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Contributing to Licensing Policy Reviews: A Guide for Local Stakeholders

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1. INTRODUCTION

Licensing boards are legally required to publish statements of licensing policy at least once every five years. These documents are intended to provide local stakeholders with an indication of how the boards will manage the licensed premises in their area, outlining their approach to matters such as opening hours and children's access.

Policy statements are a potentially valuable tool in helping to make licensing decisions more strategic. Their development provides boards with the opportunity to stand back from routine administrative practice and consider the bigger picture in relation to licensing in their area. Patterns and trends in alcohol problems can be examined with remedial and preventative licensing action identified. Using a published policy to guide licensing practice supports consistent and well-reasoned decision-making and can help make the licensing process more transparent.

How to use this guide

This guide is intended to supplement existing AFS guidance about the development of licensing policy with learning from the last round of policy review in 2018. It provides practical suggestions to support you to engage in the review process effectively, and to make recommendations to licensing boards relevant to the licensing objectives and local context. This guide should be read in conjunction with the AFS:

- [Licensing Resource Pack](#) which provides more detailed information about contributing evidence and information to licensing policy reviews.
- [Review of statements of licensing policy 2018 – 2023](#) which discusses areas of progress and learning in licensing. Links to additional information about specific topics have also been included throughout this guide.


2. THE POLICY REVIEW PROCESS

Who boards must consult

Licensing boards are required to consult with the local licensing forum for their area and any other people they think appropriate when developing their policies. Forums should be representative of the interests of licence holders, police, health, education or social work, young people and residents. If one of these groups is not represented on the forum, then boards are expected to make reasonable efforts to engage with them in other ways.

Consultation methods

Different boards will each have their own way of consulting and getting responses. The most common consultation method used by boards is to issue a call for written views. Other consultation methods used by boards have included oral evidence sessions, consultation events, workshops, drop-in sessions, and public meetings. Sometimes boards will undertake several rounds of consultation, for example having a 'pre-consultation' on the existing policy followed by a



“You should contact the licensing board as soon as possible to find out what consultation methods they plan to use and expected timescales, as well as any other ways you could contribute.”

‘formal consultation’ on the new draft policy. They may also conduct separate consultation exercises specifically on the issue of overprovision.

Timescales

Boards have a period of 18 months after each local government election to review and update their licensing policies, meaning the current round of policies require to be published by **November 2023**. Most boards initiate the review process shortly after being appointed, but it is for each board to decide when and for how long they consult on their policies. The earliest public consultations in the previous round of policy development took place 6 months after the local elections.

Who to involve

At the earliest opportunity, you should consider how you might best contribute to the policy review and who else you should involve; this could be people and departments in your own organisation with access to relevant data and expertise, or people within external organisations and different sectors. In particular, you might find it useful to engage with:

- **The licensing board:** Boards can start to engage with local stakeholders about the policy well in advance of any formal consultation processes being initiated. You may be able to provide information and advice to the board to inform its initial consideration of the policy or approach to the review.
- **The local licensing forum:** Forum members are well positioned to gather evidence to feed into consultations, and to use their expertise to make recommendations about the policy. In many areas boards and forums work closely together to develop the policy. During previous rounds of policy development some forums established working groups specifically for this purpose – sometimes at the request of the relevant licensing board. You can find out more about forums in our [Local Licensing Forum Members’ Guide](#).
- **Local partner organisations:** Local partners can work collaboratively to produce local alcohol profiles to inform licensing policies. These are reports that present evidence from multiple agencies to show how alcohol is impacting on communities in the area. Coordinated evidence from different agencies can provide a particularly valuable evidence base to inform the board’s approach. For example, the [Scottish Borders Alcohol Profile](#) is developed every two years by the local Alcohol & Drug Partnership on behalf of the Scottish Borders Local Licensing Forum.
- **Communities:** Licensing stakeholders frequently comment that community voices are absent within the licensing system but have the potential to be a powerful lever for change. The review process gives people an opportunity to have their say on alcohol their community, and directly input into shaping the local licensed environment in their area.

