



# Tackling Illicit Tobacco for Better Health

Final Evaluation Report Executive Summary

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# EXECUTIVE SUMMARY

## Background

In recognition of the role of illicit tobacco (IT) in undermining tobacco control strategies and in maintaining and encouraging tobacco use among deprived communities, the North of England *Tackling Illicit Tobacco for Better Health Programme* (the Programme) was launched in July 2009<sup>1</sup>. The main aim of this pilot Programme was to increase the health of the population in three regions (North West, North East and Yorkshire and Humber) through reducing smoking prevalence by (a) reducing the availability (supply) of IT, thus keeping real tobacco prices high; and (b) reducing the demand for IT by building on existing tobacco control measures. Prior to the launch of this Programme, IT was largely the responsibility of the agency, Her Majesty's Revenue & Customs (HMRC), which focused predominantly on supply, so the Programme marked the first large-scale attempt of the health sector to reduce IT use.

The UK Centre for Tobacco Control Studies (UKCTCS)<sup>2</sup> was commissioned in September 2009 to evaluate the Programme up until March 2011. The evaluation team was multi-disciplinary and included researchers from the Universities of Nottingham, Durham (including researchers from FUSE<sup>3</sup>), Stirling, Northumbria and University College London.



## Methods

In recognition of the role of illicit tobacco (IT) in undermining tobacco control strategies and in maintaining and encouraging tobacco use among deprived communities, the North of England *Tackling Illicit Tobacco for Better Health Programme* (the Programme) was launched in July 2009<sup>2</sup>. The main aim of this pilot Programme was to increase the health of the population in three regions (North West, North East and Yorkshire and Humber) through reducing smoking prevalence by (a) reducing the availability (supply) of IT, thus keeping real tobacco prices high; and (b) reducing the demand for IT by building on existing tobacco control measures. Prior to the launch of this Programme, IT was largely the responsibility of the agency, Her Majesty's Revenue & Customs (HMRC), which focused predominantly on supply, so the Programme marked the first large-scale attempt of the health sector to reduce IT use.

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<sup>1</sup>NoE Tackling Illicit Tobacco for Better Health Programme Action Plan 2009-2012.

<sup>2</sup>UKCTCS, UK Centre for Tobacco Control Studies [www.ukctcs.org](http://www.ukctcs.org)

<sup>3</sup>FUSE, the Centre for Translational Research [www.fuse.ac.uk](http://www.fuse.ac.uk)

# Executive Summary

## Results

### Process evaluation

It is important to take account of the context in which the Programme was operating between 2009 and 2011 which included: the recession and the likelihood of it stimulating demand for IT products; the change of government and the resulting disruption to the financing and staffing of the Programme as well as the restructuring of public health at the local level from 2010 onwards; the complex nature of the IT market which was dynamic and rapidly evolving; the government's freeze on all public health media campaigns. Collectively these factors can only have had a negative impact on the Programme.

The Programme was complex and multi-faceted and only key milestones in its development are described here. During the initial stages, the Programme devoted time to developing a logic model to identify and track the impact of eight objectives on activities and outputs. Together with the UKCTCS, key performance indicators were agreed. The first objective of the Programme and an underlying theme throughout the Programme's work was 'partnership working'. Much time and energy was devoted to this in the early stages, including establishing a multi-disciplinary Governance Board (GB) which involved key stakeholders from HMRC and Trading Standards, Health and Marketing across the three regions. Three regional steering groups were also set up, staff were appointed to key positions and funding was leveraged from external sources for additional posts. A website was set up to act as the communication vehicle for the Programme. The Programme also commissioned market research (from NEMS market research) to understand its target audience: who used IT and why.

