

Queensland Government interim response to the final evaluation report of the Tackling Alcohol-Fuelled Violence Policy (April 2019)

Interim Government response

The Queensland Government welcomes the final report of the independent evaluation of the Tackling Alcohol-Fuelled Violence (TAFV) Policy.

The final report is the culmination of a comprehensive, rigorous and intensive body of research and evaluation. Queensland is grateful to the evaluation team, led by Professor Peter Miller and consisting of academics from Deakin University, the University of Queensland, James Cook University and La Trobe University, for their hard work and considered and evidence-based insights. The final report will make a crucial contribution to Queensland's ongoing efforts to ensure the TAFV Policy is achieving its three key objectives of a safer night-time environment, cultural change around drinking practices in entertainment precincts, and a balanced regulatory framework.

The Government is pleased to note the final report finds there have been modest but promising reductions in some indicators of alcohol-related harm in night-time environments statewide, particularly in relation to violence rates in the very early weekend hours, ambulance callouts and hospital admissions. In particular, the Government notes the report finds:

- a 29% average reduction per month statewide in serious assaults between 3 and 6am, with a 40% reduction in the Fortitude Valley SNP and a significant reduction in the Toowoomba SNP,
- a 29% reduction in ambulance callouts in SNPs between 3 and 6am, and an 11% average reduction statewide,
- a 12% reduction in hospital admissions of ocular bone fractures in greater Brisbane, and a 4% average reduction per month statewide, and
- at least one serious crime (including rape and grievous bodily harm) per week across Queensland has been solved using ID scanner data.

These positive outcomes are testimony to the sustained and collaborative hard work of our dedicated emergency services personnel, liquor licensing officers, licensed industry operators and funded support services to provide safe spaces in which Queenslanders can enjoy the state's vibrant nightlife.

The Government is also pleased to note the final report finds there has been no adverse impact from the TAFV Policy on the night-time economy. Patron numbers attending SNPs remain high, licensed venue numbers in precincts are strong and growing, live music performances are increasing and tourism is unaffected. There has also been no displacement of alcohol-related harm and violence to venues outside SNPs. The TAFV Policy focus on reducing alcohol-related harm has not occurred at the cost of vibrant, world-class entertainment precincts and a healthy liquor, hospitality and tourism industry.

Importantly, the Government notes the introduction of mandatory networked ID scanners for premises trading after midnight in SNPs has been effective in reducing antisocial behaviour, without any significant adverse impact on industry. The final report also indicates that implementation of the major new measures under the Policy – trading hour

restrictions and ID scanners – has delivered savings of approximately \$2.30 to \$4.59 for every dollar spent.

The Government also notes the final report findings that funded support services in SNPs provide valuable assistance to primarily young, intoxicated, distressed and injured patrons, and may also contribute to preventing less serious crime and harm. The services enjoy the support of patrons and venues when run well.

The Government acknowledges the final report shows there is more work to do to change drinking behaviour in Queensland's entertainment precincts. The final report finds Queenslanders are among the heaviest drinkers in the nation, and this is contributing to unacceptable rates of alcohol-related harm in and around late-trading licensed venues. The Government does not resile from this challenge, and appreciates the opportunities explored in the final report to support meaningful, lasting cultural change.

The 2019–20 State Budget provides an additional \$6.6 million to continue delivery of TAFV measures for a further year, until the Government finalises the response to the report after consultation with stakeholders. The Government will draw on the detailed findings and recommendations of the final report to ensure the right measures are in place to deliver a comprehensive, evidence-based and sustainable response while continuing to appropriately support Queensland's vibrant night-time economy. It will also draw on other contributions to the body of data and research currently available to inform evidence-based policy development.

The Government appreciates that a wide range of stakeholders will have views of the potential benefits, risks and impacts of measures recommended by the final report. It is therefore vital that all relevant stakeholders have a reasonable opportunity to express their considered views before the Government finalises its position on particular measures. To facilitate this consultation, the interim Government response divides individual final report recommendations into the following three categories:

- 1. Recommendations supported in-principle** (seven recommendations) – those recommended measures which would strengthen and enhance Queensland's approach and can be implemented within existing resources, or whose intent is substantially achieved through existing or planned Government policies or programs.
- 2. Recommendations accepted for further consideration** (21 recommendations) – those recommended measures which could strengthen and enhance Queensland's approach but, due to their more far-reaching operational, policy or funding impacts, require further consideration.
- 3. Recommendations not supported** (10 recommendations) – those recommended measures which the Government considers would not strike an appropriate balance between reducing alcohol-related harm and supporting a vibrant and innovative licensed industry, or which could otherwise involve adverse unintended impacts.

A final Government response will be developed to reflect the outcomes of this further consideration and consultation, and of further consideration of the policy, funding and operational impacts of particular recommended measures. The interim Government response to specific recommendations is fully detailed in the table below. Broken down by objective of the TAFV Policy, this response broadly provides as follows:

Objective 1 – a safer night-time environment

The Government will consider and consult on implementation of a range of recommended measures to improve the safety of the night-time environment by

enhancing existing means of policing and enforcing compliance. These include extending the duration of police banning orders to ensure they can function as a genuine deterrent, maintaining mandatory ID scanners, and maximising the benefits of scanners by enabling banning lists to be shared with venues not on the ID scanner network.

The Government also accepts in-principle the final report's recommended measures aimed at reducing the unintended impact of the ID scanner requirements on individual businesses. These measures include reducing the length of time venue bans remain on the system, limiting the scanning requirements for venues closing before midnight to peak periods, and exploring options for venues to use pass-outs instead of having to rescan patrons on re-entering the premises.

The Government also supports in-principle the recommended exemption of community clubs from having to verify patrons' identities twice through the operation of mandatory ID scanners. This would exempt the following venues from the ID scanning requirements:

- Bundaberg Services Club
- Caloundra RSL
- Maroochy RSL
- Toowoomba Sports Club, and
- Cowboys Leagues Club (Townsville).

The final report includes a number of recommendations aimed at reducing violence in night-time precincts by imposing significant additional regulatory restrictions on late-trading venues. A key objective of the TAFV Policy is to strike an appropriate regulatory balance between reducing alcohol-related harm and supporting Queensland's night-time economy. For this reason, the Government cannot support recommended regulatory measures which unduly restrict the ability of venues to generate sustainable late-night revenue streams apart from the service of alcohol (such as the imposition of a 3.30am hard close in all SNPs), or to provide vibrant and world-class entertainment precincts (such as the discontinuation of the extended permits scheme). However, subject to further stakeholder consultation, the Government supports in-principle the recommended extension of CCTV as a proportionate means of enhancing the safety of late-trading venues. In finalising its response, the Government will consider future funding, service delivery and governance options for SNPs in consultation with affected service providers, licensees, employees and other relevant stakeholders. This will include exploration of alternative ways of realising the intended benefits of the recommended regulatory restrictions on late-trading venues in SNPs without unduly impacting business or creating unintended flow-on impacts. As discussed below, opportunities will be explored to engage casinos as part of this work.

The Government notes the final report's findings that the use of illicit drugs, pre-drinking and the exclusion of casinos from trading hour restrictions are potentially undermining the impact of the TAFV Policy. As part of a comprehensive approach to alcohol and other drug harm reduction, the Government will consider introduction of appropriate anti-drugs campaign activities.

However, Queensland considers any imposition of a minimum unit price on alcohol should be subject to a nationally-consistent approach, with work to this end already underway at a national level. Queensland will participate in national discussions on

this issue.

