



Alcohol and Entertainment Licensing Sub-Committee – Supplementary Agenda

Friday 13 June 2025 at 10.00 am

**Boardrooms 7 & 8 - Brent Civic Centre, Engineers
Way, Wembley HA9 0FJ**

**Please note that this meeting will be held in person with members
of the Sub-Committee required to attend in person.**

Membership:

Members

Councillors:

Ahmed

Akram

Hylton

Substitute Members:

Councillors:

Bajwa, Chohan, Clinton, Long, Mahmood,
Rajan-Seelan and L.Smith

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes and agendas please visit:
[Council meetings and decision making | Brent Council](#)

**Please note proceedings for this meeting are not being
webcast.**

**The press and public will, however, be welcome
to attend the open parts of this meeting in person**

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
- (b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Supplementary Agenda

Item	Page
3 Application for the Review of a Premises Licence following Expedited Review by Metropolitan Police for the premises known as Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH, pursuant to the provisions of the Licensing Act 2003	1 - 234

This supplementary agenda pack contains the representations submitted by the Premises Licence Holder.



- Please remember to **SWITCH OFF** your mobile phone during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public.

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IN THE BRENT LICENSING SUB-COMMITTEE

IN THE MATTER OF THE APPLICATION FOR THE REVIEW OF A PREMISES LICENCE FOLLOWING EXPEDITED REVIEW BY METROPOLITAN POLICE FOR THE PREMISES KNOWN AS CARLTON LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD

Index to Bundle

	Report	
1.	Consultant Report by Complete Licensing (Richard Bunch)	2 - 129
	Witness statements	
2.	Statement of Mr Prashanth Thavatheva	130 - 160
3.	Statement of Mr Uzair Alam	161 - 162
4.	Statement of Mr Owais Mousa	163 - 164

CL001 CARLTON LOUNGE

Document
CL-6971

Consultants Report



CL002

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Biography



**COMPLETE
LICENSING**
Page 3

RICHARD BUNCH **Principal Crime Prevention and** **Licensing Consultant**

"I'm really enjoying being involved in licensing from 'the other side'. My years of experience mean I can prevent potential licensing issues with police and other authorities."



I retired from the police service in April 2016 after serving in both Sussex and Metropolitan Police Services. Upon retirement, I was issued a certificate of service recognising my exemplary career.

Throughout my three decades of service, I held various roles in both uniform and detective positions, including major crime branches and community policing. At the time of my retirement, I was a substantive sergeant responsible for the police licensing team in the City of Westminster. I also managed several departments as an acting Police Inspector.

I qualified as a divisional and major crime branch detective at the National Criminal Investigation Centre in Maidstone, Kent. Additionally, I became an Advanced Interviewer, Family Liaison Officer, Exhibits Officer, and Disclosure Officer. I have worked on Divisional Drug Squads, Sussex Police Corporate Development Department, Sussex Police Unsolved Crime Investigations, and the Metropolitan Police City of Westminster Homeless Unit. As a qualified Key Decision Maker on CPS Charging Standards, I worked for two years at the country's busiest custody centre at Charing Cross Police Station. Following this, I served as the Crime Operations Manager for the Oxford Street, Regent Street, and Bond Street crime team at West End Central Police Station. During this period, I co-authored Operation Blizzard, a policing initiative for the busy autumn nights and Christmas period in London's West End. This initiative, designed to support the West End Business Improvement Districts (BIDs), was successful in reducing crime and disorder and was embedded in the Mayor of London's policing plan.

My final role was as Licensing Sergeant for the City of Westminster, working in partnership with the City of Westminster Licensing Authority. I was responsible for over 6,500 licensed premises, gaining extensive knowledge in licensing issues, crime and disorder within premises, reviews, and problem-solving through a partnership approach.

During my service in Sussex Police, I worked with licensed premises in rural towns, villages, and larger coastal towns and cities. I received two commendations for bravery and a merit for assisting the Metropolitan Police in recovering a kidnap victim while serving with the Major Crime Branch in Sussex Police. Richard is a member of the Association of British Investigators, which is working with the Law Society of England & Wales.

» **Contact Richard:**
richard@completelicensing.uk

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Brefing Sheet



**COMPLETE
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Page 5



**COMPLETE
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Night Time Observations Briefing Sheet

Date of Observations: 5th June 2025

Name of Assigned Person

Richard Bunch

Instructing Solicitor/Barrister/Consultant (Name, Phone, Email)

Kaneetha Vetivel (Greater London Solicitors) k.vetivel@glsolicitors.com, +44 7810 718923

Gerald Gouriet KC Gerald.Gouriet@ftbchambers.co.uk

Detailed Instructions

You should review and familiarise yourself with the following materials before attending:

- The premises licence variation application
- The representation from the Licensing Authority and the three redacted representations from residents
- The Licensing Sub-Committee's decision notice
- The applicant's written statement
- Counsel's note of the hearing
- Two video clips of the incident under review

During your visit, please pay particular attention to the following areas and make recommendations where appropriate:

- **ClubScan and searching procedure:** Assess how effectively the ID scan and wand searches are conducted.
- **Entrances:** Consider whether both entrances are required, or whether limiting access to one is practicable and beneficial.
- **Emergency arrangements:** Identify whether the premises have a formal emergency policy. If not, recommend an appropriate procedure.
- **Staff training:** Review any staff training records. What further training would you recommend?
- **CCTV:** Note what CCTV footage was requested, what was provided, and whether the response was full and timely.
- **Outdoor areas:** Observe how the outdoor spaces are used. Is noise well managed? Are any changes needed?

- **Clientele:** Comment on the type, age, and behaviour of the patrons. Is the allegation that the venue attracts a large number of drunks fair or substantiated?
- **Shisha Lounge operation:** Observe whether this area causes any problems. Make any recommendations.
- **Licensing history:** Be aware of the venue's compliance record and any relevant past incidents.
- **Additional points:** Having considered the decision notice, please include anything else you believe would assist those instructing you.

Address of Venue

Carlton Lounge,

232-234 Kingsbury Road, NW9 0BH

Venue Contact Person & Phone

Prash Theva, [REDACTED]

What 3 Words Location

///spaces.direct.wallet

Safety Note

If you feel unsafe at any time, please call James Hoffelner on [REDACTED] Remember that your primary role is to observe and report, not to intervene.

Legal Reminder

This report may be used in legal proceedings. Ensure that you comply with all relevant laws, including the Harassment Act, Trespass laws, Data Protection Act, Human Rights Act, and the Regulation of Investigatory Powers Act 2000.

Professional Conduct

Always act in the best interest of Complete Licensing. Maintain professionalism and integrity, and ensure that your actions comply with all applicable laws.

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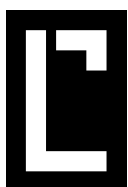
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Expert Report



1 BACKGROUND

- 1.1 I have been instructed by the owners and operators of Carlton Lounge and Tiger Bay Shisha Lounge, 232-234, Kingsbury Road, London, NW9 0BH. In my role as Crime & Disorder Consultant for Complete Licensing I form part of a team of legal representatives following the premises being subject of a summary review brought by the Metropolitan Police under Section 53A Licensing Act 2003. The officer bringing the review is Sergeant Michael Sullivan from the Brent Police Licensing Team.
- 1.2 The Police brought the review of the premises license following a serious incident having taken place in Fairfield Crescent directly opposite the venue at about 0328Hrs on Sunday 18th May 2025. The incident resulted in the death of a young male a short time later in a nearby hospital. The male was subject to a stab wound and despite the best efforts of the medical staff they were unable to save the male, and he died as a result of his injuries.
- 1.3 The victim was a 26-year-old male Mr. Ali Faris Muhammad. In the making of this report, I am fully aware that there is an ongoing police investigation into his murder, and I would like to emphasise that I am very aware of the Metropolitan Police Homicide Team investigations and sensitive to their investigations and ongoing enquiries.
- 1.4 On a personal note, I would like it recognised how saddened I am professionally to be involved in this overall incident. My personal condolences are passed to the family and friends of the victim, which must be an extremely difficult time. I have through my police career acted as a family liaison officer in similar circumstances and can fully empathise with the family and friends of the victim.
- 1.5 Having now spent time with the owners and operators I have also seen how saddened they are that their venue has been linked with this incident that took place in such close proximity to their premises, with both the victim and the suspects having been customers earlier in the evening.



2. BUSINESS PROFILE



- 2.1 Since my instruction I have taken the opportunity to understand fully the business and its operation. Many businesses have a long and established history, and Carlton Lounge and Tiger Bay are no exception.
- 2.2 This included a full personal observation of the premises and the operation through a Friday evening. This gave me the opportunity to see for myself how the staff operated and conducted themselves and what type of patron the venues attracted.



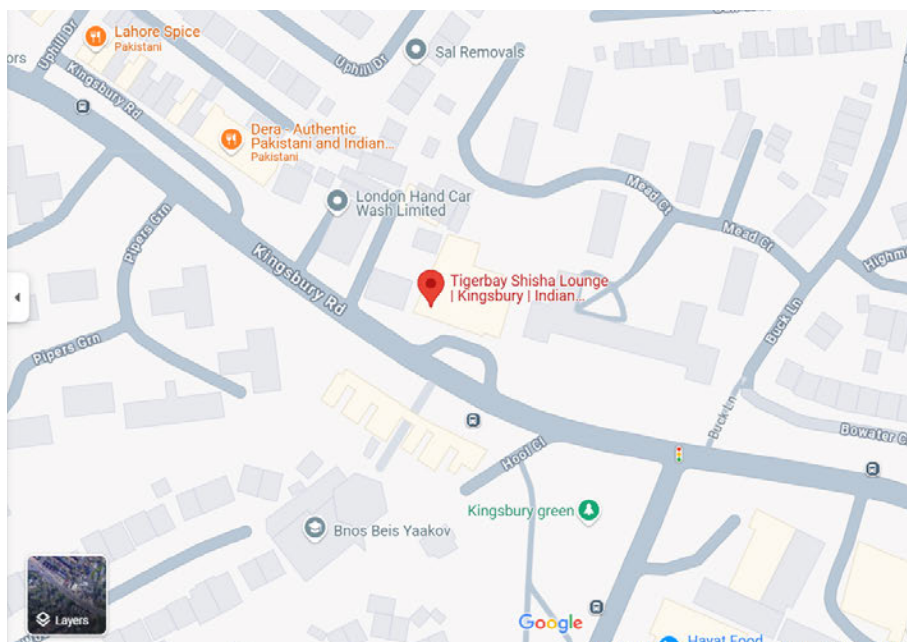
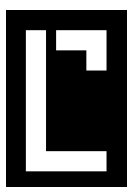


Image 2 – Map detailing location of Carlton Lounge & Tiger Bay Shisha Lounge.

- 2.3 The business has been operating in its current format since 2010. The owner, premises license holder and Designated Premises Supervisor (DPS) is Mr. Tavi Thevarajah who is [REDACTED]. The licensee company is Carlton Lounge (UK) Ltd. The business is operated by his son Mr. Prash Theverajah who is the CEO of the group.
- 2.4 The Carlton Lounge and Tiger Bay Shisha are located on Kingsbury Road. The area is made up of both residential and commercial properties, primarily with blocks of flats and accommodation above shops, restaurants and food outlets. The area is busy with high traffic volume throughout all periods of the day.
- 2.5 Directly opposite the venue is a parade of shops with its own roadway and parking area. There is an alleyway that leads down behind the shops to the rear of the main buildings. This is a haven for street drinkers and drug users. Also accommodated by rough sleepers who urinate and defecate in the area.



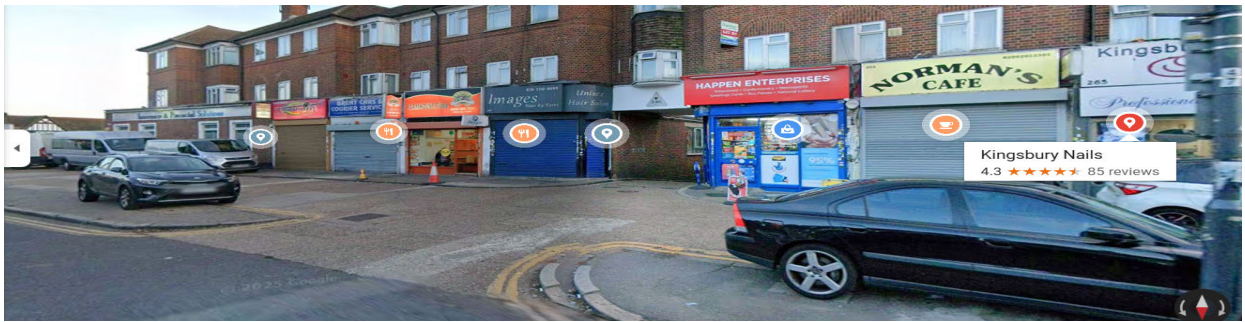


Image 3 – Parade of shops opposite Carlton Lounge (Scene of Incident)



Image 4 – Two views to rear of shop parade





Image 5 – Satellite map detailing location of Carlton Lounge & Tiger Bay

- 2.6 In total Carlton Lounge (UK) Ltd hold five premises licenses and are very experienced in the hospitality industry. The Tiger Bay brand can be seen in various areas of the capital and further afield. There is also a village pub in their portfolio. There are also bars/lounges in Malaysia and India. The company is named Tiger Bay International and is branded as such.
- 2.7 Tavi Thevarajah is a very successful businessman with other business ventures in travel and leisure. None of the family or staff involved in the group's businesses are irresponsible individuals. I found them to be extremely conscientious with regard to the local community and all their employees.
- 2.8 Tavi Thevarajah has been involved with the premises itself since 2008 and took full control of the premises and business in 2010. That is when the journey started with this business and beyond.
- 2.9 The premises at 232 – 234 Kingsbury Road are two separate operations within one premises under one premises licence. The owners describe the venue as offering a four-in-one experience. Firstly, Carlton Lounge which is a very good Indian Restaurant serving an Asian Fusion menu. The food is excellent, and the restaurant and bar areas are stylish. The premises have a large beer garden area which is well maintained with water features and a pond. There is also covered outside seating which is located to the rear of the Tiger Bay area. On the upper level there is a large conference and banqueting area which is used for weddings, parties and corporate events.





Image 6 – Bar area Carlton Lounge

2.10 Adjoining the main building is the Tiger Bay Lounge & Shisha. Before I go further, I noted that both the Police and their council in the hearing on 23rd May 2025 kept describing Tiger Bay as a nightclub. This venue is not a nightclub. It could not be further away from a nightclub. It is a lounge bar and restaurant. It provides live and recorded music and dance and seeks to provide a relaxed and chilled environment for its customers.

2.11 There are many screens around the premises that are used for visual effects and to show sporting events, such as football, boxing, cricket and other mainstream sports. There are no strobe lights, flashing lights, huge dance areas or massive speakers. It does not look to create that experience.

2.12 In the Tiger Bay area, you can have beer, cocktails, wine, champagne, spirits, tea, coffee, smoothies, milkshakes, and soft drinks throughout the operating periods. You also have the opportunity to enjoy the full menu from the Carlton Lounge and a smaller menu later on in the evening.

2.13 The genre of music creates a relaxed atmosphere and is at a level where you are able to easily speak to people.

2.14 People are seated at tables and are given full waiter service. You can use the bar in Carlton Lounge should you wish to. The majority wish to remain in the soft seating and enjoy the atmosphere.



2.15 The Carlton Lounge Restaurant is extremely popular with the local community and clients that travel from all over the capital and beyond to enjoy the food and service. Customer demographics run from the elderly, to families, young people. It is very multi-cultural.

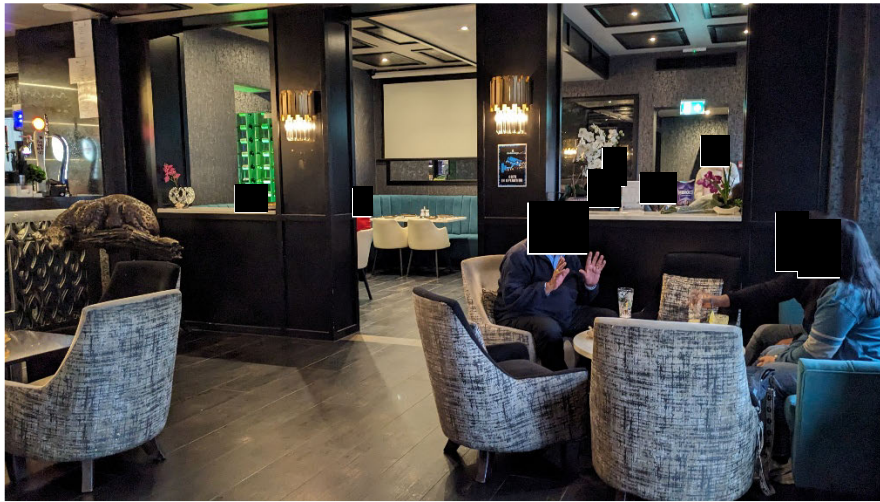


Image 7 – View pf restaurant area Carlton Lounge

2.16 The menus are extensive and priced to attract a more discerning client and certainly not those that wish to cause any form of issue. It all attracts a decent crowd.

2.17 The staff are extremely well turned out in both the Carlton Lounge and Tiger Bay areas of the premises. Waiters, drinks runners, shisha runners and bar staff are all in shirts, ties, waistcoats and trousers. The owners have high demands and expectations of their staff.





Image 8 – View of Beer Garden area



Image 9 – Beer Garden area from Tiger Bay Shisha

2.18 The Tiger Bay aspect of the business primarily attracts customers later in the evenings. It is a venue to relax in and does attract a younger crowd. Albeit all ages can be seen enjoying the venue.

2.19 The Police have commented on how they have little faith in the management of this business following the incident. There is a much larger picture to be taken with regard to the Tiger Bay Lounge in that this particular venue forms part of a far larger business with a number of like premises in



London and around the world. I found thi to be a very committed, ambitious and professional organisation.



Image 10 – Tiger Bay International Branding

2.20 The premises in Kingsbury alone currently employ 43 people. The monthly wage bill for this venue is £85,000. That is a great deal being injected into the local economy and clearly many individuals that work at this venue and their respective families are reliant on this income.

2.21 Many of the employees have been at the Tiger Bay venue for many years and are part of a large family working group. Should the Licensing Sub-Committee feel that the revocation of the premises license is necessary this will have a huge impact on the community



2.22 PERSONAL OBSERVATIONS – 6TH TO 7TH JUNE 2025

2.23i was instructed to complete personal observations at both the Carlton Lounge and the Tiger Bay Lounge. The observations required to be completed through a busy operating period.

2.24My personal observations were completed between 6.00pm on Friday 6th June 2025 and 3.00am on Saturday 7th June 2025.

2.25The purpose of these observations was to view the operational practices of the premises and to ensure the four licensing objectives as below were promoted:

- **Prevention of crime & disorder**
- **Ensuring public safety**
- **Prevention of public nuisance**
- **Protection of children from harm**

2.26As a consultant with many years of experience the purpose of my observations is to give a clear and balanced view of all the premises that I represent in the capital and across the country. If there is an area that needs to be addressed, I will comment accordingly. If the premises is not operating as is required and expected by the Licensing Act 2003 and promoting the Licensing Objectives I will say so.

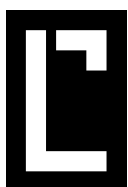




Image 11 – Internal branding Tiger Bay Shisha

2.27 I have many other similar venues that I work closely with and where we have had similar types of incidents. Our team of consultants and legal teams have brought the venues up to standard and they still operate to the highest standards.

2.28 The premises benefits from a premises licence for the following hours and licensable activities:



Regulated Entertainment: Live Music – Recorded Music – or anything of a similar description:

Times: Monday – Thursday 11:00 – 03:00
Friday – Saturday 11:00 – 04:00
Sunday – 11:00 – 03:00

Provision of Late-Night Refreshments:

Times: Monday – Thursday 23:00 – 03:30
Friday – Saturday 23:00 – 04:30
Sunday 23:00 – 03:30

Sale or Supply of Alcohol:

Times: Monday – Thursday 11:00 – 03:00
Friday – Saturday 11:00 – 04:00
Sunday 11:00 – 03:00

The opening hours of the premises:

Times: Monday – Thursday 11:00 – 03:30
Friday – Saturday 11:00 – 04:30
Sunday 11:00 – 03:30

2.29 These operating hours and licensable activities are consistent with similar types of venues across the capital. There is nothing unusual about them and in themselves should give no cause for concern.



Image 12 – View of Tiger Bay VIP area from Beer Garden



2.30 Before I arrived at the venue, taking in all the evidence provided by the Police prior to my arrival, I was expecting some poorly run, disorganised licensed premises that were clearly failing to promote the four licensing objectives. I was also expecting to find the premises on the Police and Local Authority radar as being a poorly operated premises and business. This was clearly not the case.



Image 13 – Night view of frontage to Carlton Lounge & Tiger Bay

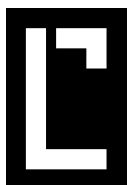
2.31 I initially spent time with Tavi and Prash Thevarajah in the restaurant area of the premises. It was early evening, and the premises had been open since 12.00pm. There were a few people in the restaurant and a group enjoying a meal in the beer garden.

2.32 Smart and efficient waiters were busying themselves inside and out. If they were not serving food and drinks, they were monitoring the restaurant and beer garden.

2.33 The venue was clean and very smart and well presented. Families, elderly and young couples were enjoying the early evening.

2.34 All relevant signage was clearly displayed at the bar including a schedule of the premises licence, challenge 25 etc.

2.35 The Thevarajah family are clearly upset by the incident on 18 May but they showed themselves to be determined to maintain their business and operate at the highest possible standards. The family stated that the restaurant would normally be far busier at this time on a Friday, but the incident has had a very negative impact at present.



2.36 Prash Thevarajah gave me a full tour of the premises which is extensive. On the upper floor of the main building is the large function room as mentioned. This is used regularly by members of the local community for weddings and parties. Both local and larger corporates also regularly hold functions in the area.



Image 14 – Kitchens and Chefs @ Carlton Lounge

2.37 The kitchens, preparation areas and cleaning facilities are immaculate. The head chef at the venue has been there for 13 years and has been key to building the business to the level it is today. The kitchen staff were also well turned out in matching uniforms. Again, this clearly shows the standards the owners and operators expect and work to.

2.38 I was told that customers travel from all over the capital and beyond to the Carlton Lounge and the Tiger Bay Lounge.

2.39 Both business areas share the garden area, with Tiger Bay providing covered outside seating areas and the VIP area backing onto the lawns. There is a large screen with large plants that assist with noise reduction.



- 2.40 The rear of the garden has a high wooden fence securing the rear of the property and preventing unwanted entries and protecting residents from noise and nuisance from the garden use.
- 2.41 Regarding the VIP area of Tiger Bay following a noise abatement order in 2022 all speakers have been removed from this area. At 12.46am on Saturday 7th June 2025 I made a recording and video of the noise emanating from the lounge of Tiger Bay. It is very low and well within any required standards. There is no trading in the garden after 11.00pm.
- 2.42 The Tiger Bay Lounge starts to attract people from 9.00pm. Although customers could use the bar in the Carlton Lounge, they are encouraged by the waiters to sit at a numbered table and be waited on. The majority take the opportunity to eat, many just to enjoy a drink, cocktail, coffee and a shisha. The music provided is low level, providing a calm atmosphere.
- 2.43 As the evening progresses it gets busier and becomes busy by 11.00pm. The premises is obviously very popular, and they operate a 90-minute sitting per table. This is a house policy and is effective in maintaining through put for the business, and discourages people staying in the venue after they have eaten, solely to drink. This policy is relaxed slightly during quiet periods.
- 2.44 A DJ takes over a small booth centred in the middle of the main area of the lounge. The area around him is small and cramped as the space is maximised for tables. I did see a small group of girls dance in front of the DJ for a few minutes, but this was very low key, and they returned to their table. A few people did stand and dance at their table but never leaving their place.
- 2.45 I emphasise again this is not a nightclub as described by the Police and their legal representative. This is a shisha lounge which is a completely different business model.

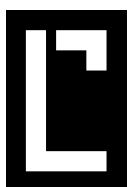




Image 15 – Tiger Bay Shisha 7th June 2025

2.46 This evening was actually the start of the Ede celebrations, and many customers came and took advantage of the venue. They came and ate and enjoyed a first night from their fast.

2.47I witnessed groups at 1.30am playing board games and cards in various areas of the lounge. Not a sight you would see in a nightclub.



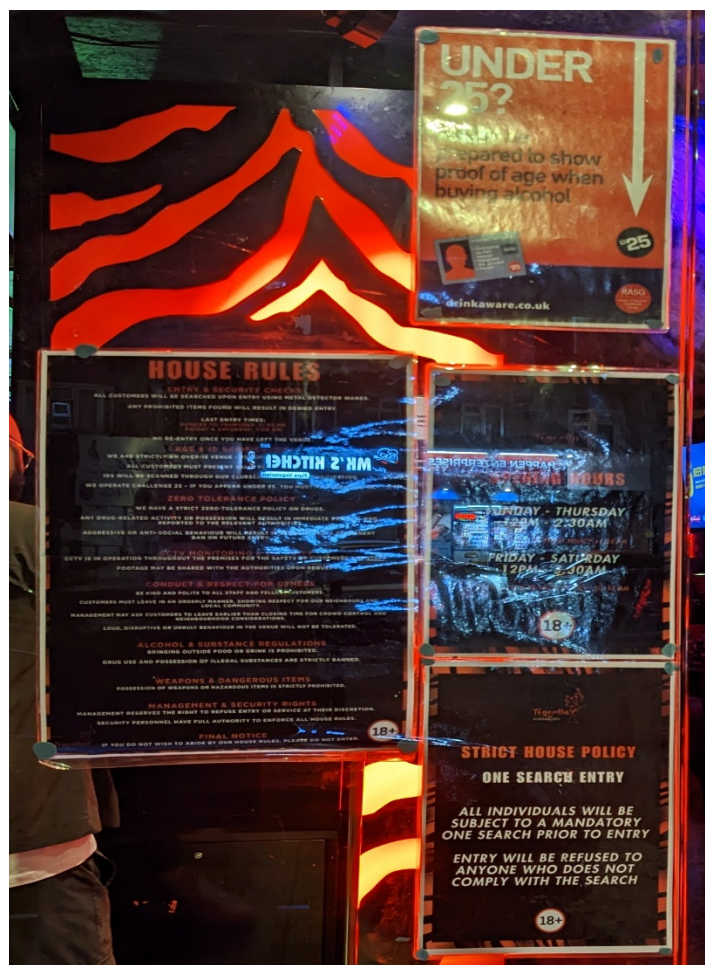


Image 16 – Signage at entrance to Tiger Bay

- 2.48 Throughout the evening, I monitored the security team. The SIA team are provided by Solid Security and seemed very professional and focused on their role. Five were on duty including one female. They were all well turned out and clearly displaying their SIA badges and identities.
- 2.49 Following the hearing there is now a requirement for a search policy to be in place. This includes a search of all customers entering the premises. This is obviously a new procedure being adopted. The searches both manually and with the wands were satisfactory. The control of the queue needed to be managed better that evening, but following my advice the situation has been resolved.
- 2.50 They have now adopted a clear four-step process prior to entry as detailed below.
1. Queue to the right side of the entrance.
 2. Complete a manual search including bags.
 3. Thorough wand search.
 4. Complete ID Scanner process.



2.51 This is as thorough a process as you can deliver, given the parameters available with regards to manual searching.

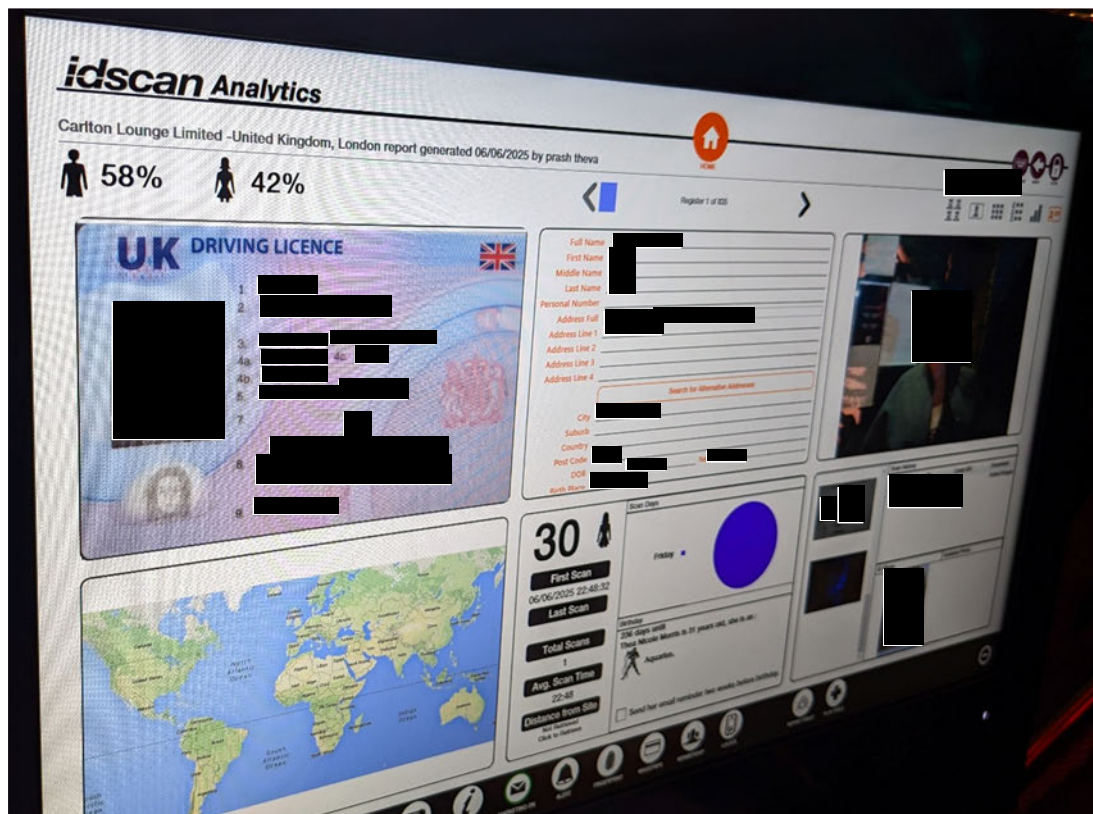


Image 17 – ID Scan in operation @ Tiger Bay

2.52 I witnessed several refusals of entry to the venue by the staff as potential customers did not have the required ID. This caused some irritated conversations between regular customers, SIA and management, but they remained fully compliant. In time this will become the norm.

2.53 We need to consider the entrance to the restaurant area only, as families with children do come to just eat later (which is a normal entity in some cultures). There are two clearly defined entrances and if you have parents and two children, I would recommend some concession going forward based on a dynamic risk assessment from the SIA team and the management. They can be directed to only use the restaurant and toilet areas and not to enter Tiger Bay. Throughout my observations a security team member monitored the main entrance to the restaurant.





Image 18 – SIA security at frontage of Tiger Bay





Image 19 – New queue procedure in place 7th June 2025.

2.54 As the evening progressed, I saw customers ordering various, coffees, teas, and milkshakes – which is extremely unusual for a venue of this nature but clearly shows-off the friendly multi-cultural vibe they promote.



Image 20 – Milkshakes served 0200Hrs Tiger Bay



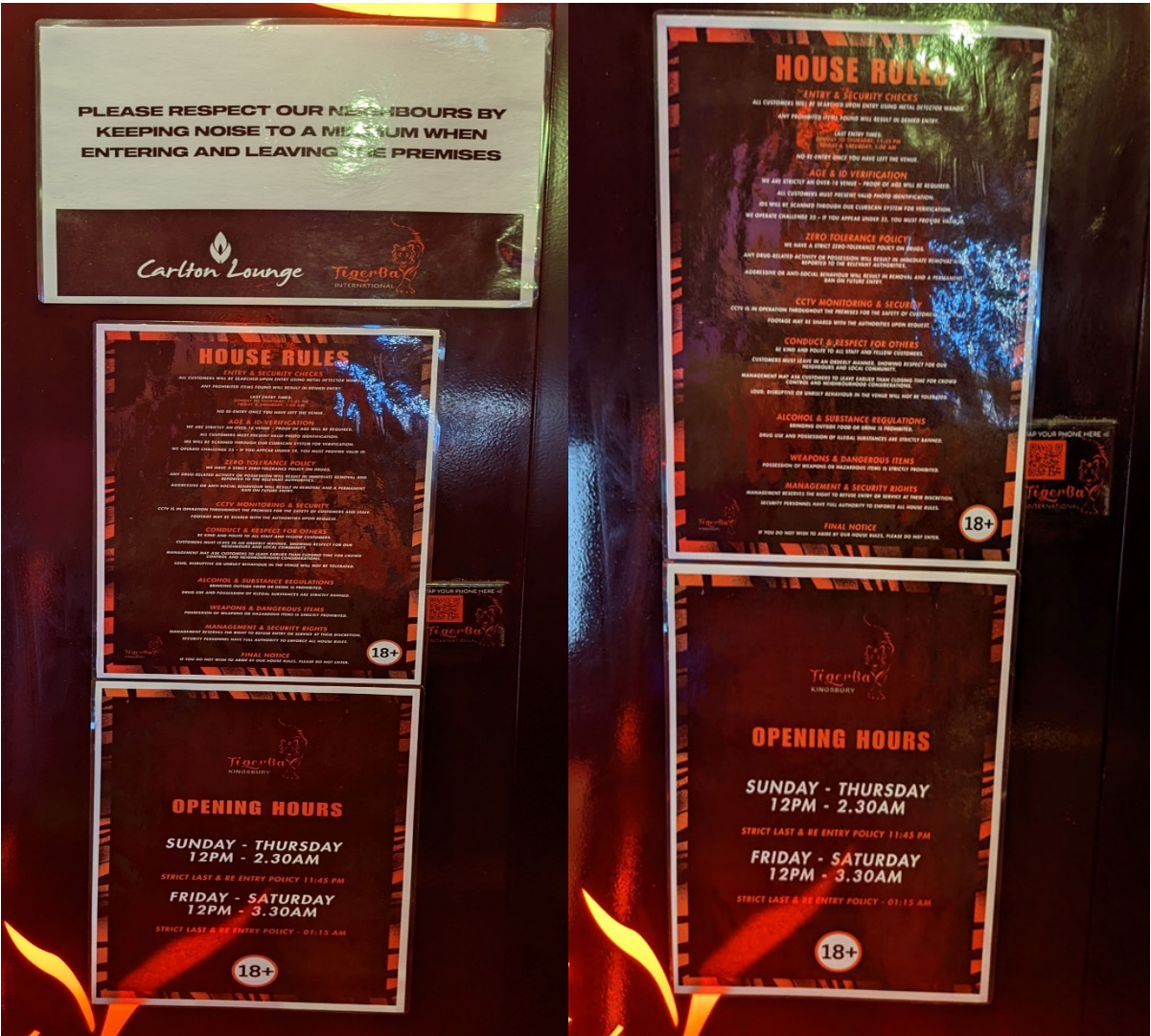


Image 21 – Further public notices @ Tiger Bay

- 2.55The venue’s management provides clear and accurate signage for all customers to view. The signs are clearly placed in the front windows and cover all policies and timings including last entries.
- 2.56Throughout the evening, I monitored the sound recordings outside the premises with the SIA teams. They have a digital decibel meter and record readings every 30 minutes at the front and rear of the property. These are photographed and placed onto a WhatsApp group and filed. The requirement is they will be recorded every two hours. The management go above and beyond this requirement.

