partners should, and do, inform them of their obligations in this regard.

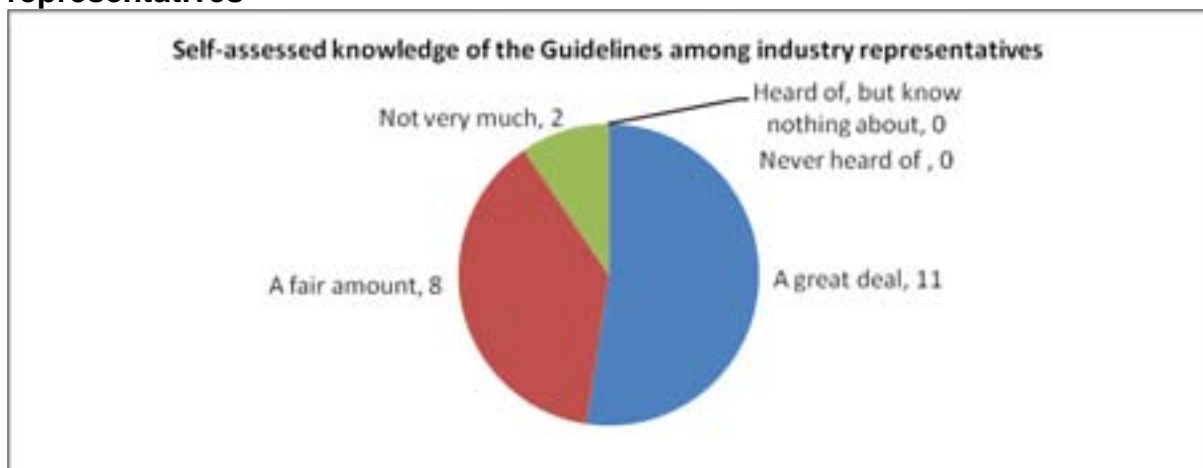
There was almost universal acceptance of, and satisfaction with, the Guidelines among alcohol company representatives, rights-holders and independent stakeholders: the majority considered the Guidelines to be clear, concise and easy to comply with. There was consensus that the Guidelines are effective in promoting responsible drinking, although views were more mixed about whether the Guidelines help promote community and diversionary activities.

#### Knowledge of the Guidelines

##### *Industry representatives*

3.2 In the pro-formas, industry representatives tended to say they knew either 'a great deal' (11) or 'a fair amount' (8) about the Guidelines, with only two industry representatives saying they didn't know very much about them.

**Figure 3.1: Self-assessed knowledge of the Guidelines among industry representatives**





- 3.3 As might be expected, respondents who sit on the SGAIP were particularly likely to report knowing ‘a great deal’ about the Guidelines, while non-SGAIP respondents were more inclined to say they know ‘a fair amount’. The two respondents who said that they didn’t know very much about the Guidelines had not been involved in the initial SGAIP discussions about the Guidelines.
- 3.4 Industry representatives who did not sit on the SGAIP tended to say that their employer had drawn their attention to the Guidelines, either as part of in-house awareness training, or, in the case of new employees, induction training:

*When we have new starts joining the company in the marketing field we make sure they are taken through the induction, and that induction talks about the whole responsible drinking agenda and the Sponsorship Guidelines.*

Industry representative

*When I first started with our company, our Public Affairs Manager basically gave me a copy of the Guidelines and just said: “This is something you need to be aware of and need to have a knowledge of in your role”.*

Industry representative

### ***Independent stakeholders and rights-holders***

- 3.5 The three independent stakeholders who participated in the research also felt they were reasonably knowledgeable about the Guidelines, and tended to be aware of the detail contained within them. They commonly reported that, due to their remit within their organisation, they had been sent a copy of the Guidelines upon publication.
- 3.6 Compared with the independent stakeholders and industry representatives, rights-holders were substantially less knowledgeable about Guidelines. Indeed, a couple of them appeared to find it difficult to recall whether or not they had seen the document and reported that most of their understanding of what was contained within it had come from conversations with their industry partners. There was also a tendency for this audience to almost conflate the Guidelines with similar or related codes, particularly the Portman code (which does not specifically relate to sponsorship agreements), and to assume that if they were complying with those other codes they would also be complying with the Scottish requirements.

*I haven’t been made hugely aware of them and I’ve been involved in sponsorship with alcohol companies for [many] years now.*

Rights-holder

*I’m more familiar from my past experience of UK-wide Guidelines rather than the specific Scottish variations of it, but I would say [I have] a reasonable knowledge.*

Rights-holder

- 3.7 There was a clear sense in which the rights-holders felt that they do not necessarily require sight of the Guidelines document, nor extensive knowledge of the detail within it. They viewed their industry partners as being knowledgeable and responsible in ensuring their sponsorship activities comply with the Guidelines, and felt the industry should, and do, guide them in this area, as required:

*We don't pretend to be experts and that's where we want our partners to say: "This is what you should be doing and this is what you can't be doing", because they are the ones that have to live by these Guidelines.*

Rights-holder

*[My knowledge of the Guidelines] would have been via our partners. You know, if there is any change in the Guidelines or some background bits and pieces of activity that they were carrying out then they would have edited out the relevant bits and sent them over to us.*

Rights-holder

- 3.8 Industry representatives and rights-holders alike perceived a lack of awareness of the Guidelines among external agencies they work with, such as PR agencies or event catering suppliers and smaller companies. They felt that greater awareness of the Guidelines among these external organisations would contribute to ensuring the promotion of responsible standards across all sponsorships.

*[Awareness] sort of varies. The larger organisations are pretty up to speed with things but we get a lot of contact from smaller local organisations [looking for sponsorship], that maybe don't really [have an awareness] and we have to explain to them: "Look for legislative reasons we can't get involved in this", because we get a lot of requests for things that involve or are directly aimed at young people that we just can't go for and they don't perhaps think of that.*

Industry representative

## **Perceptions of the Guidelines**

- 3.9 Overall, the Guidelines in their current form are seen as being necessary, worthwhile and effective.
- 3.10 In the qualitative interviews, there was almost universal acceptance of, and satisfaction with, the Guidelines. However, one stakeholder offered a vastly different perspective, highlighting a strand of opinion which fundamentally objects to alcohol being used to sponsor any event, sport, team or attraction.
- 3.11 This stakeholder pointed out that the exposure of young people, in particular, to alcohol marketing influences their decisions around when and how they consume alcohol and how much they drink. For this stakeholder, a blanket ban on sponsorship by alcohol companies, such as exists in France, is one of the ways in which young people need to be protected, allowing a culture of low alcohol consumption to become more acceptable. They believed the detailed measures in the Guidelines to be irrelevant;

commenting, for example, that it doesn't matter if there is a restriction on alcohol companies advertising on children's replica football jerseys, when those same children have posters on their walls that feature their favourite players sporting alcohol-branded clothing, and when they are surrounded by alcohol branding every time they attend a game.

- 3.12 Many industry representatives felt that the Guidelines really represent what sensible and ethical companies and right holders would be doing anyway. Still, many participants mentioned the clarity of the Guidelines as a favourable aspect, suggesting that this enables both alcohol companies and rights-holders to absorb and implement them relatively easily; makes industry and rights-holders obligations clear; and makes decision-making more straightforward. Related to the clarity of the Guidelines, participants were generally appreciative of the fact that the Guidelines are short, meaning that they are an easy read, a quick point of reference and allow alcohol companies to go further with additional rules if they wish.

*..... it does what it says on the tin..... it's not too prescriptive and it just gives people guidance and direction of travel..... about some of the considerations that need to be put in place.*

Industry representative

*I think what the Guidelines did is give a very clear steer of a number of principles that could and should be applied as part of delivering alcohol sponsorship in Scotland.*

Industry representative

- 3.13 A number of participants thought that the endorsement of the Guidelines by the Scottish Government and, in particular, the Foreword by the Minister for Public Health, was positive, giving the Guidelines credibility and importance. However, of even greater importance to the alcohol companies, rights-holders and other stakeholders, was that the Guidelines are voluntary and not guided by statute or external regulation. For participants, this is seen as positive as it allows them to comply with the Guidelines without the time and complexity involved in stringent regulation.

*I think that, in principle, [the Guidelines] are exactly the right way to go..... I think self-regulation is vitally important and there isn't a need to go further and legislate and put in place restrictions.*

Stakeholder

*.... It's a good thing, let's run with it.... to turn it into legislation or to put even more rules and responsibilities in, or Guidelines in, or suggestions in, isn't really necessary because people have bought into the spirit of it. They are therefore not trying to get round the detail of it.*

Industry representative

- 3.14 A number of participants, particularly rights-holders, also felt that the current economic climate makes it vital to avoid making the Guidelines too prescriptive because it's hard enough at the moment to find sponsors. They feared that any tightening of Guidelines would make this position deteriorate, possibly even leading to some events being cancelled.