The Government also does not support the recommended inclusion of casinos in trading hour restrictions, or in a high-risk venues scheme. The Government is not satisfied imposing this additional regulatory burden on casinos would assist in reducing violence rates, with casinos already subject to a high level of scrutiny and required to meet a higher level of safety than other licensed premises. Instead, the Government will explore opportunities to actively engage casinos in SNP management and safety.

The Government notes SNP support services are effective in supporting vulnerable, intoxicated patrons, and will consider future funding, service delivery and governance options for SNPs in consultation with affected service providers and other relevant stakeholders. This consideration will focus on ensuring support services are flexible, sustainable and appropriately aligned and coordinated with other complementary efforts within SNPs.

The final report recommends that police, Emergency Department staff and ambulance officers collect data from intoxicated night-time patrons to whom they provide services about their alcohol consumption and where they consumed their last drinks ('last drinks' data). The Government is aware of the potential benefit of 'last drinks' data in identifying patterns of problematic venue behaviour and targeting regulatory responses accordingly.

However, the Government is concerned that requiring this data to be collected would impose an additional burden on emergency services which could detract from the delivery of timely frontline care, could lead to patrons refusing to engage with emergency services, and could expose emergency services personnel to aggression from intoxicated patrons. Self-reported data from intoxicated persons may also not be reliable. The Government will endeavour to meet the intent of this recommendation by considering opportunities to undertake targeted research to replicate the potential benefits of 'last drinks' data as part of future evaluation.

Objective 2 – cultural change

The final report provides important insights for ensuring future alcohol awareness and antiviolence campaigns are evidence-based, effective and rigorously evaluated, and involve a strong and clear focus on outcomes. The Government appreciates these insights and will have close regard to the findings and recommendations of the final report in developing and delivering future campaigns.

It is noted that evaluators were unable to obtain sufficient information about schools' participation in the alcohol and other drugs education program to assess the program's impact. The final report recommends a review of the program, ongoing monitoring of its implementation and greater transparency in relation to schools' compliance. Elements of this recommendation are already substantially achieved through current practice in the state school system.

However, the Government considers this recommendation generally does not have sufficient regard to schools' existing accountability around implementation of drug and alcohol education as part of the Australian Curriculum, nor the importance of maintaining schools' autonomy in delivering curriculum in a way that is effectively targeted to the particular school community. For this reason, the Government is not able to support the recommendation in full. However, further consideration will be given to opportunities to use existing oversight mechanisms to specifically focus on state schools' delivery of drug and alcohol education as part of implementation of the Australian Curriculum. Where relevant, specific elements of the recommendation may be incorporated into the Queensland state school system's

existing practice.

Similarly, the final report was unable to reach conclusions about alcohol consumption trends in SNPs, and in licensed venues in particular. The final report considers existing survey measurement and monitoring of drinking behaviours is not sufficient for measuring the impact of the TAFV Policy on drinking patterns among patrons of late-trading premises. The Government will consider further opportunities to address this issue, including the final report's recommendations to establish an independent health research steering committee and adjust and publish further details about the conduct of surveys.

Objective 3 – a balanced regulatory framework

The Government accepts in-principle the recommendation to continue support for SNP governance boards, considering boards an important measure for engaging stakeholders in collaborative effort to help manage SNPs. Boards will be consulted about future funding, service delivery and governance options for SNPs.

To ensure regulatory effort and resources are appropriately targeted at need, the Government supports in-principle the recommendation to conduct regular reviews of SNPs boundaries and inclusion criteria. The review will include consideration of the recommended discontinuation of the Ipswich CBD SNP and Inner West Brisbane (including Caxton Street) SNP. As a first step, the Government will consult with affected stakeholders about the recommended discontinuation of those SNPs, noting the low patron numbers and violence levels they experience (for Inner West Brisbane, on non-event nights). If the Caxton Street SNP is discontinued, alternative arrangements will be explored to ensure sufficient policing resources remain available to cover Suncorp Stadium event nights.

In principle, Queensland partially supports the recommended measures to strengthen the enforceability of venues' and servers' responsible service of alcohol (RSA) obligations. The Government supports in-principle and will consult stakeholders on the recommendation to improve the enforceability of RSA obligations by creating a penalty for licensees who fail to ensure their venues' risk assessment management plan is properly implemented. However, the Government does not support creation of an express requirement to consider a patron's level of intoxication before they may be lawfully served alcohol, considering this requirement is already implicitly achieved by existing law. Also, the Government does not support the recommendation to discontinue the application of the mistake of fact excuse to RSA prosecutions, considering this an important safeguard under the general criminal law.

In principle, the Government partially supports the recommendations focused on making the liquor licensing process more transparent, focused on the broader community impacts of licensing decisions and amenable to community input. In particular, Queensland will consult on the potential benefits of proactively publishing the reasons and supporting documents for licensing decisions, subject to privacy and resourcing considerations.

However, the Government does not support the imposition of a moratorium on new and amended liquor licences. As nearly two in three new liquor licences are for low-risk premises, the link between alcohol-related harm and the rate at which liquor licences are granted is not sufficient to justify a measure with the potential to impact so adversely on the night-time economy.

The Government may consider taking particular matters, such as violence rates and outlet density, into account in licensing decisions especially when considering the need to make the licensing process more transparent and inclusive of

community input. Licensing decisions are currently informed by consultation with the Queensland Police Service, local governments and members of the public. In this way, matters relating to potential violence and social and health impacts are already considered in the licensing process. This flexible approach means licensing decisions balance the objectives of minimising alcohol-related harm and supporting the sustainable development of Queensland's hospitality industry. Additionally, as detailed below, issues relating to the availability of alcohol and evidence regarding the impacts of outlet density will be considered more broadly as part of the Government's work under the 'Keep Queenslanders Healthy' priority area of *Our Future State: Advancing Queensland's Priorities*.

The Government is similarly not satisfied the cost to government and industry of creating new penalties and intrusive audit powers and functions in relation to the provision of alcohol sales data is justified. More complete sales data is already able to be collected from suppliers and other licensees on a case-by-case basis as required for compliance and enforcement purposes, and similar data is available through a number of other sources, including the taxation system and the Australian Bureau of Statistics, for research purposes.

The Government values the vibrancy of our night-time precincts, and agrees supporting a diverse range of alternative revenue streams for venues which are not reliant on late-night alcohol sales, such as original live music, is important to that vibrancy. Queensland will therefore continue to make the most of available opportunities to support original live music in entertainment precincts.

The Government response will be delivered in a dynamic and well-coordinated reform space. Under *Our Future State: Advancing Queensland's Priorities*, significant activity is planned or underway to deliver on key targets which align with the intent of the TAFV Policy. In particular, the TAFV objective of changing drinking culture in entertainment precincts aligns closely with the target under the 'Keep Queenslanders Healthy' priority area of increasing the number of Queenslanders with a healthy body weight. 'Keep Queenslanders Healthy' encompasses delivery of *My health, Queensland's future: Advancing health 2026* and establishment of Queensland's first Health and Wellbeing Commission, both of which recognise harmful levels of alcohol use as contributors to obesity and chronic disease.

The objectives of a safer night-time environment and a balanced regulatory environment align with the target under the 'Keep Communities Safe' priority area of reducing the rate of Queenslanders who are victims of crime. The objectives of 'Keep Communities Safe' are also contributed to through the implementation of the *Domestic and Family Violence Prevention Strategy 2016-2026*, which recognises that alcohol and other drug use is a situational factor that contributes to violence. This close alignment with existing bodies of work presents an ideal opportunity to maximise the effectiveness and sustainability of the Government response to the final report and to improve delivery of the Government's priorities for the community. The relevant governance and implementation structures under the *Our Future State: Advancing Queensland's Priorities* priority areas will be closely engaged in the design and delivery of relevant measures under the Government response, ensuring this response contributes meaningfully to realisation of the Government's targets and is aligned with complementary effort across Government.

