



Alcohol and Entertainment Licensing Sub-Committee

Tuesday 14 April 2026 at 10.15 am

Members Suite - 4th Floor, 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.

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)
Hylton
Mahmood

Substitute Members:

Councillors:

Akram, Chohan, Clinton, Ethapemi, Long,
Maurice, 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](#)

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 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.

Item	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 a New Premises Licence by Mr Thamothersampillai Tharmarasa for the premises known as API AVI Convenience Store, 383 Church Lane, NW9 8JB, pursuant to the provisions of the Licensing Act 2003	1 - 100

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LICENSING ACT 2003

Application for New Premises Licence

1. The Application

Name of Applicant:	Mr Thamothersampillai Tharmarasa
Name & Address of Premises:	API AVI Convenience Store, 383 Church Lane, NW9 8JB
Applicants Agent:	Ian Rushton

The application is for a new premises licence as follows:

To provide: the sale of alcohol and to remain open from 7am to 11pm Monday to Sunday.

2. Background

This application falls within a Cumulative Impact Zone (CIZ),

This means the Licensing Authority has published evidence that the number, type or density of licensed premises in that area is having a cumulative impact and is undermining the licensing objectives, and that granting further licences permitting the sale of alcohol is likely to be inconsistent with the Authority's duty to promote the licensing objectives.

The designation of the area as a CIZ does not alter the necessity for applications to be assessed individually under the Licensing Act 2003, nor does it restrict the Authority's discretion to approve an application if it deems such approval appropriate based on the specific circumstances presented.

However, applications pertaining to areas within a CIZ should address potential cumulative impact concerns and clearly outline the measures that will be implemented to promote the licensing objectives. This includes demonstrating how the premises will not contribute to any increase in cumulative impact."

3. Promotion of the Licensing Objectives

See separate sheet.

4. Relevant Representations

Representations have been received and withdrawn from the Licensing Officer and Ward Councillor. Representations remain outstanding from the Police and local resident..

5. Interested Parties

None

6. Policy Considerations

Policy 1 – Process for Applications

Conditions on the licence, additional to those voluntarily sought/agreed by the applicant, may be considered. Conditions will focus on matters which are within the control of individual licensee and which relate to the premises or areas being used for licensable activities, the potential impact of the resulting activities in the vicinity. If situations arise where the licensing objectives may be undermined but cannot be dealt with by the use of appropriate conditions the Licensing Authority will consider whether it is appropriate for a licence to be granted or continue to operate.

7. Determination of the Application

Members can take the following steps when determining a new premises licence application:

- grant the licence;
- exclude from the scope of the licence any of the licensable activities to which the application relates;
- refuse to specify a person in the licence as the premises supervisor;
- reject the application

8. Associated Papers

- A. Application Form & plan
- B. Police Rep
- C. Licensing Rep
- D. Cllr Rep
- E. Resident Rep
- F. OS Map



Regulatory Services
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

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

Online Ref. No: 21208
Application No: 37419
Date: 18 February 2026

LICENSING ACT 2003

Licence: Premises Licence New Application
Application No: 37419

Dear Sir/Madam,

Applicant: Mr THAMOTHARAMPILLAI THARMARASA

Date Received: 17 February 2026

An application was made to Brent Council under the Licensing Act 2003 by the above-named applicant. If you would like to make a representation please email business.licence@brent.gov.uk. Representations must specify in detail the grounds of opposition and must relate to the promotion of the licensing objectives.

In order that consideration of the application may not be delayed, it will be appreciated if a reply can be sent to us by:

17 March 2026.

Yours faithfully

Vanesha Haulkhory
Licensing Support Officer
Regulatory Services

Part 1 – Premises Details

Postal address of premises, or if none, ordinance survey map reference or description

API AVI CONVENIENCE STORE

383 Church Lane, London, Brent, NW9 8JB

Telephone Number at premises (if any):

Non domestic rateable value: 15500

Part 2 – Applicant Details

Proposed Licence Holder:

Mr THAMOTHARAMPILLAI THARMARASA

Agent Details

Ian Rushton

JL LICENCE AND RETAIL

77 Womack Gardens, merseyside, WA9 5UY

Part 3 – Operating Schedule

When do you want the premises licence to start? 18-03-2026

If you wish the licence to be valid only for a limited period, when do you want it to end?

