

Responsible Authority:	Haringey Public Health, London Borough of Haringey
Date:	22/07/2019
Name:	Maria Ahmad, Health Improvement Officer Marlene D'Aguilar, Health In All Policies Officer
Contact:	Maria.Ahmad@Haringey.gov.uk Marlene.DAguilar@haringey.gov.uk

Public Health representation relation to: TILSON STORE, 40 TILSON ROAD, TOTTENHAM, N17 9UY

Supply of Alcohol

Monday to Sunday 0700 to 2300

The opening hours of the premises:

Monday to Sunday 0700 to 2300

Where the Licence authorises supplies of alcohol whether these are on and/or off supplies:

Supply of alcohol for consumption **OFF** the premises only

I as a representative of the Director of Public Health act as the responsible authority under the Licensing Act 2003 and would like to make a representation in support of the review regarding the premises license at: TILSON STORE, 40 TILSON ROAD, TOTTENHAM, N17 9UY

Public Health has concerns under the following licensing objectives:

- Crime and disorder
- Protecting Children from Harm

Haringey: Alcohol and Health

Tackling alcohol misuse is key to achieving the outcomes in Haringey's Health and Wellbeing Strategy: giving every child the best start in life, reducing the gap in life expectancy between the east and west of the borough and improving mental health and well being. Part of achieving these involves community safety efforts to tackle alcohol crime and anti-social behaviour and ensuring health considerations are taken into account in any licensing decisions. We want to create a culture that prevents problem drinking from starting and provides help for people early on should they be struggling.

Haringey experiences some of the greatest levels of alcohol-related problems in London and the harm due to alcohol is a growing concern. In the five-year period of 2009/10 – 2014/15, alcohol related hospital admissions increased by 38% with the local cost of these admissions now estimated to be £7.5 million annually. During the same time period, the (DSR) rate of admissions per Haringey person also increased for both men and women, 31% and 26% respectively. Across the borough, there are currently over 800 licensed premises for the sale and supply of alcohol and this figure continues to rise, with some areas of high-level clustering. Evidence shows that an increased number of alcohol outlets results in significant

increases in alcohol consumption and alcohol-related harm (including injury, violence and medical harm). Antisocial behaviour associated with street drinking has been recognised as a concern in Haringey. Problems identified include; litter, noise, urination and intimidation all of which have a detrimental impact to the quality of life for residents.

Though many factors are known to contribute to the above, the licensing committee has direct influence over two: density of licensed premises and trading hours.

Local Context of the Premises

The premises is located within a busy residential area and surrounded by 1 children's centre and 1 primary schools located within 500 meters of the premises (SafeStats, 2016). There are 4 on licenses and 3 off licences within 250m.

The premises has also been subject to prior offences since November 2015 over concerns of crime and disorder associated with the premises.

Public Health has specific concerns about the applicant's ability to uphold the 4 licensing objectives following seizures of illicit alcohol from the licensed premises under the control of the Premise License Holder and Designated premises Supervisor Zeynel Gunduz on 1st April 2019.

The premises have not adequately demonstrated their commitment to uphold the licensing objectives, particularly relating to the prevention of crime and disorder and protecting children from harm. The Licensing Authorities approach to the supply of illicit goods is set out in Haringey's Statement of Licensing Policy 2016-21 at paragraph 58. It states that where illicit goods have been found it is considered as poor management which has the potential to undermine the licensing objectives.

Crime and disorder

The repeated sale of illicit alcohol constitutes illegal activity in direct contradiction to a commitment to the prevention of crime and disorder, and has likely exacerbated issues in the area.

The LSOA (small geographical area) in which the premise is located saw 6 alcohol related ambulance callouts in 2017/18. On Tilson Road there were 28 crimes in the past year (June 18 to May 2019), of which 14 (50%) were violent or sexual offences and 4 (14%) were anti-social behaviour (Police.UK).

This premises is located in the east of the borough where the impact of the sale of high strength beers lagers and ciders is having an adverse effect. The increase in street drinking and anti-social behaviour as a result of the increase and easy availability of these high strength cheap alcohol is being seen within the wards in the east of the borough. Supplying alcohol at cheap prices does not help to prevent anti-social behaviour and undermines the public health message.

Protecting Children from Harm

In the last compliance inspection (January 2019) the licence premises failed to keep a refusal book as part of the condition for the Responsible Retailers Scheme and therefore have not demonstrated their commitment to promote licensing objective; protecting children from Harm. Due to the premises situated within a busy residential area and two schools located nearby including a children's centre and primary school (4 min walk away), we have concerns over the safeguarding of children.

Recommendation

Public health is not confident in licensee's ability to promote the four licensing objectives going forward and therefore we recommend the committee considers revoking the license.

Should committee not revoke the license we recommend that the Designated Premises Supervisor be removed from the license as deemed appropriate and recommend the following conditions be attached to the license.

- No alcoholic goods or tobacco products will ever be purchased or taken from persons calling to the shop. The licensee will ensure that all purchases are made from authorised wholesalers and invoices for all goods on the premises will be made available and produced for inspection by council officers, police or HMRC upon request.
- The licensee will immediately report to Trading Standards any instance of a caller to the shop attempting to sell alcohol or tobacco products.
- A stock control system will be introduced, so that the licensee can quickly identify where and when alcoholic goods have been purchased.
- An ultra-violet light will be available at the premises for the purpose of checking the UK Duty Stamp on spirits as soon as practical after they have been purchased.
- If any spirits bought by the business have UK Duty Stamps that do not fluoresce under ultra-violet light, or are otherwise suspicious, the licensee shall identify the supplier to Trading Standards as soon as possible.
- The licensee shall adopt the 'Challenge 25 policy', and promote it on their premises through the prominent display of posters.
- The licensee shall require staff to note any refusals to sell to young people in a refusals log. The refusals log shall be checked and signed monthly by the designated premises supervisor. The refusals log shall be made available for inspection upon request by the council licensing team, Trading Standards or the police.
- The licensee shall ensure that staff are trained on relevant matters including the conditions on the premises licence; age restricted products; and (if they are ever left in charge of the shop) the operation of the cctv system and how to deal with visits from authorised officers. The licensee shall keep records of training and instructions given to staff, detailing the areas covered, and make them available for inspection upon request by authorised officers. Staff shall sign to confirm that they have received and understood the training.
- Age-restricted products training shall cover the following steps: the assessment of age; how and when to challenge for proof of age; acceptable proof of age and how to check it; and recording refusals.
- All staff shall be trained in recognising signs of drunkenness, how to refuse service and the premises duty of care. Training shall be regularly refreshed and at no greater than 6 monthly intervals. The premises shall display prominent signage indicating that it is an offence to sell alcohol to anyone who is drunk.
- High strength alcohol sale restriction: no super-strength beer, lagers or ciders of 6.5% ABV (alcohol by volume) or above shall be sold at the premises
- No promotion of super-strength alcohol (above 6.5% ABV) and single cans (i.e. buy one get one free) OR there shall be no promotional sales of alcohol at the premises where alcohol is sold at a price lower than that at which the same or similar alcoholic drinks are sold, or usually sold, on the premises
- There shall be no self-service of spirits on the premises
- The licensee should continue the responsible retailers plus scheme

These conditions are designed to ensure that the licensee takes appropriate steps to promote and uphold all four licensing objectives. We believe that all licensees who are fulfilling their duty to promote the licensing objectives will be already complying with many of these conditions. These are the type of precautions needed to meet Haringey's Statement of Licensing Policy requirement of a high standard of management.