*I've heard rumours in the past.... whereby alcohol sponsorship [might no longer] be allowed... I would be against [the Guidelines] getting tightened because that could lead to sponsorship being banned altogether.... If there's more investment in sport then hopefully you are going to get a healthier nation.*

Rights-holder

- 3.15 A number of participants commented that the Guidelines felt similar to other documents and codes which set out good practice in this area, such as the Portman Group Code of Practice. While many commented that this can cause a lack of clarity over which to use and which should take precedence, it was also largely seen as positive in a number of ways: first, it helps to reinforce good practice messages among the workforce at both alcohol companies and rights-holders, giving a consistent message in respect of how things should be done. Secondly it allows industry representatives to push for changes to other codes of practice to bring them into line with the Guidelines; and thirdly, it allows companies who work across the UK to push for similar Guidelines to be adopted in England, Wales and Northern Ireland, bringing best practice in those areas in line with Scotland. Given that the Portman Group is currently consulting on developing specific sponsorship guidelines, there is a challenge for the Portman Group, SGAIP and others to ensure that the different guidelines are aligned and clear.

*We have taken the Scottish Guidelines and given them to the Portman Group and said that these are what yours should look like, which I think is about as resounding an endorsement as you can have for them.*

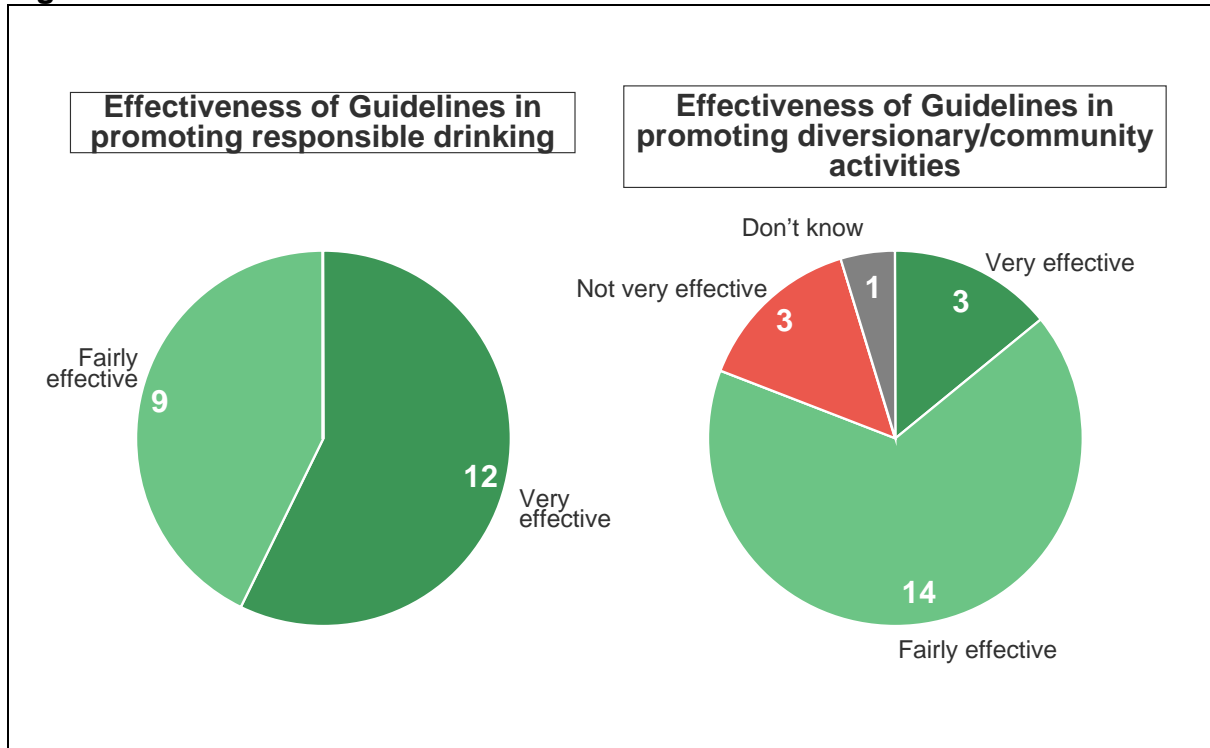
Industry representative

*We don't only operate in Scotland and we have been able to share them across other areas of business. There is an awareness of an additional level of principles around alcohol sponsorship that we were able to share with our colleagues in England and Wales and across in Northern Ireland and I think that in itself has been a positive benefit.*

Industry representative

- 3.16 As well as being satisfied overall with the Guidelines, participants also generally thought that they were effective against two of the core principles. One of these principles is in integrating responsible drinking messages, ensuring that those signed-up carry prominent responsible drinking messages and avoid linking alcohol with success or any condoning of anti-social behaviour. As the chart below illustrates, over half of respondents (12 out of 21) thought the Guidelines had been very effective in this regard while the remaining nine respondents thought they had been fairly effective. The other principle tested in the pro-forma was around the effectiveness of the Guidelines in promoting diversionary and community activities. Although respondents largely thought that the Guidelines were effective in this regard too, there was less unanimity than in respect of the promotion of responsible drinking, as illustrated in the chart below. This may reflect a lack of certainty among some participants about what was actually meant by diversionary and community activities (discussed in more detail in the next chapter) or a lack of experience in this area.

**Figure 3.2: Perceived effectiveness of the Guidelines**



## 4 IMPLEMENTATION OF THE GUIDELINES

- 4.1 This section reviews how the Alcohol Sponsorship Guidelines are being interpreted and implemented by alcohol industry sponsors and by rights-holders. It also considers participants' suggestions for enhancing the Guidelines and ensuring implementation in the future.

### Overview

The research uncovered no major issues with regard to the interpretation and implementation of the Guidelines. The industry representatives and rights-holders interviewed were complying with all of the core principles relevant to them and very few of them identified any barriers to doing so. Indeed, most of them said that, by the time the Guidelines were published, they were already behaving in ways consistent with most, if not all, of the principles; whether as a result of following the Portman Group code, company-specific codes of practice, the Committee of Advertising Practice (CAP) code and/or relevant legislative requirements.

Still, there was a sense in which the industry representatives felt that compliance could be an issue among some smaller companies and that rights-holders could take on more responsibility for implementation *vis a vis* sponsors. Additionally, there were suggestions for enhancing specific principles covered in the Guidelines and for ensuring future compliance more generally – the latter included raising awareness of the Guidelines among all those to whom they are applicable, and developing a mechanism for identifying and addressing non-compliance.

### Responsibility for implementation

- 4.2 All of the rights-holders who took part in the research said that reference to the Alcohol Sponsorship Guidelines forms an important part of their contractual agreements with sponsors. However, only a couple of them said that their contracts state explicitly who is responsible for implementing the Guidelines. When asked where they thought such responsibility lies, they tended to say with both themselves and their sponsors but a couple of them clearly felt that sponsors should assume a lead role. For their part, and consistent with views reported in the previous chapter, industry representatives expressed frustration that some rights-holders are not more cognisant of their responsibilities under the Guidelines and therefore more willing to 'go the extra mile' to ensure appropriate implementation.

*It's an agreement with both parties, so it would mean that both of us have got to be aware of [the Guidelines] but it is something that we would probably expect to be driven by a partner.*

Rights-holder

*I think the onus is very much upon the industry at the moment to deliver the content of the [Guidelines]... With a sponsorship we're about to announce, there was a long and heavy debate about whether we could include parts of the [Guidelines] in the contract, and they pushed back very heavily against that... they saw it as our responsibility to hold to the code rather than theirs.*

Industry representative

- 4.3 Still, some of the industry representatives also commented that the situation is gradually changing, with rights-holders increasingly recognising that it is in their own interests, as well as those of the wider public, to work towards effective implementation.

### **Current implementation practice**

- 4.4 The research uncovered no major issues with regard to the interpretation and implementation of the Guidelines. The industry representatives and rights-holders interviewed were complying with all of the core principles relevant to them and very few of them identified any barriers to doing so. Indeed, most of them said that, by the time the Guidelines were published, they were already behaving in ways consistent with most, if not all, of the principles; whether as a result of following the Portman Group code, company-specific codes of practice, the CAP code and/or relevant legislative requirements. Still, there was a sense in which participants felt that compliance could be an issue among smaller companies that have no representation on the SGAIP.

*We are absolutely doing these things and I would feel that the Sponsorship Guidelines would be the very, very bottom net that we would [use to] try and catch anything out and I would very much doubt if anything would reach that far.*

Industry representative

*It's not difficult to do what's on there. It might be difficult for some organisations to do it well but it's something that larger companies and certainly the responsible companies would be doing anyway.*

Industry representative

- 4.5 The remainder of this chapter examines interpretation and implementation of the individual components of the Guidelines in detail, highlighting areas of best practice and barriers to compliance where appropriate. It also considers views on how the Guidelines might be enhanced to ensure that they remain fit for purpose.

### **The Core Principles of the Guidelines**

**1) 'As an integral part of each new sponsorship, the sponsor will make a recognisable commitment to activities or events that promote responsible drinking or support diversionary/community activities'**

- 4.6 All of the industry representatives and rights-holders who took part in the research said that their company or organisation actively engages in the promotion of responsible drinking as part of its sponsorship agreements, whether by integrating responsible drinking messages on all relevant communications; donating advertising and marketing collateral to such messages; strictly controlling sampling activity; or, in the case of one of the rights-holders, offering sponsors incentives to promote responsible drinking (see paragraphs 4.28-4.35 for more information on these activities). Several

industry representatives from larger companies also described commitments that their company had made to support diversionary and/or community activities. These commitments took the form of funding charitable foundations or other initiatives aimed at promoting sports or cultural activities among young people and local communities.

