



c/o
Scottish Health Action on Alcohol Problems
12 Queen Street
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30 January 2025

Neil Gray MSP
Cabinet Secretary for Health and Social Care
Scottish Government
St Andrew's House
Regent Road
Edinburgh
EH1 3DG

Dear Cabinet Secretary

We write further to the Scottish Parliament Public Audit Committee's consideration of the Audit Scotland report into Alcohol and Drug Services to ask for further detail about how the Scottish Government intends to increase the focus on alcohol-related harm and how we can support this.

As you will be aware, on 19 December, the Committee took evidence from Caroline Lamb, Director-General Health and Social Care and Chief Executive of NHS Scotland. In this session the Director-General confirmed that the Scottish Government accepted recommendation 1 of the report, that by mid-2025 it must "work with key stakeholders to identify and agree actions to increase focus and funding for tackling alcohol-related harm, while continuing to tackle drug-related harm".

You confirmed the Scottish Government's position during General Questions on 16 January, responding to Audrey Nicoll MSP that "We remain committed to tackling alcohol-related harm on an equal footing with harm caused by drugs."

In her letter to the Auditor General, forwarded to the Committee prior to her oral evidence, Ms Lamb listed a number of actions that are/have been underway to address alcohol harms:

- the introduction of Minimum Unit Pricing;
- a PHS review of evidence on protection children and young people from alcohol marketing;
- the incorporation of UK-wide clinical guidelines for alcohol treatment services into a National Service Specification for alcohol and drugs services;
- the National Mission's increase in residential rehabilitation capacity resulting in increased rehab capacity for people with alcohol problems; *and*

- work with organisations such as ourselves on raising awareness of the link between alcohol and cancer and guidance on alcohol death reviews.

Whilst all of these pieces of work are welcome, it is our view that the listed actions will not be sufficient to deliver an increased focus on alcohol issues. Indeed, many of the actions listed have been planned or underway for some time while others represent a delay. Work on alcohol marketing is actually a step back from the Scottish Government's previous commitment to bring forward a consultation on this matter by the end of 2024.

The Audit Scotland report notes that while action has been taken to tackle drug deaths such as the establishment of the Drug Deaths Taskforce, the National Mission and the MAT (medically assisted treatment) standards for drugs, "there have been no equivalent developments specifically focusing on reducing alcohol harm during this period, and the Alcohol Framework has not been updated in six years." One of the consequences of this is ADPs focusing on MAT standard compliance, leading to less focus on tackling alcohol harm.

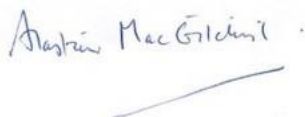
In the Committee's session on 21 November, the Auditor General stated "necessary interventions such as the provision of drug services and the creation of the national mission have, in part, come at the expense of a focus on alcohol deaths and alcohol services" and that "we have not got the right balance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

We agree and consider that a co-ordinated and adequately-resourced plan is necessary to respond to the alcohol harms "public health emergency" which the Scottish Government itself declared in 2021. However, the Scottish Government's response to-date does not demonstrate a proportionate response to the urgency and the scale of the challenge we face.

We welcome the increase to the drug and alcohol services budget announced this week and would be grateful for further detail on whether this will be used to reflect Audit Scotland's call for increased funding to tackle alcohol problems.

We would also be grateful for more detail on how the Scottish Government intends to deliver on the Audit Scotland recommendations more widely, particularly recommendation 1. We would welcome a meeting with you to discuss how we can support this work.

Yours sincerely,

A handwritten signature in blue ink, reading "Alastair MacGilchrist".

Dr Alastair MacGilchrist
SHAAP Chair

A handwritten signature in black ink, reading "Laura Mahon".

Laura Mahon
AFS Acting Chief Executive