Public Document Pack



Alcohol and Entertainment Licensing Sub-Committee

Thursday 15 June 2023 at 10.00 am Boardroom 8, 3rd Floor, Brent Civic Centre

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

The press and public are also welcome to attend this meeting in person. Please note the meeting is not scheduled for live webcast

Membership:

Members Councillors: Ahmed (Chair) Bajwa Chohan Substitute Members Councillors: Collymore, Ethapemi, Hack, Mahmood, Long. Lorber, Rubin

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

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit: www.brent.gov.uk/committees

The press and public are welcome to attend this meeting



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 of trade union).
- (b) The interests a 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.

Agenda

Introductions, if appropriate.

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Page

1 Apologies for absence and clarification of alternate members

2 Declarations of Interests

Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.

3 Application for the Review a Premises Licence by Home Office 1-52 Immigration Enforcement for the premises known as Saraswathy Bhavan, 549 High Road, Wembley, HA9 2DJ, pursuant to the provisions of the Licensing Act 2003

Date of the next meeting: Date Not Specified

- 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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LICENSING ACT 2003

Application for the Review a Premises Licence

Name of Applicant:	Home Office Immigration Enforcement
Name & Address of Premises:	Sarashwathy Bhavan, 549 High Road, Wembley, HA9 2DJ
Applicants Agent:	

1. Application

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The application is for the review of a premises licence held by Mr Anil Verma and Mrs Vandana Verma. The premises are known as Sarashwathy Bhavan, 549 High Road, Wembley, HA9 2DJ

2. Grounds for Review

The grounds for review are the Prevention of Crime and Disorder.

3. Relevant Representations

Representation has been received from Home Office Immigration Enforcement

4. Background

These premises are currently licensed for the sale of alcohol and to remain open from 11am to 11pm Monday to Saturday and 12 noon to 10.30pm Sunday

The Designated Premises Supervisor is Mrs Vandana Verma

The steps the Committee may take are:

- To modify, remove or add conditions
- To exclude the sale of alcohol or other licensable activity
- Remove the Designated Premises Supervisor
- Suspend the licence for up to 3 months.
- Revoke the licence

5. Associated Papers

- A. Review Application
- B. Current Licence
- C. OS Map

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[Insert name and address of relevant licensing authority and its reference number (optional)] Licensing Authority: Brent Council

Application for the review of a premises licence or club premises certificate under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form, please read the guidance notes at the end of the form. If you are completing this form by hand, please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

I Home Office Immigration Enforcement

apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description Sarashwathy Bhavan, 549, High Road, Wembley				
Post town	Post code (if known)			
London	HA0 2DJ			

Name of premises licence holder or club holding club premises certificate (if known)
Mr Anil Verma	

Number of premises licence or club premises certificate (if known)

Part 2 - Applicant details

I am	Please tick ✓ yes
 an individual, body or business which is not a responsible authority (please read guidance note 1, and complete (A) or (B) below) 	
2) a responsible authority (please complete (C) below)	\boxtimes
3) a member of the club to which this application relates	

(please complete (A) below)

(A) DETAILS OF INDIVIDUAL APPLICANT (fill in as applicable)

Please tick ✓ yes			
Mr 🗌 Mrs 🗌	Miss 🗌 1	Ms	Other title (for example, Rev)
Surname		First names	
I am 18 years old or over			Please tick √ yes
Current postal address if different from premises address			
Post town		Post Code	
Daytime contact telephone	number		
E-mail address (optional)			

(B) DETAILS OF OTHER APPLICANT

Name and address
Telephone number (if any)
Telephone number (it any)
E well address (actional)
E-mail address (optional)

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Home Office Immigration Enforcement Alcohol Licensing Team Lunar House
40 Wellesley Road
Croydon
CR9 2BY
Telephone number (if any)
relephone number (ir any)
E-mail address (optional)
IE.Alcoholreviews@homeoffice.gov.uk

This application to review relates to the following licensing objective(s)

1) the prevention of crime and disorder	
2) public safety	
the prevention of public nuisance	
the protection of children from harm	

lease	tick	one	or	more	boxes	√
1						

Please state the ground(s) for review (please read guidance note 2)

Grounds for review:

We have grounds to believe the license holder has failed to meet the licensing objectives of prevention of crime and disorder, as illegal working has been identified at this premises.

Section 36 and Schedule 4 of the Immigration Act 2016 (the 2016 Act) amended the Licensing Act 2003 (the 2003 Act) to introduce immigration safeguards in respect of licensing applications made in England and Wales on or after 6 April 2017. The intention is to prevent illegal working in premises licensed for the sale of alcohol or late-night refreshment.

The Home Secretary (in practice Home Office (Immigration Enforcement)) was added to the list of Responsible Authorities (RA) in the licensing regime, which requires Home Office (Immigration Enforcement) to receive premises licence applications (except regulated entertainment only licences and applications to vary a Designated Premises Supervisor (DPS)), and in some limited circumstances personal licence applications. In carrying out the role of responsible authority, Home Office (Immigration Enforcement) is permitted to make relevant representations and objections to the grant of a licence or request a review of an existing licence as a responsible authority where there is concern that a licence and related licensable activity is prejudicial to the prevention of immigration crime including illegal working.

Please provide as much information as possible to supponde as note 3)	ort the application (please read guidance
Please refer to accompanied review pack for de	etailed information
	Please tick √ yes
Have you made an application for review relating to the premises before?	
If yes, please state the date of that application	Day Month Year
If you have made representations before relating to the and when you made them	premises, please state what they were
	Please tick ✓ yes
 I have sent copies of this form and enclosures to th and the premises licence holder or club holding the as appropriate 	-

I understand that if I do not comply with the above requirements my application will be rejected

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

Part 3 - Signatures (please read guidance note 4)

Signature of applicant or applicant's solicitor or other duly authorised agent (please read guidance note 5). If signing on behalf of the applicant, please state in what capacity.