The Government recognises that achieving the objectives of the TAFV Policy requires comprehensive and sustained effort. As part of this effort, the Government will further monitor and evaluate alcohol-related harm in Queensland and the effectiveness of the Government's policy response. Details of this further monitoring and evaluation will be determined after further consideration and consultation, and will be included in the Government's final response to the report.

Interim Government response highlights

Queensland will continue funded Safe Night Precinct measures for a further year, while undertaking further consideration and stakeholder consultation on the issues raised in the report. The Government will draw on the final report and other relevant research to ensure the right set of comprehensive, evidence-based and sustainable measures are in place to reduce harmful drinking behaviour in Queensland's entertainment precincts while continuing to support Queensland's vibrant night-time economy.

Subject to this further consultation and consideration, significant measures to be implemented could include:

- maintenance of a regulatory approach which appropriately balances harm reduction with the maintenance of vibrant, world-class entertainment precincts and a healthy liquor, hospitality and tourism industry
- enhancement to the enforceability of responsible service of alcohol obligations
- increased transparency around the licensing process through the proactive publication of reasons and supporting documents for licensing decisions, subject to privacy and resourcing considerations
- retention of the ID scanner network, with adjustments to minimise unintended impacts on business and ensure the power to record venue bans on the network is being used appropriately
- exemption of community clubs from operating mandatory networked ID scanners
- an increase in the duration of police banning orders to provide a real deterrent to troublemaking and offending in and around licensed premises
- adoption of a comprehensive, evidence-based approach to alcohol and other drug harm reduction in the design and delivery of future campaigns addressing alcohol awareness and the use of illicit drugs
- adoption of a comprehensive, evidence-based, whole-of-Government approach to antiviolence, including in the development and delivery of future antiviolence campaigns
- participation in national discussions on the introduction of a minimum unit price for alcohol
- a continued focus on alcohol and other drug education in state schools as part of implementation the Australian Curriculum: Health and Physical Education
- while continuing the separate regulation of casinos, exploration of opportunities to actively engage casinos in broader entertainment precinct management and safety
- retention of SNP boards, and consideration of future funding, service delivery and governance options for SNPs in consultation with affected service providers, licensees, employees and other relevant stakeholders
- addressing identified data gaps, including for 'last drinks' data and longitudinal data about drinking culture change among key TAFV Policy demographics
- further monitoring and evaluation of the TAFV Policy and alcohol-related harm in Queensland
- consideration of opportunities to improve the capacity to measure the cultural impact

of the TAFV Policy on drinking behaviour, and

- reducing venues' reliance on late-night alcohol sales by supporting a diverse range of revenue streams in entertainment precincts, such as live music and food service.

Responses to individual recommendations

No.	Recommendation	Response
1	Close all venues in SNPs at 3.30am.	<p><i>Not supported</i></p> <p>The Government is not satisfied closing all late-trading venues in SNPs at 3.30am, following cessation of the service of alcohol at 3.00am, would strike an appropriate regulatory balance. This measure could restrict the ability of venues to generate sustainable late-night revenue streams apart from the service of alcohol, and could impact the vibrancy of entertainment precincts.</p> <p>A key intent of the TAFV Policy is to encourage the development of a diverse night-time economy that includes, but does not centre solely on, service of alcohol. Having regard to this, the Government considers clearer evidence is required that links alcohol-related harm with venues in SNPs remaining open, either without liquor service or with service of liquor under one-off extended trading permits, to justify a hard 3.30am close in SNPs. The final report does not provide sufficient evidence, finding that assaults between 3.00am and 6.00am have reduced by 40% in Fortitude Valley SNP and an average of 29% per month statewide since the introduction of the TAFV Policy.</p> <p>Further, the Government is not satisfied the potential adverse effects of imposing a fixed closing time across all venues in SNPs have been sufficiently articulated and considered. These include the potential flow-on impacts on public transport and public spaces, with large numbers of patrons likely to exit licensed venues simultaneously as a consequence of the imposition of a uniform closing time.</p> <p>The Government will explore alternative ways of realising the intended benefits of this recommendation without unduly impacting the night-time economy or creating unintended flow-on impacts. This exploration will occur in the context of the Government's consultation regarding the future funding, service delivery and governance options for SNPs (as discussed at recommendation 28 below).</p>
2	Stop the Extended Trading Permits Scheme.	<p><i>Not supported</i></p> <p>Similar to recommendation 1 above, the Government is not satisfied the link between venues in SNPs remaining open beyond the cessation of the ordinary service of alcohol at 3.00am and alcohol-related harm is sufficiently clearly established to justify discontinuing the extended trading permits</p>

No.	Recommendation	Response
		<p>scheme.</p> <p>As with recommendation 1, the Government is also concerned this recommendation does not give sufficient consideration to the commercial impacts of further reducing the capacity of SNPs to appropriately accommodate late-night patronage. When used appropriately, this scheme has an important role to play in supporting the vibrancy of Queensland's entertainment precincts.</p> <p>From 1 February 2017, in response to an interim report from the evaluators, the Government amended the <i>Liquor Act 1992</i> to reduce to six the number of extended trading permits a venue could be granted per calendar year, and to limit the availability of permits to special occasions only. The Government considers these measures strike a more reasonable regulatory balance.</p> <p>However, the Government will examine the extent to which extended trading permits are being overused as part of its consideration of the future options for SNPs.</p>
3	Retain mandatory networked ID scanners, with amendments:	<p><u>Supported in-principle</u></p> <p>Subject to consultation, the Government will retain the ID scanner network. The Government notes the findings in the report that the network has been effective in reducing antisocial behaviour in and around late-trading premises and has been associated with some reductions in harm.</p> <p>The Government also notes introduction of the network has had only a minimal impact on business. As detailed in the response to specific sub-recommendations below, the Government supports in-principle the proposed enhancements. If progressed, implementation would occur in a way which obviates unintended impacts on business without jeopardising the overall integrity and effectiveness of the scanning regime.</p>
3(a)	Reduce the days on which mandatory scanning is required for venues closing before 1am to Friday, Saturday and Sunday nights, as well as late trading public holidays.	<p>The Government in-principle supports appropriately targeting the ID scanning requirements at the peak, high-risk periods during which most alcohol-related harm occurs. For venues closing by 1am, this generally means Friday, Saturday and Sunday nights, and the eves and nights of late-trading public holidays.</p> <p>Additionally, particular circumstances in particular SNPs can give rise to anomalous alcohol consumption patterns from precinct to precinct and from time to time. For example, particular SNPs and venues experience regular spikes in patronage outside weekends, including because of weekly and special events.</p> <p>Final determination of the Government's position on this recommendation will be subject to</p>

No.	Recommendation	Response
		consultation about appropriate arrangements to be put in place to respond to anomalous alcohol consumption patterns.
3(b)	Allow venues with external toilet and smoking facilities to 'stamp' patrons to avoid the need for rescanning.	To reduce the unintended impost of the ID scanning requirements, the Government supports in-principle the introduction of an appropriate pass-out stamp scheme which does not jeopardise the overall integrity or effectiveness of the scanning regime. Consultation will occur on whether the scheme could be structured to only allow patrons to be issued pass-out stamps where their IDs have already been scanned by the venue.
3(c)	Community clubs be granted exemption from mandatory networked scanning, but remain subject to other restrictions, including the risky venues scheme.	<p>The Government will consult with industry to identify a technological solution which preserves the benefits of mandatory ID scanning while avoiding the need for community clubs to verify patrons' identities twice through the operation of mandatory networked ID scanners. The following venues are proposed to be exempted from ID scanning:</p> <ul style="list-style-type: none"> • Bundaberg Services Club • Caloundra RSL • Maroochy RSL • Toowoomba Sports Club, and • Cowboys Leagues Club (Townsville).
3(d)	Add an offence to the Liquor Act of making vexatious bans for ID scanner operators/licensees on the scanner network.	<p>Concerns have been raised about vexatious and excessive venue bans being recorded on the ID scanner network. These include venue bans applied to:</p> <ul style="list-style-type: none"> • police and compliance officers • witnesses to incidents • staff from competing venues, and • friends of banned persons. <p>With no avenue for appealing venue bans, the recording of vexatious bans could undermine the benefits of the ID scanning regime. The Government therefore supports in-principle the creation of a specific offence to address this practice.</p>

