

Licensing
Arun District Council
Environmental Health
Arun Civic Centre
Maltravers Road,
Littlehampton
West Sussex
BN17 5LF

15th February 2022

Dear Sir or Madam,

Re: Sussex News, 15B Surrey Street, Littlehampton, West Sussex, BN17 5AZ.

The West Sussex County Council (WSCC) Public Health Directorate wishes to support the application by Trading Standards to review the licence of: Sussex News, 15B Surrey Street, Littlehampton.

The Public Health Directorate concurs that the Licensing Objectives of:

- (1) The Prevention of Crime and Disorder
- (2) The Protection of Children from Harm

are not being promoted, as demonstrated by the sale of alcohol to a person under the age of 18, as part of a Trading Standards 'test purchase' operation. We are disappointed to learn about the sale of alcohol to a child and endorse the recommendations made in the review application by Trading Standards.

The sale of alcohol to children is of extreme concern, particularly in light of the strong evidence demonstrating the harms, caused by alcohol, to children:

According to guidance provided on NHS.UK, children and young people are advised not to drink alcohol before the age of 18¹, due to the following health risks:

- Drinking alcohol can damage a child's health, even if they're 15 or older. It can affect the normal development of vital organs and functions, including the brain, liver, bones and hormones.
- Beginning to drink before age 14 is associated with increased health risks, including alcohol-related injuries, involvement in violence, and suicidal thoughts and attempts.
- Drinking at an early age is also associated with risky behaviour, such as violence, having more sexual partners, pregnancy, using drugs, employment problems and drink driving².

¹ <https://www.nhs.uk/common-health-questions/childrens-health/should-my-child-drink-alcohol/>

² <https://www.nhs.uk/common-health-questions/childrens-health/should-my-child-drink-alcohol/>

In 2021 the WSCC Public Health and Social Research Unit published the West Sussex Substance Misuse Needs Assessment which includes data on the prevalence of alcohol use and misuse in young people, both locally and nationally³.

The national data shows that alcohol remains the substance most commonly used by young people. In 2018, 44% of young people said they had ever had an alcoholic drink, the same as in 2016⁴.

The What About YOUth (WAY) survey 2014 was a one-off survey designed to collect robust local authority level data on a range of health behaviours amongst 15 year-olds, including whether they smoke, drink alcohol or have taken drugs. The survey data tell us that, compared to the England average, young people in West Sussex are more likely to binge drink⁵.

Relevant findings from 'Lifestyles of 14 to 15 year-olds in West Sussex: 2015' report include:

- 3.7% of 14-15 year-olds surveyed regularly drink alcohol.
- 36.3% of 14-15 year-olds surveyed occasionally drink alcohol.
- Of the 40% of 14-15 year-olds who drink occasionally or regularly, 89% drink once a week or less, 9% drink 2-3 times per week, 2% drink on 4 or more days per week.
- Of the 40% of 14-15 year-olds who drink occasionally or regularly, 43.9% occasionally drink with the intention of getting drunk, and 11.6% regularly drink with the intention of getting drunk.
- The proportion of young people who drink alcohol in their own homes has increased in recent years from 47% in 2009 to 61% in 2014⁶.

Data from the West Sussex 'Local Alcohol Profile' show that hospital admissions in under 18s, for alcohol-specific conditions, have been on a downward trend since 2007, but this decrease has levelled off in recent years, following an increase in admissions for under 18 year-old males. Admissions for under 18 males and females remain similar to the England average. The current West Sussex rate of hospital admission episodes for alcohol-specific conditions in under 18s (male and female) is 34.6 per 100,000 population. This is statistically similar to the England average of 31.6⁷.

Given the harm caused to children by alcohol and the prevalence of alcohol misuse and harm being experienced by young people in West Sussex, it is especially disappointing to note that staff at Sussex News sold alcohol to a child. It is extremely concerning that there was both a lack of signage relating to and operation of a Challenge 25 policy, despite this being a condition of the licence, and that Trading Standards officers noted that a further condition, relating to the operation of CCTV, was not being adhered to.

It is also noted that the member of staff, who sold alcohol to the underage Trading Standards volunteer, could not operate the refusals register, which indicates a lack of effective training at the premises.

³ <https://jsna.westsussex.gov.uk/assets/living-well/west-sussex-substance-misuse-needs-assessment-2021.pdf>

⁴ P.42 <https://jsna.westsussex.gov.uk/assets/living-well/west-sussex-substance-misuse-needs-assessment-2021.pdf>

⁵ P.43 <https://jsna.westsussex.gov.uk/assets/living-well/west-sussex-substance-misuse-needs-assessment-2021.pdf>

⁶ P.43 <https://jsna.westsussex.gov.uk/assets/living-well/west-sussex-substance-misuse-needs-assessment-2021.pdf>

⁷ P.43-44 <https://jsna.westsussex.gov.uk/assets/living-well/west-sussex-substance-misuse-needs-assessment-2021.pdf>

Trading standards officers had sent a letter and given very recent verbal advice about the sale of age restricted products, which had clearly not been acted upon.

The intelligence received by Trading Standards, regarding proxy purchasing of other age restricted products (e-cigarettes) at this premises, raises further questions and concerns about the running of this premises and the apparent disregard for the licensing objectives outlined above.

In summary, the WSCC Public Health Directorate fully supports the suggestion made by Trading Standards for the Licensing Committee to seriously consider a revocation of the premises license and believe it to be necessary, proportionate and reasonable in order to prevent further crime and disorder and to protect children from harm.

Yours faithfully,

Holly Yandall
Public Health Lead for Alcohol and Drugs

On behalf of the Director of Public Health