Signature R Hundal

.....

Date 18/04/2023

Capacity Responsible Authority.....

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 6) Alcohol Licensing Team Lunar House 40 Wellesley Road				
Post town	Post Code			
Croydon	CR9 2BY			
Telephone number (if any)				
If you would prefer us to correspond with you us (optional) IE.Alcoholreviews@homeoffice.g	- ·			

Notes for Guidance

- A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
- 2. The ground(s) for review must be based on one of the licensing objectives.
- Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
- 4. The application form must be signed.
- An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
- 6. This is the address which we shall use to correspond with you about this application.

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Premises Licence Review

Sarashwathy Bhavan 549 High Road Wembley HA0 2DJ

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Case Summary

On 03 March 2023, the West London ICE team visited Sarashwathy Bhavan, 549 High Road, Wembley, HA0 2DJ after intelligence was received that the business was employing illegal workers. Entry to the premises was gained under Section 179 of the Licensing Act 2003. The visit was accompanied by **Example 1**, a licensing officer from Brent Council.

Five arrests were made, and it was found that one employee was sleeping on the kitchen floor as he was homeless.

A referral has been made to the Civil Penalty Compliance Team in relation to the illegal working.

Licensed Premises History

The premises license number is 162606 and is held by Mr Anil Verma and

The DPS Vandana Verma, licence number: PL1163. Issuing authority: Wokingham Borough Council.

Anil Verma stated that the business is listed as Dosa Centre LTD, trading under Sarashwathy Bhavan, company number 11356450. Dosa Centre LTD was incorporated on 11 May 2018, Vandana Verma is named as a director. The registered office address is 29 New Broadway, Middx, Hillingdon, England, UB10 0LL. The Civil Penalty Compliance Team has sent an information request and is currently considering the case against this company.

Enforcement Visit dated: 03 March 2023

Entry was gained to the premises at 15:30. Upon entering, Immigration Officers encountered the following workers:

was encountered in the kitchen of the premises; a search was conducted on his person and he was in possession of the keys to the restaurant. Home Office checks revealed that had applied for a visit visa on 19 June 2019, which was granted from 08 July 2019 to 19 January 2020. This visa was granted with no right to work an no recourse to public funds.

admitted having overstayed his visa by 3 years.

During an interview with Immigration Officers, and the admitted having been working as a **sector** of 3 months. He worked 6 days a week, for 10 hours per day. He stated that Anil gave him the job and stipulated his hours and tasks. He is paid £900 a month, cash in hand with food from the restaurant included. He admitted to his employer being aware that he has no right to work in the UK and never presented any documents prior to employment.

He was asked, "Does your employer know you're not allowed to work in the UK?

Mr Verma was also interviewed about several employment stating he has been employed for five months, asked for a passport copy but did not receive it or chase it up as in his words "We get busy and it slipped my mind".

Mr Verma was then asked "Are you aware that **and the second secon**

Act 1971 as a person liable to be detained under Para 16 of Schedule 2 of the same act. He was offered voluntary departure but refused due to wanting to stay and earn money.

that was also encountered in the kitchen. Home Office checks revealed that had arrived on a visit visa which expired on 18 January 2023. This visa gave no right to work or recourse to public funds. admitted to officers that hed overstayed. stated during questioning that he had been working at the premises for 15 days as a working 6 days per week, 10 hours per day. He also stated the owner of the business, Anil Verma gave him the job. Paying him £30 to £40 per day with food, although he has not been paid yet. He did not show any right to work documents before or during his employment stating that Mr Verma knows he has no right to work in the UK.

He was then asked. "So the owner knows you are not allowed to work but he still gave you the job?" replied "Yes".

Mr Anil Verma was questioned regarding employment. He stated that had been employed since January. He asked him for a copy of his passport but did not know his visa had expired stating he thought it was due to expiry on 31 March and he would leave. He confirmed was paid cash in hand and the hours of employment.

It is clear Mr Verma had not checked **sector and the sector and th**

was arrested under Sch 2 Para 17(1) of the Immigration Act 1971 as a person liable to be detained under Para 16 of Schedule 2 of the same Act. He was offered voluntary departure but refused due to wanting to stay and work. has submitted an asylum claim dated 17 March 2023.

was encountered in the kitchen. provided his full details date of birth: an Indian national. stated he had entered the UK on a business visa in 2022.

Further examination showed that we was a negative trace on Home Office systems. He could not provide any evidence of his business visa or his lawful status to enter or remain in the UK.

as

was questioned regarding his employment at Sarashwathy Bhavan to which he stated that he had worked there for one month and reports directly to (who also no right to work) for his duties within the kitchen. He works six days per week between 12 noon and 22:00hrs. He has not submitted or been requested to submit any right to work details before or during his employment at the premises. He did state that he was sleeping rough prior to working and receiving free food from the business.

Mr Verma when questioned stated had worked there for four days as a helper within the kitchen, requesting documents but had not received them and that he is on a trial. The pair had not arranged a rate of pay according to Verma and that he was unaware of **according to Verma** and right to work status. s an illegal entrant and committed an offence under 24(1)A of the 1971 Immigration Act, (as amended) and breached 3(1)a of the same Act. has no right to work in the UK.

was encountered in the kitchen area. Now known to be date of birth: an Indian national. was questioned about his role in the business and replied that he was a porter and cleaner.

Further examination showed that was an overstayer in the United Kingdom with no right to work. In the United had originally entered under a Tier 5 migrant visa to work for the Kuwaiti Embassy (also sponsor) in September 2019 that expired in September 2021. On 30 July 2021, applied to extend his Tier 5 migrant visa to continue working for the Kuwaiti Embassy. This expired on 03 October 2022 and the made no further applications. Since this date has had no right to work in the UK.

was located in the kitchen area of the restaurant where the food was being prepared. Stated during questioning that he had been working at the premises since 18 February 2023 as a porter and cleaner, working Tuesday to Sunday from 12 noon to 23:00hrs. He also stated the owner of the business gave him the job, paying him £1100 per month although he has not been paid yet.