No.	Recommendation	Response
3(e)	Limit the amount of time that venue-based bans remain on the system to six months.	As noted above, concerns have been raised about vexatious and excessive venue bans being recorded on the ID scanner network. The Government therefore supports in-principle the recommendation to impose a limit on the time venue bans remain on the network.
3(f)	Make banning lists available to all venues in Queensland operating after midnight.	Making banning lists available to all venues, and not just those on the ID scanning network, would provide a greater deterrent for troublemakers and offenders. The Queensland Police Service and the Office of Liquor and Gaming Regulation are currently working together to develop a mobile or web-based application to enable licensees not on the ID scanner network to access data relevant to their venues.
4	Introduce a two-year moratorium on liquor licences for on-licensed premises except for restaurants and licensed cafes where people can only purchase alcohol if they are having a meal.	<p><u>Not supported</u></p> <p>The Government notes a moratorium would have a significant adverse impact on the liquor, hospitality and tourism industry across the state, and has the potential to stifle innovation and industry development both inside and outside SNPs. This impact is considerably broader than the intent of the TAFV Policy to promote a safer night-time environment.</p> <p>The final report does not provide sufficient evidence of a link between the rate at which liquor licences are granted and alcohol-related harm to justify such an impactful measure. In 2017–18, nearly two thirds of the new licences granted were for low-risk businesses where the service of alcohol is subsidiary to the main business. Accordingly, it is unclear how a moratorium would contribute to the TAFV Policy objective of a balance between the interests of the night time economy and reducing alcohol-fuelled violence in entertainment precincts.</p> <p>Having regard to these considerations, the Government is not satisfied of the appropriateness of introducing such a measure with the capacity to impact so adversely and severely on the night time economy without clear evidence of its potential benefits.</p> <p>However, the Government will continue to explore issues relating to the availability of alcohol and evidence about the impacts of outlet density more broadly as part of work under the <i>Our Future State: Advancing Queensland's Priorities</i> priority areas of 'Keep Queenslanders Healthy' and 'Keep Communities Safe'.</p>
5	Conduct a Review of SNP boundaries and criteria for inclusion, and introduce annual reviews of SNPs.	<p><u>Supported in-principle</u></p> <p>To ensure regulatory effort and resources are being deployed where they are needed most, the Government supports in-principle the review of existing SNPs and entertainment precincts and the</p>

No.	Recommendation	Response
	<p>a) Remove Caxton Street as a SNP.</p> <p>b) Remove Ipswich as a SNP.</p>	<p>introduction of periodic future reviews.</p> <p>If implemented, this review process would involve close consultation with a range of stakeholders, and will include consideration of the resourcing requirements and key role of police in maintaining the safety of entertainment precincts. The introduction of ID scanners in 2017 will support the review of SNPs by providing a means of quantifying changes in patron numbers attending SNPs.</p> <p>As an initial step, the Government will consult with stakeholders about the removal of Inner West Brisbane (including Caxton Street) and Ipswich CBD as SNPs. Queensland notes patron numbers and violence in both SNPs are low (on non-event nights, in the case of Caxton Street).</p> <p>Also, in the case of Caxton Street, violence is limited on event nights due to proactive policing strategies such as road closures and a significantly increased police presence. If the Inner West Brisbane SNP is discontinued, the Government will consider alternative arrangements to ensure the continuation of these effective policing strategies on event nights.</p>
6	<p>Remove funding to the SNP project scheme.</p> <p>a) Support for SNP board administration should continue.</p>	<p><u>Supported in-principle</u></p> <p>The Government notes funding grants have had no demonstrable impact on the rate of serious assaults in SNPs. On this basis, the Government supports in-principle the recommendation to remove funding in favour of exploring more evidence-based and sustainable ways of supporting safety initiatives within SNPs. This exploration will occur as part of the Government's consideration of future funding, service delivery and governance options for SNPs (as per recommendation 28 below) and will involve close consultation with SNP boards.</p> <p>The Government also supports in-principle the continuation of SNP boards, noting the critical role boards can play in tackling alcohol-related harm in SNPs and engaging stakeholders.</p>
7	<p>Introduce a targeted, evidence-based High-Risk Venues scheme.</p> <p>a) Queensland government should implement a targeted, evidence-based, high-risk venues scheme which replicates and improves on the NSW Violent Venues scheme to incorporate Last Drinks data from hospitals and ambulance attendance location</p>	<p><u>Not supported</u></p> <p>The Government is not satisfied the cost of establishing and maintaining a high-risk venues scheme is justified. The intent of a high-risk venues scheme is already largely achievable through licence conditions and the enforcement of existing statutory provisions, supported by compliance programs targeted at the highest risk venues based on intelligence relating to risk profiles.</p> <p>The Government notes this recommendation also relies on the use of 'last drinks' data collected by emergency services. As discussed at recommendation 15 below, the Government has reservations about the appropriateness of emergency services collecting this data. While opportunities will be</p>

No.	Recommendation	Response
	information.	considered to undertake targeted research to replicate the potential benefits of the collection of 'last drinks' data, that data would be point-in-time rather than longitudinal, and may therefore not support the ongoing operation of a high-risk venues scheme.
8	Add a section to the Liquor Act to include a statement that: 'the licensee/their employee must satisfy themselves that a person is not unduly intoxicated before serving them alcohol or allowing consumption'.	<p><i>Not supported</i></p> <p>The Government notes the current offence provisions prohibiting service of unduly intoxicated patrons already achieve the intended effect of this recommendation by imposing an implicit onus on servers to assess patrons' level of intoxication before effecting service.</p>
9	<p>The Liquor Act should be amended to ensure 'Mistake of fact' (Section 24 of the Criminal Code) cannot be exploited to avoid responsibility for serving an unduly intoxicated person.</p> <p>a) The changes should ensure that the modified Mistake of Fact is a defence rather than an excuse, meaning that the defendant would have to establish the defence on the balance of probabilities rather than the prosecution having to exclude the excuse beyond reasonable doubt. Specifically:</p> <p>b) If undue intoxication of a person is material to the charge of an offence against the Act, the operation of section 24 of the Criminal Code is excluded;</p> <p>c) In these instances it is for the defence to prove that, at the time of the offence, the relevant person honestly and</p>	<p><i>Not supported</i></p> <p>The Government does not support removal of the 'mistake of fact' excuse for RSA offences. This excuse is an important safeguard of the general criminal law, applying to most offences in Queensland. The Government does not consider the final report makes out a sufficiently compelling case to remove the excuse—and thereby effectively reverse the onus of proof—for RSA offences alone.</p>