**Good practice example:**

Tennent's donated their sponsorship rights for the Scotland men's Under 21 football team to the Scottish Government's CashBack for Communities Scheme. This meant that the Scheme was promoted on the training kit of the team, as well as on trackside advertising at all home games, editorial and advertising in match programmes and access to the players for CashBack-related media opportunities. The deal also includes 300 free tickets for each under 21 home game, to be used for competitions.

**Good practice example:**

Another company that has sponsored a football club in the past has encouraged the club to get involved in Alcohol Awareness Week. It provided the club with Alcohol Awareness Week table toppers, posters and beer mats for placement in the club bar and reception during home games.

**Good practice example:**

Diageo sponsors the Scottish Grocer Magazine Social Responsibility Award. The award recognises social responsibility amongst the off-licensed trade in Scotland against a set of standards, which include: a robust system to prevent underage drinks purchase and consumption, and clear communication of the policy; responsible display and promotion of alcohol; involvement in local initiatives like Crimestoppers; and involvement in positive local programmes which benefit local social life and community health, like local festivals and gala days, sports events etc.

- 4.7 Still, a small minority of participants questioned the meaning of the term 'recognisable commitment' in the context of the Guidelines, asking: "what is a recognisable commitment", "how do you demonstrate your recognisable



commitment?” or “who judges what is a recognisable commitment?” The focus group participants suggested that a good way to address such questions would be to add relevant case study examples to the Guidelines. They felt it important that the case studies cover a range of commitments, undertaken by both smaller and larger organisations, to illustrate the varied ways in which the principle can be applied.

**2) ‘Alcohol brands must not be used to sponsor teams, brands, celebrities or events with a particular appeal to those under the age of 18’**

4.8 Industry and rights-holders who were interviewed invariably stated that this principle is consistent with provision in their own code of practice and/or in the CAP code and is therefore “embedded” or “ingrained” in everything they do. While all felt that the principle is effective in its current form, one of the rights-holders was keen to draw a distinction between teams and events that have a particular appeal to under 18s, and those that have a general, family appeal. He thought it entirely appropriate for alcohol companies to sponsor the latter types of events and, indeed, commented that it is a “good thing” to create environments where young people are exposed to alcohol being consumed responsibly. A similar comment was made by an industry representative.

4.9 Of course, demonstrating compliance with the principle is sometimes contingent upon the availability of accurate audience demographic data for the events in question. Current practice in respect of the collection and analysis of such data is discussed under point 5 below.

**3) ‘Alcohol brands will not be used to sponsor an individual who is under 18. This does not prevent alcohol brands being used to sponsor teams and events, where the team or event includes participation of a person under 18; although any team members under the age of 18 will not be used individually in any promotional or brand activation activity’**

4.10 Again, all of the participants said they adhere strictly to this principle and, indeed, almost half said that they err on the side of caution by not sponsoring, or not putting forward for sponsorship, individuals under the age of 25, reflecting the Portman Group and CAP guidelines for the marketing of alcoholic drinks.

**Good practice example:**

Tennent’s consciously avoid sponsoring under 21 football teams because they cannot guarantee that, at any one time, most of the players in those team will be over 18.

- 4.11 One of the stakeholders interviewed felt strongly that an under 25 threshold should apply for all sponsorship of individuals and that the Guidelines should be changed accordingly.

*The whole under 25 issue...is much bigger than just sponsorship obviously but I think it's a very important issue for the Sponsorship Guidelines to look at in a bit more detail...in terms of using images or promotional material of people under 25; whether that's appropriate or not...Lewis Hamilton if he's lucky he's 26 but he looks younger. [The Guidelines should be brought] into line with the rest of the standards in the media.*

Stakeholder

- 4.12 In the focus groups among industry representatives, however, there was little support for this suggestion. Several of the participants commented that, as 18 is the legal age for alcohol consumption, it makes sense that the same threshold applies in respect of sponsorship.

**4) 'Prior to sponsorship of any individual or team, the owners of the alcohol brand should make all appropriate efforts to check if there is any known reason why an alcohol brand would be inappropriate'**

- 4.13 The industry representatives interviewed took this principle very seriously, not least because they were extremely wary of any associations that might bring their brand into disrepute. Almost all of them said that, prior to entering into a sponsorship agreement, they carry out an "audit" of, or "research thoroughly", the individuals, teams or events concerned to identify any reasons why the sponsorship might be inappropriate. Additionally, one individual said that his company has written regulations stipulating types of association it will not consider.

- 4.14 A few participants recounted specific instances of their company rejecting or terminating particular sponsorship or similar agreements because of the "risk" these associations posed to their reputation:

*We have been pulling back from cars and drivers for a while and I think pretty much stopped everything involved in motor sports. That's not to say that motor sport sponsorship can't be used positively. You look at Johnnie Walker's involvement with the McLaren Formula One team at the moment and it's largely putting out the message of responsible drinking...but we choose not to be involved because of the risk of negative associations.*

Industry representative

*We have had things proposed to us by football clubs to run activities funded by them – so not even things that we would have to pay for – that would seem attractive to us, that used legends from their past, [some of whom] had a chequered history with alcohol, but we just said "no, absolutely no way; we're not branding that".*

Industry representative

4.15 Reflecting such strong feeling among industry representatives, there was a consensus that this principle of the Guidelines is appropriate and there is no need to clarify or enhance it.

**5) ‘All reasonable efforts must be made to obtain historical (or anticipated, if a new event) demographics for the sponsored events. For association with an alcohol brand, demographics must indicate that 75% of the event participants, audience and spectators are over 18’**

4.16 All but one of the industry representatives interviewed said they work closely with rights-holders to obtain historical demographics for the event(s) that they sponsor. While a few of them had found this process to be straightforward, most identified barriers to obtaining the requisite information. Specifically, it was noted that:

- while it is possible to collect basic demographic information as part of the ticket sales process, the tendency for people to buy tickets online and on behalf of others makes it very difficult to ascertain the age of all those who will come into possession of tickets
- certain events have no historical precedent, meaning relevant data simply isn’t available. There was particular reference to new arts and cultural events that have family appeal and for which it can be difficult to predict the likely number of under 18s that will attend
- the demographics of television audiences for particular events are often very difficult to establish until after those events – for example, it was noted that in the run up to the last football World Cup, the event organisers anticipated that only 20% of the audience would be under 18 but this proved to be a gross under-estimation
- for events with a global audience, such as Formula One, there can be additional logistical challenges in obtaining cross-national audience data.

4.17 Besides these perceived barriers, it was clear that some of the data currently being used to assess the demographic profile of audiences is not particularly robust. For example, a few participants said that they simply look at the numbers of adult and junior tickets sold, taking junior sales as a proxy for the proportion of under 18s that will be attending. However, junior tickets can typically only be purchased by people aged 16 and under, so this method potentially misses people aged between 16 and 18 years.

4.18 One of the stakeholders interviewed felt that the difficulties involved in collecting accurate data are such that the Guidelines should not specify the exact percentage of participants, audiences and spectators that must be over 18, but instead simply state that the majority should meet this threshold.

4.19 However, industry representatives in the focus groups stated that they were “comfortable” or “reasonably happy” with the 75% figure and that, for them, the wording of the principle – and specifically the reference to ‘reasonable efforts’ – is key as it acknowledges implicitly that the available information

“isn’t necessarily going to be absolutely clear”. At the same time, they felt that it would be helpful to include in the Guidelines case studies or examples of best practice in this area to illustrate ways of approaching data collection for different types of event. No case studies of good practice were identified in the industry interviews completed but this does not mean that there are no examples in the industry as a whole which could be used in the Guidelines.

*I think the wording says: ‘all reasonable efforts must be made’. Now we would take that as saying: “Well, what were the ticket sales like last year? What kind of groups are you getting? Is there a children’s section?”...Put three or four case studies [into the Guidelines] to say: “Here is how you report an arts sponsorship; here is how you report sport; here is how you report TV...”*

Industry representative

**6) ‘Competitions for tickets, which include hospitality involving the service of alcohol, must only be open to those over 18’**

- 4.20 All of the industry representatives who took part in the research said that they follow this principle as standard, with a few specifying that rules around competitions are written into their terms and conditions of contract with rights-holders.
- 4.21 However, one of the stakeholders interviewed, along with a small number of participants in the industry focus groups, felt that there would be no harm in opening up competitions to under 18s because, if licensing laws are being enforced properly, winners who are below the legal drinking age should not be served alcohol in any case. A couple of people took this argument a stage further, suggesting that the wording of the principle be changed to specify that: “no competition winner can be under 18 if the prize is alcohol”. Most of the focus group participants did not support this suggestion, however and were comfortable with the principle in its current form.