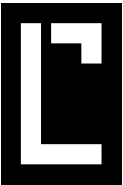




Image 22 – SIA conducting 30 min sound checks at front of Tiger Bay

2.57As you enter through the door of the venue, there is a manned reception desk. Placed on this desk are all the required compliance books which are up to date and clearly record all incidents. The books are always ready for inspection and are as follow:

- 1. Accident Book.
- 2. Alcohol Refusals.
- 3. Incident book including details of all SIA operatives.
- 4. Visitors Book.

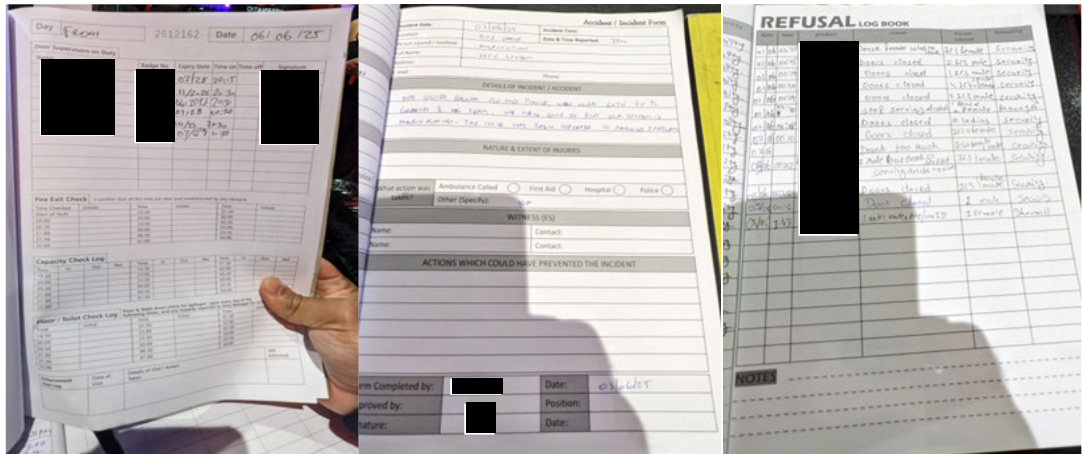


Image 23 – Compliance Logs at Tiger Bay





Image 24 – Friendly welcome to be had at Tiger Bay.



3. STAFF TRAINING

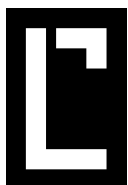
- 3.1 I have been asked to consider the staff training at the venue. I can confirm that all staff complete a full induction training and complete six-monthly training sessions in January and July. These sessions are mandatory and must be completed even if you have recently completed your induction course. All training sessions are organised by [REDACTED], who is the company's Business Consultant.
- 3.2 The company uses various training platforms and compliance recording platforms such as [REDACTED] and [REDACTED]. Staff are trained in Risk Assessments and Health & Safety, and all training is recorded and signed off. Staff receive a manual handbook also.
- 3.3 [REDACTED] has provided a full profile on his background and competencies. He has also included all documentation relating to the companies' training packages. I understand he has completed a statement detailing his involvement.



4. INCIDENT LEADING TO SUMMARY REVIEW

- 4.1 I have been told that the Tiger Bay Lounge operated as normal throughout the evening of the incident. Two groups of males entered into a verbal altercation within the VIP area of the premises which is located to the rear of the shisha lounge adjacent to the outside garden area. It appears the two males that entered into the altercation included the victim of the stabbing and the suspect with other members of their respective friend groups.
- 4.2 The SIA working that evening intervened and adopted a recognised procedure of separating the two groups. Two males which included the suspect were ejected from the premises. This was done without issue, and they were both escorted through a fire exit located between the main entrance to Carlton Lounge and Tiger Bay Lounge. They did not remonstrate and were compliant. This was about 0220Hrs on Sunday 18th May 2025.
- 4.3 The two males were requested by the SIA team to leave the area. They did not and remained outside walking around. It is believed they had access to a vehicle outside through this period.
- 4.4 The victim and his friend's group remained inside the premises for about an hour. The two ejected males can be seen on CCTV hanging around the fenced area to the frontage of the premises. At about 0325Hrs the same day a large saloon type vehicle appears on the forecourt of the Carlton Lounge premises. This vehicle contains a group of males who exit the vehicle.
- 4.5 From my enquiries, it is likely that this group of males are clearly connected with the group still inside the premises and have been contacted. There is immediate interaction between the males and the SIA on duty. At about this time we believe the males contained within the premises have exited through the alley from the garden area at the side of the premises.
- 4.6 The entire group then enters into a verbal altercation outside the venue. The venue's SIA and management staff try to calm and resolve the situation. A fracas breaks out and, in the melee, you can see staff intervening and trying to separate the group.
- 4.7 The CCTV shows that in the middle of the you can see the son of the premises license holder and DPS Mr. Prash Theverajah trying to break the fighting up.

The group run across the road into the parade of shops and into an area adjacent to the alleyway that leads to the rear of the shop fronts. Mr. Theverajah is still in the middle of the group, trying to resolve the situation.



- 4.8 He witnesses the two parties in a short fight. One kicks the other and the other responds with what was at the time believed to be a punch to the body. This is possibly when the victim was stabbed. No one knew then that the victim had suffered a serious injury.
- 4.9 The suspects make off from the scene as do others. There is then a clear realisation the victim is seriously injured. It appears that one of the friend groups has made a 999 call to the London Ambulance Service (LAS). The LAS have then contacted the Police requesting assistance and informing them of a potential stabbing.
- 4.10 In the meantime, CCTV shows a white SUV type vehicle being driven to the location of the victim at the entrance of the alleyway. It appears the victim is assisted into the vehicle which is then driven off at speed.
- 4.11 On the arrival of the Police and LAS there is some confusion as to the location of the victim.
- 4.12 Whilst this was going on a staff member called to a friend to call the Police. This call was made by the venue contrary to the comments of the Police, and is timed at 3.28.

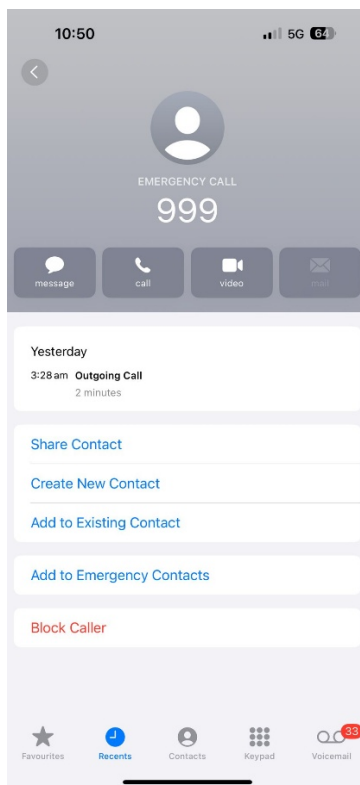
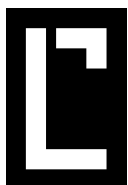


Image 1 – Screenshot Detailing '999' call to emergency services.



- 4.13 At 0340Hrs, Police received a call from a nurse at Northwick Park Hospital stating that a male had been brought in with a stab wound. The staff tried to treat and save Mr. Muhammad from his injuries but were unable to do so.
- 4.14 The Metropolitan Police initiated a full investigation into the matter. All staff involved in the incident have provided witness statements. The premises were closed for four days whilst the Police completed their enquiries, primarily around CCTV and obtaining statements. The scene was subject to road closure and cordon whilst the forensic teams completed investigations at the scene of the assault in Fairfield Crescent.
- 4.15 The premises owners and management have fully complied and assisted the Police with their investigations. This has been recognised in writing by the Senior Investigating Officer (SIO) Detective Inspector [REDACTED] See his emails dated 21 and 22 May.



From: [REDACTED]
Date: Wed, 21 May 2025 at 16:43
Subject: RE: Carlton Lounge Review
To: [REDACTED]

Dear Mr Theva,

By way of introduction, I am a supervising officer in Met Police Homicide Command and I am one of the detectives overseeing the murder enquiry currently underway.

I am aware of the assistance you have been providing our enquiry, in particular helping us to identify all the security and staff from your business, some of whom may hold vital eyewitness evidence. I therefore wanted to extend my gratitude and thanks to you for your help, it is greatly appreciated.

Furthermore, you have continued to support us whilst we keep your premises as a scene for examination - something that we acknowledge is highly disruptive to you. I'd like to assure you that I shall have a further update for you on that this evening. Thank you for your patience and understanding with this, you no doubt understand that in a murder enquiry we cannot leave any stone unturned and must be extremely thorough in our enquiries.

Regarding the licencing matter, I realise that would be distressing for you, I can only encourage you to fully cooperate with the Licencing Team, as I am sure you already are, to address any concerns identified.

I shall email again this evening with an update about your venue and its release back to you.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email from Detective Inspector [REDACTED] Wednesday 21st May 2025



From: [REDACTED]
Date: Thu, 22 May 2025 at 19:49
Subject: Carlton Lounge / Tiger Bay
To: [REDACTED]

Dear Mr Theva,

As discussed earlier, your premises at 234a Kingsbury Road was released from police control, officially at 12:51pm today.

As requested, I can confirm that police had control of the premises in its entirety, as part of a criminal investigation, from Sunday 18th May, at approximately 4am, until 12:51pm today, Thursday 22nd May. During this time you and your colleagues/staff were unable to access or use the premises or equipment/goods therein.

Once again, I wish to thank you for your cooperation and patience with us, whilst we carried out our enquiries; we appreciate this has been impactful on your business.

Regards

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Email from Detective Inspector [REDACTED] Wednesday 21st May 2025



5. REVIEW & INTERIM STEPS

- 5.1 As was to be expected the Police immediately brought a Summary Review of the premises licence under Section 53A Licensing Act 2023. The documentation was completed by Sergeant Michael Sullivan.
- 5.2 Sergeant Sullivan has given an outline of the events that took place in the early hours of that morning and also highlighted a number of points which I have listed below and will comment on further.
- 5.3 The review document was completed and signed by Sergeant Sullivan on 21st May 2025 2/3 days after the incident.
- 5.4 I have not had sight of any statements or documents submitted with this review application. He makes mention of a crime report under the new MPS Connect system [REDACTED] and [REDACTED]. I understand the sensitivity, but redacted copies may be useful.
- 5.5 Following my observations and investigations, I believe the comments in the Section 53A application are misleading and in areas inaccurate. The alleged failings highlighted by Sergeant Sullivan in his review are –

The following failings have been noted:

1. Police were called at 03:31 hours on Sunday 18th May 2025 by LAS – which had in turn received a 999 call from a man reporting a stabbing at Tiger Bay. On police and medic arrival, no casualty was present. At 03:40 police had a call from a nurse at Northwick Park Hospital to report a man had come in with stab wounds.
2. CCTV shows a large-scale disorder immediately outside the venue from about 03:25 to 03:30, during which the victim received a stab wound and collapsed at the scene. He was taken to hospital by other people, before emergency services arrived. Estimated 20–25 people involved in the disorder.
3. There was no call from the venue staff or management to reports of the disorder, or anything else. Staff were present and witnessing events, and security personnel were involved in the disorder, in apparent attempts to separate people.
4. The suspect can be seen entering the venue at 02:00am, with others. There is no search of any of them, frisk, metal detector, wand or otherwise.



5. The suspect is later seen outside with a large knife, which was used in the disorder and appears to have been used to stab the victim, ultimately killing him (subject to pathology confirmation on cause of death). Staff can be seen trying to calm and manage the situation during this time.
 6. Appears likely that the knife was in the suspect's possession *inside* the venue.
 7. Police body worn video (BWV) shows a manager telling an attending CID officer that the groups involved in the disorder had not been inside Tiger Bay before the disorder. This was untrue, as they had been and indeed most, if not all, of the people had come from inside Tiger Bay, some having been specifically ejected by the staff/security.
 8. Police BWV shows the manager [REDACTED] saying he thinks bottle/bottles were involved. A customer approaches and says a knife was used and had been pulled out inside the venue. He was promptly ushered away by another manager/member of staff.
 9. House to house enquiries revealed local residents complain there is frequently noisy anti-social behaviour from the venue.
- 5.6 By the time these submissions were made for the Licensing Sub-Committee to consider the Police would have had time to complete enquiries with the Homicide Team, the staff at the venue and view the CCTV to present a far more accurate picture of the events. This was not the case, and using the same numbering, my comments on "the alleged failings" are -
1. No comment to make
 2. This gives the impression that number of people were fighting in the street. As can be seen on the CCTV, there were relatively few in the group actually *fighting*. These included the two black males ejected by the venue who stayed in the area, the two males who remained in the venue, and the group of males that had not been in the venue arriving in a blue saloon motor vehicle. The other people involved were staff members attempting to bring the situation under control and separate the parties. There were also several bystanders watching events unfold. This was a very short period before the group split into Fairfield Crescent where the assault took place.
 3. There was a call from the venue at 0328Hrs. (Please see the above screenshot)
 4. There was no search completed on the two suspects before they entered the venue. The venue has operated since 2010 without an issue of this nature. There was no condition on the premises license requesting a search of patrons entering Tiger Bay. The Police and Local Authority had



ample opportunity to make such a request in the variations on the premises license in August and October 2024. Neither responsible authority made such an application.

5. I have viewed the CCTV and spoken with the CEO Mr Prash Theverajah, who was with the group in Fairfield Crescent at the time of the incident trying to bring the situation under control. I can see no large knife and neither did Mr Theverajah.
 6. For most of the time the suspect was in the venue he appears to have been in the VIP area, where the initial altercation between the two groups of males took place prior to the two suspects being ejected from the premises. The CCTV has been viewed, and no knife can be seen. The suspect was outside the venue for a period of about one hour after he was ejected and had access to a vehicle. I believe it to be more likely that the suspect obtained a knife from the vehicle than that he brought it into the licensed premises.
 7. To a point the comments from the staff member are correct. There was a group of males that had not been in the venue who were clearly involved in the disorder as described. They were the group that arrived in the blue saloon vehicle and did not enter the premises. and were clearly associated with the victim.
 8. I understand bottles were seized from the two black males as they were escorted off the premises. There is a possibility some confusion has come about and hence his statement.
 9. I will comment later in this document regarding the house-to-house enquiries completed by the Police and the comments made regarding noise and anti-social behaviour. This has attracted many negative representations and Facebook Groups canvassing people who may not live in the immediate area. Pro-forma representations have been circulated and clearly submitted by anonymous individuals.
- 5.7 The Licensing Sub-Committee in their interim steps decision did not suspend the license and only introduced conditions allowing the premises the opportunity to continue trading through the period of the interim steps to the final review hearing on Friday 13th June 2025.
- 5.8 This has given the premises and its entire team time to review their policies and operating procedures. This is supported by their legal team and licensing consultants.



6. POLICE INVESTIGATION:

6.1 The Police investigation is currently still ongoing, but I do understand the suspect has been identified and arrested and is currently remanded and awaiting trial.

6.2 There may be evidence that would be suitable for this hearing that will be subject to the investigation and upcoming trial. We ofcourse cannot rely on such evidence coming to light due to the sensitive nature of the criminal investigation currently taking place.





7. REPRESENTATIONS

- 7.1 There have been several representations made in support of the Police and the revocation of the premises license. I understand the public concern regarding the incident and of course the ongoing knife crime in the Greater London area.
- 7.2 The police have stated that they have evidence from residents complaining of crime and disorder, anti-social behaviour and noise issues emanating from the Carlton Lounge and Tiger Bay Lounge. These representations do not correlate with the local crime recordings in the area.
- 7.3 Had such issues come to light I do not understand why the police and local authority did not make strong representations in August and October of last year when the premises varied the conditions and times on their license.
- 7.4 Most concerning is the Facebook group (as detailed below) that have clearly been canvassing in a large area through Kingsbury, Queensbury and Edgware, and produced a letter to be pasted and copied and submitted to Brent Council, all requesting anonymity. You will note from the representations the majority are all pasted and copied from this letter.
- 7.5 These representations give a skewed view of the premises and are in no way an accurate picture of the local resident's profile. Some give the impression of making representations on an issue that does not directly affect them.
- 7.6 I invite the licensing sub-committee to view the supporting representations, which give a far more detailed view of the businesses.



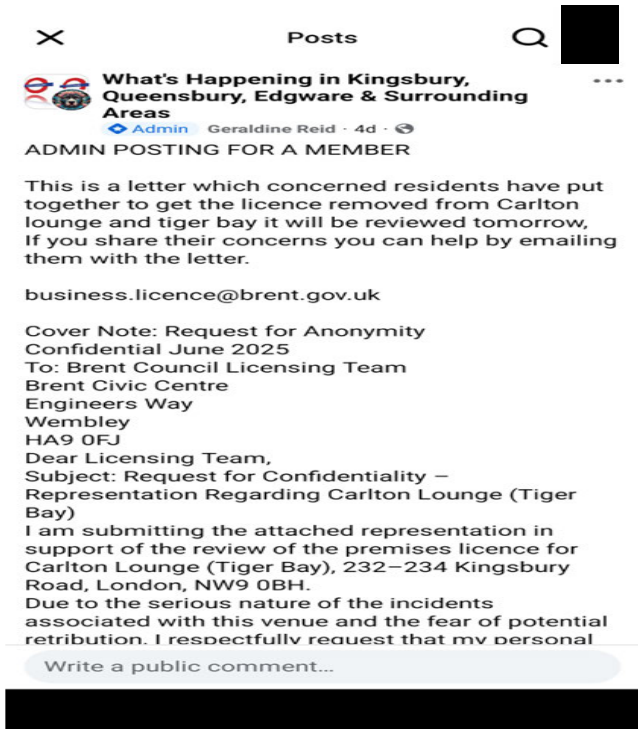


Image 25 – Facebook page from local residents.



8. POLICE REPRESENTATIONS

8.1 The Police have delivered a damning view of the Carlton Lounge and Tiger Bay Shisha Bar in the Section 53A document submitted bringing this review hearing.

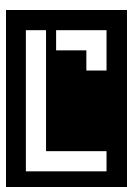
8.2 Having been involved in such matters myself I appreciate the fact the Police need to have some reaction to the serious events that have taken place, but they need to be accurate in their submissions. In August and October of last year, the Police and Local Authority made no representations regarding the operation of the venue and the suitability of the management. Now a few months later the management and owners are said to be incompetent and not suitable to hold a premises license. The same people have operated this premises for the last 15 years with nothing coming close to the incident precipitating the summary review.

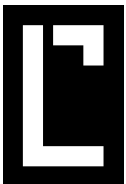
8.3 The crime statistics that I have produced for you to view later in this document do not support the claims the venue is responsible for crime, disorder and public nuisance.

8.4 The offence of murder is of course extremely serious.. The owners and operators of these businesses do not want to be associated with such crimes, and in no way were they responsible for the actions of the suspect or the victim in this matter. The venue was not complicit in the crime and disorder of the fatal stabbing. They were operating their business as they had done so for years without issue. Three thousand customers a week on average use the venue, never causing incidents of this nature. Two parties had an altercation within the venue, one party was ejected and escorted from the premises. They were asked to leave the area; they refused to do so. Why, because they were looking and waiting to confront the other party. One party (2 people) was asked to remain inside. They did so for about an hour but it can now be surmised were planning on inciting trouble, hence the other group of males in a vehicle arrived at the venue. Then all the disorder and stabbing took place outside of the venue within a very short time frame. Staff members were actively involved in trying to calm the situation.

8.5 That said, there are areas that need to be addressed, and conditions added to the licence to bring the operation up to a standard that is completely fit for purpose and similar to other like premises in the capital.

8.6 Had the Police completed any form of licensing visit as I would expect on a regular basis to a venue of this nature they would have been aware of the standards set at the venue and perhaps delivered a more balanced view. Sadly, this was not the case with their assumptions.





9. Local Authority Representations

9.1 The local authority has also made representations of a similar nature. However, they have offered 13 conditions for consideration. This is a matter for the legal representative and the owners to consider.



10. CRIME STATISTICS – KINGSBURY POLICE AREA

10.1 I have taken the opportunity to research the crime statistics and crime hotspots for the Metropolitan Police, Kingsbury Police area. These premises are located to the southern edge of the Police area map as shown.

10.2 These statistics are taken from the Police UK database which collates information from the countries crime reporting systems. I have to presume these are accurate as they have been taken from a recognised platform.

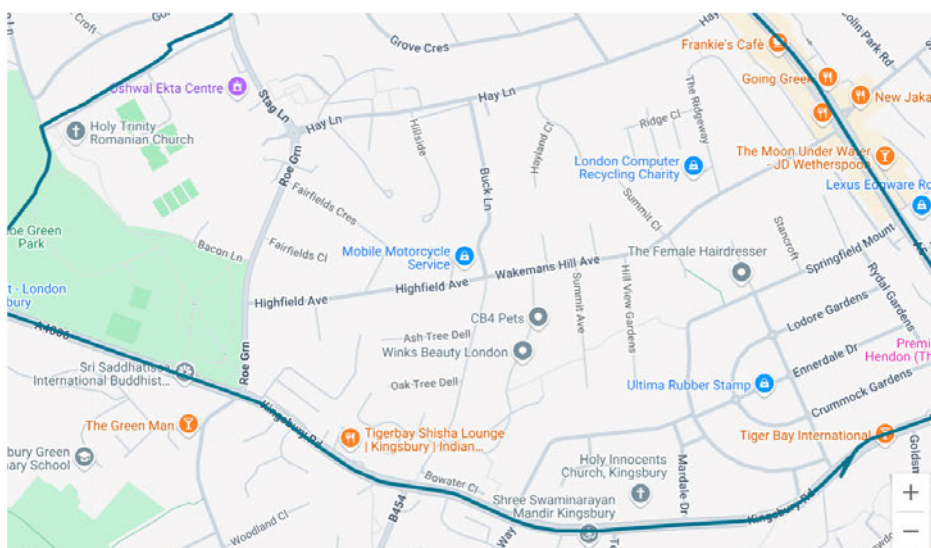
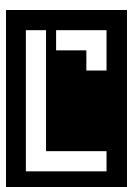


Image 26 – Boundary Map of MPS Kingsbury Police area.

10.3 The crime statistics are presented by type and volume and give an accurate insight to the activities in the Kingsbury Police area. The crime Hot Spot maps drill down to a particular area within the Kingsbury area. This gives an accurate picture of the amount and types of crimes being committed.



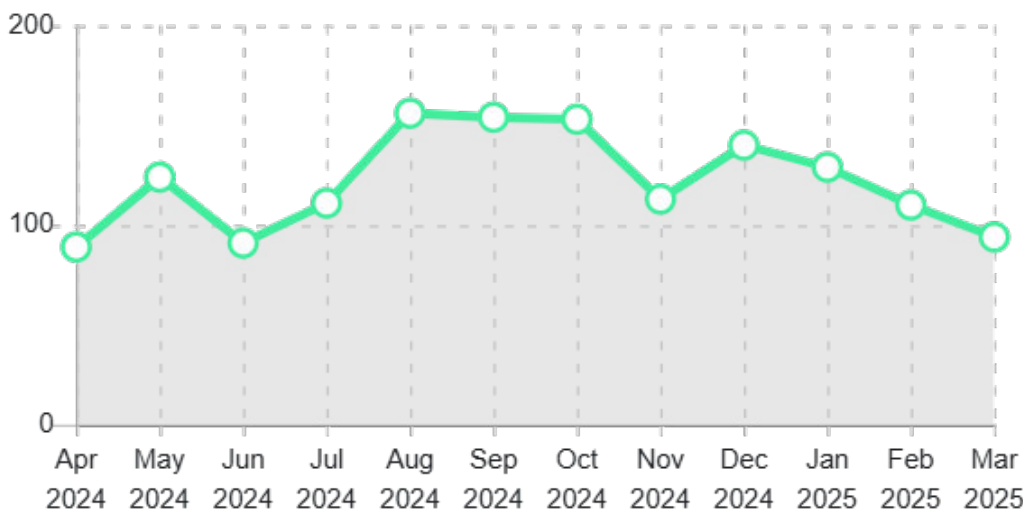


Image 27 - Crimes number Kingsbury Police area - Rolling 12 months

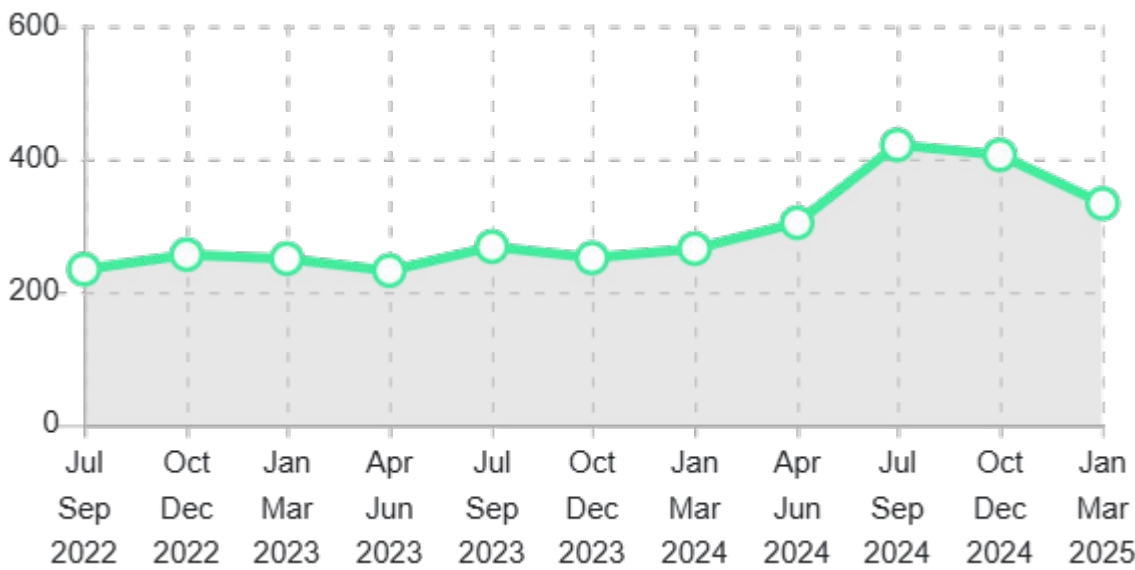


Image 28 - Crimes number Kingsbury Police area - Rolling 3 years



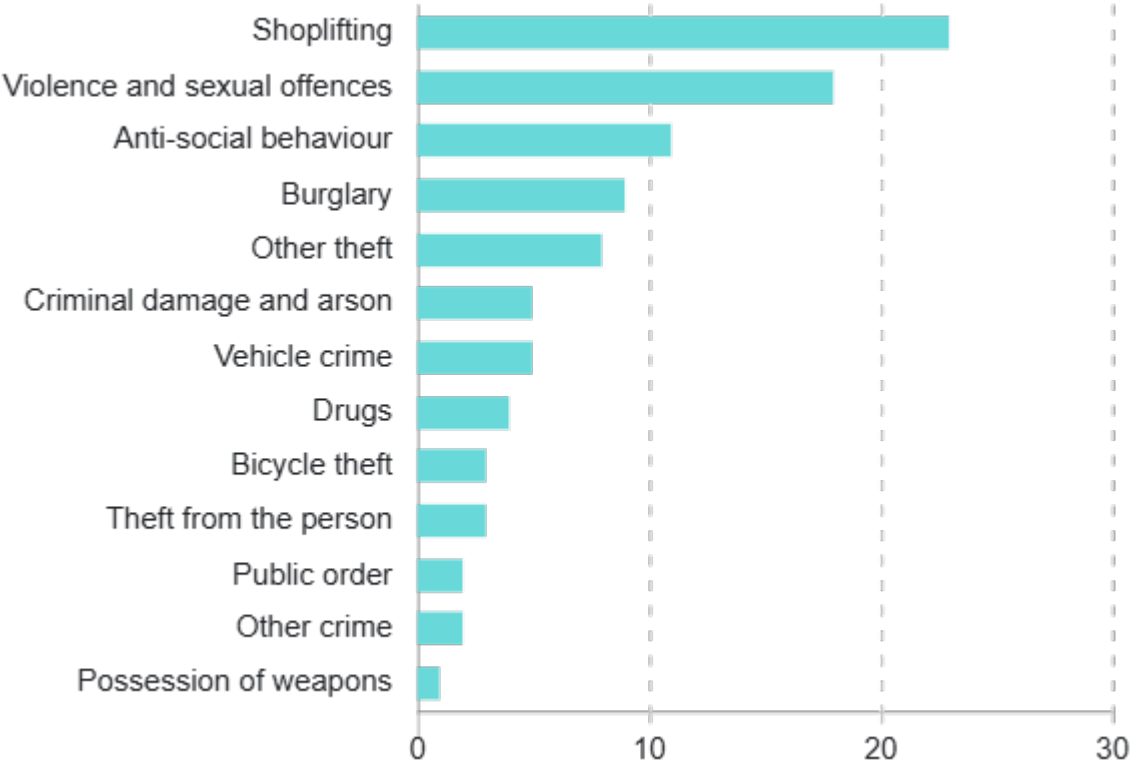


Image 29 - Crimes by type last recorded month – March 2025



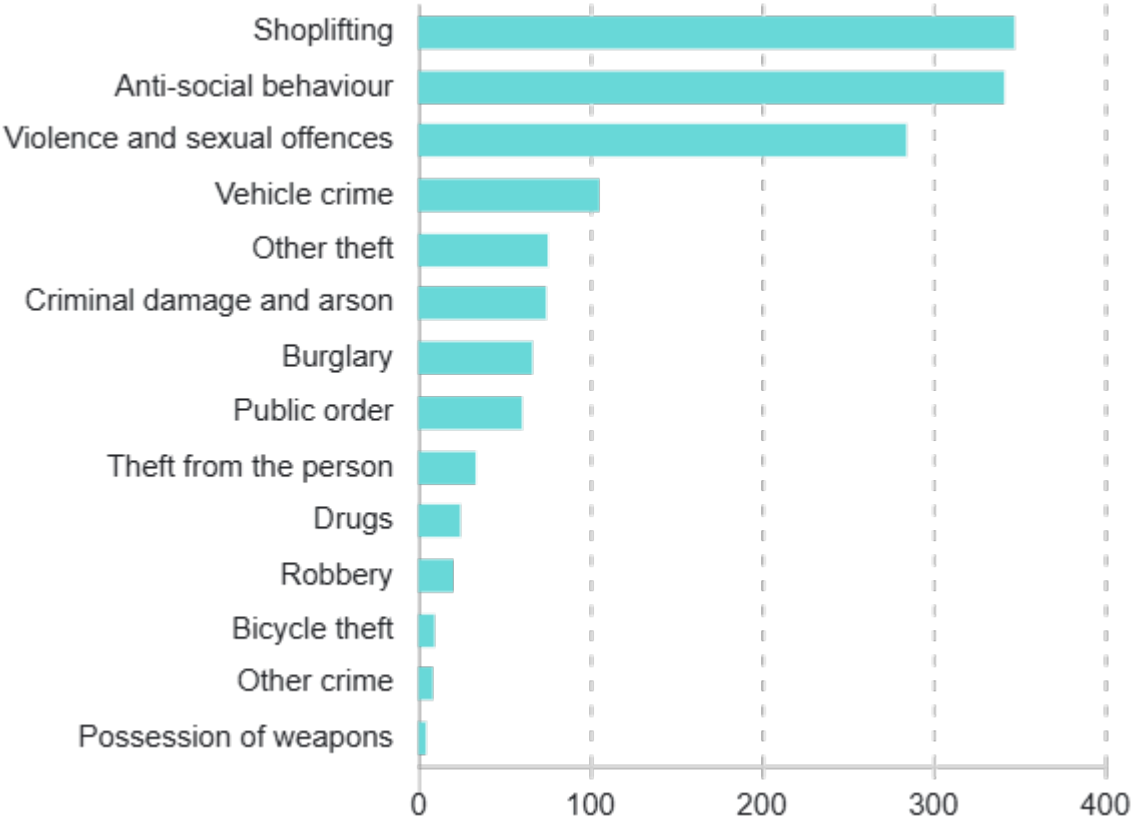


Image 30 - Crimes by type rolling 12 months to March 2025



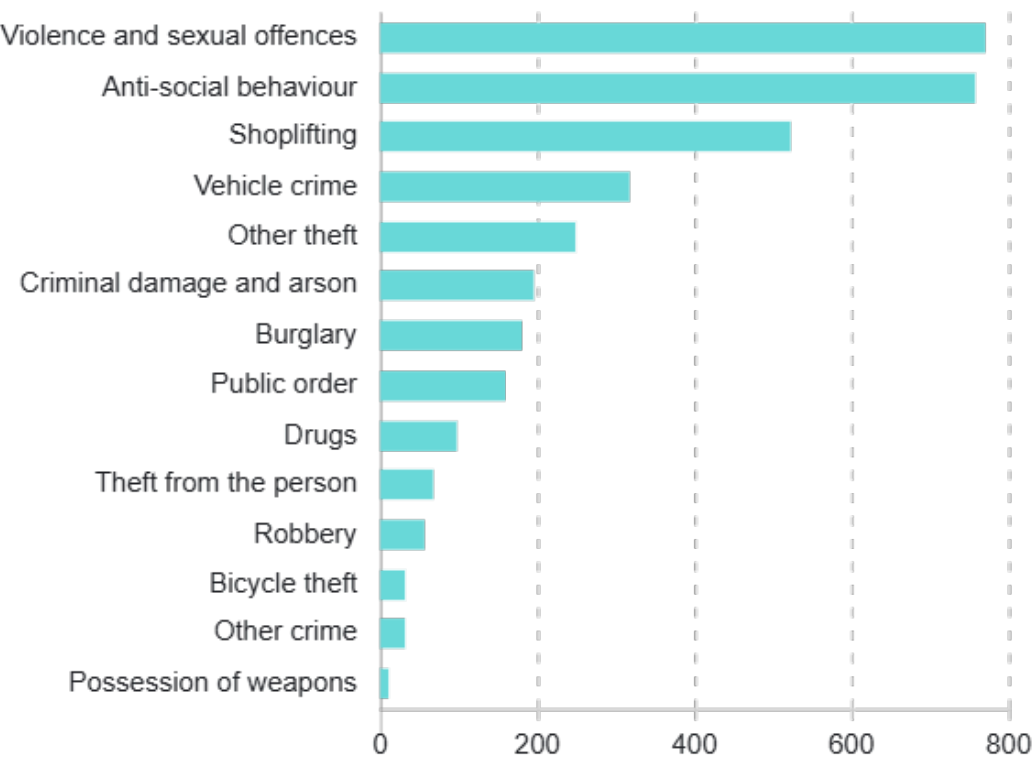


Image 31 – Crimes by type rolling 3 years to March 2025

10.41 have researched the crime hotspot areas for the past six months. As shown on the below map for the entirety of the Kingsbury Police area most crimes are committed in the North and East of the boundary. The numbers are always consistently lower to the south and the area of the Carlton and Tiger Bay venues.



