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Licensing Team  
Environmental Health  
Arun District Council  
West Sussex  
BN17 5LF

30<sup>th</sup> May 2023

Dear Sir or Madam,

**Re: Felpham Corner Shop Ltd t/a Premier Corner Shop, 109-111 Felpham Road, Bognor Regis, PO22 7PW.**

The West Sussex County Council (WSSC) Public Health Directorate wishes to support the application by Trading Standards to review the licence of: Felpham Corner Shop Ltd t/a Premier Corner Shop, 109-111 Felpham Road, Bognor Regis, PO22 7PW.

The Public Health Directorate concurs that the Licensing Objectives of:

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

are not being promoted, as demonstrated by the illegal sale of alcohol to a person under the age of 18, as part of a Trading Standards 'test purchase' operation.

The sale of alcohol to children is of extreme concern, considering the strong evidence demonstrating the harms caused by alcohol to children and young people. It is noted that the premises licence holder had recently received both verbal and written advice about the sale of age restricted products, including advice on staff training. The subsequent sale of alcohol to a person under the age of 18, as part of a Trading Standards 'test purchase' operation indicates that this advice had not been acted upon and suggests a disregard for the law. The WSSC Public Health Directorate is disappointed to learn about the sale of alcohol to a child and endorse the recommendations made in the review application by Trading Standards.

### **Supporting Evidence**

#### **Harms, caused by alcohol, to children and young people**

In 2009, the Chief Medical Officer of England published official guidance on alcohol focusing specifically on children and young people<sup>1</sup>. It recommends that an alcohol-free childhood is the healthiest and best option<sup>2</sup>. The guidance is based on a body of evidence

<sup>1</sup> [Alcohol consumption by children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/164221/Alcohol_consumption_by_children_and_young_people.pdf)

<sup>2</sup> [Alcohol consumption by children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/164221/Alcohol_consumption_by_children_and_young_people.pdf)

that alcohol consumption during any stage of childhood can have a harmful effect on a child's development. Furthermore, alcohol use during the teenage years is related to a wide range of health and social problems, and young people who begin drinking before the age of 15 are more likely to experience problems related to their alcohol use<sup>3</sup>. Drinking at a young age, and particularly heavy or regular drinking, can result in physical or mental health problems, impair brain development, and put children at risk of alcohol-related accident or injury. More broadly it is also associated with missing or falling behind at school, violent and antisocial behaviour, and unsafe sexual behaviour<sup>4</sup>.

According to guidance provided on NHS.UK, the health risks associated with drinking alcohol before the age of 18 are as follows:

- Drinking alcohol can affect the normal development of vital organs and functions in children under 18, 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 driving<sup>5</sup>.

### **National prevalence of alcohol use by children and young people**

National data indicates that alcohol remains the substance most commonly used by young people. In a 2021 national survey, 40% of school pupils said they had ever had an alcoholic drink<sup>6</sup>, a figure which may be broadly applied to the West Sussex population of young people.

### **Local alcohol-related hospital admissions among children and young people**

Each year in West Sussex, there are more than 65 alcohol-specific hospital admissions (where the hospital admission is wholly attributable to alcohol) among under 18s. Since 2015/16 the rate of these admissions has increased, having previously followed a downward trend. The rate of these admissions in West Sussex (36.9 per 100,000 population, 2018/19-2020/21) is significantly higher than that rate for England overall (29.3 per 100,000)<sup>7</sup>.

In Arun, alcohol-specific admissions among under 18s have also increased since 2017/18 and the comparable rate for the district is 57.7 admissions per 100,000 under 18s. This is the highest rate out of the seven district and boroughs in West Sussex and is above rates for the South East Region and England overall.

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<sup>3</sup> [Alcohol consumption by children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>4</sup> [Part 5: Alcohol drinking prevalence and consumption - NHS Digital](#)

<sup>5</sup> <https://www.nhs.uk/common-health-questions/childrens-health/should-my-child-drink-alcohol/>

<sup>6</sup> [Part 5: Alcohol drinking prevalence and consumption - NHS Digital](#)

<sup>7</sup> [Local Alcohol Profiles for England - Data - OHID \(phe.org.uk\)](#)

### **Under 18s using specialist alcohol treatment services in West Sussex**

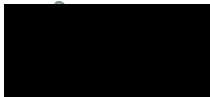
The latest data for 2021/2022 shows that 62% of under 18s in the West Sussex specialist children and young people's drug and alcohol service were receiving treatment for alcohol-related substance misuse.

Given the harm caused to children and young people by alcohol in West Sussex and high rate of alcohol harm in young people in Arun District, it is especially disappointing to note that staff at Felpham Corner Shop Ltd t/a Premier Corner Shop, sold alcohol to a child. Whilst the licensee confirms that a Challenge 25 policy is in place, a lack of written documentation on staff training and recent sale of alcohol to a person under 18, suggests that this not being adhered to.

West Sussex Public Health are supportive of the recommendation of Trading Standards to suspend the premises alcohol licence for 3 months, as this will provide sufficient time for staff retraining. We respectfully recommend that the committee consider applying the following conditions to promote the licensing objectives:

- i) Individual members of staff should immediately be retrained in the Challenge 25 policy with written documentation, signed by the employee and countersigned by the licence holder.
- ii) All individual members of staff should receive refresher training on the Challenge 25 policy every 3 months, with written documentation signed by the employee and countersigned by the licence holder
- iii) The refusals log should be reviewed and signed by the licence holder, monthly.

Yours sincerely,



Sophie Krousti  
Public Health Lead for Alcohol

**On behalf of the Director of Public Health**