**7) ‘Alcohol branding must not appear on children’s replica sports shirts or clothing under sponsorship agreements signed after 1 January 2008’**

- 4.22 Again, all of the industry representatives and rights-holders to whom this principle was relevant said that they follow it as standard and regard it as a non-negotiable element of sponsorship contracts. Indeed, a few industry representatives from larger companies said that they stopped placing branding on children’s clothing a number of years ago, well before the publication of the Guidelines.
- 4.23 Still, several participants questioned the ultimate efficacy of the principle in protecting under 18s, pointing out that children often buy, or are bought, adult size shirts so that they can “look more like their heroes”. There was a consensus that there is nothing industry can do to prevent such behaviour and, indeed, that introducing age checks for people buying shirts would at best amount to a partial solution because adults would still be able to give shirts to under 18s. Industry representatives in the focus groups expressed

some concern that the Scottish Government might seek to resolve the issue by banning shirt sponsorship entirely. They felt that such a move could have a detrimental impact on Scottish sport and suggested that parents should be left to decide whether or not it is appropriate for their child to have an alcohol branded piece of clothing.

- 4.24 A separate issue that was raised in respect of children's replica clothing was whether or not it is appropriate for such clothing to feature branding for non-alcoholic versions of sponsors' products. A specific example cited was Hibernian Football Club's replica shirts, which feature branding for John Crabbie's non-alcoholic ginger beer. Among the industry participants in the focus groups, there was a consensus that such practice is "not in the spirit of the Guidelines" and should be actively discouraged by the SGAIP. One participant noted that as an increasing number of alcohol companies are producing low- or zero-alcohol products, it may be necessary to "future proof" the Guidelines to pre-empt any new compliance issues that this might raise. A specific suggestion made was that the wording of the principle could be adapted to state that: 'Branding associated with alcohol products must not appear on children's replica sports shirts...'

**8) 'At sponsored events or events associated with the sponsorship, event organisers and all on and off trade alcohol providers (where the level of sponsorship and/or contractual relationship allows) will comply with the standards of good practice and advice contained in the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks: Scotland' guide'**

- 4.25 Some of the industry representatives and rights-holders interviewed said that their company/organisation does not deliver any bar or sampling facilities at the events it sponsors, with these services provided by experienced bar operators. They felt confident that such operators are well versed in the requirements of licensing legislation and the Social Responsibility Standards, and carry out their work accordingly.
- 4.26 Participants who said that their company does operate bar or sampling facilities reported that the staff involved (including service and security staff) are trained or briefed on relevant licensing legislation and the requirements of the Standards so that they are fully aware of their individual responsibilities in this area. One participant said that his company operates a personal license system for its service staff.

**Good practice example:**

One industry representative said that their company has an established protocol for use on occasions when the service of alcohol at events it is sponsoring is being carried out by staff from outwith the company. This protocol includes using a check list to brief the staff on the procedures they must follow and providing the event host (e.g. the hotel, stadium etc.) with a code of conduct.

- 4.27 None of the participants had experienced any barriers to implementing this principle. Accordingly, none made any suggestions for clarifying or enhancing it.

### **Sampling**

- 4.28 The Guidelines include the following stipulations concerning sampling at sponsored events or events associated with the sponsorship:
- Sponsorship should not encourage illegal, irresponsible or immoderate consumption such as binge drinking, drunkenness or drink driving and should not have a particular appeal to under 18s
  - Anyone carrying out sampling activity with consumers must comply with current licensing legislation and be trained in the serving of alcohol
  - Every effort should be made to restrict samples in line with the government sensible daily drinking guidelines
  - Challenge 21 principles should be applied and age verification sought if doubts exist as to the consumer's age
  - Samples must not be given to anyone who appears to be intoxicated
  - Water/soft drinks and snacks should be provided wherever possible
- 4.29 Most of the industry representatives and rights-holders stated that sampling is not carried out at their sponsored events, so they had no experience of implementing these principles. Participants who said their organisation does carry out sampling were clearly cognisant of their responsibilities in this area and followed strict procedures accordingly. In each case, this included: ensuring that staff carrying out the sampling are fully trained in the service of alcohol; operating a token or hand stamp system to restrict the number of drinks that an individual can consume; including responsible drinking messages on sample cups and other communications associated with the sampling; providing soft drinks/water and in some cases snacks; and asking for proof of age wherever appropriate. In respect of the latter measure, it was notable that not all participants were aware that Challenge 21 has been superseded by Challenge 25. A participant who was aware of this felt it important that the Guidelines are amended to reflect the change.
- 4.30 While participants in the focus groups similarly noted the need for the Guidelines to include reference to Challenge 25, a few of them also questioned whether it is necessary for the Guidelines to include *any* stipulations regarding sampling as this area is covered by licensing legislation. A couple of people suggested that a simple statement to the effect of: "all events must comply with licensing legislation" would suffice. Most of the other participants disagreed with this, however, commenting either that the Guidelines are there to "illuminate the legislation", or that it is "handy" to have a single document containing all of the information they might need on alcohol sponsorship.

*If you're sitting down with the local 10k race organiser and he has got a beer tent or something there, it's handy to have the little booklet and say: "this is what we're working to as part of the sponsorship deal"...It's more helpful than not helpful.*

Industry representative

### **Integrating responsible drinking messages**

4.31 The Guidelines state that:

- All print/paper based point of sale communications should carry prominent and appropriate responsible drinking messaging. For example: the [www.drinkaware.co.uk](http://www.drinkaware.co.uk) logo or a responsible drinking reminder
- Any sporting sponsorship activity must not imply that it is acceptable to consume alcohol before, or while playing sport. Nor should it suggest that alcohol enhances sporting performance, social or sexual success
- There should be no implication that bravado, aggressive, dangerous or anti-social behaviour is advocated or condoned by the brand.

4.32 Without exception, the industry representatives interviewed said that they "use every opportunity" available to promote responsible drinking and place relevant messaging on all point of sale communications, including all advertisements (banners, posters, programmes etc.) as well as on tickets, cups, drink tokens and drink carriers. As mentioned already, a couple of participants representing larger companies also said that they dedicate some of their advertising space entirely to responsible drinking messages as a way of demonstrating their commitment in this area. One of the rights-holders stated that his organisation "gifts" marketing collateral to sponsors to promote responsible drinking.

#### **Good practice example:**

As part of its sponsorship of the Heineken Cup, Heineken pursues a comprehensive range of measures aimed at promoting responsible drinking. One of six TV facing branding boards is used exclusively to promote an 'Enjoy Responsibly' message, and programme advertising includes prominent 'Enjoy Heineken Responsibly' and Drinkaware logos. All plastic pint glasses and four pint carriers are printed with alcohol by volume and units per pint information. The pint carriers also carry 'Enjoy Heineken Responsibly' and Drinkaware logos.

**Good practice example:**

As part of its sponsorship of Scottish Rugby, the Edrington Group, producers of the Famous Grouse, co-authored an article with the Scottish Rugby Union on responsible drinking. The article, included in an England v Scotland match day programme, congratulated rugby fans on their responsible approach to alcohol and encouraged them to continue to drink in moderation so as to set a positive example to other consumers.

- 4.33 However, several participants questioned the efficacy of “standard” responsible drinking messages, suggesting that these have “become wallpaper” and “just wash over” consumers. They felt that companies should be given greater flexibility to develop creative messages that are tailored to their target market or the sponsored event; or that “fit the brand personality”, as these are likely to have more of an impact on consumers.
- 4.34 In addition to these views, there was reference to the fact that the Guidelines cover print and paper communications only, not internet based media. One of the stakeholders stressed that alcohol companies’ are committing an increasing proportion of their marketing budgets to online, and in particular social media, communication so, in effect, the Guidelines may not cover most of their communication activities. The same stakeholder went on to say that young people are the main users of social media and that alcohol companies are trying to “colonise young people’s space”.
- 4.35 For their part, participants in the focus groups noted that the Guidelines are specifically focused on point of sale communications and that a large proportion of online communications do not fall into this category. They also pointed out that the Portman Group has a digital marketing code of conduct to which members adhere. They suggested that the code be referenced in the Guidelines to ensure that all companies are aware of it.

**Suggestions for ensuring implementation**

- 4.36 In addition to views set out above, there were a number of more general suggestions for ensuring compliance with the Guidelines in the future.

***Awareness raising and information sharing***

*I personally think [the Guidelines] cover everything they need to...It’s more about how you use them and how you make sure other people use them.*

Industry representative



*Driving greater application through awareness is an opportunity that I feel exists around the Guidelines at the moment.*

Industry representative

- 4.37 Across all of the participant groups, it was felt that efforts need to be made to ensure that all alcohol companies (particularly smaller companies that are not part of the SGAIP) and rights-holders are fully aware of the Guidelines. There were various suggestions for raising awareness; the most common of which was using relevant existing events, forums or and networks – for example, those run by the Scottish Council for Development & Industry (SCDI), SportScotland and the SGAIP itself – as “conduits for getting the information out there”. Other, less common suggestions included: running training courses or seminars; formally re-launching the Guidelines; and placing advertisements in relevant press stating that all major alcohol companies in Scotland have signed up to the Guidelines.
- 4.38 To facilitate ongoing engagement and compliance with the Guidelines, participants favoured the creation of an online portal or toolkit – either on the Scottish Government website or a standalone site – where a live version of the Guidelines could be readily accessed as and when required. A few people suggested that other documentation relevant to alcohol sponsorship – for example, licensing legislation, the Social Responsibility Standards and the Portman Code – could be included alongside the Guidelines to provide a ‘one stop shop’ for sponsors, rights-holders and event organisers alike.
- 4.39 Most participants, including both industry representatives and rights-holders, said they would also welcome more sharing of current and best practice in respect of the Guidelines so that they are better placed to both judge how their own company or organisation is performing in this area, and to identify new or better ways of approaching compliance. Again, a dedicated webpage or site, such as that described above, was the preferred vehicle for such information sharing.

