



Ein cyf / Our ref: MA-L/VG/0248/18

Dr Dai Lloyd AM
Chair
Health, Social Care and Sport Committee

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22 May 2018

Dear Dai,

I wrote to you on 28 March, setting out my response to the recommendations made by the Health, Social Care and Sport Committee (published on 5 March) in relation to the Public Health (Minimum Price for Alcohol) (Wales) Bill.

In relation to recommendations 13 and 14, I said I would share the Welsh Government's early plans for the evaluation of the legislation during their development.

It is intended that the overarching evaluation of the Public Health (Minimum Price for Alcohol) (Wales) Bill will take the form of a contribution analysis. There will be four strands of data and research which feed into this assessment.

Contribution analysis is a theory-based evaluation method, appropriate to the review of complex, multi-level programmes of work where direct causal attributions are not possible.¹ The approach is applicable here as the introduction of a minimum price for alcohol is not the only factor which may impact on alcohol consumption and alcohol-related harm. The evaluation approach needs to take account of this and assess the contribution the policy has made to any observed changes in outcomes. Theoretically, it is considered reasonable to assess the contribution of the programme if:

- There is a theory of change illustrating links between actions and outcomes
- Planned activities were implemented
- Evidence is available to support the above
- Other factors that could have an impact on outcomes have been considered.

¹ Mayne, J. (2008) Contribution analysis: An approach to exploring cause and effect. The Institutional Learning and Change (ILAC) Initiative.

This approach aims to make a reasonable assessment of the contribution of the policy to meeting its overall aim.

An initial, draft theory of change is included in the annex. The successful contractor will, as a first stage, further refine the theory of change for the policy. The next stages will consist of generating and reviewing available evidence collected as a result of actions taken by the policy and assembling an informed contribution story.

There are a number of strands of work that will contribute to the generation and reviewing of evidence. These are:

- **Routine data**

The National Survey for Wales collects and reports on alcohol consumption on an annual basis – new data are published during the summer and will be reported annually as part of ongoing monitoring for alcohol policy.

Data on alcohol-attributable mortality and alcohol-attributable hospital admissions are included in the annual profile for substance misuse produced and published by Public Health Wales each autumn.

Monitoring data will be collected from local authorities about compliance with the legislation.

- **Commissioned studies**

A number of specific studies may need to be commissioned to provide the evidence to feed into the contribution analysis. The areas in which these are likely to be needed are outlined in red text in the annex. They include:

Social attitudes and awareness – it is likely questions will be commissioned in an appropriate survey at specific time points (to be agreed) prior to implementation and during the five-year review period. These will assess awareness and understanding of the aims of the Bill and social attitudes towards the introduction of a minimum price for alcohol. By including questions over a period of time, changes in awareness and understanding can be assessed as the communications campaign is delivered. These findings can also be used to inform ongoing communications plans.

Work with retailers – plans for this work are being developed. It is likely we will use existing relationships with the Welsh Government's Alcohol Industry Network and the Welsh Retail Consortium to facilitate access to research participants for this work. Public houses could be included in this aspect of research work to obtain feedback on the impact of the policy on this sector.

Qualitative work with services – plans are being developed. It is likely some work will be undertaken prior to implementation to understand what impacts services think the legislation is going to have and how services are supporting their clients in preparation for implementation. Further work is likely to follow implementation to establish perceptions of the impact of the legislation. Services may also be used as a contact point for harmful drinkers themselves.

Cross-border sales – data on cross-border grocery sales on cards registered in Wales were used for the explanatory memorandum and competition assessment. These data may be used again and other work may be commissioned to explore the cross-border impact of the policy.

Alcohol sales data – sales data, which show the prices paid for alcoholic beverages are not available routinely, and therefore will need to be made available for use by the Welsh Government.

Analysis of household expenditure – plans for this work are being developed. Possible data sources will be explored, with a view to undertaking further analysis to establish whether shares of household expenditure on different categories of goods are changing after the implementation of the legislation.

Further analysis of routine data – there may be a need to undertake or commission some bespoke analysis of some of the routine data, such as National Survey data on alcohol consumption routinely-published headline statistics. Further analysis will be required to monitor the consumption of hazardous and harmful drinkers. The Office of National Statistics has recently changed the definition of alcohol-related deaths so further analysis may also be required to ensure the statistics being examined over time are comparable.

Other possible commissioned work – if relevant issues are raised which have not previously been considered, it is likely that additional work would be commissioned to explore these in more depth.

- **Learning from the evaluation of the implementation in Scotland**

The Scottish Government has asked NHS Health Scotland to commission a programme of work to evaluate minimum pricing legislation in Scotland. Welsh Government officials have attended meetings to learn more about these studies and will continue to observe progress. Consideration will be given to applying the learning from the Scottish studies to Wales (where it is considered appropriate to do so). In particular, we will be looking to learn early lessons from the Harmful Drinkers Study and the Small Retailers Study. Studies which have been commissioned in Scotland and may provide data for the contribution analysis here in Wales are highlighted in blue in the annex.

We have commissioned Figure 8 Ltd, an independent research agency to undertake a comparability assessment of harmful drinkers and the services available to them in Wales and Scotland. This will allow us to determine the extent to which we can learn from the study being undertaken in Scotland and to what extent and where best to focus the commissioning of any study in Wales.

- **An externally-funded independent evaluation by Cardiff University**

A team of researchers from Cardiff University is developing a bid for funding from the National Institute for Health Research to evaluate minimum unit pricing in Wales. If the bid is successful, this work will complement work commissioned by the Welsh Government and will provide further sources of evidence that can be used in the contribution analysis assessment. Areas where this study can potentially feed in are included in purple text on the diagram in the annex.

Welsh Government officials have seen an expression of interest and been given the opportunity to comment on a draft of the full proposal but have not been involved in its development, which is important for its independence. The full bid is due to be submitted shortly and decisions about funding will be known in November. We will continue to keep up to date with the progress of this bid.

We are giving careful consideration to the evaluation and review of this novel and ground-breaking legislation and how we can best learn from other studies which are planned or already underway in this policy area.

Over the coming months, further work will be taken forward to finalise our plans. I fully accept that the evaluation should focus on the extent to which the legislation has contributed to delivering change across a range of key outcomes and the impacts of minimum unit pricing on specific groups. However, I do not believe it is necessary or appropriate to specify the precise scope of the evaluation report on the operation and effect of the legislation on the face of the Bill as this could potentially remove our ability to be flexible to respond to issues and developments as they arise, should the Bill be enacted.

I look forward to continuing to work with the committee as the Bill progresses through the Assembly.

Yours sincerely,

A handwritten signature in black ink that reads "Vaughan Gething". The signature is written in a cursive, flowing style.

Vaughan Gething AC/AM

Ysgrifennydd y Cabinet dros Iechyd a Gwasanaethau Cymdeithasol
Cabinet Secretary for Health and Social Services

Annex: Theory of Change – MUP Wales – showing existing studies elsewhere and possible additional studies to be commissioned.

NOTE: Text in purple signifies possible findings from Cardiff University study. Text in red outlines work to consider commissioning. Text in blue is a Scottish study. Text in black signifies routine data.