He did not show any right to work documents before or during his employment and the company have not asked to see his right to work documentation.

The restaurant and business owner Mr Anil Verma was interviewed at the premises and stated that the premises had been working there for four days asking him for a copy of his passport, proof of ID and home address but as he hasn't since him since did not get the passport copy. He confirmed that he was a kitchen porter on trial working with no agreed pay due to the trial employment.

Mr Verma was asked "Did you know that **be and the set of the set o**

as a person liable to be detained under Sch 2 Para 17(1) of the Immigration Act 1971 as a person liable to be detained under Para 16 of Schedule 2 of the same act. He was offered voluntary departure but refused due to wanting to stay and work. has no leave to remain in the United Kingdom or right to work.

was encountered in the kitchen area, now known to be date of birth: an Indian national. stated he nad entered the UK in 2006 hidden in a lorry.

7

Home Office systems had no trace of **the second** being granted leave to enter the UK. He has made no applications to regularise his stay and has never had the right to work.

for six weeks, working 4 to 5 days per week from 12 noon to 22:00hrs. He is paid \pounds 1100 in cash and employed by Anil. He did not show any right to work documents before or during his employment.

also stated that he had been living at the premises for 10 days and was granted permission to do so by, in his own words "The owner of the shop Anil". He doesn't pay any rent to live there and sleeps on the floor on cardboard within the kitchen.

The owner Mr Verma was questioned regarding the problem employment stating he had worked there for five months. Verma then stated he was aware that had no documents but was supporting him as he had asked for help and Verma agreed.

Mr Verma stated he was unaware that

was sleeping at the restaurant.

24(1) A of the 1971 Immigration Act, (as amended) and breached 3(1)a of the same Act. Was asked if he would like to return to India with Home Office assistance if required. He stated that he would like to. This process is ongoing with Mr Cooperation.

In summary, one of the key questions asked to Mr Anil Verma was:

Today on 03 03 2023, West London ICE encountered 5 people illegally working in your restaurant - Sarashwathy Bhavan. Is there anything you would like to add or say?

His reply:

I knew of 2 people. I employed them to work because they were in very bad condition when they came to work. I didn't know about the 3 people as they only came to work 3 / 4 days ago.

Other Employees

7 other employees were encountered during the visit. These employees were checked against Home Office systems and found to be working within their conditions.

It must be noted that these employees were found to be working in the front of the restaurant in customer facing roles. Interviews with the 7 workers displayed that the owner was aware of the correct checks which needed to be conducted.

Reasons for Review

Section 36 and Schedule 4 of the Immigration Act 2016 amended the Licensing Act 2003 to introduce immigration safeguards in respect of licensing applications made in England and Wales on or after 06 April 2017. The intention is to prevent illegal working in premises licensed for the sale of alcohol or late-night refreshment.

There were five illegal workers encountered at the premises.

In this case, the business owner had demonstrated an awareness and understanding of the processes and responsibilities to conduct checks on the people they employ as there were staff who had right to work checks conducted by Mr Anil Verma.

It is an offence to work when a person is disqualified to do so, and such an offence can only be committed with the co-operation of a premises licence holder or its agents. It is also an offence to employ an illegal worker where there is reason to believe this is the case. Mr Anil Verma has deliberately overlooked the rules and laws in place to prevent crime and disorder.

Section 182 guidance at point 11.27 states that certain activity should be treated particularly seriously, and this includes employing someone who is disqualified from that work by reason of their immigration status in the UK. 11.28 of the guidance states that it is expected that revocation of the licence – even in the first instance – should be seriously considered.

Immigration Enforcement submits that for commercial reasons those engaged in the management of the premises employed an illegal worker and a warning or other activity falling short of a review is inappropriate; therefore, Immigration Enforcement has proceeded straight to review.

Outcome Sought

The objective of the Licensing Act 2003 (the Act) is to provide a clear, transparent framework for making decisions about applications by individuals or businesses wishing to sell or supply alcohol or provide certain types of regulated entertainment and late-night refreshment.

There are four licensing objectives which underpin the Act, and which need to be taken into account and promoted throughout the licensing process.

The licensing objectives are:

- the prevention of crime and disorder
- · public safety
- the prevention of public nuisance and
- the protection of children from harm

Saraskwathy Bhavan under the control of Mr Anil Verma and Mrs Vandana Verma has been found employing illegal workers. This business has clearly failed to meet the prevention of crime and disorder objective.

Right to work: a two-tier approach

During the visit, seven workers were encountered with the right to work. Mr Verma stated he had seen and/or copied right to work documentation for these staff. Six of which were encountered as front of house employees in public facing roles.

The five workers with no right to work were all encountered in the kitchen which is basement level and non-public facing.

Mr Verma has demonstrated an inconsistent approach to ensuring the correct checks are made before employing staff. The rates of pay, hours and conditions differ greatly between the two cohorts of workers. It is considered that whether for commercial advantage or negligence, Mr Verma has employed 5 back of house staff illegally, paid in cash and below the minimum wage (£9.50 as of April 2022).

The conditions subjected to the kitchen staff, namely sleeping on the floor, bare the hallmarks of exploitation/modern slavery. Mr worker at the premises stated that the owner would pay him after 15 days employment around £30 to £40 a day. As worker at the premises works 10 hours per day, 6 days a week this would put him at no more than £4 per hour. The UK minimum wage at the time of the enforcement visit was £9.50. It is considered that Anil Verma knows his responsibilities as an employer and applies this to the front of house while readily flouting the same responsibilities for the kitchen staff.