No.	Recommendation	Response
	<p>reasonably believed that the person whose undue intoxication is material to the offence was not unduly intoxicated;</p> <p>d) Evidence that the relevant person did not assess the level of intoxication of the person whose undue intoxication is material to the offence is evidence that any belief that the person was not unduly intoxicated was not reasonable.</p>	
10	Amend the Liquor Act to include an offence of not complying with Risk Assessed Management plan.	<p><u>Supported in-principle</u></p> <p>The <i>Liquor Act 1992</i> requires licensees to keep a risk assessed management plan and ensure all staff are aware of, and comply with, the plan. However, there is no penalty provision associated with failure to meet this obligation. The Government considers creation of a penalty provision would assist in the enforcement of this obligation, and for this reason supports this recommendation in-principle and subject to stakeholder consultation.</p>
11	Amend the Liquor Act to include, and document, consideration of violence rates, family violence rates and the current density of outlets in any granting of new liquor licences or changes to existing licences.	<p><u>For further consideration</u></p> <p>Licensing decisions are currently informed by consultation with the Queensland Police Service, local governments and members of the public. In this way, matters relating to potential violence and social and health impacts are already considered in the licensing process. Any licence granted can then be subjected to harm-minimising conditions relevant to the particular identified harms directly attributable to a particular licence application. How this process is undertaken will be subject to the further consideration of this recommendation.</p> <p>Queensland considers a flexible, discretionary approach provides a more appropriate means of ensuring licensing decisions balance the objectives of minimising alcohol-related harm and supporting the sustainable development of Queensland's hospitality industry.</p> <p>Although the Government does not support amending the Liquor Act, the Government will continue to explore issues relating to the availability of alcohol and evidence about the impacts of outlet density more broadly as part of work under the <i>Our Future State: Advancing Queensland's Priorities</i> priority areas of 'Keep Queenslanders Healthy' and 'Keep Communities Safe'.</p>

No.	Recommendation	Response
12	The Liquor Act should ensure that all liquor licensing decisions are transparent, that reasons are published for every decision, and that there is timely and easy public access (e.g. posted on the Office of Liquor and Gaming Regulation (OLGR) website) to all submissions and evidence that an applicant seeks to rely upon throughout the proceedings in support of their application.	<p><u>Supported in-principle</u></p> <p>A significant amount of information is already publicly available about licence applications. Subject to privacy and resourcing considerations, licensing decisions are published and notified to parties who lodged an application, objection or submission.</p> <p>Subject to privacy and resourcing considerations, and to planned consultation, the Government supports in-principle the recommendation to proactively publish the reasons and supporting documents for licensing decisions as a way of promoting public confidence and enhancing the rigour and transparency of the licensing process.</p>
13	Amend the Liquor Act to make CCTV mandatory for all venues that trade after midnight.	<p><u>Supported in-principle</u></p> <p>The <i>Liquor Act 1992</i> currently requires venues trading after 1am in the Brisbane City Council area to operate CCTV, with CCTV able to be imposed as a licence condition in other regions. Noting that many areas outside the Brisbane City Council area continue to experience high levels of alcohol-related harm, the Government will consult with affected stakeholders about replacing and extending this existing requirement with a single statewide requirement. If implemented, the Government will engage closely with stakeholders to appropriately manage the transition to this extended requirement.</p>
14	Include casinos in trading hours restrictions and mandatory ID scanning or the high-risk venues scheme if implemented.	<p><u>Not supported</u></p> <p>While the Government does not support this recommendation, it will consider options for meeting its underlying intent.</p> <p>Trading hours for casinos are regulated under the <i>Casino Control Act 1982</i> (the Control Act) and the respective Casino Agreement Acts, which support each casino in Queensland. Casinos already operate under a significant level of scrutiny and achieve a higher level of security than other licenced venues, having to comply with the Control Act rather than the <i>Liquor Act 1992</i>.</p> <p>The Government also considers removal of 24-hour trading hours would be inconsistent with the Government's plans for creating a 'new world city' for Brisbane, the intent of the development of Queen's Wharf Brisbane.</p> <p>Inclusion of casinos in mandatory ID scanner networks or the high-risk venues scheme (if implemented) would need to be considered in the context of casinos' existing operating requirements. This would involve further consultation with operators to better understand how they</p>

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		<p>manage their operations outside of standard hours, and how they can be engaged positively in late-night entertainment precinct management and safety.</p> <p>Casinos potentially therefore have an expanded role to play in the overall management and safety of SNPs. The Government will therefore consider opportunities to engage casinos in proposed consideration of the future funding, service delivery and governance options for SNPs (as discussed at recommendation 28 below).</p>
15	<p>Introduce last drinks questions to Emergency services across Queensland:</p> <p>a) Police</p> <p style="padding-left: 20px;">i) <i>Where did you consume your last drink?</i></p> <p>b) Emergency Departments</p> <p style="padding-left: 20px;">i) <i>Where did the event occur? (to be asked as a routine administration question)</i></p> <p style="padding-left: 20px;">ii) <i>How many alcoholic drinks have you consumed in past 12 hours? (to be asked by clinical or administrative staff)</i></p> <p style="padding-left: 20px;">iii) <i>Where did you consume your last drink? (to be asked by clinical or administrative staff)</i></p> <p>c) Ambulance</p> <p style="padding-left: 20px;">i) <i>How many alcoholic drinks have you consumed in past 12 hours?</i></p> <p style="padding-left: 20px;">ii) <i>Where did you consume your last drink?</i></p>	<p><u>For further consideration</u></p> <p>The Government recognises the potential benefits of collecting ‘last drinks’ data. By tracing violence and harms occurring in night-time precincts back to particular venues, the collection of this data would assist in identifying patterns of problematic venue behaviour and targeting regulatory responses accordingly.</p> <p>However, the Government considers there are a number of significant barriers to the collection of this data by emergency services. These include:</p> <ul style="list-style-type: none"> • it may not be reasonable to rely on information obtained from intoxicated people as accurate data, particularly for the regulatory purposes proposed by the report • the additional impacts on the workloads of frontline staff in being required to ask an extensive range of information, and the industrial relations implications of this • the flow-on impacts on patients, including by diverting resources from patient care, causing some intoxicated patrons not to engage with emergency services, and potentially not resulting in positive clinical outcomes for clients, and • the impact of hospital and ambulance staff possibly being exposed to additional aggression in dealing with intoxicated people in response to questions of this kind. <p>In relation to the question recommended for police officers, the Government notes this question currently exists in Queensland Police Service reporting but is not mandatory. There are concerns that requiring this data to be captured by police on an ongoing basis could divert officers away from being able to respond effectively in their frontline role.</p> <p>In relation to the questions proposed for Emergency Departments, the Government notes these are very busy environments in which complex assessments, decisions and actions have to be made rapidly. Administrative functions will always be secondary to clinical functions in the delivery of</p>

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		<p>emergency care, with clinical staff expected to prioritise the needs of patients over data collection. The Government is concerned that requiring clinical staff to ask additional questions regarding alcohol consumption could impact on patient safety by diverting resources from patient care of affecting the timeliness of care delivery.</p> <p>Having regard to the potential benefits of the collection of 'last drinks' data and the reasons collection by emergency services personnel is not considered appropriate, the Government will consider opportunities to replicate the potential benefits of the collection of this data by undertaking targeted research as part of further evaluation of alcohol-fuelled violence (see response to recommendation 27 below).</p>
16	<p>Improve the collection of Alcohol sales data:</p> <p>a) Liquor suppliers who do not provide comprehensive and accurate data within three months of request should be subject to a substantive penalty.</p> <p>b) The OLGR should be given powers under the liquor act to audit liquor suppliers' records to ensure that data provided is accurate.</p> <p>c) The OLGR should conduct random audits of 5% of the data provided annually.</p>	<p><i>Not supported</i></p> <p>Noting there is no immediate practical benefit from increasing alcohol sales data collection, the Government is not satisfied the cost of creating new penalties and intrusive audit powers and functions is justified. More complete sales data is already able to be collected from suppliers and other licensees on a case-by-case basis as required for compliance and enforcement purposes. Similar data is available through a number of other sources, including the taxation system and the Australian Bureau of Statistics, for research purposes.</p>
17	<p>Increase of minimum police bans to 1 month with an option of up to 6 months.</p>	<p><i>Supported in-principle</i></p> <p>The Government notes that, due to the orders' limited duration, the power to issue initial police banning notices for 10 days has not been effective in changing behaviours and impacting on community safety. An extension of the banning periods to one month for initial police bans would provide a sufficient consequence to deter future troublemaking and highlight the seriousness with which anti-social behaviour in SNPs will be treated.</p> <p>Currently, police officers of the rank of Senior Sergeant and above have the power to extend the effect of a banning notice to up to three months by issuing an extended banning notice after a review</p>