Stakeholder interviews enabled an understanding of the Theory of Change behind the Programme. They indicated that partnerships were developing well even at an early stage in the Programme's implementation and were identified as a key legacy of the Programme towards the end of the evaluation period. Nevertheless, issues were identified such as the ownership of the illicit tobacco issue, sharing of intelligence between local, regional and national enforcement bodies and the need for further development of the formal process for doing so. The Programme played a key part in the negotiations around a revised protocol for sharing intelligence and closer working between the different enforcement bodies. This was thought to be critical and underpinned all of the Programme's work, for example if the Programme raised awareness of the dangers of IT use which resulted in intelligence forthcoming about local traders, this intelligence needed to be seen to be acted upon for the Programme to have continued credibility. Discussions around the revised protocol permeated the early interviews with stakeholders and later resulted in a decision to use the Crimestoppers hotline rather than the Customs Hotline for intelligence reporting by the GB, although HMRC continued to promote the Customs Hotline.



A social marketing campaign, *Get Some Answers* (GSA), was developed to reduce demand for illicit tobacco, based on the Programme's research. This avoided discussion of relative health risks of illicit and licit tobacco (a strategy which had been used previously but which implies that licit tobacco is 'healthier'); instead, and for the first time in the UK, the Programme focused on aspects of criminality of illicit tobacco in local communities and the role it played in young people's smoking. The GSA campaign was only run in the North West (NW) and North East (NE) because of the Government freeze on media spend which affected Yorkshire and Humber (Y&H) which was solely funded by the Department of Health. The GSA campaign was implemented in June/July 2010 and again in January/February 2011 in the NW and NE regions.

The Programme had a high profile throughout and was perceived by stakeholders to have significantly raised awareness of illicit tobacco among the relevant agencies and national policy makers as well as consumers.

### Outcome evaluation

The selection of 'higher-level' indicators to monitor supply and demand factors was not easy as it became apparent during the course of the evaluation that such indicators were not routinely collected and appraised. Without a control region, attributing any findings to the Programme is not possible. However we believe that all the indicators, from a variety of sources, point towards the Programme having an impact on reducing demand and greater coordination of activities to reduce supply of IT in the region.

The two websites set up by the Programme attracted a great deal of interest. Hits on the main Programme website ([www.illicitobacconorth.org](http://www.illicitobacconorth.org)) totalled 17,578 from April 2010 to October 2011 including 12,844 new visitors. The GSA website

(www.get-some-answers.co.uk) received 16,038 hits from June 2010 to October 2011 including 12,991 new visitors; hits originated from 79 countries, but the vast majority emanated from the UK.

Among participants in the stakeholder surveys, 52% in the second survey in 2011 indicated that IT had been a higher priority than a year ago, and 85% of these said that this was because of the influence of the Programme. Awareness of IT and related issues was perceived to have been raised across stakeholders.

From the 2009 and 2011 NEMS surveys, the proportion of smokers who had brought back, or had others bring back, duty-free cigarettes from abroad fell substantially, from 33% and 27%, to 27% and 22%, respectively. The proportion of smokers purchasing IT also fell, from 20% to 18% and particularly among young smokers, as did the total market share of illicit tobacco, from 9.4% to 8.8%; this fall was more marked in the NE than in the NW. Awareness of IT increased from 54% to 69% and, importantly, the proportion of smokers who were comfortable with illicit fell four percentage points to 15%, with similar reductions recorded in both regions. The proportion 'very uncomfortable' with illicit tobacco rose by four percentage points to 59%. The proportion of people reporting that they were likely to report someone selling IT increased by three percentage points to 29%, 76% reporting that they would report sales to children (as in 2009). A survey of young people's (aged 14 to 17 years) smoking behaviour by Trading Standards North West (TSNW) and NEMS data suggested a marked decrease in smoking among young people in the region.

There was a clear impact of the GSA campaign on Crimestoppers calls in the NE and NW regions which increased from 100 in the period April 2009 to March 2010 to 328 for the year April 2010 to March 2011 during which the campaign ran; calls in Y&H which did not run the GSA campaign fell from 33 to 19 across the two periods. Calls to Crimestoppers dropped off from April 2011 across the region onwards suggesting that the social marketing campaign would need to be continued to have a sustainable large effect. Calls to the Customs Hotline have increased steadily across the three regions during the evaluation period.