*Illustrating best practice is probably a very good way of improving, not necessarily the Guidelines themselves but the environment around them, so where good things happen we applaud them and put them somewhere other people can see them and go: “that’s a good idea; I’m going to do that.”*

Industry representative

*We have no issue with the Guidelines at all; we are happy to implement them but it would just be good to see what other people are doing. Is there a good uptake? Is everybody on the same page? Are we leading the way and can people learn from us?*

Rights-holder

## **Identifying and addressing non-compliance**

- 4.40 Participants in the focus groups felt strongly that compliance with the Guidelines should remain voluntary rather than mandatory but they also felt that there needs to be a “mechanism” for picking up and addressing non-compliance. Views were divided over the form this mechanism should take. Some participants felt that any monitoring should be carried out by an independent body or stakeholder, suggesting that this would be more credible than self-regulation and consequently may “pre-empt” any potential tightening of the Guidelines. Others disagreed, however, favouring the continuation of a self-regulatory approach. Regardless of their preferred mechanism, participants broadly agreed that attempts to monitor compliance must be preceded by efforts to raise awareness of the Guidelines, as described above, and encourage all companies to sign up to them.

*Before we get to the compliance point, I think you need to get through the education phase and the process of trying to sort this out if that's what the problem is...If you leap into compliance now you would get bombarded with complaints [about] people that are not sitting around this table, that aren't signed up to the Guidelines.*

Industry representative

## **Bringing greater cross-national consistency in sponsorship Guidelines**

- 4.41 Finally, a few of the industry representatives interviewed were keen to stress the importance of there being consistency of alcohol sponsorship Guidelines across the UK and, indeed, between the UK and Europe:

*To me, working across the UK and, indeed, across Europe, the more consistency we can get, the easier it is for everybody...Best practice should be best practice across the UK.*

Industry representative

*I would encourage the [Scottish Government] to work with someone like Portman to find out exactly the need for [the Guidelines]. If there are areas specific to Scotland that they feel Portman hasn't captured within their code, then I would encourage them to build Guidelines around that.*

Industry representative

- 4.42 Participants in the focus groups too identified consistency as an important issue and suggested that it should be a key consideration for the Portman Group as it develops its new code of practice for sponsorship. However, they also recognised that consistency is complicated by the fact that legislation and policy priorities in respect of alcohol differ in Scotland and the rest of the UK. Still, there was a view, and indeed an aspiration, that the Portman sponsorship code will be loosely based around the Scottish Guidelines but include “caveats” referencing relevant variation in legislation and practice across the UK.

## 5 RECOMMENDATIONS

- 5.1 This chapter sets out recommendations flowing from the review regarding both the Sponsorship Guidelines and the wider environment within which these sit.

### The Sponsorship Guidelines

- 5.2 The table below sets out recommendations in respect of each of the individual components of the Guidelines.

Core principle/element	Recommendations
'As an integral part of each new sponsorship, the sponsor will make a recognisable commitment to activities or events that promote responsible drinking or support diversionary/community activities'	SGAIP should consider adding to the Guidelines some case studies to illustrate what is meant by a 'recognisable commitment' in this context, particularly in relation to diversionary and community activities. The examples should span a range of commitments, undertaken by both smaller and larger companies, to ensure these speak to all relevant audiences
'Alcohol brands must not be used to sponsor teams, brands, celebrities or events with a particular appeal to those under the age of 18'	Effective in its current form; no changes required
'Alcohol brands will not be used to sponsor an individual who is under 18. This does not prevent alcohol brands being used to sponsor teams and events, where the team or event includes participation of a person under 18; although any team members under the age of 18 will not be used individually in any promotional or brand activation activity'	Effective in its current form but it would be prudent to recommend that companies avoid sponsoring teams that could potentially comprise a majority of under 18s  In respect of the sponsorship of individuals, SGAIP should be mindful of the view that an under 25 threshold should apply as per the Portman Group and CAP guidelines, and consider whether this is an area it might review in the future - partly to promote greater consistency across sponsorship and marketing codes of conduct
'Prior to sponsorship of any individual or team, the owners of the alcohol brand should make all appropriate efforts to check if there is any known reason why an alcohol brand would be inappropriate'	Effective in its current form; no changes required
'All reasonable efforts must be made to obtain historical (or anticipated, if a new event) demographics for the sponsored events'	SGAIP should consider reviewing in more detail the approaches alcohol companies are taking to collecting demographic data, with a view to identifying good practice that could be included in the Guidelines
'Competitions for tickets, which include hospitality involving the service of alcohol, must only be open to those over 18'	Effective in its current form; no changes required
'Alcohol branding must not appear on children's	SGAIP should consider adapting this

<p>replica sports shirts or clothing under sponsorship agreements signed after 1 January 2008'</p>	<p>principle of the Guidelines to encompass branding for non-alcoholic versions of sponsors' products. Specifically, the current wording of the principle could be changed to: <i>'alcohol branding or branding for non-alcoholic versions of alcoholic drinks must not appear on replica sports shirts...'</i></p>
<p>'At sponsored events or events associated with the sponsorship, event organisers and all on and off trade alcohol providers (where the level of sponsorship and/or contractual relationship allows) will comply with the standards of good practice and advice contained in the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks: Scotland' guide'</p>	<p>Largely effective in its current form but the Guidelines should also state that alcohol providers must comply with the requirements of licensing legislation</p>
<p>Sampling</p>	<p>Effective in its current form but should be updated to reflect the move to Challenge 25</p>
<p>Responsible drinking messages</p>	<p>Largely effective in its current form but SGAIP should consider addressing in the Guidelines the growth of online and digital communications. As a minimum, it would be helpful to include a reference to the Portman Group's digital marking code and recommend that companies follow this</p> <p>The findings of the ongoing Portman Group consultation may point towards additional ways in which the issue might be addressed</p>

## Other recommendations

- 5.3 In addition to the recommendations set out above, the findings of the review point towards actions that SGAIP might take to help ensure compliance with the Sponsorship Guidelines in the future.
- 5.4 First, given the broad consensus on the need to raise awareness of the Guidelines, consideration should be given as to how this might best be achieved. Clearly, it will be important to balance the need to maximise awareness with that of avoiding placing undue financial or practical burdens on industry, rights-holders or the Scottish Government. From this point of view, the suggestion of using existing forums or networks to 'spread the word' would seem preferable to running bespoke training or awareness raising sessions.
- 5.5 Second, the extent of spontaneous support for an online portal, where the Guidelines and related documentation can be easily accessed, suggests that such a resource would be well used and should definitely be considered. It would facilitate cross-referencing of the relevant legislation and codes, and could also serve as a vehicle for the sharing of ideas, experiences and best practice.

- 5.6 Third it will be important to establish a dialogue among all interested parties regarding how non-compliance with the Guidelines might be identified and addressed in the future – including whether this should be undertaken by an independent body or the industry itself. This dialogue must precede concerted attempts to raise awareness of the Guidelines, however, to avoid ‘putting the cart before the horse’.
- 5.7 Finally, it will be important to ensure that there is consistency between the Guidelines and any new guidelines developed by the Portman Group to help ease the process of compliance and avoid any unnecessary confusion on the part of UK-wide companies and rights-holders.

## **APPENDICES**

**Appendix A – Phase One Mapping Exercise pro-forma**

**Appendix B – Phase Two Topic Guides**

**Appendix C – Phase Three Topic Guide**

## Appendix A – Phase One Mapping Exercise pro-forma

### Research project: Review of the Alcohol Sponsorship Guidelines for Scotland

#### Sponsorship activities form

Thank you for assisting with this research. Although you have been identified as the person to whom to send this form, it may be that you will have to enlist the help of colleagues to ensure **all** relevant sponsorships signed since 1 February 2009 and/or sponsorship activity that was signed before 1 February 2009 but are still active/ongoing are included.