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		<p>of the incident and the person’s previous anti-social behaviour. A six-month duration of an extended police banning notice would bring Queensland in line with New South Wales banning orders.</p> <p>Having regard to these considerations, the Government supports in-principle the recommendation to increase the duration of initial and extended police banning notices.</p>
18	<p>Introduce a Minimum Unit Price on alcohol across Queensland.</p>	<p><u>Not supported</u></p> <p>The Government notes the recommendation to introduce a minimum unit price responds to the high level of pre-drinking by SNP patrons, which could possibly be driven by cost pressures and which the final reports finds is undermining the effectiveness of the TAFV Policy. However, while a minimum unit price could raise the cost of low-cost, high-volume alcohol products, this may not change the fact that most packaged liquor is cheaper than alcohol available at late-trading venues and may therefore have little impact on pre-drinking by SNP patrons.</p> <p>Having close regard to the findings of the final report and other relevant research, Queensland will therefore undertake further work and consultation to develop an evidence-based policy response to the difficult challenge of pre-drinking.</p> <p>Queensland further notes that the introduction of a minimum unit price has significant interjurisdictional implications, impacting on the distribution and marketing of liquor products nationally. The introduction of a minimum unit or floor price is being considered by the Ministerial Drug and Alcohol Forum for inclusion in the <i>National Alcohol Strategy 2018-2026</i>, a sub-strategy of the <i>National Drug Strategy 2017-2026</i>.</p> <p>Given its national implications, the Government does not support the introduction of a minimum price on a jurisdiction-by-jurisdiction basis, but will participate in national discussions on a possible nationally-consistent approach.</p>
19	<p>Trial the introduction of [a] government support scheme for original live music played before 10pm.</p>	<p><u>For further consideration</u></p> <p>The Government is committed to supporting and developing Queensland’s music and broader arts and cultural sectors. Providing places and spaces for original live music is a key part of the music ecosystem.</p> <p>Queensland provides a range of funding to support contemporary music in Queensland, including:</p> <ul style="list-style-type: none"> operational funding to Queensland’s music industry development association, QMusic, as

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		<p>well as to Woodfordia Inc., Queensland Music Festival, and Brisbane Festival</p> <ul style="list-style-type: none"> • funding a range of contemporary music projects (including creative development and touring) through Arts Queensland’s contestable funding programs, including the Queensland Arts Showcase Program, Playing Queensland Fund and Individuals Fund, and • funding for music awards, including the Carol Lloyd Award, in partnership with the Australasian Performing Right Association and Australasian Mechanical Copyright Owners Society (APRA AMCOS), Hutchinson Builders and QMF, Billy Thorpe Scholarship, and Grant McLennan Fellowship. <p>The Government values the vibrancy of our night-time precincts and agrees that supporting a diverse range of alternative revenue streams for late-trading venues is important to promoting that vibrancy and reducing venues’ reliance on late-night alcohol sales. Queensland will consider future opportunities to optimise support for original live music in entertainment precincts.</p> <p>The Government is also giving active consideration to opportunities to support the live music industry as part of consultation and development of <i>Creating Queensland’s Future: 10-Year Roadmap for the arts, cultural and creative sector</i>.</p>
20	<p>Create a health promotion scheme whereby National Health and Medical Research Council guidelines for low-risk drinking are prominently posted on all points of sale in Queensland</p>	<p><u>For further consideration</u></p> <p>The Government recognises that promoting drinkers’ awareness of the risks and potential impacts of their choices is an integral part of a comprehensive strategy for preventing and reducing risky alcohol consumption in entertainment precincts.</p> <p>Noting the National Health and Medical Research Council guidelines are currently under review, the Government will consider posting point-of-sale guidelines as part of a broader approach to raising awareness and promoting and supporting help-seeking behaviour.</p>
21	<p>Conduct a trial of the ‘clubs against drugs’ program.</p>	<p><u>For further consideration</u></p> <p>The Government will consider a trial of ‘clubs against drugs’ or a similar program, having regard to the program’s content, evidence base and implementation requirements. It is critical that any trial should be place-based, delivered collaboratively with local industry, service providers and governance structures, and undertaken as part of a comprehensive approach to alcohol and other drug harm reduction.</p>

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22	Commission a comprehensive independent review of the Alcohol and Other Drug school education program.	<p><u>For further consideration</u></p> <p>As detailed below, the intent of parts of this recommendation are substantially achieved through current practice in the state school system. To that extent, the Government supports specific sub-recommendations in principle.</p> <p>However, the Government is concerned this recommendation generally does not have sufficient regard to schools' existing accountability around implementation of drug and alcohol education as part of the Australian Curriculum, nor the importance of maintaining schools' autonomy. The Government is for these reasons not able to support this recommendation in full, but will give further consideration to opportunities to use existing oversight mechanisms to specifically focus on state schools' delivery of drug and alcohol education as part of implementation of the Australian Curriculum: Health and Physical Education. Where relevant, Queensland will also incorporate specific sub-recommendations into the Queensland state school system's existing approach.</p> <p>Queensland's responses to the sub-recommendations below relate largely to the state school system only; the Department of Education (DoE) has no jurisdiction over curriculum implementation or use of programs outside of state schools.</p>
22(a)	This review should be led by the Department of [the] Premier and Cabinet and explicitly cover issues of implementation and monitoring, along with the development of an ongoing impact assessment and regular reporting.	<p>State schools' implementation of alcohol and other drugs education is already subject to a significant level of oversight.</p> <p>All Queensland State schools are required to implement (teach, assess and report on) the Australian Curriculum: Health and Physical Education by the end of 2020. This includes a focus area on alcohol and other drugs. Schools' implementation of the Australian Curriculum is reviewed by the School Improvement Unit as part of the DoE's school review process.</p> <p>As part of a statewide data collection, State schools also report annually on their implementation of an alcohol and other drugs program.</p> <p>On this basis, the Government is not satisfied there would be significant further benefit from imposing a substantial additional layer of external reporting and monitoring. However, as noted above, the Government will use existing oversight mechanisms to specifically focus on state schools' implementation of alcohol and other drug education as part of implementation of the Australian Curriculum.</p>
22(b)	Every school in the state should identify	Arrangements for the day-to-day management and delivery of different elements of the school