Fire Safety:

One worker stated he was sleeping on the floor of the premise's kitchen floor for at least 10 days. Mr Verma stated he visited the premises everyday but was unaware of anyone sleeping in his kitchen. This is extremely concerning not only for the

wellbeing and safety of the workers but also from a fire safety perspective. A referral has been made to London Fire Brigades enforcement team.

The license holder would have been aware of their responsibilities to uphold the licensing objectives as they are clearly defined as part of the premises license application, ie. the right to work checks and keeping records for audit purposes.

Immigration Enforcement has submitted that the license holder clearly knew the rules and responsibilities of employing people. Right to work checks and documents were kept for workers who had the right to work, however the license holder knowingly broke these rules to employ

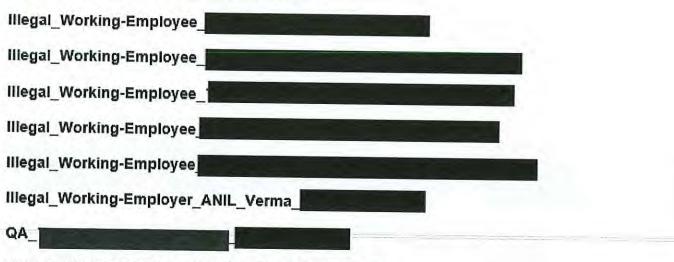
and

Mr Verma stated during his interview with Immigration that he employed two workers who had no right to work and also aware of three more who he had given trial employment to.

Merely remedying the existing situation (for instance by the imposition of additional conditions or a suspension) is insufficient to act as a deterrent to the licence holder and other premises' licence holders from engaging in criminal activity by employing illegal workers and facilitating disqualified immigrants to work illegally. Immigration Enforcement asks that the premises licence is revoked.

This submission and appended documents provide the licensing subcommittee with background arguments and information pertinent to that contention. These provide the sub-committee with a sound and defensible rationale as to why it should revoke the licence.

Appendix A – Officer records



Visit_EV27-866,417_Sarashwathy_Bhavan_(Closed)

llegal Working - Employee	
Details	
Type of work	Visit
Visit reference	
Created by	
ProntoID	IND India
Subject CID Person ID	Unknown
Subject name	
Subject DOB	
Subject nationality	IND India
Subject gender	Male
Time	16:30
Created at geolocation	Easting 517954
	Northing 185048
Creation date	03-03-2023 16:30:55
Language of Interview	
What language is the interview carried out in?	I English
Interpreter used?	No
Obligation	
How long have you been working here?	3 months
What is your job role/ what are your duties?	Chef
What days/ hours do you work each week?	6 days, 10 hours everyday
Do you work the same hours/ days every week?	Everyday the same
Control	
Who gave you this job (name and role in business)?	gave me the job
Who tells you what days/ hours to work?	
Who tells you what tasks/ duties to de each day?	

Remuneration	
How are you paid (money, accommodation, food)?	Cash in hand, I also eat from here.
If money, how much and how do you receive it?	900 pounds a month. Cash in hand
Do you pay income tax or have a National Insurance number?	Nothing
Pre-employment Checks	
What name does the employer know you as?	By my name
Did you show documents before being offered the job? If so, what?	None
Does your employer know you're not allowed to work in the UK?	Yes he knows
Additional Questions	
Did the owner or show ask you to show any documents before being offered the job?	No nothing
Photographs	
No photographs.	
Declaration	
confirm that I have understood all the qu	Jestions and that the details are true and correct.
nterviewee signature	
Observations	03-03-2023 16:40:02
Dbservations	Subject was encountered in the kitchen.
Do you suspect this person of illegal vorking?	Yes

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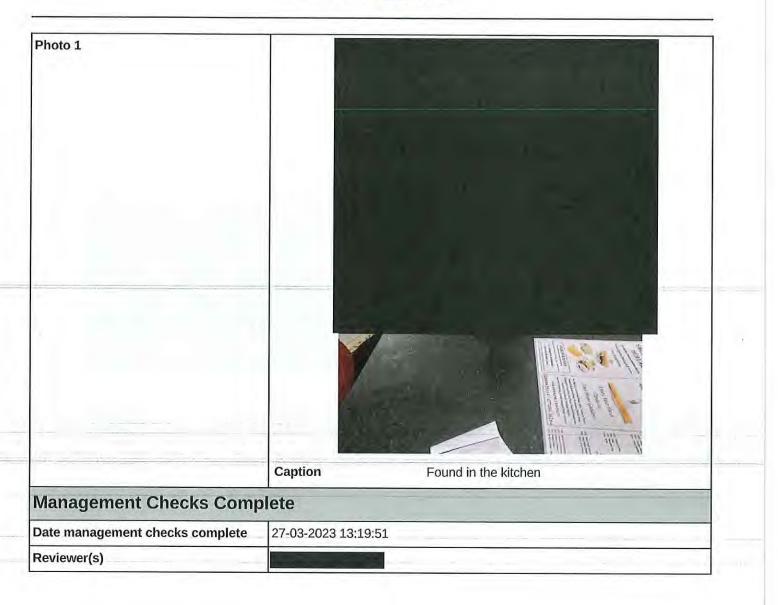
Management Checks Complete	
Date management checks complete	31-03-2023 15:54:09
Reviewer(s)	

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Illegal Working - Employ	
Details	
Type of work	Visit
Visit reference	
Created by	
ProntoID	IND India
Subject CID Person ID	
Subject name	
Subject DOB	
Subject nationality	IND India
Subject gender	Male
Time	17:11
Created at geolocation	Easting 517939
	Northing 185055
Creation date	03-03-2023 17:10:55
Language of Interview	
What language is the interview carried out in?	English
Interpreter used?	No
Obligation	
how long have you been working at sarashwathy bhavan?	One month for 3 months I didn't work
who gave you the job at sarashwathy bhavan?	I came here myself
who gave you a job?	One guy
what is the guys name?	I don't know
is the guy working today?	No he left ages ago
Control	
Who tells you what days/ hours to work	Pointed to
Has told you every time to come in or is it just today?	Yes every time
Does he just tell you what time to come or does he give you jobs to do?	He tells me everything