When completing this form, please consider the following:

- **Sponsorship means the terms of an agreement or part of an agreement to support a live sporting or cultural product, event or activity, in return for which the sponsored party agrees to be associated with or promote the sponsor's brands**
- **Only commercial sponsorship** activities should be included; marketing and advertising activities should not be included, nor should local community support initiatives undertaken by the drinks industry e.g. by a village pub or local distillery
- Include only Scottish sponsorship activities; sponsorship activities signed outwith Scotland should not be included
- Include only sponsorships over the value of £5,000
- Include only new sponsorships signed since 1 February 2009 and/or sponsorship activity that was signed before 1 February 2009 but are still active/ongoing
- Please provide all relevant information at each question

Please return completed forms, by email, to [david.myers@ipsos.com](mailto:david.myers@ipsos.com) by 5pm on Friday 23<sup>rd</sup> September

**PART ONE: ORGANISATIONAL DETAILS AND AWARENESS OF, AND VIEWS ON, THE GUIDELINES**

Name of company

Your name

Your position

Your workplace address

Telephone number(s)

Email address

**Q1. Overall, how much, if anything, would you say you know about the Alcohol Sponsorship Guidelines for Scotland?** (please type an 'x' next to the option that comes closest to your answer)

- A great deal
- A fair amount
- Not very much
- Heard of but know nothing at all about them
- Never heard of them

**Q2. How effective do you think the Alcohol Sponsorship Guidelines for Scotland are in ensuring that alcohol sponsorship activities undertaken in Scotland promote responsible drinking?** (please type an 'x' next to the option that comes closest to your answer)

- Very effective
- Fairly effective
- Not very effective
- Not at all effective
- Don't know

**Q3. How effective do you think the Alcohol Sponsorship Guidelines for Scotland are in ensuring that alcohol sponsorship activities undertaken in Scotland promote diversionary/community activities?** (please type an 'x' next to the option that comes closest to your answer)

- Very effective
- Fairly effective
- Not very effective
- Not at all effective
- Don't know

**Q4. If you could make one change to the Alcohol Sponsorship Guidelines to improve them, what would it be?** (please type your answer in the box below)



**PART TWO: RECORD OF SPONSORSHIP ACTIVITY**

Please refer to the guidance notes for completing this form and the example of a completed form (attached to the email from Ipsos MORI)

Over the next 3 pages we have included space to record details of 3 sponsorship activities. If you have more than 3 sponsorship activities to record, please copy and paste the table below as many times as necessary (instructions on how to do this are included in the guidance notes for completing this form (attached to the email from Ipsos MORI)

**Sponsorship activity 1**

<b>Q1. Name of sponsoring brand</b> (please type your answer in the box to the right)	
<b>Q2. Industry segment of sponsoring brand</b> (please place an 'x' next to the appropriate answer and provide further detail if you select 'Other')	Whisky Beer/cider Spirit Other
<b>Q3. Target population of sponsoring brand</b> (please type your answer in the box to the right)	
<b>Q4. Name of sponsored event, activity, initiative, team, or brand etc.</b> (please type your answer in the box to the right)	
<b>Q5. Date(s) of sponsored event, activity, initiative, team, or brand etc.</b> (please type your answer in the box to the right)	
<b>Q6. Location of sponsored event, activity, initiative, team or brand etc.</b> (please type your answer in the box to the right)	
<b>Q7. Target population of sponsored event, activity, initiative, team or brand etc.</b> (please type your answer in the box to the right)	
<b>Q8. Type of sponsored event, activity, initiative, team or brand etc.</b> (please place an 'x' next to the appropriate answer and provide further detail if you select 'Other' arts event' or 'Other')	Music event Other arts event Sports event Sports team/club Other
<b>Q9. Type of sponsorship</b> (please place an 'x' next to the appropriate answer)	Main Subsidiary
<b>Q10. Please provide details of sponsorship activities undertaken</b> (please type your answer in the box to the right)	
<b>Q11. Please provide details of any activities your organisation undertook to ensure adherence with the Alcohol Sponsorship Guidelines for Scotland</b> (please type your answer in the box to the right)	

## Sponsorship activity 2

<b>Q1. Name of sponsoring brand</b> (please type your answer in the box to the right)	
<b>Q2. Industry segment of sponsoring brand</b> (please place an 'x' next to the appropriate answer and provide further detail if you select 'Other')	Whisky Beer/cider Spirit Other
<b>Q3. Target population of sponsoring brand</b> (please type your answer in the box to the right)	
<b>Q4. Name of sponsored event, activity, initiative, team, or brand etc.</b> (please type your answer in the box to the right)	
<b>Q5. Date(s) of sponsored event, activity, initiative, team, or brand etc.</b> (please type your answer in the box to the right)	
<b>Q6. Location of sponsored event, activity, initiative, team or brand etc.</b> (please type your answer in the box to the right)	
<b>Q7. Target population of sponsored event, activity, initiative, team or brand etc.</b> (please type your answer in the box to the right)	
<b>Q8. Type of sponsored event, activity, initiative, team or brand etc.</b> (please place an 'x' next to the appropriate answer and provide further detail if you select either of the 'Other' options)	Music event Other arts event Sports event Sports team/club Other
<b>Q9. Type of sponsorship</b> (please place an 'x' next to the appropriate answer)	Main Subsidiary
<b>Q10. Please provide details of sponsorship activities undertaken</b> (please type your answer in the box to the right)	
<b>Q11. Please provide details of any activities your organisation undertook to ensure adherence with the Alcohol Sponsorship Guidelines for Scotland</b> (please type your answer in the box to the right)	

### Sponsorship activity 3

<b>Q1. Name of sponsoring brand</b> (please type your answer in the box to the right)	
<b>Q2. Industry segment of sponsoring brand</b> (please place an 'x' next to the appropriate answer and provide further detail if you select 'Other')	Whisky Beer/cider Spirit Other
<b>Q3. Target population of sponsoring brand</b> (please type your answer in the box to the right)	
<b>Q4. Name of sponsored event, activity, initiative, team, or brand etc.</b> (please type your answer in the box to the right)	
<b>Q5. Date(s) of sponsored event, activity, initiative, team, or brand etc.</b> (please type your answer in the box to the right)	
<b>Q6. Location of sponsored event, activity, initiative, team or brand etc.</b> (please type your answer in the box to the right)	
<b>Q7. Target population of sponsored event, activity, initiative, team or brand etc.</b> (please type your answer in the box to the right)	
<b>Q8. Type of sponsored event, activity, initiative, team or brand etc.</b> (please place an 'x' next to the appropriate answer and provide further detail if you select either of the 'Other' options)	Music event Other arts event Sports event Sports team/club Other
<b>Q9. Type of sponsorship</b> (please place an 'x' next to the appropriate answer)	Main Subsidiary
<b>Q10. Please provide details of sponsorship activities undertaken</b> (please type your answer in the box to the right)	
<b>Q11. Please provide details of any activities your organisation undertook to ensure adherence with the Alcohol Sponsorship Guidelines for Scotland</b> (please type your answer in the box to the right)	

**Thank you very much for completing this form.**

**Please return completed forms to [david.myers@ipsos.com](mailto:david.myers@ipsos.com) by 5pm on Friday 23<sup>rd</sup> September**

## Appendix B – Phase Two Topic Guides

### Topic guide - Industry

#### Introduction

- Introduce self and Ipsos MORI
- *Explain purpose of research: Ipsos MORI is conducting a review of the Alcohol Sponsorship Guidelines for Scotland, on behalf of the Scottish Government Alcohol Industry Partnership. A couple of weeks ago we sent you a form on which to record your company's sponsorship activities. Thank you very much again for taking the time to complete the form; it is much appreciated. We are now seeking to build on the understanding we gained in that exercise by conducting these more in depth interviews with a selection of people who completed the form. The interviews will focus in more detail on awareness and views of the Guidelines, and what is being done by your company to implement them. Please rest assured that this is not a test and you are not in any way being judged on compliance - we just need to get an accurate picture of where the industry currently is in respect of the Guidelines and what if anything the Scottish Government Alcohol Industry Partnership could be doing to improve the guidelines, ensuring that they remain fit for purpose.*
- Explain the interview should take around 45 minutes.
- Emphasise confidentiality and anonymity
- Obtain permission to record

#### Knowledge and perceptions of the guidelines

- You said in your form that you know a fair amount/not very much/very little about the Alcohol Sponsorship Guidelines for Scotland. From where would you say you have obtained most of your information about the Guidelines?
- IF NOT MENTIONED: Have you seen the Scottish Government's official Guidelines document?
- IF YES: What did you think of the Guidelines in terms of: level of information provided; whether anything important is missing; whether there is any other information that would be useful – particularly in relation to implementation; any other strengths and weaknesses
- How do you feel about the general principle of having Alcohol Sponsorship Guidelines for Scotland?
  - PROBE FOR: pros and cons
- You said in the form that you think the Guidelines are effective/ not very effective in ensuring that alcohol sponsorship activities undertaken in Scotland promote *responsible drinking*. Why did you say this; what did you have in mind at the time?
- You also said that you think the Guidelines are effective/not very effective in ensuring that alcohol sponsorship activities undertaken in Scotland *promote diversionary/community activities*. Again, why did you say this; what did you have in mind at the time?
- Do you have any other general comments that you would like to make about the effectiveness of the Alcohol Sponsorship Guidelines for Scotland?

## Implementing the guidelines

EXPLAIN: *I'd like to move on now and talk a bit about implementing the Guidelines*

- First, what is your perception of how well or otherwise the Guidelines have been implemented by a) the alcohol industry in Scotland generally; and b) your own company?
- Overall, how easy or difficult has your company found it to implement the Guidelines? PROBE FOR DETAIL ON ANY DIFFICULTIES MENTIONED AND ANYTHING THAT HAS FACILITATED IMPLEMENTATION
- Is there someone within your organisation who has specific responsibility for overseeing implementation of the Guidelines?
  - IF YES: Who is that? How do they go about doing this? PROBE ON ANY STANDARD PROCEDURES
  - IF NO: How is implementation handled in your company? PROBE ON: PERSONNEL INVOLVED, ANY STANDARD PROCEDURES ETC.