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	<p>specific individuals as the responsible anti-violence and alcohol and other drug officer, and this person should be listed on reports to the government and on school websites.</p>	<p>education program varies from school to school. However, as the recognised leaders of their schools, principals are ultimately responsible for all school-based decisions and are the appropriate contact officers in relation to anti-violence and drug and alcohol education. As such, the Government considers the intent of this sub-recommendation is already substantively achieved through existing practice.</p>
22(c)	<p>Every school should have a publicly-available plan for alcohol and other drug education and anti-violence outlined on the school website.</p>	<p>State schools are required to attain a high level of transparency in the planning and delivery of alcohol and other drug education and anti-violence.</p> <p>State schools already publish a wide range of plans relevant to alcohol and other drug education and anti-violence on their websites. These include behavioural codes of conduct for all students.</p> <p>Every state school is required to implement health and wellbeing education – including anti-violence and healthy relationship components – either as part of their delivery of the Australian Curriculum or as part of the school’s pastoral care program.</p> <p>The Australian Curriculum: Health and Physical Education includes a focus area on alcohol and other drugs, and must be implemented in all State schools (by being taught, assessed and reported on) by the end of 2020. The current Years 7 to 10 alcohol and other drugs education program is aligned to the Australian Curriculum. Non-state schools are also required to implement the Australian Curriculum: Health and Physical Education, although implementation timelines vary across jurisdictions.</p> <p>The Government is satisfied these existing requirements substantially achieve the intended effect of this sub-recommendation.</p>
22(d)	<p>The Department of Education should be required to collect and keep records of the content delivered in each school which document the elements presented, and the year levels and classes delivered to.</p>	<p>Specific programs delivered in individual schools are not recorded centrally. However, state schools report annually on their implementation of an alcohol and other drugs program.</p> <p>The Government is satisfied this provides a sufficient level of oversight and is concerned adding an additional layer of record-keeping would place an unnecessary burden on schools, and particularly secondary schools, and would not assist in reducing the prevalence of alcohol and other drug use.</p> <p>Also, the Government considers this additional reporting requirement would disregard school autonomy, a key priority for DoE. State schools may opt to use DoE’s alcohol and other drugs education program or one of a range of other external programs chosen by the principal in consultation with the school community. This ensures the programs schools deliver are appropriate</p>

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		to the local school context and the wishes of the school community.
22(e)	The Department of Education should report to the Department of [the] Premier and Cabinet annually on the compliance within schools.	<p>State schools' compliance in relation to the delivery of alcohol and other drug programs is subject to oversight by DoE. Schools report annually on their implementation of alcohol and other drug programs, and are reviewed by the DoE School Improvement Unit. Additionally, state school principals are supervised at the regional level, including in relation to the delivery of health and physical education.</p> <p>DoE is in a position to share schools' reporting data from the existing DoE data collection tool with the Department of the Premier and Cabinet (DPC). DoE and DPC will consider possible future reporting arrangements.</p>
22(f)	A review of program content and delivery should be conducted every 3 years by suitably qualified independent evaluators which includes a range of impact measures to be specified by the review.	<p>DoE regularly reviews all educational resources. This includes the annual review of the alcohol and other drug education program to ensure currency of content.</p> <p>In addition, the Australian Curriculum is scheduled for review post-2020. The current Years 7 to 10 alcohol and other drugs education program is aligned to the Australian Curriculum: Health and Physical Education, which all state schools are required to implement by the end of 2020. Queensland will participate actively the planned review.</p> <p>Queensland is satisfied these existing review activities substantially achieve the intended effect of this sub-recommendation.</p>
22(g)	Similarly, a comprehensive review of the teaching package should be conducted by suitably qualified, independent, drug education experts, to ensure best practice given the existence of an extensive literature on what works in school-based on drug education.	<p>The DoE alcohol and other drugs education program was developed based on extensive research, and its content endorsed by the University of Queensland Centre for Youth Substance Abuse Research and a range of other expert stakeholders. As with all other education resources, the program remains subject to regular review to ensure the currency of its content.</p> <p>In addition, the alcohol and other drugs program is aligned with the Australian Curriculum and will be considered as part of the post-2020 review of the Australian Curriculum.</p> <p>The Government is satisfied these existing review requirements substantially achieve the intended effect of this sub-recommendation.</p>
23	A review of anti-violence strategies and campaigns should be conducted to inform a whole of government approach to	<p><i>For further consideration</i></p> <p>The Government will consider options for developing a comprehensive, evidence-based, whole-of-</p>

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	<p>violence. The review should be overseen by an independent expert advisory committee.</p>	<p>Government approach to addressing violence.</p> <p>'Anti-violence' covers a very wide and complex range of social issues and behaviours, including alcohol-fuelled violence, domestic and family violence, violence against emergency service and health workers, and sexual violence.</p>
24	<p>Implement an alcohol awareness campaign which conforms to best evidence and does not use 'responsible drinking' wording.</p> <ul style="list-style-type: none"> a) Mass media campaigns should be included as key components of comprehensive approaches to improving population health behaviours. b) Sufficient funding must be secured to enable frequent and widespread exposure to campaign messages continuously over time, especially for ongoing behaviours c) Adequate access to promoted services and products must be ensured. d) Changes in health behaviour might be maximised by complementary policy decisions that support opportunities to change, provided disincentives for not changing, and challenge or restrict competing marketing. e) Campaign messages should be based on sound research of the target group and should be tested during campaign development. 	<p><i>For further consideration</i></p> <p>The Government will consider future alcohol awareness campaigns having close regard to the findings and recommendations of the TAFV Policy evaluation, in particular the need for campaigns to be based on harm reduction principles, comprehensive, integrated and evidence-based, involving a strong and clear focus on outcomes and a rigorous approach to evaluation.</p>

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	f) Outcomes should undergo rigorous independent assessment and peer-reviewed publications should be sought.	
25	The Department of Health should be required to set up an independent expert research steering committee to oversee the commissioning and reporting of any monitoring [and] evaluation research. This steering committee should have veto rights, and membership should include suitably qualified people (Ph.D. or MD) with backgrounds in medicine, public health, alcohol and other drugs and social welfare, along with relevant department representation.	<p><u>For further consideration</u></p> <p>The Government will consider whether establishing an independent expert research steering committee could duplicate many of the functions already performed by existing mechanisms. The Queensland Government Statistician's Office (QGSO) is Queensland Health's (QH's) independent source of expert advice on proposed survey and research methodologies. QGSO also provides guidance on writing market research project briefs, a primary procurement mechanism for evaluation activities.</p> <p>Further, evaluations are commissioned in accordance with QH procurement policies. These policies are the established mechanisms for maintaining accountability, integrity and transparency in contract awards, ensuring value for money and managing risk.</p> <p>The Government notes the intent of this recommendation is to enable the impact of the TAFV Policy on drinking culture, especially among key at-risk demographics, to be measured. The Government will give further consideration to opportunities to close this identified data gap.</p>
26	<p>The Queensland Government Statistician's Office (QGSO) should amend sampling and reporting practices for the Queensland Preventive Health Survey</p> <p>a) Younger age groups should be oversampled to provide more representative information of this key demographic for harm, especially alcohol-related harm.</p> <p>b) To aid better transparency of survey responses the QGSO should publicly release detailed information on the response rates for the Queensland</p>	<p><u>For further consideration</u></p> <p>QGSO conducts the annual Queensland Preventive Health Survey (the Survey) on behalf of QH. QH is responsible for survey methodology, including sampling and reporting.</p> <p>The Government will have regard to the final report's findings and recommendations in considering future opportunities to enhance the Survey's capacity to measure the impact of the TAFV Policy on Queensland's drinking culture, and in publishing information about the Survey's conduct and results.</p> <p>As with recommendation 25, the Government notes the intent of this recommendation is to enable the impact of the TAFV Policy on drinking culture, especially among key at-risk demographics, to be measured. The Government will give further consideration to opportunities to close this gap in the data.</p> <p>In relation to the recommended oversampling of younger age groups, the Government notes the Survey adheres to statistical data quality standards, such as sample size and standard error criteria,</p>