Is served the person who gave you the job?	No
How do you get paid?	Cash
Whilst IO Control was searching his property she came across some cash (notes) and asked how did he get the money?	I got the money as tips
Remuneration	
How are you paid (money, accommodation, food)?	Not been here 1 month so haven't been paid yet.
do you know how much you are going to get paid?	No, the boss hasn't told me
who is the boss?	I don't know the name, I get paid on the 10/03
Pre-employment Checks	
What name does the employer know you as?	
Did you show documents before being offered the job? If so, what?	No
did the boss or any other employee ask you for any documents to prove you could work?	No he saw me sleeping outside, and I asked for a job and he said yes
was it the boss who gave you the job or the other person who has now left?	The other person
Does your employer know you're not allowed to work in the UK?	I don't know
the boss didn't ask you to provide any documents to work?	I've only met the boss once and he has not asked me for any documents
Additional Questions	
how did you support yourself before you started work at sarashwathy bhavan?	Free food from here.
before you started work here, how did you eat?	From the church
how many days do you work at sarashwathy bhavan?	6 days a week, Tues to Sunday Monday off
how many hours do you work per day	12-10pm
what work do you do?	Cooking

Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the qu	uestions and that the details are true and correct.
Interviewee signature	03-03-2023 17:51:40
Observations	
Observations	Found working in the kitchen
Do you suspect this person of illegal working?	Yes

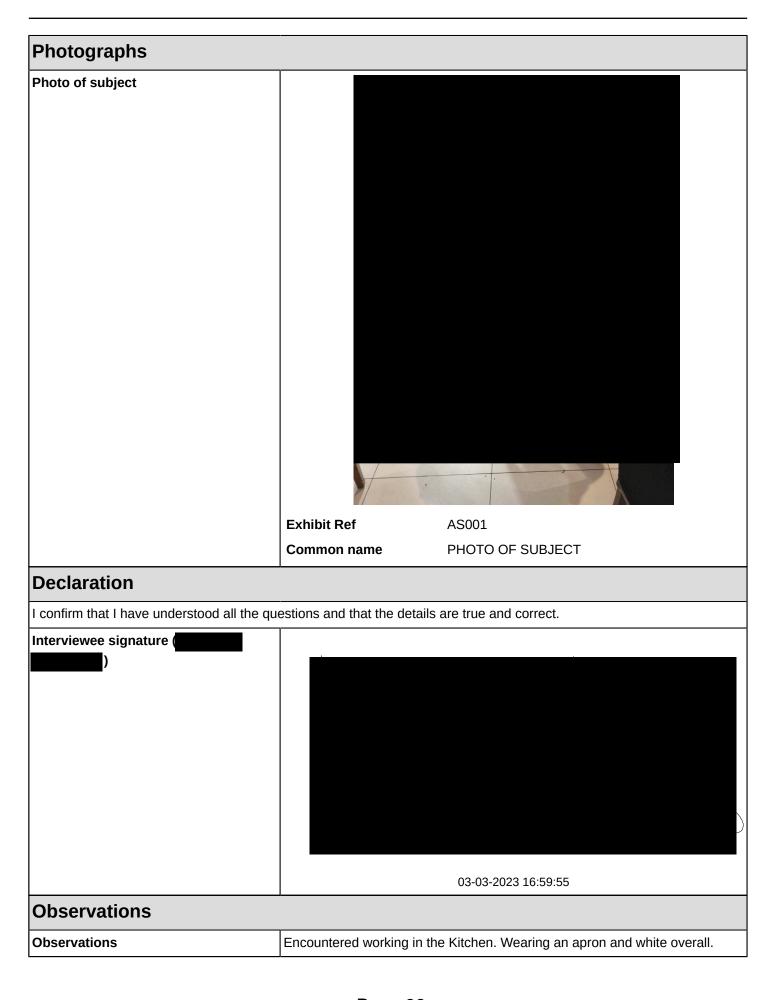


Illegal Working - Employee	
Details	
Type of work	Visit
Visit reference	
Created by	
ProntoID	IND India
Subject CID Person ID	
Subject name	
Subject DOB	
Subject nationality	IND India
Subject gender	Male
Time	17:02
Created at geolocation	Easting 517958
	Northing 185048
Creation date	03-03-2023 17:02:22
Language of Interview	
What language is the interview carried out in?	Tamil
Interpreter used?	Yes
Details of interpreter	
Does the individual understand the interpreter?	Yes
Obligation	
How long have you been working here?	6 weeks
What is your job role/ what are your duties?	Cleaning and washing up
What days/ hours do you work each week?	I work 4 to 5 days a week, I start at 12pm to 10pm
Do you work the same hours/ days every week?	I may work 6 days sometimes if they are busy, they will call me. I work between Tuesday and Sunday
how much do you get paid	£1100 a month
how do you get that payment	Cash in hand
who employed you for this job	His name I don't know the surname

	-
Did you provide any documentation for the job	I did not provide any paperwork for the job but did ask but I did not give him any
who do report to when you come to work, who tells you what to do	tells me but he is not here today
Did Final know you was illegal in the UK and had no right to work when he employed you	Νο
Control	
No details provided.	
Remuneration	
No details provided.	
Pre-employment Checks	
No details provided.	
Additional Questions	
No details provided.	
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the qu	estions and that the details are true and correct.
Interviewee signature (03-03-2023 17:16:09
Observations	
Observations	Found in the kitchen working
Do you suspect this person of illegal working?	Yes