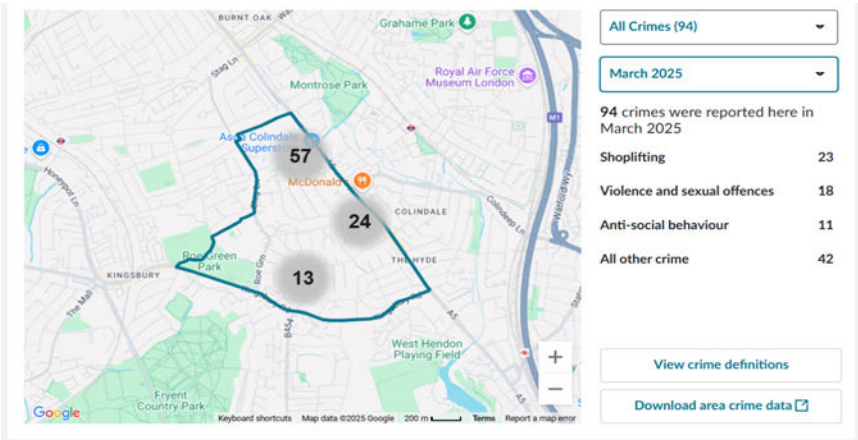


Image 32 – Crime Hotspot Map – Kingsbury Police Area – March 2025

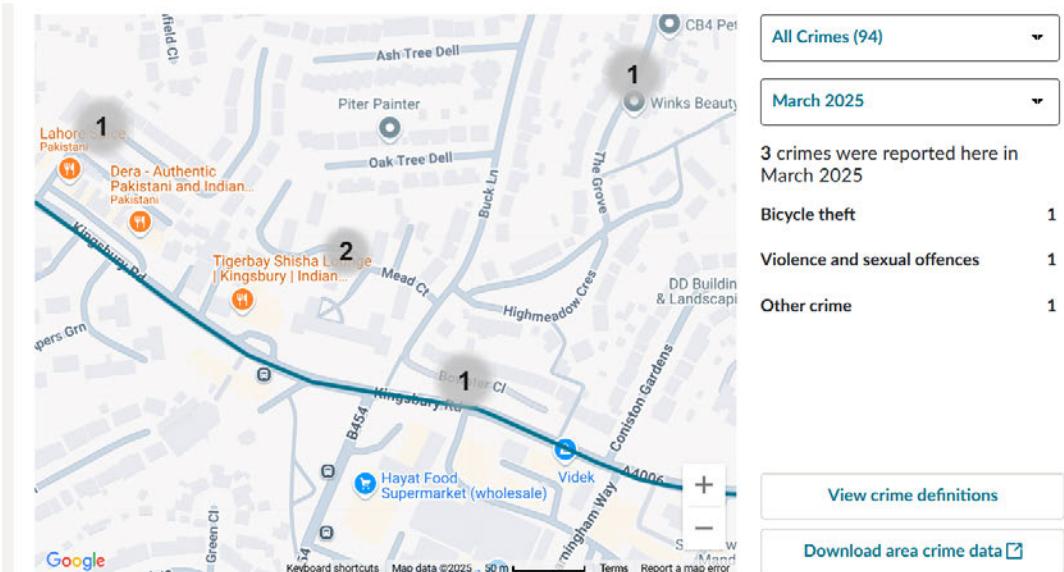


Image 33 – Crime Hotspot Map and crimes Kingsbury Road area – March 2025



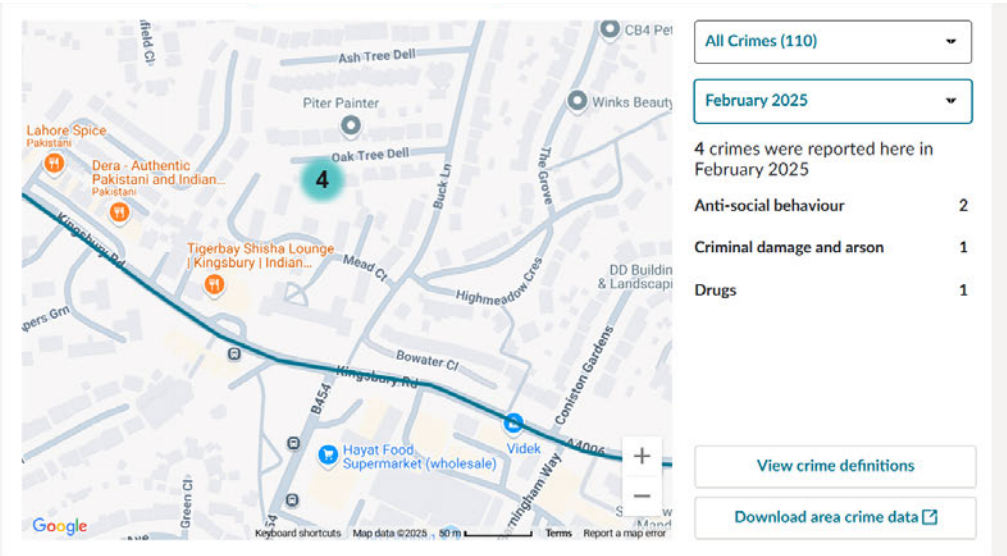


Image 34 - Crime Hotspot Map and Crimes Kingsbury Road area – February 2025

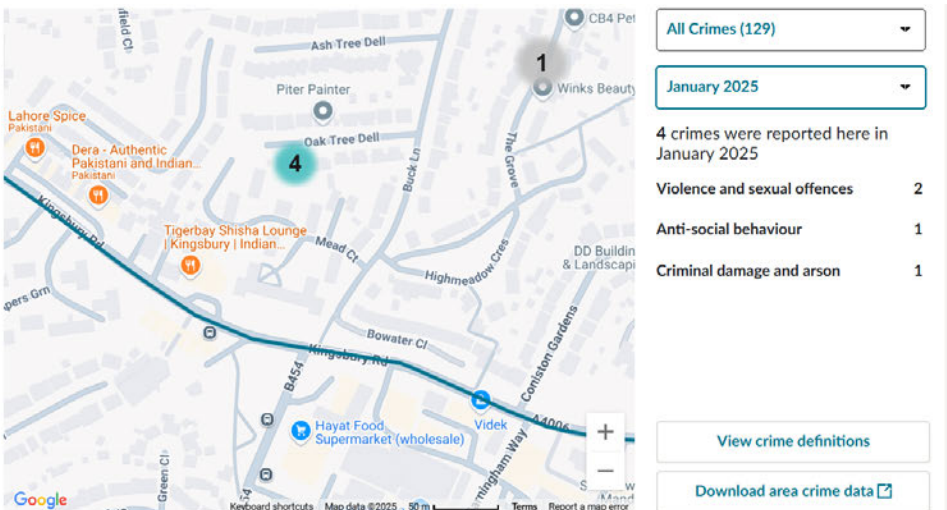


Image 35 - Crime Hotspot Map Kingsbury Road area – January 2025



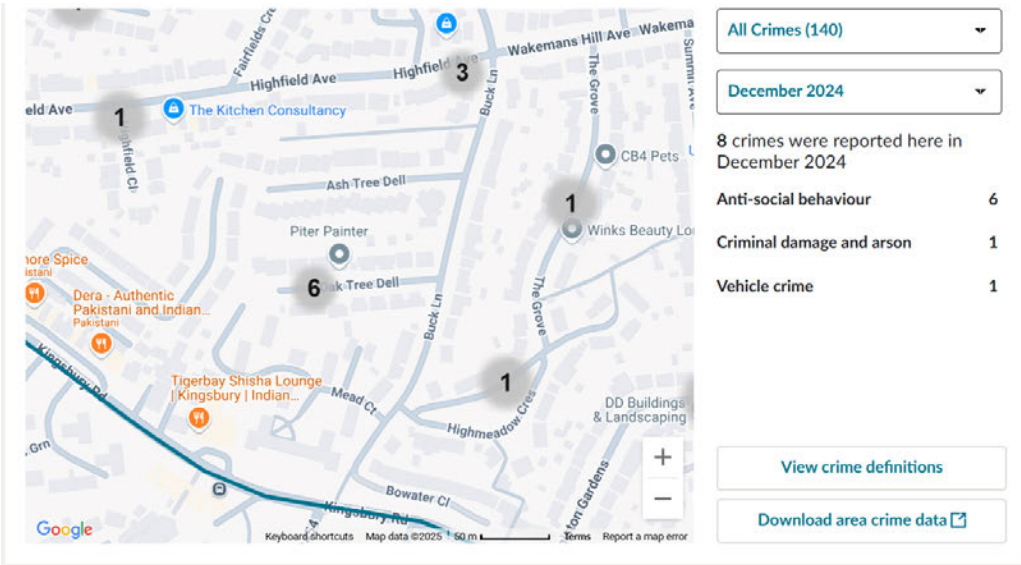


Image 36 – Crime Hotspot Map Kingsbury Road area – December 2024

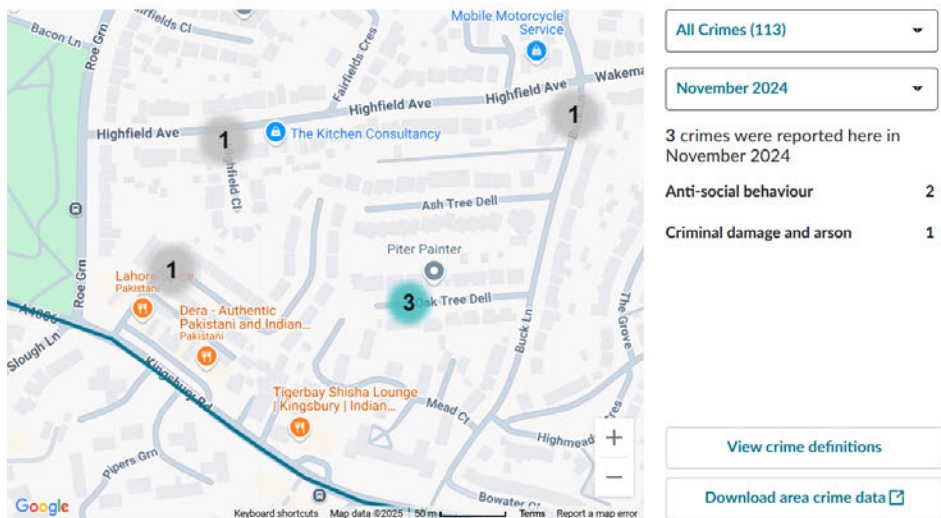


Image 37 – Crime Hotspot Map Kingsbury Road area – November 2024



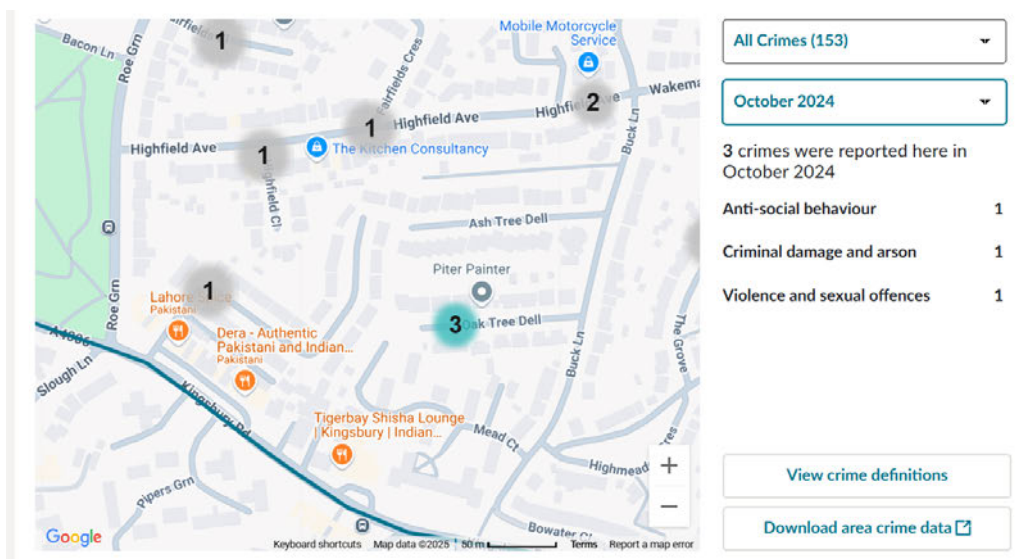


Image 38 – Crime Hotspot Map Kingsbury Road area – October 2024

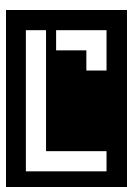
10.5 So, what can we conclude about the above data? Firstly, the reported crime types are on average lower than I would normally expect to find in a borough, and the Police are of this size and nature. There is a clear reduction in crime since last summer, which is significant. Unusually, the highest reported crime is shoplifting. I think the current ward priorities give an insight into the reasons behind this and as to why the second-ranked crime is violence and sexual offences. The current ward policing priorities are:

- **Street drinking.**
- **Violent offences fuelled by alcohol being committed in residential area causing distress to residents.**
- **Drug offences.**
- **Incidents of begging by the homeless community.**

10.6 All this evidence clearly points to where the anti-social behaviour offences are being committed and fuelled by alcohol. The area clearly has a rough sleeping issue which is likely to increase shoplifting offences, drug use, street drinking all leading to anti-social behaviours.

10.7 You will note from all the six months of crime hotspot maps included in this report no offences have been committed in and around the area of the Carlton Lounge and Tiger Bay venues.

10.8 As a result of this clear and verified information and data statistics none of the representations submitted by residents or the Police carry any weight. The two venues are not crime generators and are clearly not causing any issues to the local community. Had they done so there would have been

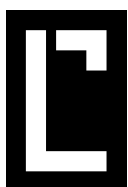


clear evidence submitted by the Police. They do not have such evidence as both the Police and Local Authority would have objected to the variations in August and October 2024.



11. CONCLUSION

- 11.1 The first comment to make is that no persons involved in this matter wanted to see the death of a 26-year-old man or another young man remanded in custody awaiting trial for murder. The knife crime culture on the streets of London is a huge ongoing issue. It appears from this incident that perhaps cultural differences had a part to play.
- 11.2 In any case I believe any venue in the capital could have been subject to the behaviour of the parties involved in the incident. The owners and operators of Carlton Lounge and Tiger Bay are in no way responsible for the behaviour of the aggressive parties involved. They do not wish to be associated with such behaviour and in no way were they responsible for inciting such levels of violence.
- 11.3 I found them to be under enormous stress, aware that a decision could be made that would revoke their premises license. That would be the end of a business that serves the local communities and is extremely popular with customers from further afield. Many long-serving members would lose the jobs and income due to an incident they had no control over. In total 17 years of hard work and conscientious development and delivery would be wasted.
- 11.4 Does this business promote the licensing objectives? In my opinion it has done so for an extended period. The world is a different place now from 17 years ago, and some amendments and adjustments to conditions, policies and procedures are already in motion.
- 11.5 Responsible authorities have stated they have lost confidence in the owners and management of the premises, and they no longer have confidence in them to hold a premises license. This was not the case in the late summer and autumn of last year. I believe both the Police and Local Authority had an opportunity to ensure the correct conditions were applied to the licence, to include a search condition and ID Scanner what could have prevented this incident taking place. The Licensing Act clearly states that premises license holders and responsible authorities should be working in partnership to promote the licensing objectives.



12. RECOMMENDATIONS

- Search requirement and supporting policy to be conditioned on the license.
- After 22:00 ID Scanner to be conditioned on the license.
- Better crowd control outside the premises with queue system in place. (Barriers or roped)
- Four step entry process to be adopted and SIA suitably trained. Queue – Manual Search – Metal Detector (Wand) search – ID Scan to enter Tiger Bay premises.
- Entry to restaurant area to be managed so as to give discretion to SIA and management regarding families and regular identified customers who are eating only.
- Consider CCTV operator through evening and nighttime period, to monitor Tiger Bay areas.
- Consider house policy of seated service only in Tiger Bay Lounge and give no access to bar area and vertical drinking.
- Hold residents' event and listen to any issues raised.
- Suggest regular Police and Local Authority meetings (Monthly) to discuss and identify any issues that can be resolved at an early stage (Partnership).

11.1 Taking all into consideration, I can understand that the easy option for the Police is to seek revocation of the premises license. I have been in this position on many occasions and thankfully been able to give Licensing Sub-Committees the confidence not to take such drastic action. There is a great deal to consider in this case. Although usually instructed by licensees, I will not hesitate to tell them if they are not operating correctly and promoting the Licensing Objectives. That is not the case with the owners and management of Carlton Lounge and Tiger Bay. In my professional opinion, they are responsible premises licence holders and employers. There are areas for improvement which they are addressing and have already done so. They have a team of licensing consultants who will support them.

11.2 I commend this report to the Brent Licensing Sub- Committee for their consideration regarding the Summary Review hearing on Friday 13th June 2025.



EXPERT'S DECLARATION (CIVIL CASES)

I Richard Bunch declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
4. I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
5. I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
6. I have shown the sources of all information I have used.
7. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
8. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
9. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
10. I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
11. I understand that;
 - my report will form the evidence to be given under oath or affirmation;



- questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
 - the Court and/or Licensing Committee may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
 - the Court and/or Licensing Committee may direct that following a discussion between the experts that a statement should be prepared showing those issues which are agreed, and those issues which are not agreed, together with a summary of the reasons for disagreeing;
 - I may be required to attend Court and/or Licensing Committee to be cross-examined on my report by a cross-examiner assisted by an expert;
 - I am likely to be the subject of public adverse criticism by the judge if the Court and/or Licensing Committee concludes that I have not taken reasonable care in trying to meet the standards set out above.
12. I have read Part 35 of the Civil Procedure Rules, the accompanying practice direction and the Guidance for the instruction of experts in civil claims and I have complied with their requirements.
13. I am aware of the practice direction on pre-action conduct. I have acted in accordance with the Code of Practice for Experts.

STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge, I confirm, are true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

DISCLAIMER

This report was completed by Complete Licensing Limited based on a defined programme of work and terms and conditions agreed with the Client. The report has been prepared with all reasonable skill, care and diligence within the contract terms with the Client, considering the project objectives, the agreed scope of works, prevailing site conditions and the degree of manpower and resources allocated to the project. Complete Licensing Limited accepts no responsibility whatsoever, following the issue of the report, for any matters arising outside the agreed scope of the works. This report is issued confidently to the Client and Complete Licensing Limited, which has no responsibility whatsoever to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk. Unless specifically assigned or transferred within the terms of the agreement, Complete Licensing Limited retains all copyright and other intellectual property rights on and over the report and its contents.



D

DRAFT – Policies

**To be agreed with
officers**



**COMPLETE
LICENSING**
Page 62

Carlton Lounge – Gold-Standard Licensing & Operational Policy Suite

Version 3.1 / Issued 11 June 2025 / Review due 01 June 2026

1 GOVERNANCE & REVIEW FRAMEWORK

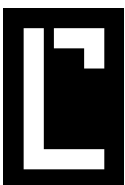
This policy is issued on behalf of the owners, management and staff of Carlton Lounge. Our commitment is clear: to uphold the four Licensing Objectives—preventing crime and disorder; securing public safety; preventing public nuisance; and protecting children from harm—to a Gold-Standard level, drawing on *Best Bar None* guidance, Brent’s leading-venue practice, national safety campaigns and our own operational experience.

Our Promise

By embedding robust procedures, continuous staff training and genuine partnership working, we give Licensing Committees and Responsible Authorities absolute confidence that these objectives are met—night after night.

Core Pillars

1. Working in Partnership – formal liaison with Police, Licensing Authority, Community Safety, Pubwatch, Safer Business forums and Licensing Connect (Licensing Act 2003 s.182 guidance).
2. Crime-Risk Matrix – identification and mitigation of potential offences (including online harms, exploitation and emerging local trends).
3. ##### 7 Drunkenness & Disorder Policy
4. Alcohol misuse threatens all four Licensing Objectives. Carlton Lounge therefore follows an intervention-led strategy—aligned with *Best Bar None*, the Responsible Retailing Code of Practice and the crowd-management guidance in The Purple Guide §5 & §21—to prevent excessive intoxication and stop disorder before it escalates.



7.1 Intervention Ladder

Stage	Staff Action	Tools & Controls
1 Prevention at the door	Refuse entry to anyone displaying drunkenness or aggression.	Breathalyser (0.08 %BAC threshold), BWV on, Refusal recorded in <i>Refusal Register</i> .
2 Monitoring inside	Continuous observation for early indicators: raised voices, rapid repeat orders, loss of balance, glassy eyes, harassment.	8-point Behaviour Checklist laminated behind each bar; floor staff radio suspicious behaviour.
3 Refusal to serve	No alcohol to anyone appearing drunk; no 'proxy' sales for the intoxicated.	POS prompts ("Server confirm not drunk?"), BWV during refusal, <i>Refusal Register</i> entry.
4 Positive intervention	Offer free water, food and seating; slow service pace; involve Night-Safety Champion.	Traffic-Light Drink-Stewarding: Green = OK, Amber = caution/soft drinks only, Red = refuse & remove.
5 De-escalation & ejection	Use non-confrontational language; escort out if behaviour worsens.	SIA "LEAPS" model, BWV recording, Ejection Leaflet with NightSafe phone & transport info.
6 Post-incident review	Duty Manager completes Incident Report incl. CCTV/BWV refs & staff statements.	Trends analysed at Monthly Compliance Meeting; refresher training programmed if >3 similar incidents/month.

7.2 Staff Training & Culture

- Six-monthly masterclass – recognising intoxication, refusal language, conflict management.
- Scenario role-plays in weekly briefings: spiking suspicion, proxy-purchase attempt, aggressive dispute.
- Breathalyser etiquette – how to request a voluntary test without inflaming the situation.
- Reinforcement that "being busy" or "security already checked" is *never* a reason to serve a drunk patron.

7.3 Environmental Engineering

- Smaller glassware for high-ABV cocktails after 22:00.



- Water stations at bar & dance-floor exit; free tap water always available.
- Clear pricing & unit labelling on menus to support informed choices.

7.4 Partnership Links & Reporting

- 5. Persistent offenders and significant incidents are:
 - 1. Logged on Licensing Connect (auto-shared with Police Licensing if flagged “violent”).
 - 2. Highlighted at the next Brent PubWatch meeting with exclusion-notice consideration.
 - 3. Included in quarterly data-returns to the Safer Brent Partnership violence-reduction dashboard.
- 6. *By combining vigilant observation, proactive refusals, supportive welfare measures and data-led reviews, Carlton Lounge minimises alcohol-related harm and maintains a safe, welcoming atmosphere for all guests.*

AUTHORITY & AUDIT CONTROLS

- Authority: The Board delegates day-to-day implementation of this suite to the Designated Premises Supervisor (DPS), supported by Complete Licensing consultants.
- Audit Programme:
 - Quarterly internal audit (Complete Licensing)
 - Annual Best Bar None pre-assessment self-audit
 - External audit by Police & Licensing Authority on request.
- Log Governance: All operational logs—Incident, Refusal, Search, Welfare, Ask for Angela, Crowd and Maintenance—are examined monthly; findings and actions are tracked on the *Compliance Action Register* with SMART deadlines.

Assurance & Oversight

Element	Requirement	Frequency / Owner
Policy ownership	Designated Premises Supervisor (DPS) – [redacted] SIA badge [redacted]	Continuous
Board oversight	Quarterly compliance dashboard covering incident statistics, training completion rates, audit outcomes and stakeholder feedback	Board Meeting – final month of each quarter



Element	Requirement	Frequency / Owner
Internal audit	40-point audit tool based on BBN criteria undertaken by Complete Licensing consultant	Monthly
External audit & accreditation	• Annual BBN assessment • Biennial SIA voluntary compliance inspection • Pub Watch peer-review visit	As scheduled
Policy review trigger	Legal change, police/EHO request, licensing review application or after any serious incident (RIDDOR, police, ambulance)	Within 14 days
Action tracking	All findings recorded in <i>Compliance Action Register</i> with SMART deadlines and assigned owners – colour-coded status	Reviewed weekly by DPS
Resident engagement	Publish annual community newsletter and hold “Meet the Manager” evening	November each year



2 CRIME & DISORDER POLICY

This policy is issued on behalf of the owners, management and staff of Carlton Lounge. Our commitment remains unwavering: to uphold the four Licensing Objectives—preventing crime and disorder; securing public safety; preventing public nuisance; and protecting children from harm—to a Gold-Standard level. We draw on *Best Bar None* guidance, Brent’s leading-venue best practice, national safety campaigns and our own operational experience.

Our Promise

By embedding robust procedures, continuous staff training and genuine partnership working, we give Licensing Committees and Responsible Authorities absolute confidence that these objectives are met—night after night.

Core Pillars (as per §1)

When applied together, these policies create a single, resilient framework that keeps guests, staff and the wider community safe while allowing Carlton Lounge to trade confidently and responsibly.

Entry, Search & Admission Controls

Figure 2.1 – Random-sample search route: ID check → search decision → wand/bag search → admit or police escalation if prohibited item found.

ADM = Admission Decision Matrix (risk-based search trigger).

Potential Crime & Disorder Offences & Related Issues

Risk Area	Typical Offences & Legislation	Key Controls in Place
Alcohol-related harm	Under-age sales / serving drunken persons (<i>Licensing Act 2003</i>)	Challenge 25, refusal register, DPS spot-checks
Public order	Threatening / abusive behaviour (<i>Public Order Act 1986 ss.4–5</i>)	SIA presence, dynamic queue management, BWV evidence



Risk Area	Typical Offences & Legislation	Key Controls in Place
Violence against the person	Assaults (<i>OAP Act 1861 ss.18-47; CJ Act 1988 s.39</i>)	CCTV coverage, security briefings, first-aid provision
Sexual offences & vulnerability	<i>Sexual Offences Act 2003</i>	"Ask for Angela", Night-Safety Champion, welfare area, spiking response
Theft & fraud	<i>Theft Act 1968</i> ; drink-spiking	Personal-property messaging, cloakroom tagging, CCTV
Drugs & weapons	<i>Misuse of Drugs Act 1971; Offensive Weapons Act 2019</i>	Random bag/wand searches, Drug Amnesty Bin, BWV
Criminal damage	<i>Criminal Damage Act 1971</i>	Patrols, exterior CCTV, incident logging
Child protection	<i>Children & Young Persons Act 1933</i>	Safeguarding training, Challenge 25, parental escort policy
Anti-social behaviour	<i>ASB Act 2014</i> ; littering regs	Dispersal plan, acoustic compliance, litter patrols
Bribery & corruption	<i>Bribery Act 2010</i>	Staff code of conduct, hospitality register
Harassment & stalking	<i>Protection from Harassment Act 1997</i>	Incident support, rapid police referral
Online harms	Digital-media offences	Social-media monitoring, liaison with police cyber-crime unit
Counter-terrorism	<i>Terrorism Acts 2000 & 2006</i>	ACT/SCaN staff, HOT/CCCC protocols, lock-down drills
Missing persons	NCA guidance	Info-sharing with police, safeguarding checklist
Drink-Spiking Response		



Overcrowding Safeguards

Vulnerability & Welfare Traffic-Light

Staff Training Matrix (excerpt)

A live, colour-coded matrix is maintained in the Flow LMS and reviewed monthly.



3 WORKING IN PARTNERSHIP

Keeping people safe is a team effort. At Carlton Lounge we know that the quickest way to resolve problems—and to stop them arising in the first place—is to work side-by-side with those who share that goal.

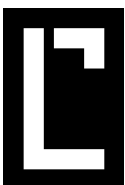
We therefore nurture open, professional relationships with Complete Licensing, our own staff, and every agency that helps safeguard the Kingsbury community. Information is shared early, briefings are two-way, and we treat every partner as a valued colleague.

How We Make Partnership Real

- Proactive links with Brent Police Licensing, Community Safety Unit and BCRP (intel exchanges & joint walk-throughs).
- DPS is single point of contact for Responsible Authorities.
- Licensing Connect registration for real-time incident reporting & council alerts.
- Active membership of PubWatch, Safer Business forums & borough NTE meetings.

Stakeholder Network

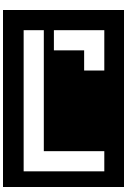
Brent Police & Community Teams • Brent Licensing & Environmental Health • Brent Community Safety • LAS • LFB • Business Associations & Safer Brent • Residents' Associations • PubWatch/ClubWatch • Public & private transport operators • Brent BIDs.



4 SECURITY STRATEGY

Element	What Happens	Why It Matters
Daily Intelligence Cycle	17:00 review: incident logs, PubWatch, Licensing Connect alerts, police intel → pre-shift brief.	Staff start with up-to-date risk picture.
Staffing & Deployment	Minimum 2 SIA; thereafter 1 SIA / 100 patrons. DPS may flex-up at 22:30 Fri/Sat.	Ensures coverage and reduces complacency.
Search & Screening	Random bag & wand checks; Drug Amnesty Bin at entrance.	Deters weapons and drugs.
Body-Worn Video	All SIA wear BWV; 31-day retention; training register kept.	Transparent, admissible evidence.
CCTV Integrity	24/7 HD network agreed with police; downloads on site; sealed USBs.	Supports investigations & monitoring.
Comms & Coordination	Encrypted radios + Brent NightSafe channel.	Rapid shared awareness.
Customer Welfare	Night-Safety Champion arranges taxis, lost-property support.	Protects vulnerable patrons.
Counter-Terror & Major Incidents	ACT/SCaN staff; HOT/CCCC sweeps; quarterly lock-down drills.	Preparedness for high-impact threats.
Professional Standards	SIA badges visible; friendly service culture; quarterly Complete Licensing audits.	Maintains public confidence.
Evidential Support	USB/DVD stock checked weekly; CCTV/BWV stored 31 days (GDPR compliant).	Evidence always available.
Search & Ejection Docs	Search Log for every check; ejection leaflets with NightSafe details.	Consistent record & guest info.

Alignment with recognised best practice: Our entry & search regime follows the security lane methodology set out in The Purple Guide – Chapter 21 (Event Security) and operational learnings shared by large-scale London venues



5 CUSTOMER WELFARE POLICY

Stage	What Staff Do	Why It Matters
Early-shift briefing	Appoint Night-Safety Champion (NSC); check welfare toolkit & recap Ask-for-Angela.	Named lead & resources ready.
Active monitoring	Observe for harassment, isolation, spiking indicators; BWV records interventions.	Early, evidence-based support.
Immediate care	All staff hold EFAW; treat minor injuries on site.	Frees ambulance & reassures guests.
Safe exit & onward journey	Escort vulnerable guests to minicabs or friends; provide Night-route info.	Reduces street vulnerability.
Incident logging	Welfare Log: nature, staff, BWV ref, refusal of help.	Due diligence & learning.
Follow-up contact	NSC contacts guest within 24 h if spiking suspected.	Closes safeguarding loop.
Key Safeguards		
Ask-for-Angela posters • Free water • Drug-illness recognition • Zero-tolerance to harassment & hate crime.		



6 CHALLENGE 25 POLICY



Serving alcohol responsibly is **non-negotiable** at Carlton Lounge. We therefore enforce the nationally recognised **Challenge 25** standard—an approach that protects children from harm and helps prevent crime and disorder.

Step	Action	Detailed Controls
1 Universal check	Visual age-assessment for every customer buying or being supplied alcohol.	Staff challenge anyone who could reasonably appear under 25 years old. Accepted proofs: • Passport • Photographic Driving Licence • PASS-accredited card (CitizenCard, Yoti, Validate UK). <i>Screenshots or photocopies not accepted.</i>
2 Request ID	Politely request proof of age.	Any doubt or refusal is logged in the Refusal Register (Licensing Connect or bound book). Register reviewed weekly by DPS; analytics feed staff coaching.
3 Validate & record	Examine ID for photo match, expiry and tampering.	
4 Serve or refuse	If ID valid ➡ serve. If invalid or absent ➡ politely refuse and offer soft drinks.	Door/bar staff may activate BWV during contentious refusals to evidence professionalism.
5 Monitoring at entry	High-risk sessions use ID-scanner (ClubScan) at the door.	Bar staff must still re-check at point-of-sale to prevent complacency or proxy sales.

Staff Responsibilities & Training

- **Mandatory e-learning** on age-verification for all FOH, bar and security staff *before first shift*.
- **Refresher workshops every six months** using scenario role-plays and fake-ID examples.



- **Mystery-shop spot checks** quarterly; results shared at team briefings.
- “No ID, No Sale” and Challenge 25 signage displayed at bar, menus, entrance and within staff areas.

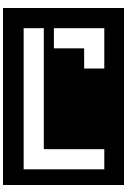
Management Oversight

- **DPS weekly audit** of Refusal Register, ID-scanner analytics and BWV clips; trends reported to monthly compliance meeting.
- Persistent under-age attempts, fake-ID hotspots or proxy-purchase intelligence are shared with Brent Police Licensing via **Licensing Connect**.
- **Annual policy review** or earlier if legislation changes (e.g. PASS digital ID pilot updates).

Record Retention

Refusal & Age-Challenge records retained **18 months** (digital or bound) in line with BBN good practice.

Consistency is key: No excuses about being busy, unsure, or “security already scanned them” override the **Challenge 25** requirement. By applying this system **every time**, Carlton Lounge fulfils its licence conditions, safeguards young people and upholds the highest standards of responsible alcohol retailing.



7 DRUNKENNESS & DISORDER POLICY

Carlton Lounge applies a **zero-tolerance** approach to drunkenness and associated disorder. All staff share a duty to identify, manage and record intoxication-related risks using the evidence-based steps outlined below.

7.2 Pre-Entry Risk Controls

Control	Detail	Evidence
Door-team visual assessment	100 % guest screening at arrival; refusals logged.	Refusal Register (Licensing Connect).
Voluntary breathalyser	AlcoDigital A90; >0.08 %BAC triggers refusal.	Reading auto-uploads via BLE to Refusal Register.
Behaviour cue cards	SIA carry laminated cards listing Common Law criteria for refusal/ejection.	Card version in Security Office.
Entry queue signage	“You may be asked for a breath test” & “No entry if already drunk”.	Photo evidence retained for audit.

7.3 Early-Warning Intoxication Matrix *(Floor & Bar Staff)*

Indicator Level	Observable Behaviours	Immediate Action
Green – Social	Normal conversation, coordinated movement, ordered pace.	Continue service; remind to hydrate.
Amber – Elevated	Raised voice, stumbling, rapid repeat orders, ignoring staff.	Offer water/food; slow service; alert floor supervisor.
Red – Intoxicated	Slurred speech, aggression, loss of balance, harassment.	Refuse service, begin supportive intervention, consider ejection.
Black – Disorderly	Fighting, threats, property damage.	SIA de-escalation → eject → 999 if violence.