3. POST-COVID RECOVERY AND THE CURRENT CONTEXT

The Covid-19 pandemic and economic crisis following in its wake is probably the most challenging time many of us have ever experienced. However, the pandemic has also opened the door to new ways of doing things, and with the initial response behind us we can turn our attention to recovery and rebuilding.

The development of licensing policies provides boards with a timely opportunity to consider emerging issues and legislative developments, and to adapt their approaches accordingly. Boards will therefore be keen to explore the actual and projected impact of COVID-19 on the licensing

objectives and the licensed sector. They will need to make significant decisions in the coming months and will require evidence, guidance, and support from local stakeholders to do so.

While we do not yet know the full impact of the pandemic, there is evidence of its effects in a number of areas. The following topics are particularly relevant to licensing and are likely to feature in the next round of policy development:

Changing drinking patterns: Evidence indicates that drinking habits have polarised as a result of the pandemic, with an overall decrease in consumption for lighter drinkers and an increase for heavier drinkers.^{i ii iii} Of major concern is the increase in high-risk drinking¹ observed in England,^{iv v} which has sustained over the entirety of the pandemic.^{vi} While equivalent research is not yet available for Scotland, it is likely that we will be experiencing similar increases, especially considering our historically higher levels of alcohol consumption and harm compared to the rest of the UK.^{vii} Combined with reduced access to services, these changing drinking patterns have tragically translated into increased harm; alcohol-specific deaths in Scotland increased by 17% in 2020 and a further 5% in 2021.^{viii} However, it can take 20 years to see the full effects of changes in alcohol consumption on harms, such as for cancers.^{ix} The pandemic and economic crisis is also being experienced differently by different parts of our population, widening existing inequalities and creating new ones.

Home drinking: Linked to the above, the pandemic has further shifted alcohol sales and drinking from the on-trade to the off-trade, exacerbating existing trends. In Scotland, 73% of alcohol was sold in off sales prior to the pandemic, with this proportion increasing to 90% in 2020 before decreasing slightly to 85% in 2021.^x The home is an unregulated environment and the continued shift to home drinking may lead to long-term public health consequences and an upwards trend in alcohol-related injuries and accidents occurring at home. In addition, while alcohol itself does not directly cause domestic violence, there are strong associations between alcohol use and domestic violence and abuse.² Home drinking also poses potential risks for children and young people, such as neglect or modelling of parental drinking.³ As such, it will be vital that boards consider the factors that can impact on the licensing objectives out with a licensed setting, and that their policies take account of alcohol-related harms occurring in private spheres as well as public.

The hospitality sector: Although the licensing regime does not have responsibility for promoting business growth, a recurrent theme within licensing policies is the need for boards to strike an appropriate balance between supporting the local licensed economy, while also upholding the five licensing objectives. During the pandemic, the hospitality sector was severely affected, with sales of alcohol in bars and restaurants plummeting by 49% overall from 2019 to 2021, while off-premises sales, such as e-commerce and supermarkets, grew significantly (by 11% between 2019 and 2021).^{xi} In 2020, the Scottish Government issued guidance to advise that it “*considers flexibility and pragmatism in decision-making and sensitivity to the wider economic situation should be at the forefront of how a board decides to operate*”.⁴ Boards will likely be very reluctant to be seen to hurt already suffering hospitality sectors but will also want to ensure that the licensing objectives continue to be promoted. As such, it is going to be vital for decision makers, advocates, and local stakeholders alike to find policies that can do both. It has been suggested that policies which may protect on-trade businesses, while reshaping the night-time economy away from alcohol-related

¹ Defined as scores of 5+ on the AUDIT-C test. This includes increasing risk, higher risk, and possible dependence.

² World Health Organization (2006). [Intimate partner violence and alcohol](#).