In summary, all of the selected indicators moved in a direction indicating that the Programme has played a key role in reducing the supply of IT and demand for it.



# Executive Summary

## Key learning points

- The Programme was unique and very ambitious, endeavouring to tackle a complex and difficult issue which hitherto had almost predominantly been focused on reducing supply; the Programme also endeavoured to tackle demand for IT. Complexities were also brought about by the multidisciplinary nature of the partnerships involved, bringing together agencies that previously had not worked closely together and operated across three diverse regions in the North of England.
- The Programme has not been immune from the devastating cuts in funding during the period under review; however the government's preoccupation with revenue has helped shield this area from some of the cuts to other health programmes.
- The Programme's strategy was very comprehensive and logical; the GB developed a clear set of activities with pathways identified to reach the intended outcomes.
- No agreed indicators exist for assessing the supply and demand of IT at a local level and relevant data are not routinely collected nor readily available for study. For the future, we recommend routine electronic monitoring for any IT actions being carried out by local authorities. At a national level HMRC estimates the size of the market annually, based on General Lifestyle Survey data of smoking prevalence against revenue receipts for the sale of licit tobacco products.
- There is no doubt that the profile and importance of IT as an issue has been raised (several indicators point favourably in this direction and among a range of national, regional and local stakeholders, professionals and consumers). This, we believe is testament to the noticeable effort the Programme went to understand the target audience and disseminate findings and materials widely across the region.
- The Programme successfully avoided using messages around the relative harms of IT, instead focusing on criminality in local communities and the influence of IT on children's smoking. Addressing illicit tobacco is very difficult, particularly during a recession, as this requires a sensitive approach addressing very complex relationships within communities around smoking (such as local suppliers being seen as 'Robin Hood' characters but also a fear of reporting some dealers) which require 'buy-in' from frontline community and health workers. Whilst not all those observed were confident about focusing on criminality, the messaging generally had resonance with frontline workers and the research indicates that these messages have had some traction with the public.
- The indicators show that despite the recession, intelligence calls increased and reported demand for IT products has fallen during the lifetime of the Programme to date.
- The Programme brought together diverse stakeholders with what were initially very different philosophies/worldviews and priorities. Over time, these disparities have been partially ironed out such that it is now possible to see all stakeholders as sharing some more universal meta-values, such as health and the reduction of social harm (especially harm to children). Greater involvement of some professional groups such as the police could be beneficial in the future.
- A significant success of the Programme was to overcome many structural barriers to sharing intelligence, such as a legislative and policy context that was extremely restrictive of data sharing. The Programme successfully supported negotiations for on-going joint working that seemed to represent new levels of collaboration between enforcement agencies. All stakeholders interviewed reported a much better understanding of the remits, resources and areas of action of other agencies involved.
- By encouraging dialogue and joint working, these partnerships have also helped to raise the profile of tobacco control as a whole, thereby partially overcoming complacency after the implementation of the smoke free legislation in 2007. On the enforcement side, this joint working has also contributed to other work around age-of-sale, illicit alcohol and counterfeit goods.
- The Programme used its budget to leverage other funds, thereby increasing investment in the issue of IT beyond the confines of the Programme's fixed-term budget.
- The Programme had a high profile regionally, nationally and internationally, and was highlighted in various Government documents during the evaluation period.
- The Programme provides a blueprint for tackling the issue which was utilised by other regions and by the government pilot projects which utilised the Programme's imagery and ideas.