7.4 Intervention Ladder *(enhanced)*

Stage	Staff Action	Tools & Controls
1 Prevention at the door	Refuse entry to anyone drunk/aggressive.	BWV on; Refusal logged; breathalyser reading recorded.
2 Monitoring inside	Observe using 8-point checklist every 10 min.	Checklist posted at POS & radios.
3 Refusal to serve	No sale to drunk; no proxy sales.	POS refusal button; auto-prompt to open Refusal Log form.
4 Positive intervention	Water, non-alc drinks, seat guest; Night-Safety Champion engaged.	"Traffic-light" lanyard prompts; welfare toolkit.
5 De-escalation & ejection	LEAPS verbal tactic → escort out; give Ejection Leaflet.	BWV footage; ejection signed by SIA + DM.
6 External hand-over	If violent, call 999; share BWV.	Statement template auto-loads in Licensing Connect.
7 Post-incident review	DM files Incident Report, tags CCTV, schedules training if trend.	Monthly KPI: <2 alcohol-related ejections per 1000 guests.



YOU HAVE BEEN LAWFULLY EJECTED



We are legally entitled to use **reasonable** force

Your behavior inside the licensed premises was unacceptable.

Your removal was necessary to prevent injuries to others and to prevent unlawful conduct by you.

Your removal from the premises may be captured on CCTV and Body Worn Video Cameras. An incident report has been completed.

This report, CCTV & Body Worn Video may be provided to Police and other responsible authorities.

The above powers also applies to persons who are refused entry but then fail to leave and put other persons at risk by their conduct.

The management reserves the right to use discretion to refuse entry to any person.

If the individual(s) refuse to leave and are drunk or disorderly, then they are committing an offence of failing to leave licensed premises – the police have a duty under the Licensing Act to assist in ejecting the individual(s). There may be other offences that individuals commit by refusing to leave, including causing a Breach of the Peace and can be arrested for these offences. In fact if you remain in a licensed premises after you have been asked to leave you commit an offence under The Licensing Act 2003 s.143(4).

Use of Force - Section 3 Criminal Law Act 1967

A person may use such force as is reasonable in the circumstances in the prevention of crime or in the effecting or assisting in the lawful arrest of offenders or suspected offenders or persons unlawfully at large.

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Use of Force - Common Law

If you have an honest held belief that you or another are in imminent danger, then you may use such force as is reasonable and necessary to avert that danger.

We hope that once you have read the above explanation about Door Supervisors ability to use force during an ejection you will decide that the Door Supervisor has acted lawfully. However if you do not then we have a good tried and tested complaints procedure that we would invite you follow.

Complaints Procedure

We treat every complaint extremely seriously and will investigate fully. Any manager or door supervisor can take details of your complaint and you should receive an email within 24 hours.

Our Complaints are handled and investigated by an external company Complete Licesing. You can report any concerns directly to them on their webistie: <https://completelicensing.uk/client-forms/complaints/>

Our Door Supervisors use Body Warn Video cameras that record not only images but audio as well. In all investigations we will view the footage from the Door Supervisor in question. Our venue is also fitted with an extensive CCTV system that we will always access the images recorded in order to aid investigation into any complaint.

After viewing the Body Warn Video, CCTV, and looked over the incident reports, we will then interview the Door Supervisor involved. This interview is recorded and can be used in any further disciplinary procedure.

What will happen after my complaint?

We have a range of outcomes following a complaint they include but aren't limited to: Management words of advice, extra training, written warning, removal from site, removal from the security company employment and should we believe that the Door Supervisor acted unlawfully we will also hand our investigation over to the Police.

Escalation

If you are not satisfied with our handling of your complaint or you are unhappy with the outcome we have a number of ways that you can escalate the matter please contact Complete Licesning following the outcome of the initial investigation.

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7.5 Recording & Analytics



- **Refusal & Ejection logs** auto-time-stamped; DPS weekly review.
- **Heat-mapping** of refusals by hour/day exported from Licensing Connect dashboard; informs staffing & promotions.
- **Key Performance Indicators** – $\leq 5\%$ drink refusals escalating to ejection; ≤ 2 ambulance call-outs per quarter.

7.6 Training & Competence

- **Six-monthly masterclass:** intoxication cues, breathalyser use, conflict resolution.
- **Scenario drills** during Sunday briefings: spiking suspicion, proxy purchase, group disorder.
- **E-learning refresher** (Responsible Retailing Alliance) annually; 100 % completion tracked.

7.7 Partnership & Enforcement Links

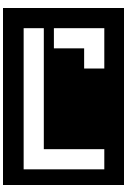
Persistent or violent offenders are:

1. Entered onto **Brent BCRP Exclusion Scheme** within 24 h.
 2. Flagged to Police Licensing via Licensing Connect (auto-notification).
 3. Discussed at monthly PubWatch for wider NTE ban consideration.
-



8.3 Lost / Found Process (*Guest Journey*)

Step	Staff Action	Recording & Comms
1 Prevention messaging	Door remind guests re valuables; FOH highlight staffed cloakroom.	Signage audit monthly.
2 Secure storage	Cloakroom open from 18:00; bags sealed in numbered totes for high-value events. close.	Auto e-mail inventory to DM at
3 Patrol & recovery	Unattended items collected, sealed in numbered tamper-bag; BWV clip bookmarked.	Entry in Found-Property Register (Licensing Connect template).
4 Proof & return	Ticket, photo ID or accurate description required; guest signs digital pad.	Digital receipt auto-e-mailed to guest.
5 Lost-item report	Guest completes web-form via QR code or phones venue.	Form syncs to <i>Lost-Item Pending</i> queue; DM auto-alert.
6 Investigation	DM reviews CCTV/BWV within 24 h; decides <i>Loss</i> v <i>Theft</i> ; contacts police if theft.	Decision and police CAD no. added to record.
7 Retention / disposal	Unclaimed items ≥ 28 days → charity (clothing) or police (valuables).	Disposal signed off by GM; audit trail kept 3 yrs.
8 Customer feedback	"How was our lost-property help?" e-mail with 1-click rating.	KPI ≥ 90 % "Helpful".





8.4 Guest Communications

- **Lost-Property Leaflet** – trifold hand-out & PDF: explains claim steps, ID required, retention times, contact details (020 8205 3115 / lostproperty@carltonlounge.co.uk). Stocked at cloakroom & handed to anyone reporting a loss.
- **Ejection Leaflet** cross-referenced: section on reclaiming items left behind when refused entry.
- QR code to online claim form printed on cloakroom ticket backs.

8.5 Recording & Analytics

- **Found-Property Register** auto-populated from numbered tamper-bag barcode scan.
- **Lost-Item Pending Queue** dashboard shows ageing reports; DM must clear within 48 h.
- Monthly KPI report: • ≤ 2 thefts / 1000 guests • ≥ 95 % items reunited within 72 h.

8.6 Staff Training & Testing

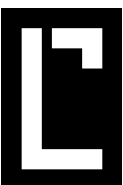


- Quarterly pick-pocket & cloakroom drill (Complete Licensing scenario pack).
- Annual GDPR & data-handling refresher – emphasises redaction of ID copies after return.
- Mystery-shop audits twice-yearly; scores fed into bonus scheme.

8.7 Partnerships & Intelligence

Alerts of organised bag-theft groups circulated via **Brent BCRP** intel e-mails; CCTV stills shared under GDPR Schedule 2 (crime exemption). Trends discussed at PubWatch.

By coupling clear guest messaging, secure storage, tech-enabled logging and responsive customer care, Carlton Lounge sets a benchmark for property protection—and demonstrates to Police & Licensing Officers that theft risk is actively controlled.





Hi there. We hope you've had a great time, but if you've lost an item, please email xxx@xxx.xx.xx

Don't despair

If you can't find it on the night don't despair, very often our cleaners find property in the morning! Its amazing what you can see with the lights up!

Contact us

Unfortunately, we can only take information for lost property in writing. If you phone the club we wont be able to help – so please don't.

When emailing us please put as much information as possible in the email so we can search our records thoroughly, **the more information the better!**

Return Service

If you have lost property in our venue, if it has been handed into our Lost & Found office you can either come down to collect it from us or we can arrange for your belongings to be sent to you by courier. This service is chargeable; however, we only charge you what it costs us. We don't make a profit out of your misfortune; we think that would wrong!

I WANT IT NOW!

Sometimes it's not possible for us to help straight away. We know this can be frustrating, but please try to stay calm. Rest assured that we will try to

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do everything possible to reunite you with your property. Leave your details in the lost property register and if we find it, we'll contact you. You can always double check by sending us an email.

What happens when we find something?

If a member of staff finds something in the club, they take it to the cloakroom. The cloakroom staff then logs the items in our Found Property register. At the end of the night the Manager then collects all these reports and double-checks the found property. The cloakroom staff also maintains a Lost Property log; they cross-reference the Found Property register and Lost Property log every time they make an entry in either.

Who looks though my property?

Our cloakroom staff search every item that is handed in. This is to see if there is any information that might help us reunite the property and the owner. No matter what you've left, don't worry they've seen it all before!

What happens if we don't find your property?

We're sorry-we can't find everything. We really will try our hardest to reunite you with your property, however sometimes it's just not possible. A legal note: We don't take responsibility or accept liability for property brought into the club or left in the club.

How long do we keep found property?

Found property will be held on the premises for a period of **28 days**, after which it will be disposed of; we donate it to a local charity if they don't want it we put it in the bin – sorry! With the exception of food and other perishable items- which we bin straight away.

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9 DRUGS & UNLAWFUL - SUBSTANCES POLICY

Objective: Eliminate illegal drug activity on the premises, protect guests from substance-related harm and demonstrate exemplary compliance with the *Misuse of Drugs Act 1971*, *Psychoactive Substances Act 2016* and *SIA “Safer Venues” Search Guidance 2023*.

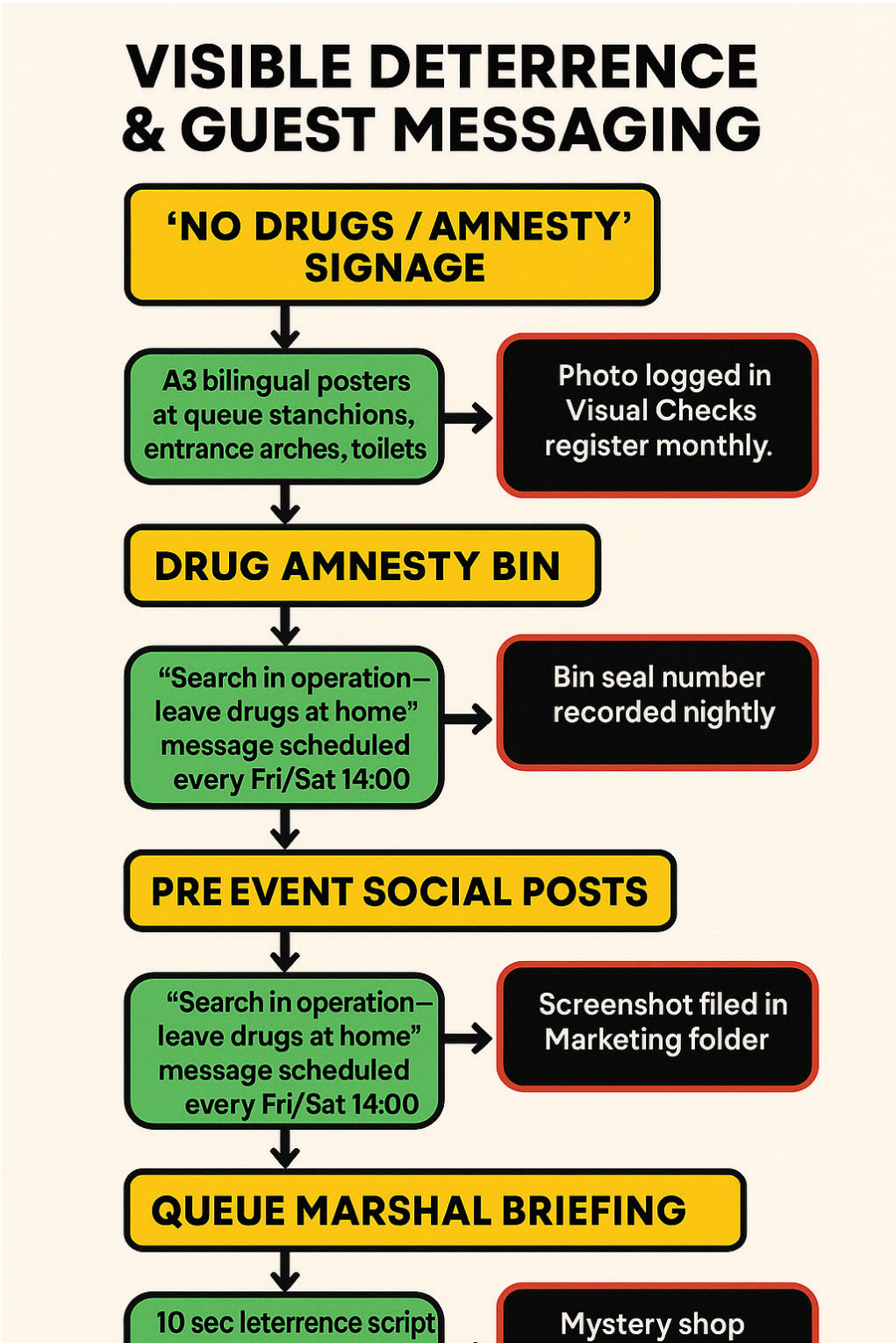
9.1 Policy Statement

Carlton Lounge enforces a strict **zero-tolerance** stance towards controlled drugs, New Psychoactive Substances (NPS), nitrous-oxide canisters and drug paraphernalia. All searches are **lawful, respectful, gender-appropriate and intelligence-led**. Guests found—or suspected—to be in possession face immediate refusal/ejection and a **lifetime venue ban**.

9.2 Visible Deterrence & Guest Messaging

Measure	Detail	Evidence
“No Drugs / Amnesty” signage	A3 bilingual posters at queue stanchions, entrance arches, toilets.	Photo logged in Visual-Checks register monthly.
Drug Amnesty Bin	MET-approved metal bin, secured & CCTV-covered next to search podium.	Bin seal number recorded nightly.
Pre-event social posts	“Search in operation—leave drugs at home” message scheduled every Fri/Sat 14:00.	Screenshot filed in Marketing folder.
Queue marshal briefing	10-sec deterrence script delivered every 15 min during peak.	Mystery-shop scorecard.





9.3 Eight-Stage Search & Intervention Procedure

Stage	Staff Action	Key Controls & Evidence
1 Deterrence at entry	Display signage; offer voluntary bin surrender.	CCTV bookmark; seal no. logged.
2 Search & Screening	Randomised “1 in 5” algorithm OR full search on intel nights; wand & bag; same-gender pat-down; BWV optional.	Search Log (Licensing Connect) auto-timestamps, notes gender & outcome.
3 Seizure & Evidence Bagging	Suspect substance placed in numbered tamper-proof bag; gloves worn.	Entry in Drugs Register ; chain-of-custody form prints via portable label printer.
4 Immediate outcome	Refuse entry/eject; issue Ejection Leaflet (with drug-support helplines); PubWatch alert within 1 h.	BWV clip ID + Refusal/Ejection log.
5 Quantity assessment	< 5 wraps/pills = personal use; > 5 or multiple baggies = supply → 999.	DPS decision noted in log.
6 Safety & escalation	Compliant suspect held in CCTV-room; violent suspect: security disengage, maintain observation, call 999.	BWV running; “Dynamic Risk” tick-box in log.
7 Police hand-over	Exhibit & log printed; officer signs Drugs Register; copy auto-e-mailed to MET Intel Box.	Record retained 3 yrs.
8 Staff training & welfare	Recognition, search, overdose signs, Naloxone usage—induction + 6-monthly refresher.	Training Matrix entry.

Welfare Emergencies – Staff activate **Spiking/Overdose Protocol**:

1. Move guest to welfare room; NSC performs primary survey.
2. Administer water, monitor vitals, use *Naloxone* if opioid suspected (SIA trained).
3. Call LAS; collect drink/containers for forensic testing.



4. Complete Welfare Log & Incident Report; offer to contact friend/family.

9.4 Spiking Prevention & Response

- **Drink-Test Kits** (Scottish Testing Strips) at all bars; results plus batch no. photographed and stored.
- UV cup covers provided on request; awareness posters in female & gender-neutral toilets.
- Any spiking allegation triggers **RIDDOR** assessment and “Ask for Angela” crossover (see §11).

9.5 Recording, KPIs & Continuous Improvement

- **Drugs Register** auto-plots seizure heat-map; DPS analyses monthly.
- **KPIs:** • <1 drug-seizure / 500 guests • 100 % chain-of-custody forms complete • ≤2 spiking allegations / year.
- **Quarterly CT & Drugs joint audit** with Brent Police Licensing & MET CT Protect team.
- Policy reviewed within **14 days** of any police intelligence, seizure-spike or legislative change.

9.6 Partnership Network

- MET Police Licensing Liaison Officer – monthly data share.
- **Brent BCRP Drug-Watch** alerts circulated to SIA via NightSafe radio.
- London Ambulance Service – direct line on welfare room phone.
- *We Are With You* charity leaflets (“You’re Not Alone”) stocked at exit.

By embedding visible deterrence, respectful searches, secure evidence handling and rapid police liaison, Carlton Lounge delivers a drugs strategy that not only meets but exceeds Home Office good-practice guidance—while supporting guest welfare and staff safety.



10 Premises Weapon, Acid & Corrosive
Substance Policy

- **Mission:** Keep all bladed articles, firearms (real or imitation), corrosive substances and other offensive weapons **out** of Carlton Lounge; safeguard guests and staff; support the Police in securing and prosecuting evidence; and comply with the *Offensive Weapons Act 2019*, *Prevention of Crime Act 1953* and MET Police **Operation Sceptre** best practice.

10.1 Policy Statement

- Carlton Lounge operates a **zero-tolerance** approach to weapons and corrosives. We rely on *visible deterrence, respectful searches, safe evidence handling and fast police liaison*—underpinned by rigorous training and transparent KPI review.

10.2 Legal & Guidance Framework

- **Offensive Weapons Act 2019** – Chapter 2 (sale/possession of corrosives) & Chapter 3 (bladed articles).
- **Prevention of Crime Act 1953** – offensive weapons in public.
- Criminal Justice Act 1988 §139 – possession of bladed articles on licenced premises.
- **NHS RRR Protocol** – *Report – Remove – Rinse* for acid/alkali attacks.
- **MET Operation Sceptre Toolkit 2025** – search lane design, evidence tubes, signage.

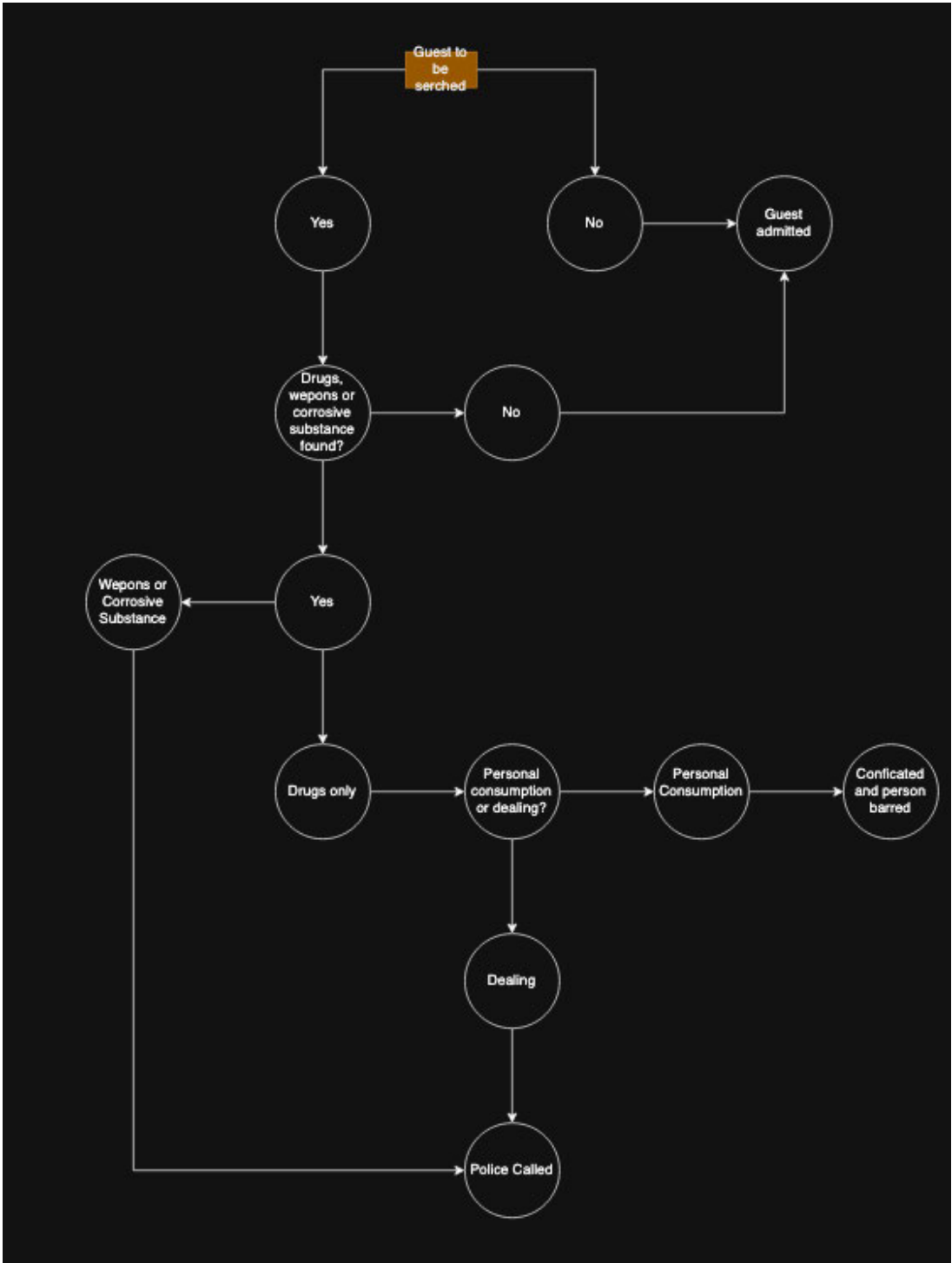
10.3 Visible Deterrence & Guest Messaging

Measure	Detail	Evidence
“No Weapons / No Corrosives” signage	A3 tri-lingual posters at queue, entrance portal, toilets.	Photograph retained in Visual-Checks register.
Amnesty Bin	Armoured steel bin (Police-spec) bolted beside search podium, CCTV-covered.	Bin seal no. recorded nightly; monthly MET collection.



Queue Marshal Script	“Searches in progress – surrender any prohibited items here.” every 10 min in peak.	Mystery-shop audit 2×/year.
Social-Media Pre-Event Post	“Weapons Searches Tonight – Enjoy Safe” at 14:00 Fri/Sat.	Screenshot filed.





10.4 Nine-Stage Risk-Control Ladder *(expands original 9-step table – nothing removed)*

Stage	Procedure	Key Controls & Evidence
1 Visible Deterrence	Signage, lighting, queue marshal, Amnesty Bin pre-entry.	CCTV bookmark; bin seal & signage photo.
2 Search & Discovery	Random “1 in 4” wand/bag check or 100 % on intel nights; metal-detector arch for ticketed events.	Search Log (Licensing Connect); gender-appropriate search; BWV optional.
3 Seizure & Safe Evidence Bagging	• Blades → rigid plastic weapons tube • Firearm/replica → police called immediately • Liquids → screw-cap evidence bottle.	Item numbered; entry in Weapons Register ; chain-of-custody label auto-prints.
4 Detention or Disengagement	Compliant carrier held in CCTV room; if violent, disengage, monitor, 999.	BWV running; Dynamic Risk tick-box.
5 Police Hand-over	MET attend ASAP or at scheduled Operation Sceptre uplift (Thu). Officer signs register & takes custody.	CAD ref. recorded; copy auto-emailed to MET intel inbox.
6 Venue Outcome	Refusal/ejection; lifetime venue ban; details to PubWatch & Brent BCRP Exclusion Scheme.	Ejection Leaflet given; Licensing Connect entry.
7 Medical & Welfare	For corrosives: Report – Remove – Rinse ; flush for 20 min; LAS 999; offer foil blanket.	First-aid record; Welfare Log.
8 Record & Review	Incident + Weapons Register + CCTV bookmark. Monthly DPS review for trend hot-spots.	KPI dashboard.
9 Staff Competence	• Annual “Weapons & Evidence” refresher (MET CT Protect) • Acid-attack first-aid drill each quarter • Search-lane role-plays.	Training Matrix.



10.5 KPI Targets & Analytics

- ≤ 1 weapons recovery per 1000 guests
- 100 % evidence items with complete chain-of-custody
- Police hand-over within 30 min (live incidents) / 14 days (amnesty)
- Data auto-syncs from Weapons Register → Licensing Connect dashboard; colour-coded “Red/Amber/Green” shows compliance.

10.6 Partnership & Intelligence Sharing

- Operation Sceptre fortnightly return – seizure counts & CCTV stills.
- Brent BCRP Knife-Crime alerts – venue contributes suspect descriptions within 4 h.
- Safer Sounds #NightSafety Hub – share acid-attack learnings.

10.7 Poster, Leaflet & Equipment Locations

Resource	Location
“No Weapons/Corrosives” Poster	Queue barrier, entrance portal, toilet lobby
Weapons Amnesty Leaflet (guest version)	Hand-out at surrender/search station
NHS RRR Acid-Attack Poster	Staff corridor & Security Office
Weapon-Seizure Evidence Tubes & Bottles	Locked Evidence Cabinet – Security Office
Crime-Scene Kit	Beside CCTV workstation (tamper seal)

- *By merging visible deterrence, intelligence-led searches, rigorous evidence chain and swift medical response, Carlton Lounge meets—and aims to exceed—Operation Sceptre gold-tier standards while maintaining an open, welcoming environment for law-abiding guests.*





11 SEXUAL ASSAULT POLICY – ASK ANGELA

Mission: Guarantee that every guest can enjoy Carlton Lounge without fear of sexual assault, harassment or stalking, and provide an *immediate, discreet* pathway to help whenever someone feels unsafe.

11.1 Policy Statement

Carlton Lounge adopts a victim-centred, trauma-informed approach which meets – and aspires to exceed – the *Mayor of London’s Women’s Night Safety Charter*, the *Safer Sounds Partnership* standards and the *National Police Chiefs’ Council (NPCC) Spiking Guidance 2023*.

11.2 Foundations & Training Matrix

Programme	Audience	Frequency	Provider / Standard
Ask for Angela Team-Member Workbook	All FOH, bar & security	Pre-first shift + annual	Lincolnshire County Council toolkit
WAVE / Bystander Intervention	Supervisors, NSC, Managers	Initial + 6-monthly refresher	Safer Sounds / MET Police
Spiking Awareness & Drink-Testing	Bar & security	Twice-yearly	Complete Licensing consultant
Trauma-Informed Care (TIC)	Welfare & Duty Managers	Annual	NHS London – A&E Night-Time Team
Safeguarding Level 2	All staff	Every 3 years	NSPCC accredited e-learning

Completion dates populate the Sexual-Safety Training Matrix in Licensing Connect; compliance KPI ≥ 95 %.



11.3 Roles & Responsibilities

Role	Key Duties
Night-Safety Champion (NSC)	On every shift ► welfare lead, holds TIC qualification, manages Angela pathway & Welfare Room.
Ask-for-Angela Deputy	Trained floor supervisor; covers breaks/absence to ensure <i>continuous cover</i> .
Security Team Leader	Activates BWV, preserves potential crime-scenes, separates suspect & witnesses, oversees cordon until police.
Duty Manager (Silver)	Notifies police/ambulance, coordinates evidence, uploads Incident Pack to Licensing Connect within 30 min.
Designated Premises Supervisor (Gold)	Quarterly audit, trend analysis, liaison with Brent Police Licensing & Safer Sounds Hub.



11.4 Guest-Facing Process *(detailed flow)*

ANGELA WELFARE PROCEDURE

Guest indicates concern → ANY staff member
hears code-phrase



Staff radios: “Angela to Welfare Room”
(plain-English, no numeric codes)



NSC meets guest <60 sec → escorts to
** Welfare Room* (CCTV-covered)

TRIAGE CHECKLIST

A = Ask – what happened? / do you feel safe?

B = Breathing – medical signs? (spiking/assault)

C = Consent – any non-consensual contact?
(yes → 999)

D = Drink-testing- offer strip; retain container

W = Well-being – contact friend/relative?

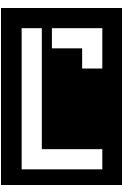
Basic help
reunite with friends / taxi



Alleged crime
seal scene, police 999,
evidence pack

Follow-up call/e-mail within 24 h (opt-in)
→ close case

COMPLETE LICENSING • APERÇU MONO BOLD & REGULAR

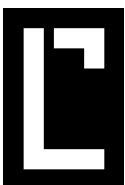




11.5 Welfare Room Standards

- Location: Rear Office 2 (key-card; CCTV outside, **not** inside).
- Facilities: sofa, blankets, bottled water, phone-charger, first-aid kit, assault-care pack (PPE gloves, evidence bags, wipes), digital clock (time-stamps), info leaflets (Victim Support, Havens, Rape Crisis, *We Are With You*).
- Two-staff rule: NSC + same-gender colleague where possible.
-

11.6 Evidence & Crime-Scene Management



Task	Procedure
Forensic care	Offer blanket/alt clothing; advise no washing/eating; retain drink in zip-bag (labelled).
Crime-Scene Kit	Barrier tape, evidence bags, gloves, marker pads; stored Security Office (seal tag checked nightly).
CCTV/BWV	Bookmark 15 min pre/post event; Duty Manager exports to encrypted USB; sealed.
Suspect handling	Compliant suspect in Staff Room 1; non-compliant – disengage, observe, call 999.
Statement capture	Witness cards handed out; statements typed asap; uploaded to Incident Pack.



11.7 Recording & Reporting

Document	Content	Retention	Access
Angela Register	Time, staff, triage outcome, CCTV/BWV refs, guest ID	24 months	DPS + Police (via Licensing Connect)
Incident Report	Narrative, witness stmts, police CAD no., evidence log	6 years	DM, DPS, Police, EHO



Trend	Monthly heat-map of Angela	–	DPS, GM, Complete Licensing
Dashboard	activations & outcomes		

11.8 KPIs & Continuous Improvement

- **KPIs:** • ≥ 90 % positive guest feedback on welfare follow-up • < 5 min average response time • 0 breaches of evidence chain.
- **Drills:** Monthly live role-play (scenario rotates: stalking, spiking, sexual harassment, domestic-violence disclosure).
- **External audit:** Annual Safer Sounds or Ask-for-Angela audit; action plan logged in Compliance Register.
- **Community sharing:** Anonymous case-studies shared at PubWatch, local university safety forums.

**“If in doubt, help is out.”* Every staff member is empowered – and expected – to activate *Ask for Angela* without managerial permission. This rapid, compassionate response underpins Carlton Lounge’s commitment to a safe, inclusive night-time economy.



12 NOISE, NUISANCE & ANTI-SOCIAL BEHAVIOUR
POLICY

Objective: Ensure Carlton Lounge’s late-night operation does **not** disturb neighbours or contribute to anti-social behaviour (ASB) on the street, thereby meeting the *Prevent Public Nuisance* and *Prevent Crime & Disorder* licensing objectives and aligning with the **Purple Guide – Chapter 18 (Noise)** recommendations.

12.1 Policy Statement

Carlton Lounge commits to a ‘**Good Neighbour, Safe Streets**’ ethos. We combine *engineering controls, operational tactics, community partnerships and continuous monitoring* to keep noise and nuisance below **+5 dB LAeq** of the pre-event background and to achieve **zero substantiated complaints**.

12.2 Foundations & Engineering Controls

Element	Action / Specification	Evidence & Review
Sound Limiters	Cloud CX-300 DSP limiters locked at 95 dB(A) dancefloor / 85 dB(A) restaurant; tamper-sealed.	Calibration certificates filed; quarterly limiter-seal check log.
Building Envelope	Secondary glazing, lobby doors with acoustic seals, rear fire-exit auto-closers.	Independent acoustic report (ACU-2025-116) – attenuation ≥ 40 dB Rw.
Bass Isolation	Sub-woofers on Isol8r pads; timber sprung floor; rubber flanking strips to skirting.	Acoustic consultant sign-off (May 2025).
HVAC / Plant Noise	Night-time mode < 40 dB(A) at façade; annual service; anti-vibration mounts.	Plant maintenance log; SFG20 PPM schedule.
Outdoor Areas	Shisha terrace closes 22:30; max 40 people; no amplified music; soft-close gate.	Terrace count sheet; CCTV spot-audit.

(Insert FIGURE 12-A – Acoustic Control Schematic here)



12.3 Operational Controls (Inside Venue)

Time	Action	Responsible
T-60 min	DJ volume drops -3 dB; "Last hour – pace your night" screen prompt.	DJ / DM
T-30 min	"Wind-Down Playlist" (≤ 85 dB(A)) auto-loads; bass cut by 50 %.	Sound Tech
T-15 min	On-screen message: <i>"Please leave quietly – neighbours sleeping"</i> .	DM
T-00 min	House lights raised 50 %; bar 'soft close' (serve water/soft only).	Bar Lead
T+10 min	Background music only (≤ 75 dB(A)); door staff commence Dispersal Plan . <i>Two-Stage Wind-Down</i> mirrors Purple Guide §18.43 best practice.	Door Lead

12.4 Guest Exit & Dispersal Plan (*Flow-chart to be inserted after table*)

1. **Positive Close (T-15)** – FOH thank each guest; remind about residential area.
2. **Lollipop Initiative** – Complimentary lolly to reduce post-exit chatter (per Home Office 'Talking Stops' study).
3. **Transport Hub Guidance** – Staff point guests to QR code for TfL night-bus & minicab partners; queue marshal calls pre-booked taxis.
4. **Quiet Corridor** – Rope line guides guests 15 m east to Kingsbury Road, away from flats at 228-230.
5. **Noise Patrol** – SIA patrol frontage every 15 min until dispersal complete; observations logged.
6. **Litter Sweep (T+20)** – Staff collect bottles, flyers; waste in locked Eurobin.
7. **Final dB Sweep (T+30)** – Portable Class 2 meter reading; target $\leq$ background +5 dB(A); result logged.

12.5 Street Management & External Liaison

Time-Band	Action	Log / Evidence
00:00 – Close	Roving patrol every 15 min; intervene on ASB, engine idling, litter.	<i>Patrol Book</i> – time-stamped.