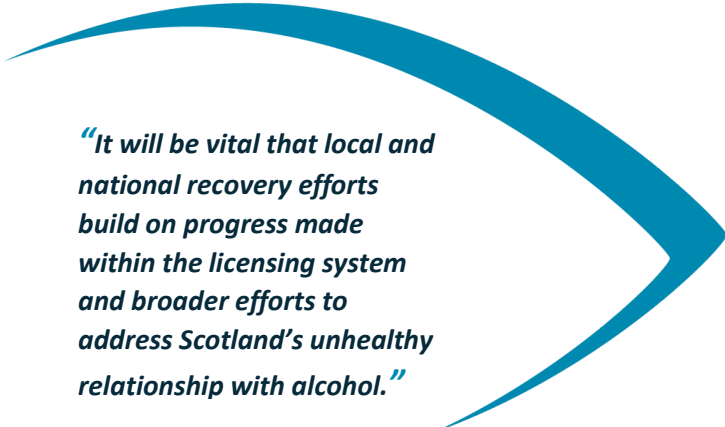
³ Alcohol Focus Scotland (2019). [Parental Drinking in Scotland Discussion Paper](#).

⁴ Scottish Government (2022). [Coronavirus \(COVID-19\): Licensing \(Scotland\) Act 2005 section 142 – statutory guidance](#).

harms, could offer a ‘win–win’ for policymakers and health advocates.^{xii} However, this raises questions regarding how boards should seek to manage competing priorities within their policies and decision-making.

Use of outdoor areas: A growing trend for outside seating areas had been identified in many areas prior to the pandemic, with a number of boards setting out their expectations and requirements in this regard. However, COVID-19 related restrictions on sales of alcohol indoors led to an increase in applications from bars/pubs to serve alcohol in spaces outdoors e.g., car parks, pavements. If outdoor spaces are licensed on a permanent basis it could result in a significant increase in the overall capacity of venues and the visibility of alcohol, including to children and people in recovery who may be passing by. However, it is unclear how and whether boards will now seek to reverse outdoor licences granted during the pandemic, or whether the trend for outdoor seating areas will continue to grow.

Online sales/deliveries: Alcohol deliveries and internet sales are not a new issue but are an evolving and expanding area of retail. The majority of boards set out their approach to alcohol deliveries within their policies, including by specifying the types of requirements and conditions that will apply. However, the COVID-19 related restrictions have accelerated the general trend to online shopping and led to an increase in premises offering home deliveries of alcohol. The types of businesses that sell alcohol online now range from small independent traders, specialist drinks retailers/clubs, local convenience stores, and supermarkets through to multinational e-commerce companies (e.g., Amazon). There is also a growing variety of app-based retailers who have arrangements with restaurants, takeaways and off-licences to deliver alcohol directly to people’s homes. Despite the reopening of physical stores, it is predicted that online sales will remain high as people have become more accustomed to online shopping. However, there is currently a distinct lack of information available about the business operations of online retailers in Scotland. For example, there is no data available pertaining to their distribution areas, or the volumes and types of alcohol they sell. In addition, it is unclear how age verification and other requirements can be effectively implemented when alcohol is being purchased on-line or delivered to people’s homes.



“It will be vital that local and national recovery efforts build on progress made within the licensing system and broader efforts to address Scotland’s unhealthy relationship with alcohol.”

Minimum Unit Pricing (MUP): MUP came into force on 1st May 2018 and, along with restrictions on irresponsible promotions, there are now greater controls than ever before on the sale of alcohol from off-sales. Boards appear to be approaching these developments differently; for example, the Glasgow policy states that these safeguards alone cannot adequately mitigate the link between the availability of responsibly sold alcohol and its unregulated consumption, while the Fife policy states that the introduction of MUP of alcohol has the potential to be a more

effective tool in reducing alcohol harm than overprovision. Many boards will be re-evaluating the relevance of MUP to their policies now that more information on the evaluation of the impact of MUP is available. In addition, in a recent legal case,⁵an overprovision policy was struck down as unlawful because the sheriff upheld the argument that it didn’t take into account that MUP had

⁵ Aldi Stores Limited Vs Dundee City Licensing Board, Case Number: B109/21, March 2022

come into force. The price, availability and marketing of alcohol can all impact consumption levels, which can in turn impact on harm, and it will be important that boards consider how different measures to tackle alcohol harm can be mutually reinforcing. In any local area it is impossible to say with any certainty what percentage of changes in alcohol consumption and alcohol related harms are due to changes in price/income as compared to availability or marketing. Accordingly, it is important to focus on the local evidence of alcohol related harm, to determine whether there is sufficient evidence of harm to support a case for controlling availability using an overprovision policy. It may also be useful to consider the differential in price between on- and off-sale, as although the introduction of MUP created a floor price, it did not elevate the price of off-trade alcohol enough to reduce the gap between on- and off-trade prices.