EXPLAIN: *The Core Principles of the guidelines are concerned with creating best practice in the areas of promoting responsible consumption and protecting those below the age of 18. I'm interested to hear about how, if at all, your company goes about implementing these principles. I'll read out each of the principles in turn and, for each, I'd like you to tell me what, if anything, your company does to comply and whether there are anything particular barriers or enablers to doing so.*

- as an integral part of each new sponsorship, making a recognisable commitment to activities or events that promote responsible drinking or support diversionary and community activities
- ensuring that alcohol brands are not used to sponsor an individual under 18
- ensuring that alcohol brands are not used to sponsor teams, brands, celebrities or events with a particular appeal to those under the age of 18
- ensuring that competitions for tickets which include hospitality involving the service of alcohol are only be open to those over 18
- making all appropriate efforts to check if there are any know reasons why an association with an alcohol brand would be inappropriate.
- Making all reasonable efforts to obtain historical demographics for the event to ensure that 75% of the event participants, audience and spectators are over 18.
- ensuring alcohol branding does not appear on children's replica sports shirts or clothing
- at sponsored events, or events associated with the sponsor, event organisers and all on and off alcohol providers comply with the standards of good practice and advice contained in the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks Scotland guide
- in addition to the core principles, the Guidelines also contain information about appropriate sampling at sponsored events. Does your company carry out sampling at events?
- IF YES: What measures do your company take to ensure sampling is carried out in a way that promotes responsible consumption and protects those under 18? PROBE FOR: not encouraging 'irresponsible or immoderate consumption; restricting amount consumed; ensuring it will be consumed by person receiving it; asking for ID; not giving samples to people who appear drunk; providing water and snacks. Also check

for ensuring the persons carrying out sampling activity comply with current licensing legislation and are trained in the serving of alcohol.

- The guidelines also encourage the integration of responsible drinking messages in all sponsorship communications. Does your company routinely incorporate these messages?
  - IF YES: What does it do?
  - IF NO: Why not?
- Apart from those associated with the Guidelines, does your company have in place any other rules or procedures e.g. internal guidance to ensure the promotion of responsible drinking, including the protection of those under the age of 18? IF YES: What are these?

### **Improving the Guidelines**

- In the form, we asked people to suggest ways in which they would change or improve the Alcohol sponsorship Guidelines for Scotland. The most common responses were:
  - A
  - B
  - C
- To what extent do you agree with these suggestions? Why/why not?
- Do you have any additional suggestions for how the Guidelines might be changed or improved?
- Do you think the Guidelines need to be tightened in any way? If so, how and why?
- How, if at all, do you think SGAIP could promote the guidelines better to raise awareness and compliance in the industry?

**Thank respondent, explain next steps and close.**

## Topic guide – Rights holders

- Introduce self and Ipsos MORI
- *Explain purpose of research: Ipsos MORI is conducting a review of the Alcohol Sponsorship Guidelines for Scotland, on behalf of the Scottish Government Alcohol Industry Partnership. The first phase of the research involved asking key industry representatives in Scotland to complete a form recording their main sponsorship activities in Scotland and also a questionnaire focusing on their awareness and perceptions of the Guidelines, including what they do to ensure compliance. We are now seeking to build on the understanding we gain in that exercise by conducting these more in depth interviews with both members of the industry and other external stakeholders like yourself. The interview will focus on your awareness and perceptions of the Guidelines and on how well you feel the alcohol industry in Scotland is performing in terms of compliance and promoting responsible drinking. I'd like to stress that there are no right or wrong answers – we are just interested in getting any views or impressions you do have.*
- Explain the interview should take around 30 minutes.
- Emphasise confidentiality and anonymity
- Obtain permission to record

### Knowledge and perceptions of the guidelines

- How much, if anything, would you say you know about the Alcohol Sponsorship Guidelines for Scotland?
- IF KNOW SOMETHING: From where would you say you have obtained most of your information about the Guidelines?
- IF NOT MENTIONED: Have you seen the Guidelines document?
- What did you think of the Guidelines?
  - PROBE FOR: level of information provided, whether anything important is missing; whether there is any other information that should be provided – particularly in relation to implementation; any other strengths/weaknesses
- How do you feel about the general principle of having Alcohol Sponsorship Guidelines for Scotland?
  - PROBE FOR: pros and cons
- Apart from the Guidelines, does your organisation have in place any other policies that cover alcohol as a sponsorship partner?
- IF YES: How do these compare with Guidelines? PROBE FOR: more or less stringent?

### Implementation of the Guidelines

I'd like to move on and talk a bit about implementation of the Guidelines...

- When you are agreeing terms of sponsorship contracts with alcohol companies, to what extent, if at all, does reference to the guidelines, and any other similar policies you have in place form part of the discussion?
- To what extent do sponsors actively promote the Guidelines?

- And in contracts, is there reference to who is responsible for implementing the Guidelines or other similar policies you have in place?
- IF YES: Who is responsible: the sponsor or your organisation?

*EXPLAIN: The Core Principles of the Guidelines are concerned with creating best practice in the areas of promoting responsible consumption and protecting those below the age of 18.*

- In general, what is your assessment of how well the alcohol industry in Scotland is performing in respect of promoting responsible drinking and protecting those below the age of 18 in its sponsorship activities? Why do you say this? PROBE FOR:
  - ANY VARIATION BY INDUSTRY SEGMENT
  - EXAMPLES OF GOOD/ BAD PRACTICE
- To what extent, if at all, do you feel the Guidelines have made a difference to the industry's performance in this area? Why do you say this?

*EXPLAIN: I'd like to ask you some more detailed questions concerning compliance with the each of the core principles of the Guidelines. You may or may not feel you know enough to answer these questions. That's fine; we're just interested in getting any views you do have. I'll read out each of the principles in turn and, for each, I'd like you to tell me what, if anything, your sponsor and your organisation do to comply and whether there are anything particular barriers or enablers to doing so.*

- making a recognisable commitment to activities or events that promote responsible drinking or support diversionary and community activities when carrying out sponsorship activity.
- ensuring that alcohol brands are not used to sponsor an individual under 18
- ensuring teams, brands, celebrities or events with a particular appeal to those under the age of 18
- ensuring that competitions for tickets which include hospitality involving the service of alcohol are only be open to those over 18
- making all appropriate efforts to check if there are any know reasons why an association with an alcohol brand would be inappropriate. .
- Making all reasonable efforts to obtain historical demographics for the event to ensure that 75% of the event participants, audience and spectators are over 18.
- ensuring alcohol branding does not appear on children's replica sports shirts or clothing or toys or games etc.
- at sponsored events or events associated with the sponsor, event organisers and all on and off alcohol providers comply with the standards of good practice and advice contained in the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks Scotland guide
- ensuring adequate responsible drinking messages are being integrated into sponsorship communications (refer to page 6 of the guidelines)
- ensuring that any sampling at sponsored events is being carried out appropriately (refer to page 5 of the guidelines)

### **Improving the Guidelines**

- To finish, off I'd like to get your views on how the Guidelines might be improved. In the first phase of the research, we asked industry representatives to suggest possible improvements. The most common responses were:



- A
- B
- C
- To what extent do you agree with these suggestions? Why?
- Do you have any additional suggestions for how the Guidelines might be changed or improved?
- Do you think the Guidelines need to be tightened in any way? If so, how and why?
- How, if at all, do you think SGAIP could promote the guidelines better to raise awareness and compliance in the industry?

**Thank respondent, explain next steps and close.**

## Topic guide - Stakeholders

- Introduce self and Ipsos MORI
- *Explain purpose of research: Ipsos MORI is conducting a review of the Alcohol Sponsorship Guidelines for Scotland, on behalf of the Scottish Government Alcohol Industry Partnership. The first phase of the research involved asking key industry representatives in Scotland to complete a form recording their main sponsorship activities in Scotland and also a questionnaire focusing on their awareness and perceptions of the Guidelines, including what they do to ensure compliance. We are now seeking to build on the understanding we gain in that exercise by conducting these more in depth interviews with both members of the industry and other external stakeholders like yourself. The interview will focus on your awareness and perceptions of the Guidelines and on how well you feel the alcohol industry in Scotland is performing in terms of compliance and promoting responsible drinking. I'd like to stress that there are no right or wrong answers – we are just interested in getting any views or impressions you do have.*
- Explain the interview should take around 30 minutes.
- Emphasise confidentiality and anonymity
- Obtain permission to record

### **Knowledge and perceptions of the guidelines**

- How much, if anything, would you say you know about the Alcohol Sponsorship Guidelines for Scotland?
- IF KNOW SOMETHING: From where would you say you have obtained most of your information about the Guidelines?
- IF NOT MENTIONED: Have you seen the Guidelines document
- What do you think of the Guidelines?
  - PROBE FOR: level of information provided; whether anything important is missing; whether there is any other information that should be provided – particularly in relation to implementation; any other strengths/weaknesses
- How do you feel about the general principle of having Alcohol Sponsorship Guidelines for Scotland?
  - PROBE FOR: pros and cons
- Are you aware of the mailbox for making comments and suggestions on the Guidelines?