Close – +20 min	Dispersal Leads guide groups to night-bus stops & taxi rank; maintain ‘Quiet Zone’.	BWV bookmarks; radio chatter.
+20 – +30 min	Litter & noise sweep; record LAeq reading.	Noise Sweep Sheet.
+30 – +60 min	Security standby for late taxi pickups; lights internal; terrace closed.	CCTV time-stamp.
07:00 daily	Cleaner checks frontage for debris/graffiti.	Cleaning checklist photo upload.

Neighbour complaints auto-create **Community Ticket** in Licensing Connect; DPS must respond within **48 h** and record resolution.

12.6 Partnership & Community Engagement

- **NightSafe Radio** – real-time ASB alerts shared with nearby venues; joint reassurance patrols on event nights.
- **Safer Brent Business Partnership** – monthly data-share of noise readings, complaint log, dispersal KPIs.
- **Resident Liaison Panel** – quarterly “Coffee & Concerns” meeting; newsletter summarises KPI trends.
- **Local Transport Operators** – minicab firms sign *Quiet Pickup Pledge*; TfL night-bus drivers briefed.

12.7 Monitoring, Recording & KPIs

Metric	Target	Tool / Log
Verified noise complaints	0 per quarter	Licensing Connect – Complaint Log
LAeq at façade (T+30)	≤ Background +5 dB(A)	Class 2 meter – Noise Sweep Sheet
Dispersal completion time	≤ 30 min post-close	Patrol Book timestamps
Litter incidents	≤ 1 per weekend	Supervisor photo audit
Staff training compliance	≥ 95 % up-to-date	Training Matrix

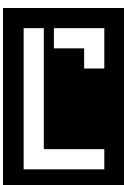
Monthly KPI dashboard reviewed by DPS; amber/red breaches trigger action plan.



12.8 Staff Training & Continuous Improvement

- **Quarterly Dispersal & Conflict-Management Drills** – scenario cards: noisy group, taxi refusal, neighbour confrontation.
- **Sound-Meter Workshop** – new starters learn calibration, LAeq logging, Purple Guide thresholds.
- **Joint Exercises** – annual night-time walkthrough with Brent EHO & Licensing to validate Dispersal Plan.
- **Benchmarking** – compare noise KPIs to *Drumsheds* large-venue data & local Hackney NTE benchmarks (no branding used).
- **Review Trigger** – Any upheld noise complaint, change in licence hours or major refurb triggers section review within **14 days**.

(Insert POSTER GALLERY: 'Leave Quietly', QR Transport, Lollipop Boarding-Card here for audit cross-reference.)



13 OVERCROWDING POLICY

Licensed capacity: 300 patrons (set by fire-risk and safety assessments).
Aim: keep crowd density within safe limits at all times, protecting all guests—including those with reduced mobility or other vulnerabilities—and meeting the licensing objective of *Public Safety*.

1 Planning & Prevention

Measure	Detail
Staff training	All SIA and floor staff complete “Crowd Dynamics & Safe Capacity” module on induction; refresher every 12 months.
Pinch-point mapping	Stairwells, toilet corridor, dance-floor edge and foyer marked on venue plan; copies in Security Office and Ops Manual.
Pre-night head-count forecast	Duty Manager totals booked tables + anticipated walk-ins, announces target occupancy in the pre-shift briefing.
Manual capacity tools	• Entry clicker at main door • Exit clicker held by roving SIA • Smoking-area clicker for re-entry head-count. Totals reconciled every 15 minutes over radio.
Traffic-light thresholds	< 80 % capacity = Green • 80 – 95 % = Amber (extra floor patrol, bar slows sales) • ≥ 95 % = Red (hold admission, management review).

2 Real-Time Monitoring

Role	Task
Door Team	Add one for every entrant; announce total/300 on radio quarter-hourly.
Exit SIA	Subtract one for every departure; announce to Door Team.
Roving SIA	Patrol pinch-points every 10 min; report visibility of head/shoulders and flow.
Duty Manager	Verifies running total at 22:30 and 00:30; adjusts staffing or bar pacing as needed.

3 Intervention Protocol



- 1. Detect crowding – If staff cannot see head, chest & shoulders or flow slows, call “Code Amber Crowd”.
- 2. Manage density – Duty Manager redirects guests to quieter area, pauses admissions or instructs bar to slow service.
- 3. Trigger points – If manual tally reaches 300 or safe routes obstructed, admissions stop until numbers drop; if exit compromised, capacity temporarily reduced.
- 4. Escalate to *Major-Incident Plan* if doors blocked, a medical emergency occurs within crowd, or any structural concern arises.

4 Documentation & Review

Record	Content	Retention
Crowd Log (paper form)	Quarter-hourly totals, amber/red alerts, actions taken.	12 months
Incident Report	Details of any overcrowding event or evacuation.	3 years
CCTV/BWV reference	Bookmark clips for training or investigation.	31 days (or longer if required)

Logs reviewed weekly by Duty Manager; patterns discussed at the monthly safety meeting to refine booking limits, staffing and floor layout.

5 Continuous Improvement

• Quarterly tabletop drill simulating capacity breach and evacuation.

• Feedback loop with Brent Licensing & Fire Service on any crowd-related observations during inspections.

Purple Guide crowd-density benchmark: maximum 3 persons / m² on dancefloor (Chapter 5). Stewards initiate “Code Amber Crowd” at 2.5 p/m²; trigger logged and reviewed.

With vigilant manual counting, clear traffic-light triggers and swift managerial response, Carlton Lounge maintains safe, comfortable conditions for every patron.



14 Anti-Bribery & Corruption
Policy Anti-Bribery & Corruption Policy

(Aligned with the UK Bribery Act 2010 and Carlton Lounge’s Code of Conduct)

Principle

Carlton Lounge trades strictly within the law and upholds the highest ethical standards. We prohibit the offering, soliciting or acceptance of any bribe—cash or otherwise—to gain a commercial, contractual or regulatory advantage, or any personal benefit.

1 Zero-Tolerance Rules

Prohibited Action	Examples
Bribes & facilitation payments	Cash “tips” to accelerate inspections, licensing paperwork or police approvals.
Improper advantages	Paying another business for favourable supplier terms or guest referrals.
Unauthorised hospitality, gifts or travel	Providing entertainment or travel for officials without following the <i>Gifts & Hospitality Procedure</i> .
False or incomplete records	Omitting or disguising payments in invoices, expense claims or POS voids.
Staff kickbacks	Accepting money or perks to: • Secure entry or jump the queue • Obtain free drinks • Bypass searches or ID checks • Access VIP areas or booths

2 Staff Responsibilities

- Refuse & Report – Politely decline any offer that could be construed as a bribe and immediately report it to the Duty Manager or DPS.
- Transparency – Record all gifts/hospitality over £25 in the *Gifts & Hospitality Register*.
- Due diligence – Before entering any consultancy or agency agreement, management must complete the *Third-Party Due-Diligence Checklist* and obtain Director approval.



- Accurate books – All payments and discounts must be recorded in our accounting system with full descriptions—no vague codes or “miscellaneous” entries.

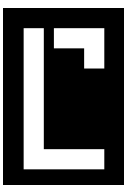
3 Management Oversight

- Annual risk review – The General Manager reviews bribery risk and updates control measures.
- Random audits – Finance Manager performs quarterly spot-checks on expenses, voids and vendor payments.
- Training – All staff complete Anti-Bribery e-learning on induction; refreshers every two years.

4 Breaches & Sanctions

- Any employee, contractor or supplier found breaching this policy faces disciplinary action up to dismissal and referral to law-enforcement agencies.
- Breaches are recorded in the *Incident Register* and discussed at the next Board meeting.

By enforcing these rules, Carlton Lounge safeguards its reputation, complies with the Bribery Act 2010 and maintains a fair, transparent environment for guests, suppliers and staff.



15 MAJOR INCIDENT & CRIME-SCENE MANAGEMENT STRATEGY

(For serious violence, medical emergencies, fire, terrorism or any crime requiring police attendance)

Purpose: To protect life, preserve evidence and ensure emergency services have clear access whenever a major incident or serious crime occurs in or near Carlton Lounge.

1 Core Principles

- 1. Life first – Evacuate or lock-down to safeguard guests and staff.
- 2. Clear routes – Keep Fire Exit A and the front pavement clear for blue-light vehicles.
- 3. Evidence preservation – Seal and protect the crime scene; avoid cross-contamination.
- 4. Accurate information – Record times, actions and witness details for police and ambulance crews.

2 Roles & Responsibilities

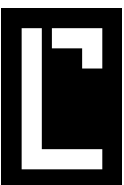
Role	Immediate Actions
Duty Manager (Silver)	Takes command, activates incident checklist, liaises with emergency services, downloads & seals relevant CCTV/BWV footage.
Head of Security (Bronze)	Leads crowd movement and cordons, deploys staff to exits and crime-scene perimeter.
Welfare Officer	Delivers first aid, shields victim(s) from view, gathers witness names and contact details.
Gold / Strategic level	General Manager or DPS, contacted once situation stabilises.

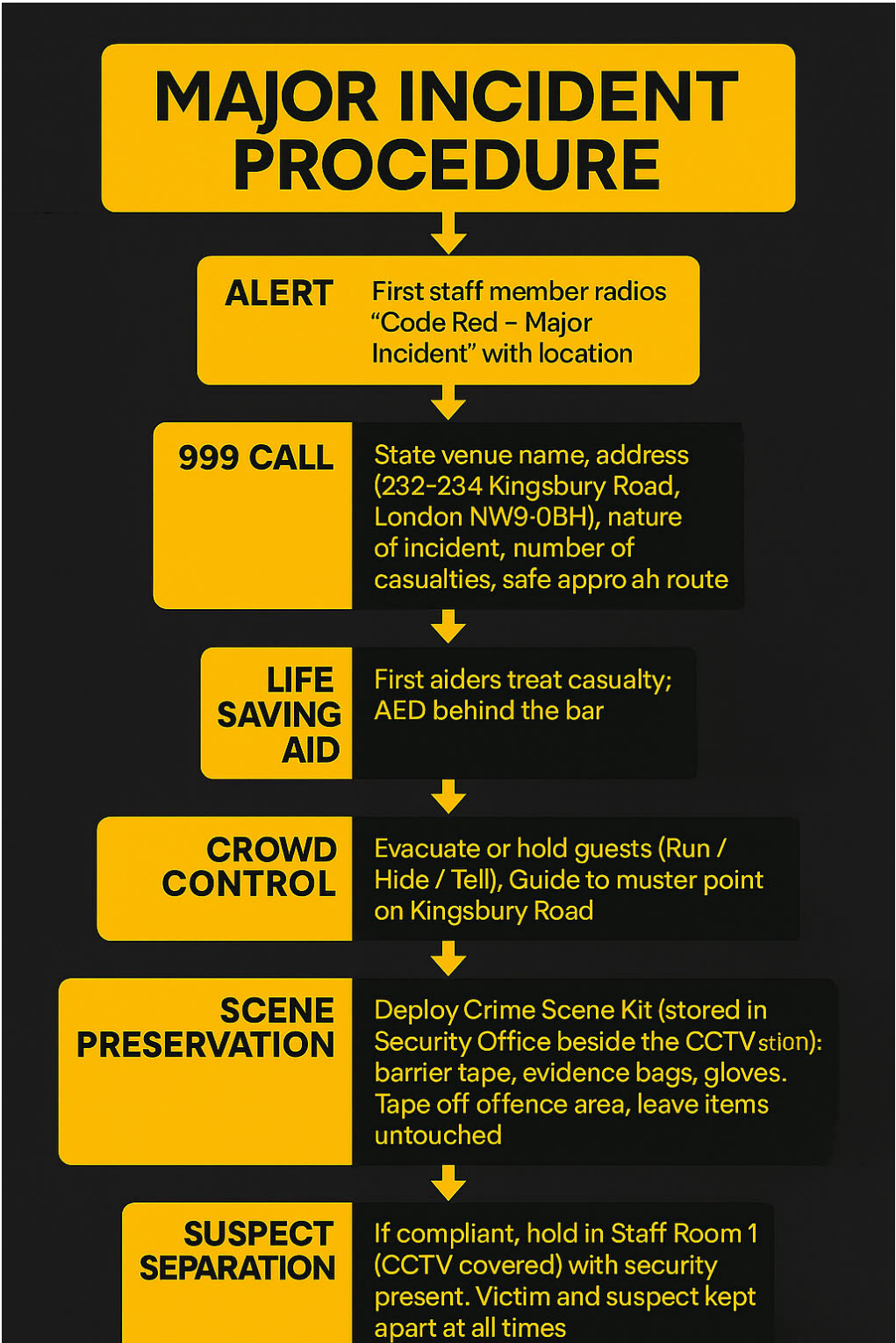
3 Immediate Response Flow

- 1. Alert – First staff member radios “Code Red – Major Incident” with location.



2. 999 call – State venue name, address (*232-234 Kingsbury Road, London NW9 0BH*), nature of incident, number of casualties, safe approach route.
3. Life-saving aid – First-aiders treat casualty; AED behind the bar.
4. Crowd control – Evacuate or hold guests (*Run / Hide / Tell*). Guide to muster point on Kingsbury Road.
5. Scene preservation – Deploy *Crime-Scene Kit* (stored in Security Office beside the CCTV station): barrier tape, evidence bags, gloves. Tape off offence area; leave items untouched.
6. Witness management – Move witnesses to Bar Lounge 2; record names, phone, e-mail. Obtain details if they leave.
7. Suspect separation – If compliant, hold in Staff Room 1 (CCTV-covered) with security present. Victim and suspect kept apart at all times.





4 Records & Evidence

Item	Action
Incident Log	Chronological times, actions, radio traffic, 999 reference—kept by Duty Manager.
CCTV/BWV	Duty Manager (or CCTV-trained staff) bookmarks & downloads footage to encrypted USB; seals in evidence bag and logs in CCTV Register.
Physical evidence	Knife, bottle, clothing: handle with gloves; place in labelled evidence bag; log in Weapons Register.
Photos	If safe, take overview image of scene on Manager phone; note time/date.

5 Post-Incident Actions

- Debrief – Internal debrief within 48 h; full report to GM/DPS and, if required, Brent Police Licensing.
- Counselling – Offer Employee Assistance Programme to affected staff.
- Review & Update – Amend risk assessments and training if gaps identified.

6 Staff Safety

No staff member should place themselves in harm’s way. If a suspect is violent or armed, staff must withdraw and wait for police.

By assigning clear duties—without relying on a dedicated CCTV operator—and supplying ready-to-deploy crime-scene kits, Carlton Lounge can react swiftly, protect life and preserve evidence whenever a major incident occurs.



16 COUNTER-TERRORISM POLICY

Aligned with NaCTSO guidance, the Protect Duty (draft) and learning from Operation Griffin / Project Servator deployments across London’s night-time economy.

Context

Although attacks are rare, crowded venues remain attractive targets. Recent plots show how quickly threats can evolve—from the 2017 London Bridge marauding attack to the 2023 “Bermuda Triangle” Vienna shootings. Carlton Lounge therefore embeds counter-terror measures that are proportionate, rehearsed and intelligence-led.

1 Main Types of Attack

- PBIED – Person-borne device (e.g. Manchester Arena).
- VBIED – Vehicle-borne device (e.g. 2007 Tiger Tiger, Haymarket).
- MTA – Marauding attackers with bladed/automatic weapons (e.g. London Bridge).
- IED – Planted improvised device (e.g. Parsons Green).
- Hostile Vehicle (HVM) assault or ramming.
- Insider threat / hostile reconnaissance.

2 Training & Guidance Framework

Programme	Audience	Frequency	Provider
ACT Awareness e-learning	All staff	Within 7 days of hire; biennial	NaCTSO online portal
SCaN (See ✓ Check ✓ Notify ✓)	Managers, Security, Supervisors	Initial & annual refresher	CTSA-led classroom
Operation Griffin / Project Servator Awareness	SIA team & Duty Managers	Annual	MET CT Protect Officer
HOT / CCCC practical drills	All operational staff	Quarterly	DPS table-top & walk-through



Programme	Audience	Frequency	Provider
Run Hide Tell role-play	Floor teams	Twice-yearly	Complete Licensing consultant

Completion dates are logged in the CT Training Matrix (retained for employment +1 year).

3 Daily Threat Management Cycle

- 1. Threat-Level Brief (D-1 & H-0) – Duty Manager announces current UK Threat Level and any CTSA alerts at shift start; copies to Licensing Connect bulletin.
- 2. Operation Griffin ‘Step-Back’ Recon – Security conduct 360° perimeter review and note suspicious vehicles or persons (7-point Servator behaviour checklist).
- 3. HOT Pre-Opening Sweep – Hidden / Obvious / Typical check of all zones incl. bins, cupboards, plant areas; repeat post-close.
- 4. Dynamic Servator Patrols – Every 30 min inside & kerbside; unpredictability reduces hostile planning opportunities.
- 5. Threat-Log Updates – Any unusual activity or NaCTSO bulletin added to *CT Briefing Sheet*; retained 12 months.



4 Evacuation v Lock-Down Decision Tree

Trigger	Primary Action	Secondary Action
Internal fire / device	Evacuate via Fire Plan muster point.	Activate RVP for blue-light crews; deploy crowd marshals.
External attack nearby	Lock-Down – secure all doors, move guests away from frontage.	Silence music; staff brief guests to “Stay Down / Stay Quiet / Await Police”.
Hostile vehicle threat	Invacuate to rear safe-haven; drop shutters.	Prepare for secondary evacuation on police instruction.

Staff are trained that public advice *Run Hide Tell* may conflict with invacuation—DM’s instruction overrides generic messaging.



5 Suspicious-Item & Bomb-Threat Procedures

Apply *HOT* → if suspicious, enact *CCCC*; minimum 100 m cordon; remove radios/phones 15 m radius; preserve *CCTV* bookmark.

Telephone/Email Bomb Threat – follow NaCTSO Bomb Threat Checklist; form stored in Duty-Manager folder and uploaded to Licensing Connect within 30 min.



6 Hostile Reconnaissance Disruption (Servator Tactics)

- Engage individuals showing anxiety, loitering, mapping behaviour.
- Record description, time, behaviour; submit 679 Form to CTSA within 24 h.
- Share real-time intel on NightSafe radio.

IT'S PROBABLY NOTHING, BUT...

IF YOU SEE OR HEAR SOMETHING THAT
COULD BE TERRORIST RELATED, TRUST YOUR
INSTINCTS AND CALL THE CONFIDENTIAL
ANTI-TERRORIST HOTLINE.
OUR SPECIALLY TRAINED OFFICERS WILL
TAKE IT FROM THERE.

0800 789 321
YOUR CALL COULD SAVE LIVES



METROPOLITAN
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POLICE



BRITISH
TRANSPORT
POLICE



NEW
SCOTLAND
YARD

7 Records & Continuous Improvement

Log	Content	Retention
CT Briefing Sheet	Date, threat level, CTSA intel, DM signature	12 months
Suspicious-Item / Bomb-Threat Log	HOT/CCCC details, cordon times, police log number	3 years
Training Matrix	ACT, SCaN, Griffin completions	Employment +1 year
Servator Patrol Book	Times, observations, engage/disrupt outcomes	12 months



Quarterly CT table-top plus annual multi-agency exercise with MET CT Protect Team.
Post-exercise reports feed into risk assessment updates.

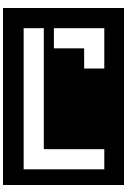
8 Links & Posters

Run Hide Tell (staff area) • “It’s Probably Nothing But...” (staff clock-in) • UK Threat-Level dial (Manager office & Security podium) • Crime-Scene Kit inventory (Security Office). High-res files in *Staff Resources > Posters*.

9 Integration with Other Policies

This CT Policy underpins the Security Strategy (§4), Major-Incident Plan (§15) and Noise/Dispersal Plan (§12) to ensure cohesive response across crime, safety and community objectives.

By combining ACT/SCaN skills, Griffin-style vigilance and Servator disruption tactics, Carlton Lounge delivers a layered, proportionate defence that satisfies emerging Protect-Duty expectations while maintaining guest experience.



17 RECORDING POLICY -
LICENSING CONNECT RECORDING POLICY -
LICENSING CONNECT
PURPOSE

Single cloud platform for Refusal, Incident, Visitor, Vulnerability, Accident and Staff-Training registers— all fully paper-less, multilingual (25+ languages) and accessible on any web browser or the Licensing Connect mobile apps (iOS / Android). The system issues real-time push alerts to Duty Managers when new records, regulator visits or overdue actions are logged, and stores evidence (photos, PDFs, CCTV time-codes) in an encrypted UK data-centre that meets ISO 27001 standards.

Licensing Connect’s Resources Hub provides templated posters and check-lists, while the Records Vault gives role-based access for regulators and consultants without exposing personal data.

Categories Logged

Crimes • Ejections • Complaints • Disorder • Drug/Weapon seizures • CCTV/BWV faults • Alcohol refusals • Authority visits.

Digital Workflow

- 1. Staff capture on phone/PC.
- 2. Auto-notify DM/DPS (+ police/EHO as appropriate).
- 3. Attach photos/CCTV.
- 4. DM adds corrective action; lock record.
- 5. Records retained per table below.

Log	Retention
Incident / Crime / Disorder	6 years
Alcohol Refusals & Ejections	18 months
Drugs & Weapons Registers	3 years



Log	Retention
CCTV / BWV faults	12 months
Authority-Visit Reports	3 years
Training & QA	
30-min onboarding tutorial; refresher 6-monthly; poster with QR code; DPS monthly dashboard review; quarterly audit (≤ 5 % error).	
External Liaison	
Secure portal access for regulators eliminates e-mail delays.	

20 External Benchmarks & Poster Library

To ensure continual excellence, this suite is cross-referenced against the following open-source standards and industry schemes:

Standard / Scheme	How Incorporated
The Purple Guide (Event Safety Guide) – 2nd Ed.	Crowd densities (§13), security lane model (§4), noise wind-down (§12), welfare & medical (§5).
Best Bar None National Criteria 2024	Monthly self-audit mapped to BBN headings; evidence uploaded to BBN portal.
Brent Women’s Night Safety Charter	Sexual-Safety pledges reflected in §11; WAVE refresher every 6 months.
Safer Sounds Partnership / #NightSafety	Incident data-share via Licensing Connect; venue on GLA Night Safety Map.
London PubWatch / NightSafe Good Practice	Live radio link; exclusion notices enforced (§2).
Drumsheds Large-Venue Playbook 2024	Search-lane, egress steward ratios, medical room layout integrated in §§4 & 13.
Safer Brent Partnership – Community Safety Strategy 2024-27	Violent-crime, VAWG & ASB priorities mapped to risk matrix (§2) and sexual-safety measures (§11).
Poster & Leaflet Locations	



Resource	Display Point
Ask for Angela Poster	Toilet lobby doors & first-aid room
Drug Amnesty Bin Poster	Search station podium
Acid Attack: Report-Remove-Rinse	Staff corridor + Security Office
Run Hide Tell (NPCC)	Staff fire-exit noticeboard
UK Terror Threat-Level	Managers’ office & Security podium
It’s Probably Nothing But...	Staff clock-in wall
Ejection Leaflet	Handed at ejection, stocked at Door Supervisor desk
Lost-Property Leaflet	Cloakroom counter & website FAQ
Incident-Reporting QR Poster	Staff corridor & office
<i>(High-resolution files are stored in /Staff Resources/Posters and referenced during audits.)</i>	



HAS THERE BEEN AN INCIDENT?

e.g. Allegation of crime, Assault, Ejections, Complaints re crime or disorder, Seizure of drugs or weapons, CCTV faults, Refusal to sell, Visits by authorities



SCAN TO START REPORT

INCIDENT LOG CHECKLIST

☒ DATE AND TIME	☒ SCENE PRESERVATION
☒ PERSON RECORDING	☒ EVIDENCE RETRIEVAL/PRESERVATION
☒ INJURED PARTIES	☒ AMBULANCE/POLICE CALLED (TIME & REF)
☒ FIRST AID	☒ CCTV PRESERVED
☒ CCTV VIEWED	☒ DPS INFORMED (TIME & WHO BY)
☒ POLICE CAD (REF NO)	☒ NAME OF COUNCIL INSPECTOR
☒ POLICE SHOULDER NUMBER	

WRITING AN INCIDENT REPORT

1

Introduce what the statement is about. It will be very brief, one or two sentences only.

2

Introduce those involved in the incident, including yourself. ONLY include individuals that are directly involved with the incident.

3

Identify and describe the location that the incident took place in, and any subsequent locations.

4

Give a detailed chronological account of what occurred.

5

Give full details & descriptions of people mentioned, starting with the suspect. Include identification of the suspect (if that occurred) and the value of any property damaged or stolen.

COVER ADVOKATE IN THIS PART

- Amount of time the suspect was under observation
- Distance
- Visibility
- Observation impeded? (Obstructions)
- Known or seen before? (and how often?)
- Any reason for remembering?
- Time lapse between observation and identification
- Error or material discrepancy in description?



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OR CALL 0330 808 2122



E

DRAFT Noise and

Dispersal Policy

To be agreed with officers



**COMPLETE
LICENSING**
Page 122

1. DISPERSAL STRATEGY

CARLTON LOUNGE

Dispersal, Transport & Noise-Management Policy (Gold-Standard Edition – June 2025)
232-234 Kingsbury Road, London NW9 0BH

1. DISPERSAL STRATEGY

The effective dispersal of customers, especially in the later hours, is key to Carlton Lounge’s overriding aim of being a courteous and responsible neighbour. We therefore move departing guests in a controlled fashion so as to avoid congestion, crime or disturbance.

1.1 Peak dispersal windows

Night	Peak window	Last admission	Terminal hour
Sunday	02:30 – 03:30	02:30	03:30
Mon – Thu	03:00 – 04:00	03:00	04:00
Fri & Sat	03:30 – 04:30	03:30	04:30

Five Front-of-House/Street-Management staff (2 SIA + 3 FOH) are deployed during these windows; suitable cover remains in place throughout trading hours.

1.2 Staff arrival & departure

Staff shifts are staggered; all employees sign an agreement to keep voices low, not slam vehicle doors and use Kingsbury Road rather than residential side-streets. Arrival/departure conduct is a contractual condition.

1.3 Customer dispersal controls

- Wind-down (last 30 min)**
 - Music steps down to background; house lights rise.
 - Cloakroom releases guests in small groups.
 - Complimentary lollipops **and a cup-cone of water** given to each guest to reduce street chatter and dehydration.
- Flow management**
 - Door Supervisors (high-vis with “Ask me about transport”) guide patrons east towards Kingsbury Station / night-bus stops or west to the **Valley Drive lay-by** taxi zone.
 - No shisha pipes, bottles or glasses may leave the premises.



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- A fixed overhead camera with heat-map overlay bookmarks footage when groups linger > 2 min.

3. Street monitoring timetable

Minutes after close Action

0-20	Shepherd guests away; no loitering outside flats.
20-40	Smoking area closed; litter sweep; dB(A) reading.
40	"Clear-pavement" check – target ≤ 40 min after terminal hour.

3. Neighbour liaison

- 24-h manager line 020 8205 3112 and a QR "digital hotline" appear on exit signage.
- Every complaint is logged in **Licensing Connect** and answered within 48 h; KPI ≤ 2 complaints / month (zero substantiated).

1.4 Door-Supervisor duties & training

- SIA staff at Kingsbury Road exit and Valley Drive taxi zone until dispersal complete.
- Nightly briefing covers: nearby transport, local taxi list, crowd hot-spots, bilingual ("leave quietly") phrases in **English & Hindi/Romanian**.
- Post-shift **10-min "hot debrief"** – actions or flash-points entered into Licensing Connect.

1.5 Notices

Clear, bilingual notices at exits request patrons to respect neighbours and leave quietly. Staff echo this message.

1.6 Taxi / PHV procedure

- Guests wait inside foyer until ride-hail app shows "Arrived"; drivers collect only from Valley Drive (geo-fenced pin).
- Engines off, radios low; door team monitor.
- Staff have details of local licensed firms; bookings logged if requested.

1.7 Continuous improvement

- **Monthly KPI review:**
 - *Clear-pavement time* (target ≤ 40 min).
 - *Neighbour complaints* (target ≤ 2 / month).
- **Bi-annual mystery-shop** by Safer Sounds auditor; scored report fed into policy update.

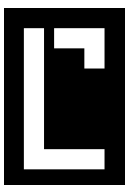


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- **Weather contingency:** disposable ponchos in cloakroom; extended foyer queue ropes in heavy rain or heat.
- **Performance KPI display** – clear-pavement timer and complaint counter posted on staff noticeboard (updated weekly).



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2. TRANSPORT STRATEGY

There are a number of transport methods that customers will use to travel to and from Carlton Lounge. Because of this, we do not anticipate over-use of any one mode. We will monitor the situation and update this policy if necessary.

1. Tube (Jubilee Line) – Kingsbury Station (3-min walk SE) is the main route. Appendix 3 shows walking times; Appendix 4 shows the Night-Tube map.
2. Bus – Routes 183, 204, 324 and night-bus N98 serve Kingsbury Circle 50 m away (Appendix 5).
3. TfL Cycle Hire – Docking point outside Kingsbury Station and secure rails opposite Valley Drive (Appendix 6).
4. Taxi / PHV – Valley Drive lay-by is the geo-fenced pick-up zone (see Appendix 1). Door staff guide passengers; ride-hail apps default to this pin.
5. Car parking – Guests directed to Sainsbury’s multi-storey (5-min walk, closes 00:00); on-site parking discouraged.

It is highly unlikely that customers will drive; parking nearby is limited and discouraged on our website.



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3. NOISE-MANAGEMENT STRATEGY

We rigorously control internal and external noise to protect nearby residents.

3.1 Structural & licence conditions

Measure	Detail
Limiter	Locked 95 dB(A); certificate filed quarterly.
Doors/windows	Closed after 22:00 (except ingress/egress).
External music	None after 22:00; shisha courtyard ambient ≤ 70 dB(A) pre-23:00.
Deliveries	07:00–21:00 Mon–Sat only.
Bottle/glass tipping	Prohibited 21:00–07:00.

3.2 Operational controls

- **Noise walks** every two hours 23:00→close; readings logged (Licensing Connect auto-alert if > 5 dB(A) above baseline).
- **Acoustic trigger email** if limiter exceeds threshold for 30 s.
- **Smoking area** capped at 15 persons, closed 23:00.
- **Litter & glass patrol** after last exit; third-party rubbish also cleared.
- Patrons re-admitted for toilet use to deter street urination.

3.3 Community engagement & review

- Complaints investigated immediately, logged, responded within 48 h.
- Quarterly residents’ forum; minutes published on website.
- Policy reviewed after each mystery-shop and any substantiated complaint.

4. CAPACITY & CROWD-SAFETY SNAPSHOT

Floor	Max capacity*	Clicker control
Ground	300 (inc. staff)	Entry & exit
First	150 (inc. staff)	Host clicker

Traffic light: **Green** < 80 % · **Amber** 80–95 % (patrols/bar slow) · **Red** ≥ 95 % (door hold).

*From fire-risk & licence schedule.

5. PERFORMANCE METRICS & AUDIT

Metric	Target	Review
Clear-pavement time	≤ 40 min post-close	Nightly log; weekly DPS summary



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Metric	Target	Review
Neighbour complaints	≤ 2 / month	Licensing Connect dashboard
Incident timeliness	100 % logged same shift	Monthly
Audit error rate	< 5 %	Quarterly random 10 % sample
Quarterly audits verify CCTV/BWV time-stamps, finance voids and Licensing Connect entries.		

With the original wording fully preserved, these Gold-Standard enhancements provide measurable KPIs, digital logging, bilingual signage, weather contingencies, proactive acoustic alerts and geo-fenced taxi pick-ups—lifting Carlton Lounge’s dispersal, transport and noise controls to best-in-class for Brent’s night-time economy.

Appendices A–D (maps, pick-up plan, noise-log sheet) are attached and updated annually



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END



IN THE BRENT LICENSING SUB-COMMITTEE

**IN THE MATTER OF THE APPLICATION FOR THE REVIEW OF A PREMISES LICENCE
FOLLOWING EXPEDITED REVIEW BY METROPOLITAN POLICE FOR THE PREMISES
KNOWN AS CARLTON LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Witness Statement of Prasanth Thavatheva

I, Prasanth Thavatheva of 232-234 Kingsbury Road, NW9 0BH hereby state the following:

- 1.** I make this statement in support of the review of the premises licence for Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH
- 2.** The facts in this statement are true to the best of my knowledge and belief. Where matters are not within my own knowledge, I have stated the source of my information.
- 3.** The premises licence is held by Carlton Lounge (UK) Limited. My father, Mr Thavatheva Thevarajah is a director of this company.
- 4.** Before anything else, I want to pass my deepest condolences to the family of the young man who was stabbed, his friends, and the wider community. No words can ease the pain of such a tragedy, and my thoughts remain with everyone affected.
- 5.** As a team, we are heartbroken by the events that unfolded on that tragic night. We are still processing what happened, and this is not something that can be ignored or brushed aside. While I know that nothing I do can bring that young man back, I am committed to ensuring that such an incident never happens again near one of my venues.
- 6.** By way of a brief background about me, I am the owner of the Tigerbay trademark, a brand that I have built through dedication and hard work. My family-run business, Carlton Lounge, is something we take great pride in, ensuring it meets the highest standards. I have also expanded my work within the hospitality industry, serving as Director of multiple businesses and partnering with international hospitality venues.
- 7.** I am proud to hold a Personal Licence, which I obtained in 2018. I have no criminal record nor any association with criminal activities.

8. Beyond my businesses, I am deeply committed to charitable causes. I actively support initiatives that provide aid to those in poverty and war-stricken countries, and I have dedicated much of my time mentoring young adults from ethnic backgrounds, giving them self-confidence to build a better life for themselves. I have spoken at conferences, including addressing 200 young adults at the BYP (Black Young Programme) conference, and participated in Tamil and Asian events. I am passionate about ensuring that compliance and promotion of the licensing objectives are upheld in Carlton Lounge.
9. My efforts and ambition have been recognised—I was shortlisted for the Young CEO Awards in 2024. I personally oversee the Sales of Alcohol training for all new colleagues, ensuring they receive six-month refresher courses to maintain compliance and uphold responsible practices.
10. In terms of my relationship with my staff, I make it a priority to build relationships with my staff, taking the time to meet them in person across different locations. I actively engage with them, understanding their aspirations and supporting their development. Through my guidance, some of my staff have successfully launched their own businesses, and I take great pride in mentoring them as they grow.
11. In relation to the incident of 18 May 2025, the group inside the venue was small, and the initial argument was diffused. Two individuals were taken outside, while the others remained inside. However, when tensions escalated outside, it was unclear who had originally been inside and who had arrived in the car.
12. The staff outside were focused on de-escalating the situation and dispersing the crowd, not escalating any conflict. At the time, no one knew that a stabbing had taken place. The situation was unfolding in front of us and moving very quickly.
13. I took an active role in supporting the police investigation, voluntarily participating in additional interviews and working to piece together the events of that evening. I worked closely with my staff and management team to understand what went wrong and identify lessons before the expedited hearing. Since then, I have ensured that key actions and guidance are reinforced across our operations. Please see attached as **exhibit PT1** an email from Detective Inspector [REDACTED] who dealt with the murder investigation thanking us for our cooperation.
14. I have also prioritised the well-being of my staff, offering them support during the venue's closure and reopening. I have helped implement simpler and clearer guidance for handling conflicts and remain committed to making the venue safer. Above all, I recognise, as a business owner and as a human being, the importance of ensuring safety for everyone.
15. **Addressing Licensing and Police additional statement received 9 June 2025 -**
Regarding noise complaints, I have worked with [REDACTED] from Brent Council for several years, along with [REDACTED] from his team, both of whom have my personal

contact details. In 2022, we did our utmost to resolve an issue with one neighbour, which led to the removal of our abatement notices on 19th October 2022. We were commended for our cooperation and efforts to reduce public nuisance. Please see attached as **exhibit PT2** email chain with [REDACTED] from Brent Council in this regard.