The references provided in the footnotes at the end of this guide all relate to studies and research into the impacts of the pandemic that you may find useful to read in more detail.

4. ISSUES TO CONSIDER WHEN REVIEWING THE POLICY

Promoting the licensing objectives

You should carefully review the policy being consulted upon to identify the measures that have been included to promote the objectives. Helpful questions to consider include:



Q *Is the board adopting new approaches to the promotion of objectives, relevant to the current and local context? What approach do you think is needed?*

The policy should make clear what the board is trying to achieve with each objective. Any trends or concerns relevant to the objectives can be outlined along with the details of any supporting evidence. Many boards have adopted new approaches to the promotion of objectives, responding to a trend towards purchasing alcohol from off-sales premises for consumption at home. For example, the Glasgow policy includes a section specifically pertaining to off-sales and the public health objective. This explains that the Board is concerned by a number of areas suffering from high levels of alcohol-related harm but containing very few licensed premises. The board does not consider it appropriate to declare these areas as being overprovided for, but the policy makes clear that it may nonetheless be inconsistent with the public health objective to grant a licence which would enable easier access to alcohol – thereby having the potential to exacerbate existing alcohol-related health problems in the area. This is set out in section 9.2 of the [Glasgow Licensing Policy](#).

Q *Are details of specific actions the board will take in pursuance of the objectives set out? What actions do you think it should take?*

The policy should provide information about what the board will do to promote the objectives. This could include actions like declaring overprovision, controlling licensed hours, or applying certain conditions. However, other measures could include ensuring all policies are fit-for-purpose, working to ensure information is kept up-to-date and accessible, liaising with local partners, endorsing local initiatives relevant to the objectives, carrying out spot checks of premises, highlighting good practice, and conducting reviews of licences. A full list of board measures to promote the objectives is provided in our online resource: [Measures to promote the licensing objectives](#).

Q *Are the factors licensed premises should consider in the promotion of the objectives set out, along with suggested actions for licensees?*

A broad range of factors can impact on the objectives that are particularly relevant to licensed premises, for example the ways people are dispersed from nightclubs could impact on the prevention of crime and disorder. You should notify the board if you are aware of any particular concerns in your area that licensees could help address. The types of actions licensees can take often relate to specific control measures that can be put in place, the training and supervision of staff, maintenance of premises, and co-operation with local stakeholders (e.g., LSO, police). A full list of example licensee measures to promote the objectives is provided in our online resource: [Measures to promote the licensing objectives](#).



Is there information about the local conditions the board may attach to licences, relevant to the objectives? What conditions would you recommend?

Some policies set out local conditions that may and/or will be applied by the board in pursuance of the objectives. For example, the North Lanarkshire policy states that the board will generally impose local conditions (which are detailed in an Appendix) when children are to be admitted to licensed premises. Including local conditions within policies not only provides an important indication of the ways in which the board will promote the objectives, it also provides examples of what conditions applicants could be subject to or volunteer themselves, and provides people making representations/ objections with suggestions of the kinds of conditions they can suggest. A full list of example conditions is set out in our online resource: [Examples of conditions to promote the objectives](#).

Overprovision

A statement on overprovision must be included in the policy. In deciding whether there is overprovision, boards are required to consider the number, type and capacity of licensed premises in a locality, and can consider other matters such as the licensed hours of premises. You may find it helpful to ask:



Is the overprovision assessment evidence-based and relevant to the current context? What evidence can you provide to inform decisions about overprovision?

