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Public Health Department



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Licensing Team Mid Sussex District Council Oaklands Oaklands Road Haywards Heath West Sussex RH16 1SS

29th August 2023

Dear Sir or Madam,

Re: KK News Ltd TA Sparks News, 56 Queens Road, Haywards Heath, RH16 1EE.

The West Sussex County Council (WSCC) Public Health Directorate wishes to support the application by Trading Standards to review the licence of: KK News Ltd TA Sparks News, 56 Queens Road, Haywards Heath, RH16 1EE.

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 on 30th March 2023, the Designated Premises Supervisor (DPS), was provided with advice by Mid Sussex Licencing Authority on the Licencing Objectives. This was followed by an advice visit on 3rd April 2023, where the DPS what given advice on underage sales and provided with online links for more support on how to comply with consumer protection regulation. The WSCC Public Health Directorate is disappointed to learn that despite this recent advice, alcohol was sold to a child and endorse the recommendation 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 people¹. It recommends that an alcohol-free childhood is the healthiest and best option². The guidance is based on a body of evidence that alcohol consumption during any stage of childhood can have a harmful effect on a

¹ Alcohol consumption by children and young people - GOV.UK (www.gov.uk)

² Alcohol consumption by children and young people - GOV.UK (www.gov.uk)

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 use³. 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 behaviour⁴.

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 driving⁵.

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 drink⁶, 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 the rate for England overall $(29.3 \text{ per } 100,000)^7$.

In Mid Sussex alcohol-specific admissions among under 18s have also shown an increase since 2016/17 and the comparable rate for the district is 35.2 admissions per 100,000 under 18s which is also above rates for England overall⁷.

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.

³ Alcohol consumption by children and young people - GOV.UK (www.gov.uk)

⁴ Part 5: Alcohol drinking prevalence and consumption - NHS Digital

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

⁶ Part 5: Alcohol drinking prevalence and consumption - NHS Digital

⁷ Local Alcohol Profiles for England - Data - OHID (phe.org.uk)

Given the harm caused to children and young people by alcohol in West Sussex and the high rate of alcohol harm in young people in Mid Sussex District, it is especially disappointing to note that staff at KK News Ltd TA Sparks News, 56 Queens Road, Haywards Heath, RH16 1EE, sold alcohol to a child.

West Sussex Public Health are concerned by the inadequate training procedures at the premises and that staff appear to have been left staff untrained for a number of years. This failure to provide training has put children at risk of harm from alcohol.

From a Public Health perspective, it is disappointing that despite previous advice provided by Trading Standards, alcohol was sold to a child. Given the serious nature of this offence and the harm caused to children by alcohol, this suggests that the premises is not taking seriously their responsibility to uphold the Licencing Objectives.

Having considered the information provided in the review, West Sussex Public Health are supportive of the recommendations made by Trading Standards which seek to limit further criminal activity and to promote the licencing objectives.

Yours sincerely,

Sophie Krousti Public Health Lead for Alcohol

On behalf of the Director of Public Health