16. I have had various emails and conversations with [REDACTED] over the last few years in relation to the TENs applications, yet none of these concerns which are now being brought forward were raised.
17. In response to the information contained under the sub-heading “incidents related to the venue”:
 - **26 May 2024** – There was no police request for CCTV. The statement mentions that the assault occurred when they left the premises. The minor variation application was granted toward the end of 2024 and this issue was not raised. Please see attached as **exhibit PT3** email chain with Brent licensing agreeing to amended conditions after the minor variation application.
 - **06 July 2024** – I am aware of this incident. [REDACTED] requested CCTV on Saturday, 6th July at 5:40am. I replied at 9:30am the same day. Later in the evening, CCTV was requested via USB. On 7th July at 12:41pm, the footage was ready for collection, and I provided a contact number. She replied that she was off duty until Thursday. On 8th July, I followed up to confirm the footage was ready. Then, on 24th July, she emailed while copying in [REDACTED] who confirmed it had been received. Again, the minor variation application was granted toward the end of 2024 and this issue was not raised. These were isolated incidents.
 - **15 March 2025** – this happened on the road outside and it does not look like this person was our customer. According to the Police Report the event described as Kingsbury Road, nothing is logged in our incident log. Looking at MJS/10 the person retracted their statement and denied being stabbed afterwards. He didn’t want to press charges and wanted to go to bed, and apologised for the call to the police call. He was safe and well at home. I am not quite sure of the relevance of this incident being included here.
 - **6 May 2025** – The 11th May they contacted a senior member of staff, not bar staff. The discussion was that the person was looking to drop charges and the staff member asked if they needed CCTV. The Police said they would contact again if CCTV was required. The case was dropped as evidence on MJS/12 on 21st May 2025. The visit was on the 29th May 2025 from PC Sullivan and [REDACTED] when they requested this CCTV for the incident. The officers said they would send a link for us to upload the CCTV and I am still awaiting the link.
 - **18th May 2025** – The comments made by PC Sullivan are incorrect. I was in the middle of the crowd with my staff, actively trying to diffuse the situation. He claims

we did not take control; however, during a phone conversation, [REDACTED] commended me and my team for handling the incident and gave verbal positive feedback on the support provided. I had initially mentioned to the police that I was not sure if the incident had originated from inside the venue because a vehicle had pulled up and the individuals who got out of the vehicle. The situation was unfolding quickly, and I did not want to give out misleading information. I also told my staff to make sure they were not giving misleading information to the police which might prejudice the police investigation. I also note there was an allegation that we did not search our customers for weapons but that was not a condition on our premises license at the time and we were not required to undertake such a search.

- **May 2025** – On the day of the expedited hearing, there was a local event attended by my father and staff. I was later informed that Sergeant [REDACTED] had also attended. On 27th May 2025, I emailed him offering to meet with him and the local community, but I have received no reply.
- **29th May 2025** – Sergeant Sullivan visited me, my colleague [REDACTED] was also present. He mentioned an allegation that someone had been attacked with a bottle on the forecourt and asked if I was aware of it. I stated that I was not aware of and was taken back by the severity of the allegation and not being aware. I did share that one of my staff members had been called a derogatory term but that he did not wish to pursue the matter as he received an apology from a friend in the group. PC Sullivan suggesting that I dismissed the comment and disregarded this is not true, the staff member was checked on and did not want to take the matter further. This is something that while it is not acceptable in society, [REDACTED] shared with PC Sullivan given that it still occurs and ethnic minorities do not necessarily share or wish to discuss these types of matters publicly.

After investigating further, I would like to correct both his and [REDACTED] statements regarding the events. CCTV confirms that the individuals in question were not ejected from the building. The lights were on, chairs were stacked on tables, staff were cleaning, and customers were leaving as we closed for the night. The CCTV also does not show the two females in an altercation on our forecourt at any point.

When I left at 2:48am, the individuals were no longer present at, or in front of the premises.

CCTV footage shows that the incident occurred later, when it appears that they returned to the vicinity of our premises. One individual picked up an empty bottle from across the road and threw it towards her friend and a white car. This sequence of events was clarified by one of the customers, who apologised for her friend's offensive remark. She confirmed that the individuals live in the same

house and were having an ongoing dispute between themselves. I informed PC Sullivan of this, yet he asked me not to obtain a statement from the individual.

- **31st May 2025** – There was a police visit to the venue which involved three police officers. Two of these were PC [REDACTED] and PC [REDACTED]. They shared they were looking to see the conditions from the hearing in place and had been observing from outside how searched being conducted. They were walked around the premises and shown the CCTV room as requested. They were shown the live CCTV on the floor manager's phone and a live image of themselves. They expressed concerns about two entrances and were assured that after 10pm all customers are searched.

At the end of the visit, they commented that all the actions being taken seemed suitable and satisfactory and in line with the conditions. They were wearing their own bodycams which should reflect this account.

- **Venue Opening Allegations** – His allegations appear to be based on a news article. Although the murder investigation team returned the premises to us on Thursday, we chose not to reopen out of respect until the council panel reached its decision. During the expedited hearing, we provided a statement through our barrister, who made it clear that we would comply with whatever decision was made.
- **Statements from PC Sullivan and [REDACTED]** – The suggestion that we hindered police investigations is not true. Sergeant Sullivan's comments about the venue's cooperation with law enforcement is wholly inconsistent with Detective Inspector [REDACTED] email sent on 21 May.

18. I can see the allegations being made that our venue is a 'nightclub' but this is plainly not the case. We have a lot of families and professionals who frequent our establishment. There is no vertical drinking and everyone who comes to the venue is seated.

19. I can see the Instagram post from a DJ who performed at our venue, who has tagged our business and commented 'turning lounges into nightclubs'. Just to be clear this is not a resident DJ. We outsource our music to another company which is responsible for sending a DJ down to our venue. We have not encouraged this comment in any way and will ensure that we speak to the company supplying the DJ's to ensure that this type of misinformation is not shared in the future.

20. Our customer base is preliminary young professionals and local business owners. I do not agree that our customers do not live locally as we have many customers who frequent our establishment from the local community. We take pride in our local community, supporting local clubs and groups.

21. As regards the allegations of urinating and defecating on the streets – I am completely shocked. Our venue has fully functioning toilets which are routinely cleaned allowing for a pleasant environment for our customers. I am aware there is a growing problem with homelessness and alcohol / drug misuse amongst the homeless. Unfortunately, this is a problem which affects many areas in and around London including Kingsbury.

Conclusion

22. Nothing even approaching the incident on 18 May has ever occurred in or around our premises before. That does not mean, however, that I and my team do not want to learn from the experience in order to ensure that nothing like it occurs again. We have been advised, and accept the advice, that additional staff training should be undertaken regarding to how to handle emergencies. Also, the Licensing Authority has recently suggested a number of conditions which could be imposed if the Sub-Committee is not minded to revoke our licence. Our licensing consultant, Richard Bunch, has also advised that the conditions on our licence need to be brought up to date. I do not want to give a knee-jerk response to these very recent suggestions, but would like to emphasise that we are giving serious consideration to our licence conditions, which our barrister is best placed to assist the Sub-Committee with at the hearing on Friday.

6. Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: _____

Dated: 11.06.2025

IN THE BRENT LICENSING SUB-COMMITTEE

**IN THE MATTER OF THE APPLICATION FOR THE REVIEW OF A PREMISES LICENCE
FOLLOWING EXPEDITED REVIEW BY METROPOLITAN POLICE FOR THE PREMISES
KNOWN AS CARLTON LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Exhibits PT1

Exhibit PT1 - email from Detective Inspector [REDACTED] who dealt with the murder investigation thanking us for our cooperation.

----- Forwarded message -----

From: <[REDACTED]>

Date: Wed, 21 May 2025 at 16:43

Subject: RE: Carlton Lounge Review

To: <[REDACTED]>

Dear Mr [REDACTED]

By way of introduction, I am a supervising officer in Met Police Homicide Command and I am one of the detectives overseeing the murder enquiry currently underway.

I am aware of the assistance you have been providing our enquiry, in particular helping us to identify all the security and staff from your business, some of whom may hold vital eyewitness evidence. I therefore wanted to extend my gratitude and thanks to you for your help, it is greatly appreciated.

Furthermore, you have continued to support us whilst we keep your premises as a scene for examination - something that we acknowledge is highly disruptive to you. I'd like to assure you that I shall have a further update for you on that this evening. Thank you for your patience and understanding with this, you no doubt understand that in a murder enquiry we cannot leave any stone unturned and must be extremely thorough in our enquiries.

Regarding the licencing matter, I realise that would be distressing for you, I can only encourage you to fully cooperate with the Licencing Team, as I am sure you already are, to address any concerns identified.

I shall email again this evening with an update about your venue and its release back to you.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: 21 May 2025 12:44

To: [REDACTED]

Subject: RE: Carlton Lounge Review

Sir

Thank you, I will look into this. Please can I ask for the phone numbers and names of two waiters [REDACTED] and [REDACTED]. We would like to speak to them and take statements.

We are going to need to speak to all of your staff who were working that night. Please can I ask for a list of who was working and any contact information you have for them.

Kind regards

[REDACTED]

Detective Sergeant

[REDACTED]

[REDACTED]

[REDACTED]



IN THE BRENT LICENSING SUB-COMMITTEE

**IN THE MATTER OF THE APPLICATION FOR THE REVIEW OF A PREMISES LICENCE
FOLLOWING EXPEDITED REVIEW BY METROPOLITAN POLICE FOR THE PREMISES
KNOWN AS CARLTON LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Exhibits PT2

Exhibit PT2 - email chain with [REDACTED] from Brent Council

From: [REDACTED]
To: [REDACTED]
Subject: Fwd: Sound
Date: 10 June 2025 21:10:07

----- Forwarded message -----

From: <[REDACTED]>
Date: Tue, 19 Mar 2024 at 13:20
Subject: RE: Sound
To: [REDACTED]
Cc: prash theva [REDACTED]

Dear Mr [REDACTED],

Further to the allegation of noise nuisance was brought to us, I wrote to you as to whether the Authority is proposing to visit the complainant's premises to verify the allegation.

Given the previous history with this complainant we are keen that a site visit should be carried out to validate the claim.

We are happy to arrange a noise consultant to do this, if an agreement with the complainant can be reached.

Please also note that for the Public Nuisance objective to be triggered, a section of the

public must raise this issue.

Kind Regards,,

[REDACTED]

Compliance Direct Ltd

www.compliancedirectltd.com

From: [REDACTED]
Sent: Friday, March 15, 2024 2:57 PM
To: [REDACTED]; Compliance Direct
<[REDACTED]>
Subject: RE: Sound

Thanks [REDACTED]

Acknowledging all recent emails with images and links, including the email to my licensing colleague, [REDACTED]

It's credit to you that the business monitors noise levels and documents findings in support of due diligence.

It would be remiss of me if I did not point out there is no objective decibel figure in your premises licence that explicitly achieves your duty to prevent public nuisance or meets the relevant operating schedule conditions therein.

That said, we certainly welcome your commitment to monitoring noise levels with the sound level meter and we welcome your prompt and positive response to our recent correspondence following noise app reports from one neighbour. We have conveyed to the same your willingness to have your sound compliance agent further investigate noise levels towards setting a suitable level.

Kind regards

[REDACTED]

[REDACTED]

Resident Services

[REDACTED]

www.brent.gov.uk

From: [REDACTED]

Sent: Wednesday, March 13, 2024 3:37 PM

To: Compliance Direct [REDACTED]

Subject: Fwd: Sound

Hi [REDACTED]

As per our conversation yesterday I have attached screenshots for sound levels for yesterday and Invoice for purchase of new decibel reader.

Also use a link to download video recording.

<https://we.tl/t-6OOFkuwsjp>

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From: [REDACTED]
To: [REDACTED]
Subject: Fwd: Charlotte Place 13th June
Date: 10 June 2025 21:11:12

----- Forwarded message -----

From: [REDACTED] >
Date: Fri, 14 Jun 2024 at 12:31
Subject: Charlotte Place 13th June
To: [REDACTED] >
Cc: [REDACTED], [REDACTED]
<[REDACTED]>

Hi [REDACTED],

As promised, please find the link below containing videos we are taking at Charlotte Place dated 13th June 2024, done as close as possible to the neighbour with the time and date stamps so everything is clear.

<https://we.tl/t-KM390Iec8M>

I have also attached an additional video where one of the neighbours is playing loud music, which can also potentially be a what is being heard ?

Kind Regards

[REDACTED]
CEO

[REDACTED]

[REDACTED]

[REDACTED]

		
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IN THE BRENT LICENSING SUB-COMMITTEE

**IN THE MATTER OF THE APPLICATION FOR THE REVIEW OF A PREMISES LICENCE
FOLLOWING EXPEDITED REVIEW BY METROPOLITAN POLICE FOR THE PREMISES
KNOWN AS CARLTON LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Exhibits PT2

Exhibit PT3 - email chain with Brent licensing agreeing to amended conditions
after the minor variation application

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited
Date: 30 September 2024 10:28:48
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)
[image007.jpg](#)
[Carlton Lounge - Annex Two Conditions Final Draft 27.09.2024.pdf](#)

Good morning [REDACTED]

Thank you for confirming that the attached annex two conditions have been agreed by the applicant. Consequently, I can confirm on behalf of the Licensing Authority that my representation can now be considered withdrawn.

As I am the designated consultee on behalf of the Licensing Authority, I am unable to confirm that the application is granted. I would however advise you to email [@Business Licence](#) to get clarification that this is the case.

Once again, thank you for your cooperation. I am grateful that we were able to find a solution that worked for all parties.

Best regards,

[REDACTED]

www.brent.gov.uk
@Brent_Council

From: [REDACTED]
Sent: Monday, September 30, 2024 10:10 AM
To: [REDACTED]
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Morning [REDACTED]

The amended conditions you sent across on Friday are agreed.

Please can you confirm the premises can begin trading for the extended hours from today and that the hearing is formally withdrawn.

Many thanks

[REDACTED]
Partner

Tel : [REDACTED]

Fax: [REDACTED]

www.glsolicitors.com

From: [REDACTED]

Sent: 27 September 2024 15:51

To: [REDACTED]

Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good afternoon [REDACTED]

Apologies, I have amended this and reattached the document. Thank you for bringing that to my attention.

Best regards,

[REDACTED]
[REDACTED]
[REDACTED]
www.brent.gov.uk

@Brent_Council

From: [REDACTED]

Sent: Friday, September 27, 2024 3:49 PM

To: [REDACTED]

Subject: FW: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Hi [REDACTED]

Thank you for this and I will review these again with the client.

Upon a brief perusal I note 12 – refers to bar staff and not staff.

Regards

[REDACTED]

Partner

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

www.glsolicitors.com

From: [REDACTED]

Sent: 27 September 2024 14:44

To: [REDACTED]

Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good afternoon [REDACTED]

As mentioned previously, I have redrafted the revised conditions based on our recent correspondence. I would kindly ask that you review them carefully to ensure that we are all in agreement on the final document.

If you could confirm in writing that your client agrees to the attached, that would be much appreciated. I can thereafter confirm that my representation is withdrawn.

Many thanks,

[REDACTED]

www.brent.gov.uk

@Brent_Council

From: [REDACTED]

Sent: Friday, September 27, 2024 12:00 PM

To: [REDACTED]

Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good morning [REDACTED]

Thank you for sending this across – I really appreciate it.

I agree with all the below, and I shall draft a revised version of all the conditions following our correspondence. I will send this over to you as soon as possible, and once I have written agreement on behalf of your client that they are satisfied with everything, I shall withdraw my representation thereafter.

Best regards,

[REDACTED]

www.brent.gov.uk

@Brent_Council

From: [REDACTED]

Sent: Friday, September 27, 2024 11:48 AM

To: [REDACTED]

Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Dear [REDACTED]

Thank you for taking the time to speak with me this morning.

Your email below is very helpful. I am in agreement that A – C are accepted.

As regards D:

2. amended condition 2 proposed below is accepted save as to kindly request 72 hours. [2. CCTV footage shall be made available to the Police and any authorised Officers from Brent Council upon ~~48~~72 hours of request] You kindly indicated this morning that the 72 hours was accepted.

4. as I explained, this is not accepted. The premises upgraded its CCTV systems last year at a great expense to the business. The current systems are already clear and recognisable footage of patrons. Our client is confident that you will be able to see

from the CCTV recordings provided over the years that the quality of the footage has improved significantly. Our client will try to keep on board your comments when the CCTV systems are next upgraded.

10 and 11. The current condition is agreed to be retained [The licensee shall keep an incident book which shall be made available to the Police and Licensing Authority on demand].

15. amended condition 15 proposed below is accepted [The last entry on Sundays to Thursdays will be 0130 and on Fridays and Saturdays to 0230.] Thank you for indicating that you would accept a minor variation application seeking to extend the entry / re entry to 2.30 Sunday through Thursday and 3.30 Fridays and Saturday. I will speak to my client to make the necessary arrangements for the minor variation application in this regard.

25. upon considering this matter afresh and in the spirit of cooperation the premises licence holder is willing to accept condition 25 as proposed in the Proposed Annex 2 without amendment [25. A telephone number shall be made available to be used by residents in relation to any complaint of noise resulting from the premises. The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the incident log.]

27. agreed to keep the current condition 35 [No rubbish or empty bottles shall be placed in the outside bins after 23:00.]

31. agreed to keep the current condition 24 [No children shall be admitted unless accompanied by a responsible adult]

33, 34 and 35. Thank you for taking on board the comments and simplifying the condition. The amended condition proposed below is accepted [All staff training shall be undertaken by all members of staff involved with licensable activities. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council]

23 and 24. Currently, noise monitoring does take place and is recorded digitally rather than in a hard copy form. We therefore propose the following condition – “Noise monitoring shall be undertaken at least once every two hours when Regulated entertainment is provided from 23.00 until the closure of the premises.” Please can you confirm if this is acceptable to you.

I believe that the above will be acceptable to you. Please can you also confirm whether we can get the amended conditions ready to be effective from this evening?

I look forward to hearing from you.

Regards

[REDACTED]

Partner

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

www.glsolicitors.com

From: [REDACTED]

Sent: 25 September 2024 11:41

To: [REDACTED]

Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Importance: High

Good morning [REDACTED]

Thank you for your feedback – it's really helpful, especially with the context/reasoning provided for each of the conditions set out in my proposal. I remain optimistic that we can reach an agreement, and thus putting me in a position so that I can withdraw my representation.

However, I think it's important to be mindful that the initial application to vary the premises licence did not reference any significant amendments to the current conditions. The only proposes changes within the application are listed below:

- *"The proposal is to extend the last entry time."* – This was stated on the second page. This was further elaborated upon on page 14 (although in the incorrect box),

specifying that *“The last entry on Sundays to Thursdays will be 01:30 and on Fridays and Saturdays to 02:30”*.

- *“Security will be continue until the premises are closed and all customers have left the area”* – listed under the prevention of crime and disorder.
- *“Noise monitoring will continue until all regulated activities have come to an end.”*
- under the prevention of public nuisance.
- *“Existing conditions on Challenge 25 will continued.”* – under the protection of children from harm, despite the current premise licence having no conditions referencing an age verification policy.

As part of my representation, I revised all the conditions (while only being able to insist upon those relevant to “the prevention of public nuisance”, the objective under which my representation was made). This was necessary due to many outdated and unenforceable conditions, while others needed rewording for clarity. I also used the application’s details to form part of my revised conditions.

To simply matters, I’ve grouped the revised conditions into the four categories following on from your feedback:

A) Conditions accepted by all parties: 1, 3, 5, 6, 7, 9, 13, 17, 26, 28, 29, 30.

B) Conditions accepted by all parties that are to be amended following feedback: 14, 16, 18, 19, 20, 21, 22, 36, 37, 38.

C) Conditions to be removed as accepted by all parties: 8, 12, 23, 23, 24, 32.

D) Outstanding conditions yet to be resolved: 2, 4, 10, 11, 15, 25, 27, 31, 33, 34, 35.

I think we are on the same page for A-C, the only outstanding matters that are yet to be resolved are within the D column. Nonetheless, following on from your feedback, I have a few comments – which I hope are beneficial:

“2. A member of staff who is conversant with the operation of the CCTV system shall always be available at the premises whilst open to the public. CCTV footage shall be provided on removable media (I.e., USB, hard drive, CD etc..).

4. The CCTV system shall be capable of obtaining clear facial recognition images of every person entering or leaving the premises with further CCTV cameras covering the internal areas stipulated on the premises plan and any additional external area that members of the public can access.”

I understand your client’s position on CCTV storage and the rationale for not accepting condition 2, and perhaps condition 4 as well. However, would your client accept the blow conditions following modification?

“2. CCTV footage shall be made available to the Police and any authorised Officers from Brent Council upon 48 hours of request.

4. The CCTV system shall be capable of obtaining clear facial recognition images of every person entering or leaving the premises.”

If these are not accepted, I will reluctantly drop this matter, as my representation wasn't made under “the prevention of crime and disorder”, and as you have said, no complaints have been raised regarding CCTV usage. However, adopting these conditions would reflect good management and co-operation.

“10. An incident log shall be kept at the premises and made available for inspection upon request by an authorised officer of Brent Council or the Police, which will record the following: (a) any incidents of crime and disorder. (b) any customers barred from the premises. (c) any ejections from the premises. (d) seizures of drugs or offensive weapon. (e) any complaints received. (f) any faults in the CCTV system. (g) any visit by a relevant authority or emergency service.

11. Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.”

I understand that your client has also decided against the above conditions. However, condition 4 on the current premises licence states: *“The licensee shall keep an incident book which shall be made available to the Police and Licensing Authority on demand.”* As the initial application stipulated that most conditions are to remain as they are, would your client therefore consider keeping this condition as it is?

“15. There shall be no entry or re-entry to the premises permitted after 00:30 on Sunday to Thursday and 02.00 on Friday and Saturday.”

I recognise that the applicant's position in not wishing to accept the above amendments that would curtail the hours of last entry. However, on page 14 of the application form, it states: *“The last entry on Sundays to Thursdays will be 0130 and on Fridays and Saturdays to 0230.”* I am happy for this condition to be amended as per the application form, though I would be opposed to its total removal, especially since it was included in the initial application.

“25. A telephone number shall be made available to be used by residents in relation to any complaint of noise resulting from the premises. The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the incident log.”

If your client is not willing to provide a contact number, I would be open to revising the condition to read: *“The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the complaints log.”* – would your client consider a condition similar to that?

“27. The placing of bottles into receptacles outside the building shall not be permitted between 22:00 hours & 09:00 hours the following morning.”

This condition was proposed to replace the current annex two condition 35, I'm not sure why the applicant would want to remove this entirely. I am happy to leave it as per the current condition which states: *"No rubbish or empty bottles shall be placed in the outside bins after 23:00."*

"31. No person under the age of 18 shall be admitted unless accompanied by a responsible adult."

This condition was intended to replace annex two condition 24, which states: *"No children shall be admitted unless accompanied by a responsible adult."* The initial application made no mention of removing this condition, and I am also unsure why the applicant now wishes to do so. It is straightforward and supports the licensing objective of "the protection of children from harm".

"33. Staff training shall be undertaken by all members of staff involved with licensable activities. Additionally, all staff shall undergo refresher training every 12 months which shall also be recorded. Staff training shall include the following topics:

- (a) Age verification policy.*
- (b) CCTV operation.*
- (c) Conflict management.*
- (d) Operating procedures.*
- (e) Proxy Sales.*
- (f) Permitted hours and relevant conditions.*
- (g) Noise monitoring.*

34. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager.

35. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council."

The aim of this condition was to replace the existing one in annex three, following a review hearing. I understand that the applicant might find the above to be overly onerous. I therefore propose that perhaps the condition can be simplified to read *"All staff training shall be undertaken by all members of staff involved with licensable activities. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council"*.

Finally, and perhaps most importantly, the application states that *"Noise monitoring will continue until all regulated activities have come to an end"* as an additional step intended to promote "the prevention of public nuisance". I had translated this into my revised conditions (23, 24). I acknowledge that your client wishes to remove these conditions, believing them to be disproportionate the application itself. However, I would appreciate if the applicant could propose an adequate condition outlining how they plan to continue monitoring noise, as stated in the application form. Thereafter, I would like to see this added as a condition. I

am of course open to suggestions, however, ultimately, I think it's important that this is added as a condition in some way.

Hopefully the above is useful, if you could let me know your thoughts, I would be most grateful. I can thereafter put together a draft of conditions that work for all parties.

Many thanks,

[Redacted signature]

www.brent.gov.uk
@Brent_Council

From: [Redacted]
Sent: Monday, September 23, 2024 5:14 PM
To: [Redacted]
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good afternoon [Redacted]

Thank you for sending this across.

I shall be out conducting site visits tomorrow; however, I shall provide you with a full and comprehensive response in due course as soon as I can.

Many thanks,

[Redacted signature]

www.brent.gov.uk
@Brent_Council

From: [Redacted]
Sent: Monday, September 23, 2024 3:36 PM
To: [Redacted]
Subject: FW: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Dear [Redacted]

Further to our conversation last Friday, please find attached.

Regards

[REDACTED]

Partner

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Proposed Annex Two Conditions (Redrafted 27.09.2024)

**Carlton Lounge, 232 – 234 Kingsbury Road, London, NW9 0BH (Premises
licence number: 362998)**

1. The premises shall operate, and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities and all recordings shall be kept for 31 days.
2. CCTV footage shall be made available to the Police and any authorised Officers from Brent Council upon 72 hours of request.
3. The CCTV system shall display on any recordings, the correct date and time of the recording.
4. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.
5. A minimum of 2 SIA licensed door supervisors shall be on duty after 22:00 if the premises will be open past 01:00.
6. All SIA licenced door supervisors shall wear clothing that can be clearly and easily identified.
7. The licensee shall keep an incident book which shall be made available to the Police and Licensing Authority on demand.
8. There shall be no open glass vessels permitted outside the area defined on the premises plan.
9. Notices shall be conspicuously displayed at the entrance notifying patrons that the premises reserves the right to undertake searches upon entry to the premises and that the premises has a “no drugs policy”.
10. Food and alcohol-free drinks shall be always available for patrons whilst the premises are selling alcohol.
11. The last entry on Sundays to Thursdays will be 01:30 and on Fridays and Saturdays to 02:30.
12. There shall be at least 4 members of staff on site after 00:00.
13. The maximum number of persons permitted on the Ground Floor shall not exceed 300 persons including staff. The maximum number of persons permitted on the First Floor shall not exceed 150 persons including staff.
14. The smoking of shisha through "alcoholic drinks" shall not be advertised.

15. The outside drinking areas shall close after 23:00, excluding the shisha areas and karoga areas.
16. Ingress and egress notwithstanding, all doors and windows shall remain closed during any regulated entertainment and/or after 22:00 in all circumstances. Staff shall undertake regular checks to ensure that all doors and windows are closed.
17. The playing of live or recorded music shall not be permitted in any external area after 22:00 hours apart from within the designated shisha areas and karoga areas as defined on the premises plan.
18. The internal areas from which any recorded music or live music is undertaken, the premises shall ensure that it is adequately sound proofed to prevent noise breakout.
19. A telephone number shall be made available to be used by residents in relation to any complaint of noise resulting from the premises. The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the incident log.
20. Noise monitoring shall be undertaken at least once every two hours when regulated entertainment is provided from 23.00 until the closure of the premises.
21. Clear and legible notices shall be prominently displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.
22. No rubbish or empty bottles shall be placed in the outside bins after 23:00.
23. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport, or proof of age card with the PASS Hologram.
24. A Challenge 25 notice shall be conspicuously displayed at the point of sale.
25. A logbook shall be kept recording all refused sales of alcohol. The log shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Brent Council and the Police.
26. No children shall be admitted unless accompanied by a responsible adult.
27. All staff training shall be undertaken by all members of staff involved with licensable activities. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises

supervisor/duty manager. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

28. During major Wembley Stadium event days, patrons shall not be permitted to congregate outside the premises, save for ingress.
29. During major Wembley Stadium event days, all drinks glass bottles shall be decanted into either toughened glass, polycarbonate material or any other type of plastic vessel.
30. During major Wembley Stadium event days, the DPS or relevant duty manager shall work in partnership with the Police and if necessary, comply with any direction given by a senior Police Officer.

**IN THE BRENT LICENSING SUB-COMMITTEE
IN THE MATTER OF THE APPLICATION FOR THE
REVIEW OF A PREMISES LICENCE FOLLOWING
EXPEDITED REVIEW BY METROPOLITAN POLICE
FOR THE PREMISES KNOWN AS CARLTON
LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Witness Statement of [REDACTED]

**I, [REDACTED] of [REDACTED].. hereby state
the following:**

- 1. I make this statement in respect the review of the premises licence for Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH**
- 2. The facts in this statement are true to the best of my knowledge and belief. Where matters are not within my own knowledge, I have stated the source of my information.**
- 3. I am a salaried employee at this establishment.**
- 4. On the day of the incident, I witnessed a disagreement taking place in the VIP area, which security had already begun to address. I saw colleagues and security staff present at the scene working to de-escalate the situation. The disagreement was purely verbal. There was no fighting.**
- 5. At that time, I informed [REDACTED] that a disagreement was occurring. Security and my colleague then escorted one of the groups out through the main entrance.**
- 6. Meanwhile, we managed to contain the other group in the garden area and moved them out of the VIP section to further de-escalate the situation. However, one individual attempted to take a bottle, which prompted me, [REDACTED] to follow him as he tried to leave the premises through a fire exit through the alley way**

7. When we reached the forecourt, the situation escalated

into a physical altercation on the road outside. I did my best to control those involved and asked [REDACTED] who was nearby to call the police. I provided [REDACTED] with the postcode to give to the police on the phone call.

8. I then saw someone fall to the ground. At the time, I didn't realize he had been stabbed. It was only when I approached him that I understood the seriousness of the injury. I was shocked and immediately shouted for everyone to stop fighting, telling them someone was hurt. At this point I saw the person who called the police and another person I shouted for help as the victim who was wounded. After that, the crowd quickly dispersed.

6. Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: [REDACTED]

Dated: 11/06/2025

**IN THE BRENT LICENSING SUB-COMMITTEE
IN THE MATTER OF THE APPLICATION FOR THE
REVIEW OF A PREMISES LICENCE FOLLOWING
EXPEDITED REVIEW BY METROPOLITAN POLICE
FOR THE PREMISES KNOWN AS CARLTON
LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Witness Statement of [REDACTED]

I, [REDACTED] hereby state
the following:

1. I make this statement in respect the review of the premises licence for Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH
2. The facts in this statement are true to the best of my knowledge and belief. Where matters are not within my own knowledge, I have stated the source of my information.
3. On 18 May 2025 I was at the venue as a customer. I know some of the staff who work at the venue personally including, [REDACTED]
4. [REDACTED] asked me to call the police and I made the 999 from the phone. A screenshot of the 999 call from my phone is exhibited as OW1.

6. Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: [REDACTED]

Dated: 11/06/2025

**IN THE BRENT LICENSING SUB-COMMITTEE
IN THE MATTER OF THE APPLICATION FOR THE
REVIEW OF A PREMISES LICENCE FOLLOWING
EXPEDITED REVIEW BY METROPOLITAN POLICE
FOR THE PREMISES KNOWN AS CARLTON
LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Witness Statement of [REDACTED]

I, [REDACTED] . [REDACTED] hereby state
the following:

1. I make this statement in respect the review of the premises licence for Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH
2. The facts in this statement are true to the best of my knowledge and belief. Where matters are not within my own knowledge, I have stated the source of my information.
3. On 18 May 2025 I was at the venue as a customer. I know some of the staff who work at the venue personally including, [REDACTED]
4. [REDACTED] asked me to call the police and I made the 999 from the phone. A screenshot of the 999 call from my phone is exhibited as OW1.

6. Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: [REDACTED]

Dated: 11/06/2026

Written Submissions on behalf of the Licence holder

Introduction

1. This review was rightly instigated because of a fatal stabbing which occurred in the street/pavement outside the licensed premises (“Carlton Lounge”) on 18 May 2025. Both the victim and the suspect are believed to have been in the premises before the incident.
2. Application for the review was made by Sergeant Sullivan of the Metropolitan Police and was advertised in the usual way, stating that “Representations must be received before 5 June 2025”. Eight of the adverse representations in the ‘Public Document Pack’ are shown as *sent* on 5 June, and three of them are undated. Counsel for the licensee does not take a procedural point on the ‘local’ representations, because there is so much duplication between those received out of time and those received in time. But counsel is concerned about the ‘holding’ representation of PC McInness (shown as sent on 5 June at 14:41). This blank representation was supplemented by a witness statement dated 9 June and received by the licensee at 17:12 that evening. The video footage it refers to has yet to be provided in a form that enables it to be viewed.
3. Three representations were made by responsible authorities: Edwin Maldoon (Licensing Enforcement Officer); Brendon McInness (Metropolitan Police); and Martin Wood (Principal Nuisance Control Officer, London Borough of Brent). PC McInness’ and Mr. Wood’s representations are shown as having been sent on 5 June.
4. Some sixteen representations against the continued operation of Carlton Lounge were made by others who have asked for anonymity¹. Eight of these are in identical (cut and paste) terms. These representations go substantially beyond the incident on 18 May. They complain of customers regularly fighting in the street (“every Friday and Saturday night”), “persistent” noise (escaping music disturbing their sleep), anti-social behaviour (screaming, revving of car engines, pavements and roads covered with broken glass), drug use and even a shooting. On 9 June at 17:22 Sergeant Sullivan produced five additional witness statements from local people in similar terms. The lateness of so much material is deeply concerning.
5. Some sixty five (65) representations have been received in support of Carlton Lounge. (Two (2) of these were sent on 5 June.)

¹ It is not clear whether page 27 of the Public Reports Pack is the entirety of that representation or should be read together with one of the other pages.