Illegal Working - Employee	
Details	
Type of work	Visit
Visit reference	
Created by	
ProntoID	IND India
Subject CID Person ID	
Subject name	
Subject DOB	
Subject nationality	IND India
Subject gender	Male
Time	16:48
Created at geolocation	Easting 517953
	Northing 185047
Creation date	03-03-2023 16:48:19
Language of Interview	
What language is the interview carried out in?	Hindi
Interpreter used?	Yes
Details of interpreter	Big word
Does the individual understand the interpreter?	Yes
Obligation	
How long have you been working here?	I started on 18th February this year
What is your job role/ what are your duties?	I am a Porter and cleaner
What days/ hours do you work each week?	I work Tuesday to Sunday from 12pm to 11pm
Do you work the same hours/ days every week?	Yes
Control	
Who gave you this job (name and role in business)?	The restaurant owner of Sarashwathy Bhavan

Who tells you what days/ hours to work?	The owner of the restaurant	
Who tells you what tasks/ duties to do each day?	The owner	
Remuneration		
How are you paid (money, accommodation, food)?	Yes. Owner has agreed £1100 per month	
If money, how much and how do you receive it?	Haven't been paid yet	
Do you pay income tax or have a National Insurance number?	No. I don't pay tax	
Who pays you?	Owner will pay cash	
Pre-employment Checks	Pre-employment Checks	
What name does the employer know you as?	He knows me as	
Did you show documents before being offered the job? If so, what?	No. He did not ask	
Does your employer know you're not allowed to work in the UK?	I don't know. I did not mention it	
Did you show your passport to the owner?	No	
Additional Questions		
Who else works here?	I work down stairs in three kitchen with other people. I don't know them. Only at work	



Do you suspect this person of illegal working?	Yes		
Photo 1			
	Caption		photo of subject 01
	Exhibit Ref		AS002
	Common na	ame	Photo of subject 01

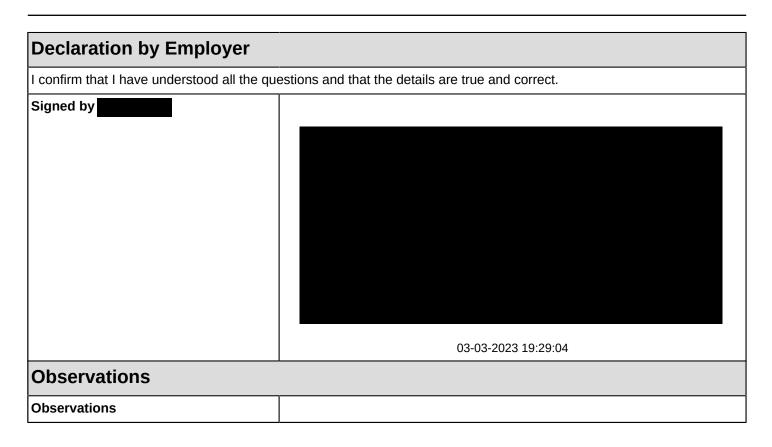
Illegal Working - Employ	/ee		
Details	1		
Type of work	Visit		
Visit reference			
Created by			
ProntoID		- 11	ND India
Subject CID Person ID	Unknown		
Subject name			
Subject DOB			
Subject nationality	IND India		
Subject gender	Male		
Time	16:40		
Created at geolocation	Easting	517954	
	Northing	185046	
Creation date	03-03-2023 16:40:36		
Language of Interview			
What language is the interview carried out in?	English		
Interpreter used?	No		
Obligation			
How long have you been working here?	15 days		
What is your job role/ what are your duties?	Assistant Chef		
What days/ hours do you work each week?	6 days a week. 10 hours	a day	
Do you work the same hours/ days every week?	Yes the same		
Control			
Who gave you this job (name and role in business)?	gave me the job		
Who tells you what days/ hours to work?			
Who tells you what tasks/ duties to do each day?			

Remuneration	
How are you paid (money, accommodation, food)?	I have not been paid yet but the owner told me that he will pay me after 15 days. He will pay me around 30/40 pounds per day but I am given food to eat here.
Who pays you?	Anil who is the owner
Do you pay income tax or have a National Insurance number?	Nothing
Pre-employment Checks	
What name does the employer know you as?	My name
Did you show documents before being offered the job? If so, what?	Νο
Does your employer know you're not allowed to work in the UK?	Yes he knows
Additional Questions	
so the owner knows you are not allowed to work but he still gave you the job?	Yes
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the qu	estions and that the details are true and correct.
Interviewee signature (03-03-2023 16:46:52
Observations	
Observations	Subject was encountered in the kitchen
Do you suspect this person of illegal working?	Yes

Illegal Working - Employ	er	
Details		
Type of work	Visit	
Visit reference		
Created by		
ProntoID		GBR British Citizen
Subject CID Person ID	Unknown	
Employer		
Subject DOB		
Subject nationality	GBR British Citiz	en
Subject gender	Male	
Time	17:48	
Created at geolocation	Easting	517958
	Northing	185047
Creation date	03-03-2023 17:4	3:22
Language of Interview		
What language is the interview carried out in?	English	
Interpreter used?	No	
Employer Details		
What is the name of the business?	DOSA CENTRE	LIMITED. Trading under Sarashwathy Bhavan
What are the Companies House and VAT numbers of the business?	Dosa centre Ltd.	11356450
What is your position here?	Restaurant owne	r / manager
How long have you owned the premises / business?	From 11 05 2018	
Is this a family business?	Yes, me and my	wife own this business.
How long has been been working at Sarashwathy Bhavan?	Both have been v basis working 20	vorking for 3 months. I've employed them on a temporary hours per week.
What hours and days do and work?		esday, Wednesday, Friday and Saturday from 6 to 10pm. day, Friday and Sunday from 12pm to 5pm.
How much are they paid per hour?	Hourly rate of 10	per hour.
Did sign and sign a contract?	No, they were en	nployed on a temporary basis. Verbal agreement.