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	<p>Preventive Health Survey for past and future surveys, as reported by the National Drug Strategy Household Survey.</p> <p>Measures to be reported include:</p> <ul style="list-style-type: none"> i) the denominator was used for determining the response rate; ii) the number of people who answered the phone iii) the number of people that didn't answer the phone. iv) the number of incomplete calls. 	<p>for reporting on consumption and trends in young adults. Information about the survey methodology is publicly available in the biennial Chief Health Officer report and on the Queensland Health website.</p> <p>The Government will consider the impact of oversampling as a means of improving representativeness of young people. In general, younger age groups are challenging to reach and often have higher non-contact rates. Maximising representativeness of young people often requires a range of specific strategies, not just oversampling. In addition, oversampling as a single strategy may simply reinforce existing biases.</p> <p>The Government also notes detailed information on alcohol-related harms in young people aged 14 years and older is also available from the National Drug Strategy Household Survey conducted by the Australian Institute of Health and Welfare every three years.</p> <p>The Government will consider opportunities to collect more representative information about this key demographic.</p> <p>In relation to the transparency of survey responses, the Government notes that a substantial amount of information about survey methodology, including response rates, is provided by QH on its public website.</p> <p>The Government will consider the impact of possibly overemphasising response rates, which are only one measure of non-sampling error, in assessing the validity of survey results. QGSO undertakes a number of strategies to minimise non-sampling errors, such as non-response, including:</p> <ul style="list-style-type: none"> • using up-to-date and accurate list of contact information • testing the questionnaire for ease of understanding and completion • sending written communication to households about the survey prior to interviewing • providing clear interviewer instructions, appropriate training and field supervision, and • emphasising for respondents the legal provisions for protecting confidentiality under the <i>Statistical Returns Act 1896</i>. <p>Having regard to these concerns, the Government will consider further the publication of information about the Queensland Preventive Health Survey.</p>

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27	<p>Commission ongoing Independent evaluation and monitoring of alcohol-related harm in Queensland.</p> <p>a) This should include an independent, expert evaluation of the impact of the opening of the Queen's Wharf Brisbane casino that is publicly available, and led by an independent steering group.</p>	<p><u>For further consideration</u></p> <p>The Government will undertake further monitoring and evaluation of the TAFV Policy and alcohol-related harm in Queensland. The Government will also consider targeted research to replicate some of the potential benefits of the collection of 'last drinks' data, as discussed in recommendations 7 and 15 above. The details of these further monitoring and evaluation processes will be determined after further consultation and consideration and included in the Government's final response.</p> <p>The Government will consider opportunities to include evaluation of alcohol-related harm in existing long-term processes for independently evaluating the safety and crime impacts of Queen's Wharf Brisbane.</p>
28	<p>Support Services funding should be scaled according to number of venues and levels of harm.</p> <p>a) Levels of harm should be measured using ambulance attendance and police-recorded serious assaults.</p>	<p><u>For further consideration</u></p> <p>The Government will consider future funding, service delivery and governance options for SNPs in consultation with affected service providers, licensees, staff and other relevant stakeholders. This consideration will focus on ensuring SNP Support Services are appropriately targeted and flexible enough to meet the particular needs of individual SNPs, sustainably funded, and aligned and coordinated with complementary activities by other stakeholders, such as SNP boards and philanthropic organisations. It will also focus on ensuring respective roles and responsibilities within SNPs are clear.</p>
29	<p>Conduct recurrent evaluations to monitor Support Service improvement and new risks and opportunities.</p>	<p><u>For further consideration</u></p> <p>The Government currently requires Support Services to report on their performance quarterly and uses these reports to identify possible enhancements and improvements in individual Support Services. The Government also conducts more intensive evaluations of underperforming services.</p> <p>The Government will consider further whether this existing monitoring achieves the intent of this recommendation.</p>
30	<p>Evaluation should be conducted every two years and the reports be publicly available to monitor performance on investment.</p>	<p><u>For further consideration</u></p> <p>The Government remains committed to monitoring and evaluating funded services and will consider the timing and dissemination of evaluations as part of its consideration of future funding, service delivery and governance options for SNPs.</p>

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31	Consider funding for Support Services via a levy on venues.	<p><u>Not supported</u></p> <p>The Government is not satisfied that sufficient justification is provided to impose this additional cost on late-trading premises, and will not consider funding Support Services via a levy on venues.</p>
32	Recurring funding should be provided to train Support Service personnel.	<p><u>For further consideration</u></p> <p>Support Services staff and volunteers are currently required to have a substantial level of skills and training. All funded services, including Support Services, must ensure staff are appropriately qualified, trained and supervised, and have the appropriate skills to meet the complex needs of their particular service users.</p> <p>Additionally, Support Services staff and volunteers are required to be provided with support and full training on the objectives of the program, referral pathways, protocols and accredited first aid qualifications. Support Service staff and volunteers can also access free mental health first aid training through Queensland Health.</p> <p>As part of its consideration of future funding, service delivery and governance options for SNPs, Queensland will consider whether this existing training is sufficient to meet the needs of individual SNPs.</p>
33	The government should conduct quarterly site visits in order to hold individuals and Support Services accountable.	<p><u>For further consideration</u></p> <p>Support Services are visited annually under current contract arrangements, and more often if there is an issue with service delivery. The Government will consider whether more regular site visits would be beneficial.</p>
34	Support Services personnel should be required to wear high-visibility clothing in order to stand out in the night-time environment.	<p><u>For further consideration</u></p> <p>Support Services contracts do not currently require staff and volunteers to adopt a standard appearance. As part of its consideration of the future funding, service delivery and governance options for Support Services, the Government will consider the potential benefits of imposing minimum appearance standards across all sites.</p>
35	It is suggested that all rest and recovery services have a stable presence in the	<p><u>For further consideration</u></p> <p>Support Services are currently required to deliver rest and recovery services from a fixed address or</p>

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	main thoroughfare of their SNP.	<p>facilities set up in the same location each night of operation. The location of those facilities can depend on the availability of suitable facilities and infrastructure, and the amenability of available locations to keeping staff and volunteers safe. At the request of the relevant SNP board, rest and recovery areas may be temporarily located closer to premises with an extended trading permit.</p> <p>The Government will consider further the feasibility and benefits of mandating that rest and recovery areas be located in a particular part on an SNP.</p>
36	A review should be conducted of radio networks in SNPSSs, with the aim of making use of the networks mandatory for all parties involved, including police.	<p><u>For further consideration</u></p> <p>The Government will pursue opportunities to better support communication and the integration of Support Services in SNPs. However, concerns have been raised that police radio networks may not be suitable for expanded shared use with Support Services. The Government will therefore give consideration to advanced technology alternatives, such as mobile apps.</p> <p>Operational police report different models are in place and are working well in different SNPs. Queensland will accordingly tailor approaches in individual SNPs having regard to existing arrangements and the local availability of resources.</p>
37	Universal data collection, a minimum dataset, and storage methods across Support Services is suggested.	<p><u>For further consideration</u></p> <p>The Government will consider practical improvements to “counting rules” and the Support Services reporting template and will work with service providers to ensure the collection and recording of consistent data. Queensland is also in the process of implementing a new platform for capturing Support Services data.</p>
38	There should be a universal set of guidelines across SNPSSs to dictate how Support Services should operate.	<p><u>For further consideration</u></p> <p>As part of its consideration of the future governance, funding and service delivery models for SNPs, the Government, in collaboration with Support Services, SNP boards and other key stakeholders, will develop guidelines for how support and other services are provided. These guidelines will not be limited to Support Services only, but will clarify all relevant parties’ roles, responsibilities and functions and how they are expected to interact.</p>