The Issues on this Review

6. The representations have considerably expanded the scope of this Review, which now falls to be considered under two headings. (i) The incident on 18 May: what happened and what steps should be taken to ensure it does not happen again? (ii) The management of the premises and the behaviour of its customers: whether there are serious management failings and widespread crime and disorder and public nuisance as alleged.
7. The issues under (i) are whether the response of the premises management and staff to the incident on 18 May fell short of what is required of them; and if it did, how badly, and what steps the Sub-Committee should take in consequence.
8. The issues under (ii) are whether the evidence supports Sergeant Sullivan's allegation of "*systemic failings in the venue's management and operational culture*"; and whether complaints made by the local residents' representations are credible or exaggerated and/or inherently unreliable.
9. It is convenient to take (ii) first, because it provides the context for (i).

(i) Management and operational culture of the premises

10. Thava Theveraja took possession of the premises at 232-234 Kingsbury Road in 2012/2013. The premises had up until then operated as a public house. He believes the licence was first transferred into his name, and subsequently (2016) into the name of Carlton Lounge (UK) Limited.
11. Early operational teething problems resulted in a review of the licence being brought in 2014, which was resolved by the licensee implementing an effective action to improve management, including staff training. (Current staff training is described in Section 3 of Richard Bunch's Report and comprises mandatory induction and six-monthly refresher courses for all staff.)
12. I respectfully disagree with Mr. Maldoon's comment that this review of over ten years ago is of "limited relevance". Its importance is in the smooth and efficient resolution of it, evidencing a proper partnership approach of the licensee, and in the fact that there has been no other review in the eleven years since.
13. The only other regulatory issue concerning Carlton Lounge relates to a noise complaint by a nearby resident in 2022, which resulted in a Noise Abatement Notice. This was resolved by the installation of a noise limiter, which was set to an agreed limit on 16 October 2022, and by noise level monitoring checks commencing after 11 pm. (See the email chain attached to these submissions, in which the Borough's Principal Nuisance Control Officer wrote: "*I am really pleased we were able to set a music noise level earlier this evening that was agreeable to both you and a nearby residential neighbour.*") There has been no further enforcement taken.
14. Application for a variation of the premises licence was made in August last year, seeking to extend the terminal hour of licensing activities by one hour and amend the 'last entry' condition by extending it to 01:30 am Sunday to Thursday and 02:30 am Friday and Saturday. Again, the responsible 'partnership working' of the licensee and the solicitors instructed by him can be seen in the attached email correspondence in which Mr. Maldoon wrote: "*Once again, thank you for your cooperation. I am grateful that we were able to find a solution that worked for all parties.*"

15. Not only does the *only* evidence of the past behaviour and operational culture of the management of the Carlton Lounge fly in the face of the accusations made against them by some (by no means all) local people, but it is difficult – if not impossible – to accept that the various allegations summarised in paragraph 4 above are believable and yet were not raised as issues in the variation application of August /October 2024, or at all.
16. Set against those allegations are 65 representations made by customers of Carlton Lounge, many of them local, as well as nearby businesses. The Sub-Committee is respectfully invited to read these testimonials carefully and find them inherently credible.
17. A further minor variation extending the above times by one hour was granted without objection in December 2024.

Incidents at the premises

18. The evidence of incidents at the premises in more than 10 years of running Carlton Lounge is limited to 6 in number, one of which is the incident on 18 May 2025 that triggered this review, and another on 24 May. The 4 incidents evidenced as occurring in the year leading up to 18 May are:
 - i. **26 May 2024:** assault occasioning actual bodily harm. The victim went to hospital complaining of a “*pain in the head*”, having been punched. She described her assailant as drunk.
 - ii. **6 July 2024:** victim went to hospital with suspected injury to face and nose, having been punched. Staff heard noise (but did not see the assault) and separated the group.
 - iii. **15 March 2025:** victim called police saying he had been attacked by 3 asian males “*on Kingsbury Road*” and stabbed. He later retracted the allegation and apologised for wasting police time. It is not clear why this has been recorded by Sergeant Sullivan as an incident related to the venue, or otherwise evidence of bad management by the staff of Carlton Lounge.
 - iv. **6 May 2025:** victim left Tiger Bay and was punched in the face by someone outside (on the pavement).
19. It is respectfully suggested that whilst these incidents need to be objectively investigated (who is telling the truth and who is not), even at their worst they do not come close to the level of concern that would usually give rise to a revocation of the premises licence.
20. The incident on **24 May 2025** is more serious, however. Though it occurred *outside* the premises, it suggests that staff did not regard what was happening on the street as their responsibility. That possibility needs to be investigated further and action taken as appropriate. If, after the facts are satisfactorily established, it appears that door staff should have done more, there needs to be a clear policy and training put in place for dealing with incidents outside but in the vicinity of Carlton Lounge.

21. There is also some evidence of a customer or customers becoming drunk. Again, the truth needs to be established. In any event, the staff should be re-trained on the service of alcohol to persons who *may not yet be*, but are *becoming* drunk. The licensing consultants instructed by the licensee will make recommendations in this regard at the hearing.

(ii) The incident on 18 May

22. The criticisms of the staff fail to have sufficient regard to the urgency of the situation as it unfolded. See the witness statement of Prasanth Thavatheva. Whilst there are undoubtedly lessons to be learned, it is respectfully submitted that the actions of the staff in dealing with a situation they had never encountered in over 10 years' trading fall far short of being fairly described as irresponsible or otherwise reprehensible.
23. The commendation given by DI Griffith is particularly telling.

Conclusions

24. Axiomatically, as section 182 Guidance makes clear, decisions on reviews under the Licensing Act must be made on evidence. The evidence in this review suggests a responsible operator who clearly wants to, and does, work in partnership with the responsible authorities, and who has done so for over ten years with just one review in the early years of the operation in 2014, which was satisfactory resolved with the licensee's evident cooperation; and one noise abatement complaint which, again, was resolved – it seems to the satisfaction of all parties.
25. There are 65 representations in support of Carlton Lounge. Whilst the decision of the Sub-Committee is, of course, not a mathematical exercise pitting the numbers on one side against the numbers on the other, the Sub-Committee is invited to give substantial weight to those 65 representations, as being inherently credible and consistent with the history of these premises as evidenced by the lack of regulatory enforcement and the palpable cooperation given to the responsible authorities: see the email chains attached to these submission.
26. Unless the fault of the licensee is palpable and severe, it is usual for an application to revoke a licence to come as a result of a number of ignored warnings. There has been no such stepped approach in this case. The application to revoke the premises licence has come as a bolt from the blue. The company licensee, and the extended family that comprise the company, do not claim to be perfect – there would be real concern if they did; but they have a history of responding to the relatively few problems evidenced before the incident of 18 May as and when they have arisen, responsibly and promptly. There has never been any complaint as to their response, and it can confidently be concluded that its response to the incident on 18 May – and to the very fact of this review – will be thorough and effective.

Gerald Gouriet KC

Francis Taylor Building

Inner Temple

12 June 2025

Brent Licensing Sub-Committee
Review under section 53C of the Licensing Act 2003
Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH

Exhibits

Email correspondence with the Borough's Principal Nuisance

Control Officer referred to in paragraph 13

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----- Forwarded message -----

From: **Martin, Wood** [REDACTED]
Date: Sun, 16 Oct 2022 at 00:34
Subject: RE: FAO Prash Theva
To: prash theva <prashtheva@gmail.com>,
office@complianceirectltd.com <office@complianceirectltd.com>

Dear Prash and Mr Sivashankar

I am really pleased we were able to set a music noise level earlier this evening that was agreeable to both you and a nearby residential neighbour.

Kind regards

Martin Wood

Principal Nuisance Control Officer

Community Protection

Resident Services

From: Martin, Wood

Sent: 14 October 2022 22:49

To: 'office@complianceirectltd.com' <office@complianceirectltd.com>

Cc: 'prash theva' <prashtheva@gmail.com>

Subject: RE: FAO Prash Theva

Dear Compliance Direct Ltd

Thank you for your email.

Yes – the visit for tomorrow evening is confirmed.

The Brent Noise App is available to all Brent residents. It enables our nuisance control team to filter our actionable from non-actionable noise reports. The attached recording was made 03 Sept 2022 at 01:06am. We would consider this to be a nuisance-level of noise and a failing to prevent public nuisance. Please note: the noise app developer recommends noise cancelling headphones for reviewing audio files.

To your question whether we can provide Sound Licensing Ltd access to the complainants accommodation. We cannot. Though we will ask.

Look forward to seeing you tomorrow evening.

Kind regards

Martin Wood

Principal Nuisance Control Officer

Community Protection

Resident Services

[REDACTED]

From: office@compliance-direct.co.uk <office@compliance-direct.co.uk>
Sent: 12 October 2022 11:07
To: Martin, Wood <[REDACTED]>
Cc: 'prash theva' <prashtheva@gmail.com>
Subject: RE: FAO Prash Theva

Dear Mr Wood,

We act for Carlton Lounge (UK) Ltd in this matter.

We are writing to confirm the visit on 15th Oct and looking forward to meeting you in person.

It appears that residents of Brent are able to record noise nuisances via a mobile app and submit this to the authority as proof of alleged nuisance. Are you able to release any such recordings, if any received, by the authority to us?

We are currently instructing Sound Licensing Ltd to provide a complete survey and to this effect would the authority provide access to the complainants accommodation?

Kind Regards,

Compliance Direct Ltd

From: prash theva <prashtheva@gmail.com>
Sent: 22 September 2022 12:27
To: Martin, Wood [REDACTED]
Cc: Butt, Councillor Saqib <Cllr.Saqib.Butt@brent.gov.uk>; Compliance Direct <office@compliancedirectltd.com>
Subject: Re: FAO Prash Theva

Hi Martin,

Thank you for the prompt response and look forward to seeing you then.

Kind regards,

Prash

On Thu, 22 Sept 2022 at 11:41, Martin, Wood <Martin.Wood@brent.gov.uk> wrote:

Hi Prash

Thanks for your email. Hope you are well too.

As per earlier email and invite: the earliest available date for the volume-setting exercise with nearby noise-sensitive receptor is Saturday 15th Oct. I will be attending on that date between 11pm and midnight.

Look forward to seeing you then.

Kind regards

Martin Wood

Principal Nuisance Control Officer

Community Protection

Resident Services

[REDACTED]

From: prash theva <prashtheva@gmail.com>

Sent: 22 September 2022 11:19

To: Butt, Councillor Saqib <Cllr.Saqib.Butt@brent.gov.uk>; Compliance Direct <office@compliancedirectltd.com>; Martin, Wood [REDACTED] >

Subject: Re: FAO Prash Theva

Hi Martin,

Hope you are well, just like to confirm you are coming tomorrow evening at 11pm so I am able to confirm with our sound engineer, so we are able to measure sound from the neighbour property.

Kind regards

Prash

On Fri, 16 Sep 2022 at 10:00, Martin, Wood [REDACTED] wrote:

Dear Prash

Have set aside an hour just in case cannot make 11pm prompt due to prior service demands. However, this volume-setting exercise should only take a few minutes.

Kind regards

Martin Wood

Principal Nuisance Control Officer

Community Protection

Resident Services

[REDACTED]

The use of Brent Council's e-mail system may be monitored and communications read in order to secure effective operation of the system and other lawful purposes.

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REGENERATION AND ENVIRONMENT

Brent Civic Centre, Engineers Way,
Wembley, Middlesex. HA9 0FJ

Tel: (020) 8937 5252
Direct Line 5561

Email: [REDACTED]

Web: www.brent.gov.uk

Date: 19/10/2022

Mr Prash Theva (Manager)
Carlton Lounge / Tiger Bay
232-234 Kingsbury Road
London
NW9 0BH

Your Ref:
Our Ref: NC/08126/19
Contact: Martin Wood

By post and email

Dear Prash,

Carlton Lounge / Tiger Bay, 232-234 Kingsbury Road, London, NW9 0BH
Formal withdrawal of noise nuisance abatement notices.

Thank you once again for your co-operation in setting a suitable music noise volume on Saturday 15th October.

I have since received summons to attend Willesden Magistrates Court on 17 November following appeal lodged against the enclosed noise abatement notices, dated and served 14 September 2022.

Having thought carefully about this matter and being mindful of your evident willingness to cooperate and meet your legal duty to prevent public nuisance, and adhere to conditions upon your premises licence, we have taken the decision to formally withdraw both noise abatement notices.

For the avoidance of doubt, there are no active noise abatement notices against Carlton Lounge / Tiger Bay.

Yours sincerely,

Martin Wood
Principal Nuisance Control Officer
Community Protection
cc Borough Solicitor



Brent - building a better borough

PROOF-OF-SERVICES

LONDON BOROUGH OF BRENT

Environmental Protection Act 1990
Section 80

Abatement notice in respect of statutory nuisance

Mr Prash Theva (Manager)
Carlton Lounge/Tiger Bay
232-234 Kingsbury Road
London
NW9 0BH

WITHDRAWN

TAKE NOTICE that under the provisions of the Environmental Protection Act 1990 the Council of the London Borough of Brent being satisfied of the **likely occurrence** of noise amounting to a statutory nuisance under section 79(1)(g) of that Act from the premises known as Carlton Lounge/Tiger Bay, 232-234 Kingsbury Road, London, NW9 0BH within the district of the said Council arising from the playing of amplified music and amplified speech.

HEREBY REQUIRE YOU as the **person responsible** of the premises from which the noise is or would be emitted **forthwith** from the service of this notice, to abate the same and also

HEREBY PROHIBIT the **occurrence** of the said nuisance and for that purpose require you to: **Cease or cause to cease the playing of amplified music and amplified speech at such a level as to constitute a nuisance**

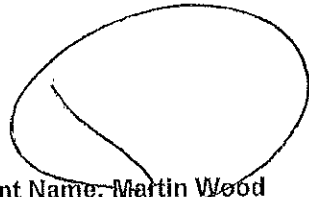
IN the event of an appeal this notice shall NOT be suspended until the appeal has been abandoned or decided by the Court, as, in the opinion of the Council, the expenditure which would be incurred by any person in carrying out works in compliance with this notice before any appeal has been decided would not be disproportionate to the public benefit to be expected in that period from such compliance.

IF without reasonable excuse you contravene or fail to comply with any requirement of this notice you will be guilty of any offence under section 80(4) of the Environmental Protection Act 1990 and on summary conviction will be liable to a fine not exceeding level 5 on the Standard Scale (currently £5,000), together with a further fine of an amount equal to one-tenth of that level for each day on which the offence continues after conviction. A person who commits an offence on industrial, trade or business premises will be liable on summary conviction to a fine not exceeding £20,000.

The Council may also take proceedings in the High Court for securing the abatement, prohibition or restriction of the nuisance. Further, if you fail to execute all or any of the works in accordance with this notice, the Council may execute the works and recover from you the necessary expenditure incurred.

Dated: 14/09/2022

Signed:


Print Name: Martin Wood
Regulatory Services
Authorised Officer

Regulatory Services, Brent Civic Centre, Engineers Way, Wembley, HA9 0JF

Email: ens.noiseteam@brent.gov.uk

Ref: EH/19/08126/MW

NB The person served with this notice may appeal against the notice to Brent Magistrates' Court, 448 High Road, London NW10 2DZ within twenty-one days beginning with the date of service of the notice (see notes attached).

If you require further information or have a query in respect of this notice, please call Martin Wood on [REDACTED]

The Notice Of Which This Is A True Copy Was Served By	
Me On The Within Named On The	14 Day Of
SEP 7, 2022	
By Personal Delivery To	MR PRASH TILVA
At	
By Affixing To	13.00 HRS
Of The Premises	
By Sending To The By Recorded Delivery, Addressed	
To The Within Named At The Address On The Notice For	
Recorded Delivery No. See Registration Book No.	
Signed	EH0
Designation	



REGENERATION AND ENVIRONMENT

Brent Civic Centre, Engineers Way,
Wembley, Middlesex. HA9 0FJ
Tel: (020) 8937 5252
Direct Line 020-8937 5561

Email: ens.noiseteam@brent.gov.uk

Web: www.brent.gov.uk

Date: 14/09/2022

Mr Prash Theva (Manager)
Carlton Lounge/Tiger Bay
232-234 Kingsbury Road
London
NW9 0BH

Your Ref:
Our Ref: NC/08126/19
Contact: Martin Wood

Dear Mr Theva,

Environmental Protection Act 1990

Carlton Lounge/Tiger Bay, 232-234 Kingsbury Road, London, NW9 0BH

It was good to meet with you, your father, and Mark (Head of Security) on Saturday 27 Aug. You will recall my visit was made at approx. 22:40hrs, in response to a noise complaint. My prior assessment indicated a statutory nuisance-level of noise from loud amplified music. During our discussion, you informed me of due diligence measures you are taking by measuring noise levels at the boundary, and unsuccessful attempts you have made to engage with one resident in particular. I acknowledge that Carlton Lounge was celebrating its 10th anniversary.

Following a later review of the noise abatement notice served on you in July 2019 (copy attached), I observed its scope is limited to noise nuisance affecting residential occupiers at Mead Court. As explained during our meeting, the complaint received on Saturday evening was in response to a complaint from a different location.

I am therefore writing to formally withdraw the 2019 notice and serve the enclosed revised notice under Section 80 of the Environmental Protection Act 1990. This is intended to deal with the matter by enabling the Council to take formal legal action should there be any occurrence of noise nuisance from loud amplified music.

Contravention of the notice could lead to the instigation of criminal proceedings against you. The maximum fine for each offence, upon conviction, is unlimited. The previous maximum fine was £20,000 (business).

Please note that there is a right of appeal to the notice. Application has to be made to the Magistrates Court within 21 days. The details are provided on the notes to the notice.

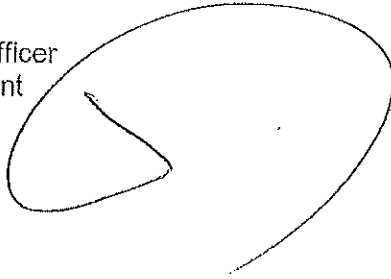
We remind you of Condition 15 (Annex 2) of your Premises Licence: No noise or vibration shall be detectable at any neighbouring noise sensitive premises. We also remind you of your duty under the Licensing Act 2003 to prevent public nuisance.

Accordingly, I would strongly advise that you ensure the playing of amplified music does not constitute statutory noise nuisance or breach of premises licence.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

Martin Wood
Principal Nuisance Control Officer
Regeneration and Environment



LONDON BOROUGH OF BRENT

Environmental Protection Act 1990

Section 80

Abatement notice in respect of statutory nuisance

Carlton Lounge (UK) Ltd
Carlton Lounge/Tiger Bay
232-234 Kingsbury Road
London
NW9 0BH

WITHDRAWN

TAKE NOTICE that under the provisions of the Environmental Protection Act 1990 the Council of the London Borough of Brent being satisfied of the **likely occurrence** of noise amounting to a statutory nuisance under section 79(1)(g) of that Act from the premises known as Carlton Lounge/Tiger Bay, 232-234 Kingsbury Road, London, NW9 0BH within the district of the said Council arising from the playing of amplified music and amplified speech.

HEREBY REQUIRE YOU as the **person responsible** of the premises from which the noise is or would be emitted **forthwith** from the service of this notice, to abate the same and also

HEREBY PROHIBIT the **occurrence** of the said nuisance and for that purpose require you to: **Cease or cause to cease the playing of amplified music and amplified speech at such a level as to constitute a nuisance**

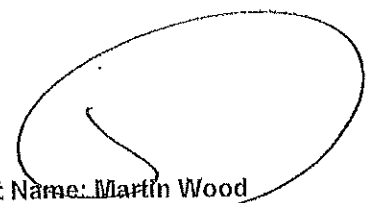
IN the event of an appeal this notice shall NOT be suspended until the appeal has been abandoned or decided by the Court, as, in the opinion of the Council, the expenditure which would be incurred by any person in carrying out works in compliance with this notice before any appeal has been decided would not be disproportionate to the public benefit to be expected in that period from such compliance.

IF without reasonable excuse you contravene or fail to comply with any requirement of this notice you will be guilty of any offence under section 80(4) of the Environmental Protection Act 1990 and on summary conviction will be liable to a fine not exceeding level 5 on the Standard Scale (currently £5,000), together with a further fine of an amount equal to one-tenth of that level for each day on which the offence continues after conviction. A person who commits an offence on industrial, trade or business premises will be liable on summary conviction to a fine not exceeding £20,000.

The Council may also take proceedings in the High Court for securing the abatement, prohibition or restriction of the nuisance. Further, if you fail to execute all or any of the works in accordance with this notice, the Council may execute the works and recover from you the necessary expenditure incurred.

Dated: 14/09/2022

Signed:



Print Name: Martin Wood
Regulatory Services
Authorised Officer

Regulatory Services, Brent Civic Centre, Engineers Way, Wembley, HA9 0JF

Tel: [REDACTED]

Email: ens.noiseteam@brent.gov.uk

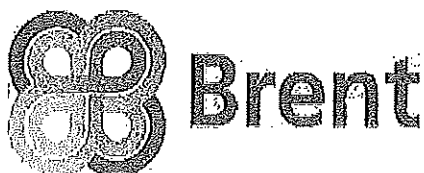
Ref: EH/19/08126/MW

NB The person served with this notice may appeal against the notice to Brent Magistrates' Court, 448 High Road, London NW10 2DZ within twenty-one days beginning with the date of service of the notice (see notes attached).

If you require further information or have a query in respect of this notice, please call Martin Wood on [REDACTED]

13.00 HRS

The Notice Of Which This Is A True Copy Was Served By	
Me On The Within Named On The <u>14</u> Day Of	
<u>SEPT. 2022</u>	
By Personal Delivery To <u>MR PRASH THEVA</u>	
At	
By Affixing To The <u>13-00 HRS</u>	
Of The Premises	
By Sending The Notice By Recorded Delivery Addressed	
To The Within Named At The Address On The Notice For	
Recorded Delivery No. See Registration Book No.	
Signed <u>[Signature]</u>	
Designation <u>ENO</u>	



REGENERATION AND ENVIRONMENT

Brent Civic Centre, Engineers Way,
Wembley, Middlesex. HA9 0FJ
Tel: (020) 8937 5252
Direct Line 020-8937 5561

Email: ens.noiseteam@brent.gov.uk

Web: www.brent.gov.uk

Date: 14/09/2022

Carlton Lounge (UK) Ltd
Carlton Lounge/Tiger Bay
232-234 Kingsbury Road
London
NW9 0BH

Your Ref:
Our Ref: NC/08126/19
Contact: Martin Wood

Dear Sirs

Environmental Protection Act 1990

Carlton Lounge/Tiger Bay, 232-234 Kingsbury Road, London, NW9 0BH

I met with Mr Prash Theva (Manager) on Saturday 27 Aug 2022, as outlined in the attached correspondence.

We are concerned that statutory noise nuisance from loud amplified music - particularly after 11pm - is likely to occur. We are therefore obliged to serve the enclosed notice under Section 80 of the Environmental Protection Act 1990. This is intended to deal with the matter by enabling the Council to take formal legal action should there be any occurrence of noise nuisance from loud amplified music.

Contravention of the notice could lead to the instigation of criminal proceedings against you. The maximum fine for each offence, upon conviction, is unlimited. The previous maximum fine was £20,000 (business).

Please note that there is a right of appeal to the notice. Application has to be made to the Magistrates Court within 21 days. The details are provided on the notes to the notice.

We remind you of Condition 15 (Annex 2) of your Premises Licence: No noise or vibration shall be detectable at any neighbouring noise sensitive premises. We also remind you of your duty under the Licensing Act 2003 to prevent public nuisance.

Accordingly, I would strongly advise that you ensure the playing of amplified music does not constitute statutory noise nuisance or breach of premises licence.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

Martin Wood
Principal Nuisance Control Officer
Regeneration and Environment

Brent Licensing Sub-Committee
Review under section 53C of the Licensing Act 2003
Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH

Exhibits

Email correspondence with Mr. Maldoon referred to in paragraph 14

From: [REDACTED]
To: [Kaneetha Vetivel](#)
Cc: [Business Licence](#); [REDACTED]
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited
Date: 30 September 2024 10:28:48
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)
[image007.jpg](#)
[Carlton Lounge - Annex Two Conditions Final Draft 27.09.2024.pdf](#)

Good morning Kaneetha,

Thank you for confirming that the attached annex two conditions have been agreed by the applicant. Consequently, I can confirm on behalf of the Licensing Authority that my representation can now be considered withdrawn.

As I am the designated consultee on behalf of the Licensing Authority, I am unable to confirm that the application is granted. I would however advise you to email [@Business Licence](#) to get clarification that this is the case.

Once again, thank you for your cooperation. I am grateful that we were able to find a solution that worked for all parties.

Best regards,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk
[@Brent_Council](#)

From: Kaneetha Vetivel k.vetivel@glsolicitors.com
Sent: Monday, September 30, 2024 10:10 AM
To: Maldoom, Edwin [REDACTED]
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Morning Edwin

The amended conditions you sent across on Friday are agreed.

Please can you confirm the premises can begin trading for the extended hours from today and that the hearing is formally withdrawn.

Many thanks

Kaneetha Vetivel
Partner

Greater London Solicitors Limited
343 London Road
Croydon
CR0 3PA

[REDACTED]
[REDACTED]

www.glsolicitors.com

From: Maldoom, Edwin <[REDACTED]>
Sent: 27 September 2024 15:51
To: Kaneetha Vetivel <k.vetivel@glsolicitors.com>
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good afternoon Kaneetha,

Apologies, I have amended this and reattached the document. Thank you for bringing that to my attention.

Best regards,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk
@Brent_Council

From: Kaneetha Vetivel <k.vetivel@glsolicitors.com>
Sent: Friday, September 27, 2024 3:49 PM
To: Maldoom, Edwin [REDACTED]
Subject: FW: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Hi Edwin

Thank you for this and I will review these again with the client.

Upon a brief perusal I note 12 – refers to bar staff and not staff.

Regards

Kaneetha Vetivel
Partner

Greater London Solicitors Limited
343 London Road
Croydon
CR0 3PA



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From: Maldoom, Edwin [REDACTED]
Sent: 27 September 2024 14:44
To: Kaneetha Vetivel <k.vetivel@glsolicitors.com>
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good afternoon Kaneetha,

As mentioned previously, I have redrafted the revised conditions based on our recent correspondence. I would kindly ask that you review them carefully to ensure that we are all in agreement on the final document.

If you could confirm in writing that your client agrees to the attached, that would be much appreciated. I can thereafter confirm that my representation is withdrawn.

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk
@Brent_Council

From: Maldoom, Edwin

Sent: Friday, September 27, 2024 12:00 PM

To: Kaneetha Vetivel <k.vetivel@glsolicitors.com>

Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good morning Kaneetha,

Thank you for sending this across – I really appreciate it.

I agree with all the below, and I shall draft a revised version of all the conditions following our correspondence. I will send this over to you as soon as possible, and once I have written agreement on behalf of your client that they are satisfied with everything, I shall withdraw my representation thereafter.

Best regards,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk

@Brent_Council

From: Kaneetha Vetivel <k.vetivel@glsolicitors.com>

Sent: Friday, September 27, 2024 11:48 AM

To: Maldoom, Edwin [REDACTED]

Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Dear Edwin

Thank you for taking the time to speak with me this morning.

Your email below is very helpful. I am in agreement that A – C are accepted.

As regards D:

2. amended condition 2 proposed below is accepted save as to kindly request 72 hours. [2. CCTV footage shall be made available to the Police and any authorised Officers from Brent Council upon ~~48-72~~ hours of request] You kindly indicated this morning that the 72 hours was accepted.

4. as I explained, this is not accepted. The premises upgraded its CCTV systems last year at a great expense to the business. The current systems are already clear and recognisable footage of patrons. Our client is confident that you will be able to see

from the CCTV recordings provided over the years that the quality of the footage has improved significantly. Our client will try to keep on board your comments when the CCTV systems are next upgraded.

10 and 11. The current condition is agreed to be retained [The licensee shall keep an incident book which shall be made available to the Police and Licensing Authority on demand].

15. amended condition 15 proposed below is accepted [The last entry on Sundays to Thursdays will be 0130 and on Fridays and Saturdays to 0230.] Thank you for indicating that you would accept a minor variation application seeking to extend the entry / re entry to 2.30 Sunday through Thursday and 3.30 Fridays and Saturday. I will speak to my client to make the necessary arrangements for the minor variation application in this regard.

25. upon considering this matter afresh and in the spirit of cooperation the premises licence holder is willing to accept condition 25 as proposed in the Proposed Annex 2 without amendment [25. A telephone number shall be made available to be used by residents in relation to any complaint of noise resulting from the premises. The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the incident log.]

27. agreed to keep the current condition 35 [No rubbish or empty bottles shall be placed in the outside bins after 23:00.]

31. agreed to keep the current condition 24 [No children shall be admitted unless accompanied by a responsible adult]

33, 34 and 35. Thank you for taking on board the comments and simplifying the condition. The amended condition proposed below is accepted [All staff training shall be undertaken by all members of staff involved with licensable activities. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council]

23 and 24. Currently, noise monitoring does take place and is recorded digitally rather than in a hard copy form. We therefore propose the following condition – “Noise monitoring shall be undertaken at least once every two hours when Regulated entertainment is provided from 23.00 until the closure of the premises.” Please can you confirm if this is acceptable to you.

I believe that the above will be acceptable to you. Please can you also confirm whether we can get the amended conditions ready to be effective from this evening?

I look forward to hearing from you.

Regards

Kaneetha Vetivel
Partner

Greater London Solicitors Limited
343 London Road
Croydon
CR0 3PA



www.glsolicitors.com

From: Maldoom, Edwin [REDACTED]
Sent: 25 September 2024 11:41
To: Kaneetha Vetivel <k.vetivel@glsolicitors.com>
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited
Importance: High

Good morning Kaneetha,

Thank you for your feedback – it's really helpful, especially with the context/reasoning provided for each of the conditions set out in my proposal. I remain optimistic that we can reach an agreement, and thus putting me in a position so that I can withdraw my representation.

However, I think it's important to be mindful that the initial application to vary the premises licence did not reference any significant amendments to the current conditions. The only proposed changes within the application are listed below:

- *"The proposal is to extend the last entry time."* – This was stated on the second page. This was further elaborated upon on page 14 (although in the incorrect box),

specifying that *“The last entry on Sundays to Thursdays will be 01:30 and on Fridays and Saturdays to 02:30”*.

- *“Security will be continue until the premises are closed and all customers have left the area”* – listed under the prevention of crime and disorder.
- *“Noise monitoring will continue until all regulated activities have come to an end.”*
- under the prevention of public nuisance.
- *“Existing conditions on Challenge 25 will continued.”* – under the protection of children from harm, despite the current premise licence having no conditions referencing an age verification policy.

As part of my representation, I revised all the conditions (while only being able to insist upon those relevant to “the prevention of public nuisance”, the objective under which my representation was made). This was necessary due to many outdated and unenforceable conditions, while others needed rewording for clarity. I also used the application’s details to form part of my revised conditions.

To simply matters, I’ve grouped the revised conditions into the four categories following on from your feedback:

A) Conditions accepted by all parties: 1, 3, 5, 6, 7, 9, 13, 17, 26, 28, 29, 30.

B) Conditions accepted by all parties that are to be amended following feedback: 14, 16, 18, 19, 20, 21, 22, 36, 37, 38.

C) Conditions to be removed as accepted by all parties: 8, 12, 23, 23, 24, 32.

D) Outstanding conditions yet to be resolved: 2, 4, 10, 11, 15, 25, 27, 31, 33, 34, 35.

I think we are on the same page for A-C, the only outstanding matters that are yet to be resolved are within the D column. Nonetheless, following on from your feedback, I have a few comments – which I hope are beneficial:

“2. A member of staff who is conversant with the operation of the CCTV system shall always be available at the premises whilst open to the public. CCTV footage shall be provided on removable media (I.e., USB, hard drive, CD etc..).”

4. The CCTV system shall be capable of obtaining clear facial recognition images of every person entering or leaving the premises with further CCTV cameras covering the internal areas stipulated on the premises plan and any additional external area that members of the public can access.”

I understand your client’s position on CCTV storage and the rationale for not accepting condition 2, and perhaps condition 4 as well. However, would your client accept the blow conditions following modification?

“2. CCTV footage shall be made available to the Police and any authorised Officers from Brent Council upon 48 hours of request.

4. The CCTV system shall be capable of obtaining clear facial recognition images of every person entering or leaving the premises."

If these are not accepted, I will reluctantly drop this matter, as my representation wasn't made under "the prevention of crime and disorder", and as you have said, no complaints have been raised regarding CCTV usage. However, adopting these conditions would reflect good management and co-operation.

"10. An incident log shall be kept at the premises and made available for inspection upon request by an authorised officer of Brent Council or the Police, which will record the following: (a) any incidents of crime and disorder. (b) any customers barred from the premises. (c) any ejections from the premises. (d) seizures of drugs or offensive weapon. (e) any complaints received. (f) any faults in the CCTV system. (g) any visit by a relevant authority or emergency service.

11. Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident."

I understand that your client has also decided against the above conditions. However, condition 4 on the current premises licence states: *"The licensee shall keep an incident book which shall be made available to the Police and Licensing Authority on demand."* As the initial application stipulated that most conditions are to remain as they are, would your client therefore consider keeping this condition as it is?

"15. There shall be no entry or re-entry to the premises permitted after 00:30 on Sunday to Thursday and 02.00 on Friday and Saturday."

I recognise that the applicant's position in not wishing to accept the above amendments that would curtail the hours of last entry. However, on page 14 of the application form, it states: *"The last entry on Sundays to Thursdays will be 0130 and on Fridays and Saturdays to 0230."* I am happy for this condition to be amended as per the application form, though I would be opposed to its total removal, especially since it was included in the initial application.

"25. A telephone number shall be made available to be used by residents in relation to any complaint of noise resulting from the premises. The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the incident log."

If your client is not willing to provide a contact number, I would be open to revising the condition to read: *"The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the complaints log."* – would your client consider a condition similar to that?

"27. The placing of bottles into receptacles outside the building shall not be permitted between 22:00 hours & 09:00 hours the following morning."

This condition was proposed to replace the current annex two condition 35, I'm not sure why the applicant would want to remove this entirely. I am happy to leave it as per the current condition which states: *"No rubbish or empty bottles shall be placed in the outside bins after 23:00."*

"31. No person under the age of 18 shall be admitted unless accompanied by a responsible adult."

This condition was intended to replace annex two condition 24, which states: *"No children shall be admitted unless accompanied by a responsible adult."* The initial application made no mention of removing this condition, and I am also unsure why the applicant now wishes to do so. It is straightforward and supports the licensing objective of "the protection of children from harm".

"33. Staff training shall be undertaken by all members of staff involved with licensable activities. Additionally, all staff shall undergo refresher training every 12 months which shall also be recorded. Staff training shall include the following topics:

- (a) Age verification policy.*
- (b) CCTV operation.*
- (c) Conflict management.*
- (d) Operating procedures.*
- (e) Proxy Sales.*
- (f) Permitted hours and relevant conditions.*
- (g) Noise monitoring.*

34. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager.

35. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council."

The aim of this condition was to replace the existing one in annex three, following a review hearing. I understand that the applicant might find the above to be overly onerous. I therefore propose that perhaps the condition can be simplified to read *"All staff training shall be undertaken by all members of staff involved with licensable activities. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council"*.

Finally, and perhaps most importantly, the application states that *"Noise monitoring will continue until all regulated activities have come to an end"* as an additional step intended to promote "the prevention of public nuisance". I had translated this into my revised conditions (23, 24). I acknowledge that your client wishes to remove these conditions, believing them to be disproportionate the application itself. However, I would appreciate if the applicant could propose an adequate condition outlining how they plan to continue monitoring noise, as stated in the application form. Thereafter, I would like to see this added as a condition. I

am of course open to suggestions, however, ultimately, I think it's important that this is added as a condition in some way.

Hopefully the above is useful, if you could let me know your thoughts, I would be most grateful. I can thereafter put together a draft of conditions that work for all parties.

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk
@Brent_Council

From: Maldoom, Edwin
Sent: Monday, September 23, 2024 5:14 PM
To: Kaneetha Vetivel <k.vetivel@glsolicitors.com>
Subject: RE: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Good afternoon Kaneetha,

Thank you for sending this across.

I shall be out conducting site visits tomorrow; however, I shall provide you with a full and comprehensive response in due course as soon as I can.

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk
@Brent_Council

From: Kaneetha Vetivel <k.vetivel@glsolicitors.com>
Sent: Monday, September 23, 2024 3:36 PM
To: Maldoom, Edwin [REDACTED]
Subject: FW: Carlton Lounge, 232-234 Kingsbury Road, NW90BH Application to vary the Premises Licence (REF: 32523) Our Ref: KV/LIT/7159/Tigerbay Palace Limited

Dear Edwin

Further to our conversation last Friday, please find attached.

Regards

Kaneetha Vetivel
Partner

Greater London Solicitors Limited
343 London Road
Croydon
CR0 3PA



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Proposed Annex Two Conditions (Redrafted 27.09.2024)

**Carlton Lounge, 232 – 234 Kingsbury Road, London, NW9 0BH (Premises
licence number: 362998)**

1. The premises shall operate, and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities and all recordings shall be kept for 31 days.
2. CCTV footage shall be made available to the Police and any authorised Officers from Brent Council upon 72 hours of request.
3. The CCTV system shall display on any recordings, the correct date and time of the recording.
4. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.
5. A minimum of 2 SIA licensed door supervisors shall be on duty after 22:00 if the premises will be open past 01:00.
6. All SIA licenced door supervisors shall wear clothing that can be clearly and easily identified.
7. The licensee shall keep an incident book which shall be made available to the Police and Licensing Authority on demand.
8. There shall be no open glass vessels permitted outside the area defined on the premises plan.
9. Notices shall be conspicuously displayed at the entrance notifying patrons that the premises reserves the right to undertake searches upon entry to the premises and that the premises has a “no drugs policy”.
10. Food and alcohol-free drinks shall be always available for patrons whilst the premises are selling alcohol.
11. The last entry on Sundays to Thursdays will be 01:30 and on Fridays and Saturdays to 02:30.
12. There shall be at least 4 members of staff on site after 00:00.
13. The maximum number of persons permitted on the Ground Floor shall not exceed 300 persons including staff. The maximum number of persons permitted on the First Floor shall not exceed 150 persons including staff.
14. The smoking of shisha through "alcoholic drinks" shall not be advertised.

15. The outside drinking areas shall close after 23:00, excluding the shisha areas and karoga areas.
16. Ingress and egress notwithstanding, all doors and windows shall remain closed during any regulated entertainment and/or after 22:00 in all circumstances. Staff shall undertake regular checks to ensure that all doors and windows are closed.
17. The playing of live or recorded music shall not be permitted in any external area after 22:00 hours apart from within the designated shisha areas and karoga areas as defined on the premises plan.
18. The internal areas from which any recorded music or live music is undertaken, the premises shall ensure that it is adequately sound proofed to prevent noise breakout.
19. A telephone number shall be made available to be used by residents in relation to any complaint of noise resulting from the premises. The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the incident log.
20. Noise monitoring shall be undertaken at least once every two hours when regulated entertainment is provided from 23.00 until the closure of the premises.
21. Clear and legible notices shall be prominently displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.
22. No rubbish or empty bottles shall be placed in the outside bins after 23:00.
23. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport, or proof of age card with the PASS Hologram.
24. A Challenge 25 notice shall be conspicuously displayed at the point of sale.
25. A logbook shall be kept recording all refused sales of alcohol. The log shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Brent Council and the Police.
26. No children shall be admitted unless accompanied by a responsible adult.
27. All staff training shall be undertaken by all members of staff involved with licensable activities. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises

supervisor/duty manager. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

28. During major Wembley Stadium event days, patrons shall not be permitted to congregate outside the premises, save for ingress.
29. During major Wembley Stadium event days, all drinks glass bottles shall be decanted into either toughened glass, polycarbonate material or any other type of plastic vessel.
30. During major Wembley Stadium event days, the DPS or relevant duty manager shall work in partnership with the Police and if necessary, comply with any direction given by a senior Police Officer.

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IN THE BRENT LICENSING SUB-COMMITTEE

**IN THE MATTER OF THE APPLICATION FOR THE REVIEW OF A PREMISES LICENCE
FOLLOWING EXPEDITED REVIEW BY METROPOLITAN POLICE FOR THE PREMISES
KNOWN AS CARLTON LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Index to Supplementary Bundle

	Report	
1.	Supplementary Consultant Report by Complete Licensing (Edward Sherry OBE)	2 - 19
	Witness statements	
2.	Statement of Mr Mubeen Quadir	20 - 22
	Supporting letters	
3.	Letter of support from [REDACTED]	23 - 24
4.	Letter of support from [REDACTED]	25 - 26
5.	Letter of support from Xavier Miller	27
6.	Letter of support from Nisaan Sritharan	28 - 29
7.	Letter of support from Kimmi Tak	30 - 31

CL01

CARLTON LOUNGE

Document
CL-67830

Supplementary Report by Senior Consultant



CL02

A

Biography



**COMPLETE
LICENSING**
Page SB3

EDWARD SHERRY OBE

Director of Strategic Licensing & Night-Time Economy

"Licensing thrives on partnership, intelligence-led policing and calm risk management. My goal is to help operators stay safe, compliant and commercially vibrant-night after night."

With more than three decades in the Metropolitan Police, Edward rose to Chief Inspector while specialising in the West End's world-famous night-time economy. Between 2000 and 2008 he built close, practical relationships with major operators—accompanying Mitchells & Butlers' security and legal teams on joint patrols through Soho to see issues first-hand.

In 2005 the company invited him inside for a two-week secondment: Edward sat in executive board meetings, shadowed brand managers, and completed licensing-accreditation assessments with new licensees—experience that deepened his understanding of commercial pressures as well as regulatory duties.

Seconded to Westminster City Council soon afterwards, Edward created CivicWatch, an intelligence-led, multi-agency tasking model that united police, council licensing officers and venue management to reduce crime and disorder across key nightlife zones. The Home Office subsequently engaged him to review Southampton's city-centre night-time economy, with his recommendations forming the backbone of the city's new licensing strategy.

As Chief Inspector in charge of Charing Cross Police Station, Edward commanded 220 officers providing 24-hour policing—including dedicated night-duty licensing teams—for London's busiest entertainment district. He later partnered with Westminster's Licensing Unit to deliver critical-incident and contingency training for leading West End venues and helped the Windmill Club in its attempts to retain its licence during a high-profile review. Consultancy projects have also taken him overseas, training Abu Dhabi Police on policing tourist areas and licensed premises.

Away from day-to-day operations, Edward earned an MSc (Distinction) in Risk, Crisis & Resilience Management and holds a Level 3 Award in Education & Training. In 2017 he was appointed an Officer of the Order of the British Empire for services to young people and policing, recognition that reflects his commitment to safe, inclusive communities.

Today, Edward blends frontline insight with academic rigour to advise venues, event organisers and authorities on licensing strategy, compliance audits, risk assessment, staff training and incident preparedness—keeping people safe while protecting operators' licences and reputations.

>> Contact Edward:



B

Supplementary Report by Senior Consultant



**COMPLETE
LICENSING**
Page SB5

1. BACKGROUND

- 1.1 This report has been prepared for the licensing hearing on Friday 13th June 2025. Due to the very recent service of substantial evidence and statements, it is necessarily in summary form. It addresses some of the issues raised in the supplementary evidence presented by Sergeant Sullivan on 9th June, which Richard Bunch did not have before him when he drafted his Report. Whilst I have not had the time to deal specifically with every issue, I will be in attendance before the Licensing Sub-Committee to answer their questions.

2. SUMMARY

- 2.1 Carlton Lounge and Tiger Bay have been in operation for over 10 years. The management tell me that until the fatal incident on 18 May they had had a good working relationship with the local council, police and community. They believe they have always undertaken actions that have been requested in a timely manner, and have been a well-respected business within the community.
- 2.2 However, the management has come to feel that since the incident the attitude of the local police, specifically the licencing department, has changed dramatically. Rightly or wrongly, but perhaps understandably, they are immensely worried by this change, and feel under considerable and unwarranted scrutiny.
- 2.3 The licensee company (Carlton Lounge (UK) Limited) and the individuals in charge of it are a close family who are badly shaken by the recent murder. They are finding it hard to come to terms with the change in licensing police attitude towards them. There appears to be a cycle of frustration emerging on both sides, which the management are keen to overcome and work with the authorities and community, to find a way forward in a constructive manner. As recently as May 29th, the owners reached out to local police, offering to host a community event to discuss any ongoing concerns. To date the local sergeant has not responded to this suggestion (email to police shown at annex 1).
- 2.4 In talking to them, I found the management to be genuinely focused on running a safe venue, and committed to working with partners to agree a framework in which they can operate successfully while at the same time being held to account for any failings should any be identified.
- 2.5 After viewing the CCTV footage of the exterior of the premises on the night of the incident three times, I still cannot fully ascertain what actually went on. I would suggest it would take the expertise of a police officer who was fully conversant with the case to review the CCTV repeatedly in 'slow time' to fully understand it. People were appearing from all directions, and the scene escalated very quickly. I do not think it at all extraordinary that members of staff, likewise, did not fully understand



the situation, and as a result may have given contradictory statements to the police. I can find no evidence or legitimate suggestion that anyone was deliberately misleading.

2.6 Dealing with the suggestion that the staff did not try to control the scene or intervene, within the footage that I have viewed and contrary to what the police have asserted, security staff and a member of in-house staff in a white shirt were quite clearly attempting to break up the fight and restrain those involved.

2.7 It is my experience that when strong young men start fighting in groups, the game is lost. The interventions must come before that, by attempting to talk them out of their desired course of action. It would appear to me that the member of staff with the white shirt was attempting to do precisely that prior to the fight breaking out.

3. MJS/20 LETTER FROM PS SULLIVAN DATE 30TH MAY 2025 TO MR T & MR P THEVARAJAH REGARDING THE INCIDENT ON THE 26TH MAY 2025

3.1 In this letter PS Sullivan sets out his previous request for certain documents and footage to be passed to him regarding the incident as the footage that had previously been sent was insufficient for his requirements. On 11th June 2025 I spoke to Mr Prash Thevarajah and he confirmed that all actions set out by PS Sullivan had been undertaken and forwarded to PS Sullivan before the Tuesday 3rd June 2025 as requested by PS Sullivan. Mr Thevarajah told me that he does not understand PS Sullivan's new approach with regard to CCTV, as he has provided all previous police requests for it within 24 hours. (table of requests shown at annex 2)

4. MJS/21: WITNESS STATEMENT FROM PC [REDACTED]

4.1 This statement relates to his visits to the premises on 31st May & 3rd June 2025 regarding CCTV for incident on 26th May 2025.

4.2 In summary, PC [REDACTED] attended the premises on a licencing visit on the 31st May 2025 and raised concerns regarding the ability of people using the venue to move between the Carlton Lounge and Tiger Bay section, thereby bypassing the security regime that has been instigated. The management of the venue now have processes in place to deal with this situation.

4.3 PC [REDACTED] visited the premises again on the 3rd June 2025 with other officers to retrieve the CCTV for the incident on the 26th May. It would appear that he found both Mr T and Mr P Thevarajah to be



unwelcoming, as they sought to understand why there had been so many visits which, they felt, was overbearing and not the normal procedure.

- 4.4 When I raised this issue with Prash Thevarajah, he said that the facts set out in PC [REDACTED]'s statement were an unfair refraction of the events as he remembered them. He could not remember saying '*They were just drunk girls*' as claimed by [REDACTED]. He feels that the police interpretation of events on the evening of the 26th does not reflect the reality of the incident, specifically around the females being ejected and the actions of his staff as they left the premises.
- 4.5 I believe these incidents together with the letter from PS Sullivan and visits by PC [REDACTED] provide a good example of the ongoing confusion and regrettable mistrust that seems to be building up between the licencing team and management since the tragic events of May 2025. A situation that the management of Carlton Lounge are keen to overcome.

5. PS SULLIVAN'S STATEMENT OUTLINING THE SUPPLEMENTARY EVIDENCE THAT HE SUBMITTED ON 9TH JUNE 2025

- 5.1 This 11-page statement, dated 9 June, sets out PS Sullivan's position regarding the current issues. In my view it presents a somewhat unfair and unbalanced view of things.
- 5.2 I take issue with the statement in the 'summary' section, when Sgt Sullivan states "*this incident (The murder) has exposed fundamental failings in the operational management, staff conduct and their level of honesty.*"
- 5.3 In my dealings with the management, I have found them to be professional and focused on providing a quality service. They were able to provide comprehensive records of refusals of entry, refusal to sell alcohol and incidents of note, which I would suggest is a clear example of competent operational management and a professional culture.
- 5.4 PS Sullivan appears to have taken against the management of the venue and is exhibiting clear signs of confirmation bias (the tendency to interpret new evidence as confirmation of one's existing beliefs or theories) against them. I base this on my review of the information provided by PS Sullivan which clearly sets out failings in both the police reporting mechanisms, the perception of the noise abatement teams by local residents, despite the noise levels being agreed with the council in October 2022 (letter from council shown at Annex 3), and the commendations made by the murder investigation team.
- 5.5 In addition, two of the incidents that PS Sullivan mentions occurred before the variation applications of last year and neither of them figured in those applications.



This 'kneejerk' reaction to the situation is not within the spirit of the Licencing Act, where cooperation and partnership working is encouraged. I disagree with PS Sullivan's 'nuclear option' – that *'there is no alternative to revocation'*. I think that there should be a period of calm reflection and consultation between the local authority, police licencing, local residents and venue itself, in order to agree a proportionate way forward, leading to the implementation of an agreed risk-mitigation framework. This is not an overnight solution, and requires the cooperation of all concerned.



6. CONCLUSION

- 6.1 The venue has been running for over 10 years. There has never been a previous incident of this kind or anything approaching it. There has been no other contact from the police regarding *any* crime incident, certainly in the last 12 months.
- 6.2 The fact that the new police incident reporting system has a glitch that does not 'flag' venue as locations of crime is not the fault of the club management. Neither is the attitude said to be displayed by the noise abatement representative who Mr. Abraham complains was unsupportive when he registered his complaints.
- 6.3 I feel that the local resident [REDACTED] summed up the situation when they talked about the current situation and stated '*I think a lot of the stuff like the stabbing could have been prevented if they worked better with the police*'
- 6.4 This has obviously not been the case over the past 12 months and I do not think it is unreasonable, indeed I think it would be a fair and proportionate response, to give this family-run licensee company an opportunity to do exactly what the resident has suggested, to work *with* the police to ensure that nothing of a like kind happens in the future.
- 6.5 In support of this approach, I make the following recommendation for the Sub-Committee's consideration:
- The police, local authority and venue work together to agree a set of standards that the venue can be held to account to
 - This set of standards are reviewed on a rolling cycle as agreed by all parties
 - The police, local authority and venue management meet with residents on a regular basis to explain the approach and seek their views on an ongoing basis.
 - The venue instigates an independent remedial training cycle with all staff, based on any failings identified as a result of this current process
 - The venue instigates a series of independent unannounced 'mystery shopper' events to test their processes with the results being made available to relevant authorities.
 - The venue instigates independent, unannounced visits to review compliance procedures in real time with the results being made available to relevant authorities.
 - The introduction of a dedicated support phone line that residents can contact to raise concerns regarding the venue.



EXPERT'S DECLARATION (CIVIL CASES)

I [REDACTED] declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
4. I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
5. I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
6. I have shown the sources of all information I have used.
7. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
8. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
9. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
10. I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
11. I understand that;
 - my report will form the evidence to be given under oath or affirmation;



- questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
 - the Court and/or Licensing Committee may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
 - the Court and/or Licensing Committee may direct that following a discussion between the experts that a statement should be prepared showing those issues which are agreed, and those issues which are not agreed, together with a summary of the reasons for disagreeing;
 - I may be required to attend Court and/or Licensing Committee to be cross-examined on my report by a cross-examiner assisted by an expert;
 - I am likely to be the subject of public adverse criticism by the judge if the Court and/or Licensing Committee concludes that I have not taken reasonable care in trying to meet the standards set out above.
12. I have read Part 35 of the Civil Procedure Rules, the accompanying practice direction and the Guidance for the instruction of experts in civil claims and I have complied with their requirements.
13. I am aware of the practice direction on pre-action conduct. I have acted in accordance with the Code of Practice for Experts.

STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge, I confirm, are true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

DISCLAIMER

This report was completed by Complete Licensing Limited based on a defined programme of work and terms and conditions agreed with the Client. The report has been prepared with all reasonable skill, care and diligence within the contract terms with the Client, considering the project objectives, the agreed scope of works, prevailing site conditions and the degree of manpower and resources allocated to the project. Complete Licensing Limited accepts no responsibility whatsoever, following the issue of the report, for any matters arising outside the agreed scope of the works. This report is issued confidently to the Client and Complete Licensing Limited, which has no responsibility whatsoever to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk. Unless specifically assigned or transferred within the terms of the agreement, Complete Licensing Limited retains all copyright and other intellectual property rights on and over the report and its contents.



C

Annex 1



Annex 1

Email to Sgt [REDACTED] 27th May 2025, as yet no response has been received

----- Forwarded message -----
From: prash theva <prashtheva@gmail.com>
Date: Tue, 27 May 2025 at 15:05
Subject:
To: [REDACTED]

Dear Sergeant [REDACTED]

I hope you are well.

My name is Prash Theva, I am the operation manager for Carlton Lounge, 232 Kingsbury Road.

Following the community meeting held at Kingsbury Temple on 23 March, which our Designated Premises Supervisor (DPS) and members of our staff, who live in the local area attended and listened to concerns raised about our venue.

We deeply value our relationship with the community and want to ensure that we fully understand and address any concerns. With this in mind, we would appreciate the opportunity to meet with you to discuss these issues and explore ways we can work together to make improvements where needed.

We would be happy to host the meeting at our venue, where we have a banqueting suite that can accommodate up to 100 people.

Alternatively, we are happy to arrange the meeting at a time and place that works best for you, or to have an initial conversation to determine the best approach. Please let us know what would be most convenient.

Having been part of the community for 13 years, we have always strived to collaborate with local residents to create a safe and welcoming environment for everyone, and we are keen to continue that commitment.

I look forward to hearing your thoughts.

Prash Theva

[REDACTED]

www.carltonleisure.com
www.tigerbayinternational.com



D

Annex 2



**COMPLETE
LICENSING**
Page SB15

Annex 2

Details of CCTV Requests made by the Police and the date they were responded to.

Officer	Date of initial request	Reason	Date Complied	Response	Area
Constable [REDACTED]	27-Jan-22	Robbery that had occurred in the area on the 14th January 2022 - CCTV Requested	27-Jan-22	Contacted via phone	External
DC [REDACTED]	25-Apr-21	CCTV Request convering external of the venue	25-Apr-21	CCTV submitted	External
DC [REDACTED]	06-Apr-23	Courtesy email to say that we managed to find cctv of our suspects further up the road and so will not require anything further from your cctv	06-Apr-23	Thankyou - Acknowledgement	External
DC [REDACTED]	24-May-23	CCTV Request convering external of the venue	24-May-23	CCTV submitted	External
[REDACTED] o	06-Jul-24	CCTV Request - Incident at Tigerbay 06/07/2024	06-Jul-24	CCTV submitted	Internal
[REDACTED]	19-Sep-24	CCTV Request - Incident at Tigerbay 17/09/2024	19-Sep-24	CCTV submitted	Internal



E

Annex 3





REGENERATION AND ENVIRONMENT

Brent Civic Centre, Engineers Way,
Wembley, Middlesex. HA9 0FJTel: (020) 8937 5252
Direct Line 5561

Email: [REDACTED]

Web: www.brent.gov.uk

Date: 19/10/2022

Mr Prash Theva (Manager)
Carlton Lounge / Tiger Bay
232-234 Kingsbury Road
London
NW9 0BHYour Ref:
Our Ref: NC/08126/19
Contact: Martin Wood**By post and email**

Dear Prash,

Carlton Lounge / Tiger Bay, 232-234 Kingsbury Road, London, NW9 0BH
Formal withdrawal of noise nuisance abatement notices.

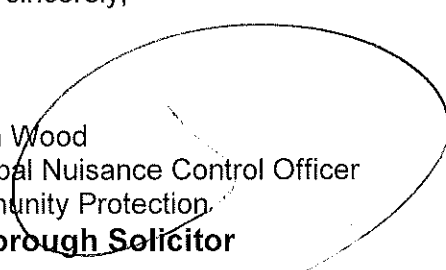
Thank you once again for your co-operation in setting a suitable music noise volume on Saturday 15th October.

I have since received summons to attend Willesden Magistrates Court on 17 November following appeal lodged against the enclosed noise abatement notices, dated and served 14 September 2022.

Having thought carefully about this matter and being mindful of your evident willingness to cooperate and meet your legal duty to prevent public nuisance, and adhere to conditions upon your premises licence, we have taken the decision to formally withdraw both noise abatement notices.

For the avoidance of doubt, there are no active noise abatement notices against Carlton Lounge / Tiger Bay.

Yours sincerely,



Martin Wood
Principal Nuisance Control Officer
Community Protection
cc Borough Solicitor

**Brent** - building a better borough

END



IN THE BRENT LICENSING SUB-COMMITTEE

**IN THE MATTER OF THE APPLICATION FOR THE REVIEW OF A PREMISES LICENCE
FOLLOWING EXPEDITED REVIEW BY METROPOLITAN POLICE FOR THE PREMISES
KNOWN AS CARLTON LOUNGE (TIGER BAY), 232-234 KINGSBURY ROAD**

Witness Statement of [REDACTED]

I, [REDACTED] of [REDACTED] hereby state the following:

- 1.** I make this statement in support of the review of the premises licence for Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH
- 2.** The facts in this statement are true to the best of my knowledge and belief. Where matters are not within my own knowledge, I have stated the source of my information.
- 3.** Whilst I am not a salaried employee at this establishment, I am a co-director in another associated company along with the directors of this business. I have been a consulting member of the management team for Carlton Lounge (Tiger Bay) over a decade.
- 4.** My professional background is in the financial service sector, but I have held HR-focused roles. I also have management experience in the retail sector and charity sector, where I worked on initiatives supporting underprivileged young adults.
- 5.** We have a robust level of staff training in place, further details of which are set out below.
- 6.** Before I share my statement, no words will ever make up for the life of the young man that was lost across and my heartfelt condolences to his family. It is another life lost to knife crime and truly upsetting.
- 7. NEW STAFF:**
 - a) All staff complete an induction process when joining the venue.
 - b) Regarding NEW STAFF, the Induction Overview pack is used to walk new staff through key areas and topics Key topics covered, introduction to:
 - a. Brand
 - b. Team Structure
 - c. Safety – Health and Safety / Fire / Challenge 25 / Licensing Objectives

- d. Expectations
- e. Service Approach
- c) Colleagues continue learning with floor manager catch ups, coaching and support.

8. ONGOING TRAINING:

- a) Colleagues have coaching and review with management, at least once per quarter. More regularly, if required. Additional 'on the job' coaching is provided as required.
- b) We have been transitioning to a new online system, Alert65 (FoodAlert System) for compliance and documents. Staff have been receiving additional training which has been noted onto this system with dates. The system provides an overview of key compliance activity, risk assessments, etc., and management are able to discuss different assessments (e.g. COSHH / our mystery customer service, HGEM, and record a date of conversation held). It is important to note as there is transition, we still have retained paper files signed of refresher training.

- 9. REFRESHER TRAINING:** All colleagues have refresher using a pack delivered by management team to remind them of key topics to support the role.

10. SALES OF ALCOHOL TRAINING:

- a) For new staff: All new staff receive an additional training pack on licensable activity and additional awareness.
- b) For refresher training: All staff complete training together delivered as huddle / discussion every January and June each year, irrespective on when training had been completed in prior.
- c) Training is delivered by Prashanth Thevarajah.
- d) Records of this training are retained separately and held onsite.

- 11. Personal License Holder (PLH):** Prior to the incident in early May a decision was made to increase the number of Personal Licence Holders (PLH) across different venues to help develop and better educate staff on objectives and help support and deliver these. This resulted in the training of 4 staff from Kingsbury. The Personal Licence Training was completed on 12 May 2025 with.

- 12.** One additional colleague attended training on 30 May 2025 from Kingsbury.

- 13.** Since the incident occurred, we have taken actions to review and strengthen our internal procedures. On 20 May Prashanth Thevarajah messaged all staff in their WhatsApp group chat to offer support for their wellbeing and provide support sites following the tragic incident and fatal stabbing of the young man.

- 14.** A staff meeting took place on 22 May. During this meeting, a check was made on colleagues' wellbeing to understand what could have been done differently. Clear guidance and learning were given on key points to take away from the incident.

15. On 23 May, a further meeting took place with all staff and management to review expectations of the licensing objectives. This was individually signed by staff and the following documents were generated:
16. This review meant that clearer guidance was generated for staff to follow. The guidance was circulated to all staff. We also updated house rules which were printed and replaced on the premises entrance. A new slide was created and added to slides shared on screen on house rules. Simpler guidance documents were created to make it easier and clearer for all colleagues to understand what they can do in certain situations.
17. The Guidance documents were shared with the SIA teams Area Manager, to cascade and communicate with their security team.
18. There have been a number of police visits to the venue since the incident to check on our compliance with licence conditions and the operation of Clubscan, on the 29 May and 31 May 2025, and the Police commented on the steps that have been taken.
19. In addition to guidance we have updated, we are seeking to take the recommendations from an external Consultant company, and the report they produced to further improve our controls and processes.

6. Statement of Truth

I believe that the facts stated in this witness statement are true.


Dated: 11/06/2025

[REDACTED]
[REDACTED]
[REDACTED]
11/06/2025

Neighbouring Resident

Location: Resident [REDACTED] Tigerbay, Kingsbury Road, London NW9

To Whom It May Concern,

I am writing as a long-time resident living directly opposite Tigerbay (also known as Carlton Lounge) on Kingsbury Road. I have lived here for many years, and I see the venue and its operations first-hand on a daily basis.

In all the years I have lived here, I have never seen any issues arising from Tigerbay. The venue is consistently run in a respectful and responsible manner, and I believe it's important to speak up and say how things truly are—especially as someone who is in a position to observe everything regularly.

Security and Customer Management:

Security staff at Tigerbay are always present, professional, and vigilant. I have seen them ensure that people enter and leave the premises in an orderly fashion. Most importantly, when the venue closes, they make a clear effort to ensure patrons leave quietly and do not disturb the peace of nearby residents. This level of care and discipline is something I genuinely appreciate as a neighbour.

Cleanliness and Conduct:

There has never been any issue with littering, noise disturbances, or anti-social behaviour coming from the venue. The area around the premises remains clean, and there is a visible presence of staff ensuring it stays that way. Tigerbay clearly sets high standards for how they want their customers to behave.

Commitment to Licensing Objectives:

As someone who observes the venue every day, I can confidently say that Tigerbay follows all four licensing objectives:

The Prevention of Crime and Disorder:

The venue employs a visible and active security presence. Any potential issues are dealt with immediately and professionally. I have never seen any serious disorder or criminal activity linked to the venue.

Public Safety:

Tigerbay manages its capacity and crowd responsibly. From what I've seen, safety is clearly a priority. Entry is controlled, and patrons are monitored appropriately throughout the night.

The Prevention of Public Nuisance:

This is especially important as a neighbour. I can confirm that Tigerbay makes a clear effort to avoid causing any nuisance to residents. Sound levels are controlled, people do not loiter outside, and staff make sure customers don't disturb the peace when leaving.

The Protection of Children from Harm:

Tigerbay operates as a lounge and bar with clear entry policies. From what I've observed, underage individuals are not permitted inside, and the venue is strict about verifying age and maintaining a safe environment.

Final Comments:

Tigerbay is a respectful and responsible local business. I have watched them operate for years and never had a reason to complain or be concerned. In fact, I believe they add a positive and vibrant atmosphere to the area while showing full respect for their neighbours.

I hope this statement helps provide a clear and honest view from someone who lives directly in front of the venue and sees its day-to-day reality.

Sincerely,

[REDACTED]

Resident [REDACTED] Tigerbay, Kingsbury Road, London NW9


Business: London Hand Car Wash Ltd

Address: 240 Kingsbury Road, London NW9

To Whom It May Concern,

Re: Statement in Support of Tigerbay (Carlton Lounge)

I am writing this statement as the owner of London Hand Car Wash Ltd, located at 240 Kingsbury Road, where I have been operating for before Carlton Lounge was present. During this time, I have had the privilege of being a direct neighbour to Tigerbay (also known as Carlton Lounge), a long-standing business in our area.

Over the many years of operating side by side, I have only experienced a positive and respectful relationship with Tigerbay. The business is well-run and contributes positively to the local area—not just economically, but also socially. I can confidently say that Tigerbay has always maintained a high standard of professionalism, both in how it manages its customers and how it interacts with neighbouring businesses like mine.

Despite the high number of patrons Tigerbay attracts, I have never experienced any negative impact on my business. There has never been an issue with littering, anti-social behaviour, or disturbances on or around my premises caused by their customers. My car wash area remains clean and unaffected, which I believe is a reflection of how responsibly Tigerbay operates.

In fact, I have seen first-hand how the management and staff go out of their way to ensure that their venue operates within the conditions of their licence. They take their responsibilities seriously and clearly make an effort to foster a peaceful and safe environment. Over the years, they have made efforts to communicate with nearby businesses and always acted in a neighbourly and cooperative manner.

It's unfortunate to hear that the venue is under review due to a recent incident. While I cannot speak to the details of that specific event, I can say with full confidence that in my long

experience, the venue has consistently demonstrated a commitment to safety, order, and community relations. One isolated incident should not outweigh over a decade of responsible business practice.

Tigerbay (Carlton Lounge) plays a valuable role in the local economy, providing jobs and drawing visitors to the area. Removing or restricting their licence would, in my opinion, not only be unfair but could also negatively affect the surrounding businesses that benefit from the increased footfall and community engagement.

I fully support Tigerbay and hope that this review will take into account the broader context of their long-standing positive impact and good record.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

My name is [REDACTED] I am a Professional sports coach who has dedicated 16 years to education, working as a headteacher across both primary and secondary schools. I now work as the head coach and managing director of The IQ Gym based at Kingfisher Community Centre in Brent.

I am very familiar with Carlton Lounge and visit this premises regularly. In my experience this is a respectable venue and the management team pride themselves in the level of service they delivery to all their customers. This is a venue I often visit with my family, they serve good food and provide sound entertainment.

If I can be of any further assistance, please do not hesitate to contact me on [REDACTED]

Yours faithfully

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Sir / Madam

Re: Appreciation for Tigerbay (Carlton Lounge)

As the owner of Happen Enterprise, located opposite Tigerbay (Carlton Lounge), I would like to express our sincere gratitude and appreciation for the continuous support and positive relationship we've shared over the years.

Tigerbay has been more than just a neighbouring business — they've consistently demonstrated a strong sense of community and responsibility that is both rare and admirable. Whenever we've encountered issues, particularly with difficult customers or shop lifters, their security team has stepped in to assist without hesitation. Their efforts have played a significant role in promoting safety and harmony across our parade of shops.

What truly sets Tigerbay apart is their commitment to professionalism and they strive to run their business to a high standard. This dedication reflects not only in their internal management but also in the way they support and uplift the wider business community around them.

Tigerbay actively engages in making our shared environment better and safer for everyone. Their contributions are deeply appreciated and do not go unnoticed.

We are proud to call them our neighbours and look forward to many more years of mutual support and cooperation.

Warm regards,

Happen Enterprise



To Whom it May Concern,

My name is [REDACTED], and I am a Director of a property management and estate agency in East London. I have been a loyal customer of Carlton Lounge (Tiger Bay) for over twelve years, first visiting as a university student and continuing to choose this venue ever since.

The recent stabbing of a young man is a tragic and unacceptable event, reflective of a broader issue affecting communities across the UK. However, in all my years visiting Carlton Lounge (Tiger Bay), I have not witnessed any incidents of this nature, nor do I believe it reflects the venue or its management.

This venue has provided a safe space for many people like myself who rely on it for wellbeing, security, and enjoyment.

There are many places to go across London, but the venue stands out as it is run in a professional and responsible manner, creating an environment where customers feel safe and respected. As a young woman, I have always felt completely secure at the venue, thanks to the attentive staff and strong leadership behind the venue. I am searched, along with all customers, as well as subject to thorough security checks, even as a long standing customer of the venue. Traveling from East London to the venue is a choice, and I make it because of the way I have consistently been treated, with care and respect by all staff over the years, which is a direct reflection of how the management team operates the establishment.

Carlton Lounge has positively contributed to my wellbeing and mental health, providing a space where I can relax, socialise, work, and even hold meetings. The atmosphere is welcoming, and I have always had confidence that customer safety is a priority. Security staff at the venue carefully monitor the entrance, ensuring responsible access while maintaining a respectful presence. They not only uphold safety within the venue but also encourage patrons to be mindful of neighbours and each other when leaving the premises.

Inside, the staff are vigilant and attentive, ensuring that guests can enjoy their experience while feeling safe at all times. This professionalism is particularly important for someone like me who values a comfortable and secure environment. The venue provides a space for social connection, cultural diversity, and positive community engagement, welcoming people from all backgrounds while maintaining high standards.

Knife-related crime is an unfortunate reality in many areas, however Carlton Lounge should not be impacted unfairly for an issue that extends far beyond its doors.

The team behind Carlton Lounge has worked tirelessly to build an environment that is welcoming, professional, and responsible. They should be recognised for their commitment to maintaining a safe and positive atmosphere rather than being affected by circumstances outside their control. I sincerely hope they are able to continue to do so for many years to come.

Should you have any further questions or queries, please do not hesitate to contact me.

Regards

Kind regards

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