### **Implementation of the Guidelines**

EXPLAIN: *The Core Principles of the Guidelines are concerned with creating best practice in the areas of promoting responsible consumption and protecting those below the age of 18.*

- In general, what is your assessment of how well the alcohol industry in Scotland is performing in respect of promoting responsible drinking and protecting those below the age of 18 in its sponsorship activities? Why do you say this? PROBE FOR:
  - ANY VARIATION BY INDUSTRY SEGMENT
  - EXAMPLES OF GOOD/ BAD PRACTICE

- Are you aware of good practice and/or other guidelines for alcohol sponsorship activity in other countries that you think we can learn from? Why do you say that?
- To what extent, if at all, do you feel the Guidelines have made a difference to the industry's performance in this area? Why do you say this?

EXPLAIN: *I'd like to ask you how well or otherwise you feel the industry is complying with the core principles of the Guidelines. You may or may not feel you know enough to answer these questions. That's fine; we're just interested in getting any views you do have. I'll read out each of the core principles in turn and for each, I'd like to tell me whether you think there are any issues with compliance and, if so, what these are and how they could be addressed:*

- So to what extent would you say the industry is:
  - making a recognisable commitment to activities or events that promote responsible drinking or support diversionary and community activities when carrying out their sponsorship activity. PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE
  - ensuring that alcohol brands are not used to sponsor an individual under 18 or teams, brands, celebrities or events with a particular appeal to those under the age of 18 PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE
  - ensuring that competitions for tickets which include hospitality involving the service of alcohol are only be open to those over 18 PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE
  - ensuring its sponsorship activities are *appropriate* – for example, in terms of the nature of sponsored events, the target audiences of the sponsorship etc? PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE.
  - ensuring that it is sponsoring events at which at least 75% of the participants, audiences and spectators are over 18? PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE
  - ensuring alcohol branding does not appear on children's replica sports shirts or clothing, toys, games etc. PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE
  - ensuring adequate responsible drinking messages are being integrated into sponsorship communications PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE (refer to page 6 of the guidelines)
  - ensuring that any sampling at sponsored events is being carried out appropriately PROBE FOR EXAMPLES OF GOOD/BAD PRACTICE (refer to page 5 of the guidelines)

### **Improving the Guidelines**

- To finish, off I'd like to get your views on how the Guidelines might be improved. In the first phase of the research, we asked industry representatives to suggest possible improvements. The most common responses were:
  - A
  - B
  - C
- To what extent do you agree with these suggestions? Why?
- Do you have any additional suggestions for how the Guidelines might be changed or improved?

- Do you think the Guidelines need to be tightened in any way? If so, how and why?
- How, if at all, do you think SGAIP could promote the guidelines better to raise awareness and compliance in the industry.

**Thank respondent, explain next steps and close.**

## Appendix C – Phase Three Topic Guide

- Introduce self and Ipsos MORI
- *Explain purpose of research: Ipsos MORI is conducting a review of the Alcohol Sponsorship Guidelines for Scotland, on behalf of the Scottish Government Alcohol Industry Partnership. The first phase of the research involved asking industry representatives in Scotland to complete a form recording their main sponsorship activities in Scotland and also a questionnaire focusing on their awareness and perceptions of the Guidelines. We then conducted some interviews with industry representatives and other external stakeholders to explore awareness and perceptions in more detail. The purpose of this group discussion today is to outline what we've found regarding ways in which the Guidelines might be changed or enhanced to ensure they are fit for purpose and to get your views on these findings. I'd like to stress that there are no right or wrong answers – we are just interested in getting any views you do have.*
- Explain the group should last around 1 hour
- Emphasise confidentiality and anonymity
- Obtain permission to record

### Introduction

In general, industry representatives and rights-holders are supportive of the general principle of having alcohol sponsorship guidelines for Scotland and feel that the Guidelines are effective in their current form. Additionally, there were no major issues raised with regard to self-reported compliance. However, the research did identify issues around awareness of the Guidelines and there were some suggestions and ideas to enhance some of the core principles.

In this discussion we will consider all aspects of the current guidelines and ask you a range of questions about how they may be improved

### The core principles, sampling and responsible drinking messages

- SHOW SLIDE 1: While there was broad support for this principle, some participants questioned the meaning of “recognisable commitment” and “community/diversionary activities”.
  - How do you feel about these terms – are they ambiguous?
  - IF YES: How do you feel these terminology issues could be addressed in the Guidelines.
- SHOW SLIDE 2: Again, there was broad support for these principles but a few participants made suggestions for how they might be developed:
  - firstly it was noted that while a particular event might appeal to over 18s, a particular event participant/team *member* might appeal to under 18s. Is this something that you feel should be addressed in the Guidelines? IF YES: Why and how? IF NO: Why not?
  - Secondly, it was suggested that the age threshold in the first two of these principles could be raised to 21 or 25. Would you support this? Why/not?
- SHOW SLIDE 3: We found that people are using a range of approaches to checking event demographics and that some of these approaches are more robust than

others. With this in mind, do you think this principle needs to be developed at all? IF YES: How? PROBE FOR:

- views around inclusion of good/poor practice examples
- whether target should be higher or lower than 75% and why
- SHOW SLIDE 4: A suggestion here was that under 18s should be allowed to enter such competitions but not served alcohol? Would you support or oppose this? Why/not?
- SHOW SLIDE 5: This principle was supported as far as it goes but there was some discussion of the problem of children buying adult sized replica shirts. Is this something that you feel should be addressed in the Guidelines - or indeed elsewhere? IF YES: How could the issue be managed?
- On a related issue, there was reference to the problem of alcohol-associated branding being used on Children's replica shirts e.g. John Crabbies branding on children's Hibs shirts. Is this something that you feel should be addressed in the Guidelines? Why/not?
- The final core principle related to standards of good practice contained in the Social Responsibility Standards for the Production and Sale of Alcoholic Drinks: Scotland Guide. Is this something that you feel is necessary as part of the Guidelines? Why/not.

EXPLAIN: IN ADDITION TO THE CORE PRINCIPLES, THE GUIDELINES INCLUDE REFERENCE TO SAMPLING AND RESPONSIBLE DRINKING MESSAGES

- SHOW SLIDE 6: Some questioned whether it was necessary for all of these points to be included as they are effectively covered by licensing legislation. Do you agree with this? Why/not?
- It was suggested that a Challenge 25 rather than Challenge 21 principle should apply in respect of sampling. Would you support this? Why/not? Should there be a specific core principle within the Guidelines about challenging people's age, irrespective of the threshold.
- There was also some suggestion that the provision of water and snacks should be mandatory? Again, is this something you would support? Why/not?
- SHOW SLIDE 7: There was reference to the fact that the focus here is on print or paper based point of sale communications and suggestion that the guidance should cover online communications too. Do you agree with this? Why/not?
- Another area of discussion was whether responsible drinking messages should be standard or brand-specific. There was a view among some that much messaging has become wallpaper and that allowing flexibility in message development will allow for more relevant messaging that is more successful in influencing behaviour. Which approach to messaging do you favour? Why?

#### **Other possible change/additions to the guidelines**

EXPLAIN: In addition to commenting on the specific principles and guidelines included in the Guidelines document, participants made additional suggestions as to how the guidelines might be enhanced or developed and we'd like to get your views on these too.

- Firstly, there was a suggestion that the Guidelines should include more reference to relevant legislation and other guidance – for example, the Portman Group code – and

how the various documents inter-relate. Is this something that you would support? Why/not?

- Second, there was an appetite among industry representatives and rights holders for more awareness raising and/or training on the Guidelines.
  - Do you agree with this? Why/not? PROBE FOR whether some form of awareness raising or more formal training is required?
    - IF AWARENESS RAISING: How do you feel this could best be done
    - IF TRAINING: Do you feel that there should be reference to training in the Guidelines - including who specifically within an organisation should be trained? How do you feel training could best be provided? PROBE FOR level of interest in: an online toolkit; in person training sessions; other forms of training
  - There was also support for more sharing of best practice in respect of the Guidelines. Again, is this something that you would welcome? Why/why/not? How could best practice be disseminated?
- It was suggested that consideration should be given to including a clause in the Guidelines forbidding, in any communications relating to the sponsorship, the use of images of people who are, or who look under 25 years old.
  - Do you agree with this? Why/not?
- It was suggested that the Guidelines should cover all events serving and selling alcohol, not just those sponsored by alcohol companies.
  - Do you agree with this? Why/not?
- We found that people liked the fact that there Guidelines weren't too prescriptive but a few of them did feel it would be useful if there were standard clauses to insert into sponsorship agreement that would specify which compliance activities would be undertaken and who would be responsible for these. Would you support this? IF YES: What specific type of clauses would be helpful.

### **Closing discussion**

- At the moment the Guidelines are voluntary. Do you think this is appropriate, or do you think the industry should undertake some sort of self regulatory approach to compliance? Why/not?
- The Portman Group is currently consulting on whether they should produce sponsorship guidelines for the UK as a whole.
  - Do you think there is benefit in having guidelines that apply UK-wide? Why/not?
  - IF YES: How do you think SGAIP could influence the development of these Guidelines if the Portman Group decides to produce Guidelines

Social Research series

ISSN 2045-6964

ISBN 978-1-78045-692-8

web only publication

[www.scotland.gov.uk/socialresearch](http://www.scotland.gov.uk/socialresearch)

APS Group Scotland  
DPPAS12677 (02/12)