Boards have the flexibility to decide the approach they take to addressing overprovision in their area and can choose to focus on only the factors that cause them concern in the light of the evidence. It is likely that many boards will be keen to identify how the pandemic has impacted on the licensed economy in their area and will be considering this as part of their overprovision assessment.

At a national level, the number of off-licences in Scotland has reached the highest level since 2010, when the relevant statistics first started to be collected.⁶ The closure of pubs and restaurants during the pandemic caused people to buy alcohol from other outlets and more shops and supermarkets applied for licences to meet demand. The number of off licences increased by 133 between March 2020 - March 2022, reaching a total of 5,155. Conversely, the nature of Covid-19, and the measures needed to reduce transmission, invariably had a disproportionate impact on the hospitality sector. While it is likely that many bars, pubs and other licensed premises will have closed permanently as a

⁶ While the number of off-sales only premises is at its highest level since records began, due to variations in how the available statistics have been published in different years, it is impossible to say for certain whether this is true for all off-sales i.e., off-sales only premises combined with those providing both on-sales and off-sales.

result, the available statistics don't enable for an assessment of how many licences were surrendered or lost. As such, it may be that the overprovision assessments will have a particular focus on the disparities between on and off sales, and the continued shift to home drinking.

Overprovision assessments must nevertheless demonstrate a factual basis, and decisions on overprovision should be informed by evidence from the police, health authorities and other agencies. The AFS [Licensing Resource Pack](#) provides detailed information about how to input to overprovision assessments, and our online resource [overprovision assessments](#) summarises the assessments contained in the most recent policies.

Licensed hours

Licensing hours are important not only to individual licensed premises but can have a wider impact for an area. Policy statements should provide information on a licensing board's policy on licensing hours. You may find it helpful to consider:



Q *What evidence can you provide about the impact of licensed hours, and what are your recommendations regarding hours for different types of premises /locations?*

AFS has identified numerous studies into the links between temporal availability and alcohol harm, which found that policies regulating times of alcohol trading can contribute to reductions in injuries, alcohol-related hospitalisations/ emergency department visits, homicides and crime.⁷ The vast majority of boards permit off-sales between 10am and 10pm each day, which is the maximum allowed by law. However, boards can stipulate shorter hours if they consider it to be appropriate. For example, in West Dunbartonshire off-sales hours are generally only permitted to 8pm, and the Board will only consider extending the closing time to 10pm if suitable enhanced control measures have been put in place to promote the licensing objectives. In addition, the hours permitted for on-sales and the night-time economy can have implications for matters such as crime and public order.

Q *Does the policy outline the principles that the board will apply when considering applications for extended hours? What would you recommend?*

Licensees can apply for an extension of licensed hours provided that it is in connection with a special event or occasion, or an event of local or national significance. Boards can also grant a general extension of licensed hours for particular specified occasions. As such, many policies outline the principles that the board will apply when considering applications for extended hours. For example, some make clear that if regular applications are made for the same premises, then applicants will be expected to consider whether they should apply to vary the premises licence. Others outline what might constitute an event of national or local significance. Some policies also set out the board's approach to the general extension of licensed hours. For example, the North Ayrshire Board has chosen not grant any general extensions, meaning that applicants seeking extended hours must always apply for them. In other areas, such as Edinburgh and Shetland, boards have opted to automatically grant general extensions for localised events.

⁷ For example: Sanchez-Ramirez DC, Voaklander D (2018). The impact of policies regulating alcohol trading hours and days on specific alcohol-related harms: a systematic review. *Injury Prevention* 2018;24: 94-100.

Children and young persons' access

It is largely for licensing boards to set out their expectations regarding factors like when children and young people should normally be allowed entry to licensed premises. It is also for boards to determine the measures that may be necessary to protect children and young people from harm. Helpful questions to consider include:



Q *Does the policy indicate what might be acceptable in terms of children and young peoples' access? What do you think is acceptable?*

Overall, it is the extent to which premises are likely to provide a family-friendly environment that tends to be the determining factor in boards' approaches to children's access. Conversely, premises where the supply of alcohol is the primary purpose of the service provided are frequently cited by boards as being unsuitable for children and young people. Several boards set out expectations with regards to young peoples' access to specific parts of premises, for example in Highland children under the age of 16 must be excluded from any room where there is a bar counter after 10pm. Some policies also specify the hours when young people should normally be allowed entry e.g., until 10pm.