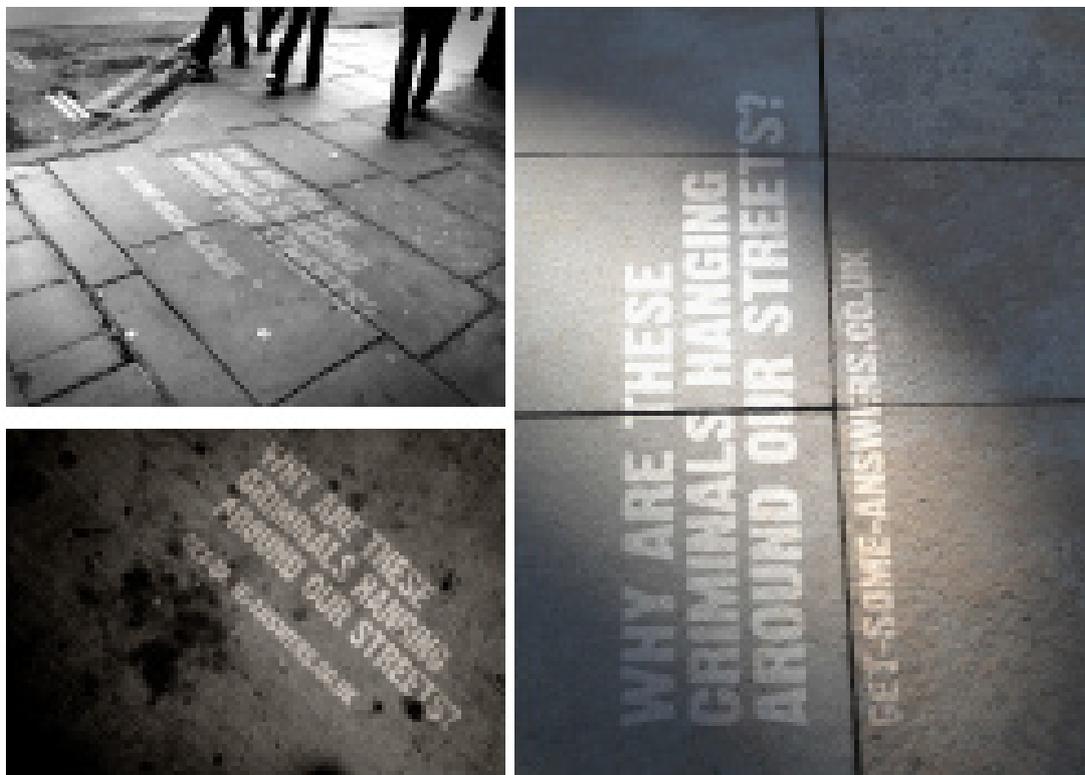


## Conclusions

Despite the recession and significant disruption and cuts to staff and resources, all the available indicators show an increase in intelligence reports to the hotlines during the campaign period and promising reductions in demand for IT which are likely attributable to the Programme. It should be noted however that this innovative and unique pilot Programme, tackling a complex region-wide issue, is still at a relatively early stage of implementation and therefore this evaluation should be seen in that context.

The sustainability of the Programme is likely to rest on continued investment. This is necessary to enable: ongoing regional coordination; regular meetings of stakeholders to enable expertise and intelligence to be shared; a sustained social marketing campaign; and progress to be monitored. In moving forward, the Programme should continue to assess consumer views. As the recession continues, striking the right balance between avoiding a focus on tax losses and relative health risks, whilst concentrating on criminality and the influence of IT on children will require vigilance. The Programme trialled a new approach to this which appears to have had resonance with the target audience and the materials have been utilised and further developed by other pilot projects in other areas.

Illicit tobacco remains a serious and significant 'upstream' problem affecting health inequalities in countries worldwide. There is also evidence of continued collusion in illicit tobacco by the tobacco industry<sup>4</sup>. The Programme offers a blueprint for regional initiatives to reduce both the supply and demand for illicit tobacco; it is an exemplar of partnership working which is thought to be unique and deserves to be widely disseminated.



<sup>4</sup>Organized Crime and Corruption Reporting Project (OCCRP) report: Big trouble at Big Tobacco is available at: <http://www.reportingproject.net/>