	гт
Did you ask for passports / documents / visa details for and	Yes, I have passport copies and BRP details for both.
before employing them?	
How long has been	He started 4 days ago.
working for Sarashwathy Bhavan?	
Did you ask for any	Yes, I did asked for passport copy and proof of ID and home address before
documents or visa details?	employing him. Because I did not see him, I did not get the passport copy.
Did you know that	No I did not know. Because he told me that he will bring his passport. And he
has no visa to work in the UK?	is on a trial basis.
How many days and hours does work?	As he has started just now, we has not decided on hours or days yet. He has worked for the last 4 days - 9 hours per day.
What is a second second ' role in Sarashwathy Bhavan?	Kitchen Porter
How long has see the see been working for Sarashwathy Bhavan?	He started in the first week of January. This 10th of March, it will be 2 months.
Did you ask for any	I have a passport copy for him.
documents/visa details before	
employing him?	
Did you know that has Overstayed his visa which expired in	No, I thought his visa was going to expire on 31st March. I had the impression that once his visa expired, he would go.
January 2023 and is not allowed to	
work in the UK?	
What is sector was an 	Working as a chef helper.
How many days / hours does work?	He works 5 days. Starts around 12pm until 9pm.
How much get paid?	Around £1500 per month. Cash in hand
How long has	He's been working for the last 5 months.
been working at Sarashwathy Bhavan?	
Did you ask for any documents / visa details for ?	I asked passport copy. But did not receive it from him.
Why did you not chase it up?	We get busy, and it slipped my mind.
Are you aware that	I did know. I tried to help him because he is suffering badly in India.
has Overstayed this visa and is not allowed to work?	
How many days and hours does work per week?	5 days - 12pm to 9pm
How much does get get get	£12 per hour

What is role at Sarashwathy Bhavan?	He's a chef
How long has been working at Sarashwathy Bhavan?	He started 4 days ago.
Did you ask for documents or visa details before employing him?	He's only been working for 4 days. I did ask him for his documents and haven't received them yet. He's working on a trial basis.
How many hours or days has worked this week?	He has worked 3 and a half days today. He comes around 1pm until 9pm.
How much does get paid?	We haven't confirmed that as he is on a trial basis.
What is role at Sarashwathy Bhavan?	Helper in the Kitchen
Are you aware that the second	I did not know as I asked him to bring his passport and I have not got it yet.
How long has been working for Sarashwathy Bhavan?	He has been working for 5 months.
Did you ask for any documents or visa details?	He does not have any documents. And again he is a poor guy, and he asked for help and I said okay.
Are you aware that a second second has no visa to work in the UK?	l didn't know.
Are you aware that a second s	I didn't know to be honest.
How many days and hours does work?	He does not have any hours or days. He works every day. He has one day off.
How much does get paid?	I give his £1200 per month. I also give him food.
Today on 03 03 2023, West London ICE encountered 5 people illegally working in your restaurant - Sarashwathy Bhavan. Is there anything you would like to add or say?	I knew of 2 people. I employed them to work because they were in very bad condition when they came to work. I didn't know about the 3 people as they only came to work 3 / 4 days ago.
Did you understand all the questions I asked you in this interview?	Yes.



Q&A		
Details		
Type of work	Visit	
Visit reference		
Created by		
ProntoID	In the second	
Subject CID Person ID		
Subject name		
Subject DOB		
Subject nationality	IND India	
Subject gender	Male	
Time	17:44	
Created at geolocation	Easting Northing	
Creation date	03-03-2023 17:44:04	
Language of Interview		
What language is the interview carried out in?	Tamil	
Interpreter used?	Yes	
Details of interpreter		
Does the individual understand the interpreter?	Yes	
Q&A		
where to you live	I live here for 10 days	
where do you sleep	I sleep on the floor on a cardboard in the kitchen	
who gave you permission to sleep on the floor	The owner of the shop Anil	
do you pay Anil to sleep on the floor	No	
Does Anil mistreat you in anyway	I have bad word against Anil, Anil just give me directions on when you work	
Do you have any postal address where psoriasis can be sent to you	No	
are you able to receive post at this address	i do you receive post from back home here	



Acceptor	
Date accepted at TCG	21-02-2023
ОІС	
Proposed power of entry	Not yet known
Comments	
Debrief (Include details of p	artner agencies in attendance)
expected, with most staff in the kitchen be Two of the employees were sleeping on th attended and stated that he visited the res sleeping on the kitchen floor. The two mer term accommodation. One of the men stat three were detained after their passports v	ensing officer. The premises employs a larger number of staff than was dow the restaurant. Five arrests were made and entered on the staff than was ne kitchen floor because they were homeless. The director of the business staurant everyday but said that he did not know that the two men were in were referred to Brent Council, who stated that they would provide short ted that he wished to make a vol dep. They were both granted bail. The other were recovered from house searches. States from Brent Licensing that she would support the revocation of the license.
Have you provided the CID Person ID on all Encounters and Arrests where necessary?	Yes
Public disorder issue	No
Family encountered	No
Closure notice served?	No
Eviction notice served?	No
Illegal Working CPRN served?	Yes - Illegal Working Referral Notice
Right to Rent CPRN served?	No
Referred for licence review?	No
Closing Details	
Date closed	26-03-2023 14:48:17
Closed by officer	
Reopening Comments	
Papers served added	

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REGENERATION AND GROWTH REGULATORY SERVICES BRENT CIVIC CENTRE ENGINEERS WAY WEMBLEY HA9 OFJ

TEL: 020 8937 5359 EMAIL: business.licence@brent.gov.uk

London Borough of Brent Premises Licence

PART A

This Premises Licence was granted by Brent Council, Licensing Authority for the area of the Borough of Brent under the Licensing Act 2003.