Q *Does the policy identify measures to help protect children and young people from harm? What would you recommend?*

Many policies outline specific conditions in order to protect them from harm. These frequently cover issues such as health and safety, and the provision of suitable facilities, children's menus, staff training etc. In addition, some include measures to ensure that children are not exposed to harmful drinking practices and alcohol marketing. For example, the Dumfries and Galloway Boards suggest that licensees consider placing a limit on the number of alcoholic drinks served to adults in charge of children or young persons. The Falkirk policy states that where licensed premises intend to hold events specifically targeted at children/young persons and alcohol is not being served (e.g., underage discos or parent and toddler groups), consideration should be given to taking steps to avoid any obvious promotion of alcohol.

Occasional licences

An occasional licence allows the temporary sale of alcohol in a place that is normally unlicensed, and applications for this type of licence can be granted under 'delegated powers', meaning the decision is made by a Clerk rather than a licensing board. You may therefore find it useful to consider:



Q *Does the policy indicate the types of events which are most/least likely to be considered for the grant of an occasional licence? What do you think is appropriate?*

The types of events which are currently indicated as being most likely to be considered for the grant of an occasional licence are special celebratory events such as birthdays, anniversary parties or wedding receptions. Conversely, events which are least likely to be suitable are those targeted towards children and families e.g., school sports days or children's parties. Events where there is no significant entertainment are also frequently highlighted as being unsuitable.



Does the policy specify the conditions that will be applied to occasional licences?

Some policies set out conditions relating to issues such as management, supervision, signage and training, which the board will apply specifically to occasional licenses, either as standard practice or on a case-by-case basis. For example, in Edinburgh, Police Scotland and LSOs provided a set of “pool” conditions to be attached to occasional licences.

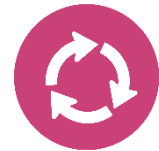


Does the policy set out measures to ensure that occasional licence applications are subject to appropriate scrutiny?

Some boards have placed a limit on the number of applications which can be considered under delegated powers. The most common approach to this, adopted in areas such as Aberdeenshire, East Lothian, and South Lanarkshire, is for boards to require a hearing where an application relates to activities that have been occurring on the premises regularly over a period of three months.

Licensing processes and public participation

There are a number of ways that community members can have a say in licensing, and the publication of policy statements provides an opportunity for boards to set out the mechanisms available to enable for community participation.



Does the policy include any information to support public participation? What would you recommend be included?

Policies can include information about the various ways in which the general public can get involved or the types of information/supports available to enable them to participate. For example, some boards have developed pro formas to assist anyone wishing to make an objection or representation, while others highlight that LSOs are available to offer appropriate support. Many boards include a commitment in their policies that they will conduct business in a way that is not off-putting to members of the public. For example, the Moray Board highlights that it wishes to create a less formal and more relaxed atmosphere so as not to intimidate parties. It explains that its aim is to reach out to all parts of society and genuinely reflect their interests, and that it will seek to encourage an open and honest exchange of information in a customer-friendly setting.