Signed..... Head of Regulatory Services Date: 15 April 2015

Licence number 162606

Licence start date: 24/11/2005

Part 1 - Premises Details

SARASHWATHY BAVANS, 549 High Road, Wembley, HA0 2DJ Telephone: 07748 636264

Licensable activities and the times authorised by this licence

Supply of Alcohol:

Day	Start Time	End Time
Monday	11:00	23:00
Tuesday	11:00	23:00
Wednesday	11:00	23:00
Thursday	11:00	23:00
Friday	11:00	23:00
Saturday	11:00	23:00
Sunday	12:00	22:30

Whether alcohol is authorised to be supplied on or off the premises: On

The Opening Hours of the Premises:			
Day	Start Time	End Time	
Monday	11:00	23:00	
Tuesday	11:00	23:00	
Wednesday	11:00	23:00	
Thursday	11:00	23:00	
Friday	11:00	23:00	
Saturday	11:00	23:00	
Sunday	12:00	22:30	

Details of Holder of Premises Licence:

Name: Verma, Mr Anil, Verma, Mrs Vandana Address: Telephone: Email:

Details of Designated Premises Supervisor:

Name: Vandana Verma Address: Personal Licence Number: Issuing authority:

Annexe 1 - Mandatory Conditions

No Irresponsible Drinks Promotions

(1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises.

(2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises?

(a) games or other activities which

require or encourage,

or are designed to require or encourage, individuals to? (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or (ii) drink as much alcohol as possible (whether within a time limit or otherwise); (b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or

discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;

(c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective;

(d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner;

(e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability). Free Water

The responsible person shall ensure that free potable water is provided on request to customers where it is reasonably available.

Age Verification Policy

(1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.

(2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.

Embedded Conditions

Alcohol shall only be sold during the hours specified below:

On weekdays, other than Christmas Day, Good Friday or New Year's Eve, between 10:00 and 23:00 hours.

On Sundays, other than Christmas Day or New Year's Eve, between 12:00 and 22:30 hours.

On Good Friday, between 12:00 and 22:30 hours.

On Christmas Day, from 12:00 to 15:00 and 19:00 to 22:30 hours.

When New Year's Eve is on a weekday, from 10:00 on New Year's Eve until 23:00 hours on New Year's Day, except when New Year's Day is on a Sunday, then the sale of alcohol shall cease at 22:30.

When New Year's Eve is on a Sunday, from 12:00 on New Year's Eve until 23:00 hours on New Year's Day

Alcohol shall only be sold to persons taking table meals in the premises and when ancillary to the meal, during the hours specified below:

On weekdays, other than Christmas Day, Good Friday or new Year's Eve, between 10:00 and 00:00 hours.

On Sundays, Christmas Day and on Good Friday, between 12:00 and 23:30 hours.

When New Year's Eve is on a weekday, from 10:00 on New Year's Eve until 00:00 hours on New Year's Day, except, when New Year's Day is on a Sunday, then the sale of alcohol shall cease at 23:30.

When New Year's Eve is on a Sunday, from 12:00 on New Year's Eve until 00:00 hours on New Year's Day.

Annexe 2 - Conditions Consistent With the Operating Schedule

None

Annexe 3 - Conditions Attached After a Hearing by the Licensing Authority

None

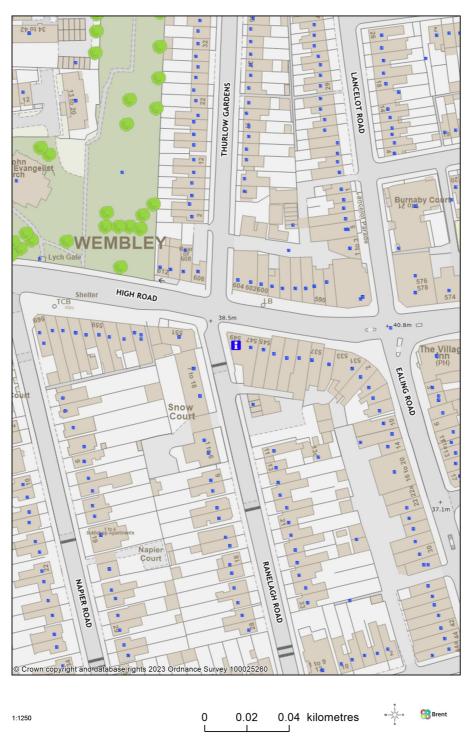
Annexe 4 - Plans

See attached sheet.

LBB - Premises Licence Licence number 162606

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Basemap Map



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Brent Council Regulatory Services Brent Civic Services Wembley , Middlesex HA9 0FJ

12 June 2023

Dear Sir/Madame

RE Notice of hearing of representations in respect os an Application for Review of Premises Licence

We write further to your correspondence and the hearing on 15 June 2023 regarding review of

Premises Licence in respect of premises known as Saraswathy Bhavan, 549 High Road, Wembley, HA0 2DJ.

- 1. As you know covid has had a huge impact on my Business financially and mentally causing me and my family long sleepless nights and immense anxiety and depression.
- 2. I had taken a £50,000 loan from the government which I am paying back monthy. This has been very hard on me.
- 3. As you may know that due to a very big shortage of chefs and other workers I was having extreme difficulty in finding suitable workers. So out of desperation and financial difficulty resulting from the impact of covid I took on these workers.
- 4. I have had all legal workers in the past. I have all their paperwork.
- 5. You must please give me a chance to correct my mistake made out of desperation . I will make 100% sure this does not happen again and any difficulty I encounter in any rates, loan repayments I will first contact the council.
- 6. I have spent more than 8 years trying to run this place and I will not let this happen again. I have nothing else so will make sure this does not happen again.
- 7. I hope that The Law is about reforming the person not about punishing so I am requesting you to let me reform and amend the mistake that I admit I have made.

Thankyou

A Verma

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