Identifying strategic links

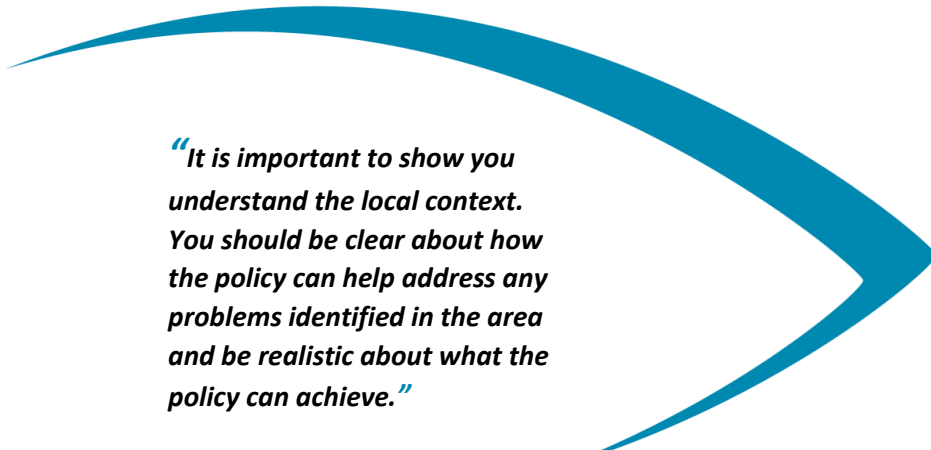
The policy should indicate how the board will take into account other matters relating to alcohol, for example local crime prevention, community safety strategies, and health.



What strategies, at both a national and local level, have been referenced in the policy? Which should be?

Although boards are quasi-judicial and need to undertake their decision-making independently, this does not prevent them from considering their policies in the broader context of identified local and national priorities etc. Boards in many areas have adopted a collaborative approach and committed to work with local partners where they share common objectives. Examples of relevant local strategies and locality plans you may wish to suggest are referenced in the policy could include Local

Outcome Improvement Plans (LOIPs), Alcohol and Drug Partnership strategic plans, and the strategic plans of the Health and Social Care Partnerships (HSCP). The pandemic has highlighted the importance of partnership working across sectors, and it may also be helpful to highlight how your organisation could contribute to the implementation of the licensing policy and support shared priorities.



“It is important to show you understand the local context. You should be clear about how the policy can help address any problems identified in the area and be realistic about what the policy can achieve.”

ⁱ Alcohol Focus Scotland (23 April 2020). [Scots report changing drinking patterns during coronavirus lockdown](#). Alcohol Focus Scotland.

ⁱⁱ Alcohol Focus Scotland (23 July 2020). [Survey shows Scots lockdown drinking rise caused by stress](#). Alcohol Focus Scotland.

ⁱⁱⁱ Angus, C. et al. (2022). [Modelling the impact of changes in alcohol consumption during the COVID-19 pandemic on future alcohol-related harm in England](#). The University of Sheffield.

^{iv} Jackson, S.E. et al. (2021). [Moderators of changes in smoking, drinking and quitting behaviour associated with the first COVID-19 lockdown in England](#). *Addiction*, 117(3), 772-783.

^v Jackson, S.E. et al. (2021). [Association of the COVID-19 lockdown with smoking, drinking and attempts to quit in England: an analysis of 2019–20 data](#). *Addiction*, 116(5):1233–44.

^{vi} Angus, C. et al. (2022). [Modelling the impact of changes in alcohol consumption during the COVID-19 pandemic on future alcohol-related harm in England](#). The University of Sheffield.

^{vii} Ponce Hardy, V. & Giles, L. (2022). [Monitoring and Evaluating Scotland’s Alcohol Strategy: Monitoring Report 2022](#). Public Health Scotland.

^{viii} National Records of Scotland (2022). [Alcohol specific deaths 2021](#).

^{ix} Holmes, J. et al. (2012). [The temporal relationship between per capita alcohol consumption and harm: a systematic review of time lag specifications in aggregate time series analyses](#). *Drug and Alcohol Dependence*, 123(1-3), 7-14.

^x Ponce Hardy, V. & Giles, L. (2022). [Monitoring and Evaluating Scotland’s Alcohol Strategy: Monitoring Report 2022](#). Public Health Scotland.

^{xi} Ponce Hardy, V. & Giles, L. (2022). [Monitoring and Evaluating Scotland’s Alcohol Strategy: Monitoring Report 2022](#). Public Health Scotland.

^{xii} Fitzgerald, N. et al. (2021). [Lockdown and licensed premises: COVID-19 lessons for alcohol policy](#). *Drug and Alcohol Review*, 41(3), 533-545.