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend:

Please give a general description of the premises: SHOP

What licensable activities do you intend to carry on from the premises?

Section J: Sale of alcohol: Off the premises

The times the licence authorises the carrying out of licensable activities

<u>Section J: Sale or Supply of Alcohol: Off the premises</u>		
<u>Day</u>	<u>Start Time</u>	<u>End Time</u>
Monday	07:00	23:00
Tuesday	07:00	23:00
Wednesday	07:00	23:00
Thursday	07:00	23:00
Friday	07:00	23:00
Saturday	07:00	23:00
Sunday	07:00	23:00

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor:

Concerns in respect of Children: N/A

The opening hours of the premises

<u>Day</u>	<u>Start Time</u>	<u>End Time</u>
Monday	07:00	23:00
Tuesday	07:00	23:00
Wednesday	07:00	23:00

Thursday	07:00	23:00
Friday	07:00	23:00
Saturday	07:00	23:00
Sunday	07:00	23:00

a) General – all four licensing objectives (b, c, d, e): SEE ATTACHED

b) The prevention of crime and disorder: SEE ATTACHED

c) Public safety: SEE ATTACHED

d) The prevention of public nuisance: SEE ATTACHED

e) The protection of children from harm: SEE ATTACHED

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Application for a premises licence

**API AVI CONVENIENCE STORE
383 CHURCH LANE, KINGSBURY, LONDON, NW9 8JB**

Operating schedule/proposed licence conditions

This operating schedule has been prepared having regard to the current information and guidance including the Council's Statement of Licensing Policy (including cumulative impact), and Home Office Guidance

This is a new business venture and the applicant is taking over the business. The shop, currently closed, will be a general convenience store selling a wide range of goods including soft drinks, confectionery, a variety of groceries, dairy goods, cigarettes, snacks, magazines etc. The proposed alcohol sales would be a part of the overall business to allow the shop to offer a more complete local general convenience service.

The applicant, Mr Tharmarasa, has plenty of retail experience and is a personal licence holder with Brent Council. He lives locally and so knows the area well. He is aware of the previous issues/problems at the shop which led to the revocation of the previous premises licence in July 2025. However, he had absolutely no involvement in any of those issues.

Prior to submitting this application, we approached and had some dialogue with the Police to discuss the application. The dialogue was positive and further dialogue is welcomed during the consultation period

Mr Tharmarasa is experienced and will run the business well moving forward. The proposed operating schedule is comprehensive and robust to ensure the promotion of the licensing objectives.

It is submitted that the granting of this licence will not add to any existing issues in the area, and the application, if approved, would not negatively impact on the licensing objectives. The proposed licence conditions are shown below and we would welcome any discussions with responsible authorities and/or interested parties on this application.

NOTE TO RESPONSIBLE AUTHORITIES AND INTERESTED PARTIES - IF YOU HAVE ANY QUERIES OR COMMENTS ON THESE PROPOSALS, PLEASE CONTACT IAN RUSHTON ON 07909 511953 OR BY EMAIL ijrushy@hotmail.com TO DISCUSS FURTHER, PRIOR TO MAKING ANY REPRESENTATIONS.

Proposed Operating schedule/proposed licence conditions

Prevention of crime and disorder

A CCTV camera system shall be installed capable of providing good quality images in all lighting conditions. Cameras shall cover the interior retail space including the till/counter area, and the immediate exterior/entrance of the premises.

The recordings shall be retained for a period of at least 31 days and made available to any authorised officer on reasonable request for evidential purposes, in accordance with data protection legislation. The recording equipment shall be kept in a secure environment under the control of the Premises Licence Holder (PLH) or another responsible named individual.

There shall be sufficient members of trained staff available to be able to download or view CCTV evidence with the minimum of delay at the reasonable request of an authorised officer.

In the event of a breakdown of the CCTV equipment the PLH/DPS or another member of staff shall inform the Licensing Authority as soon as is reasonably practicable. This information shall be recorded in the incident report register and shall include the time, date and means this was reported. The breakdown shall be repaired / replaced as soon as is reasonably practicable and without undue delay.

An appropriate number of staff shall be on duty in the shop - the number of staff on duty will be assessed and determined on a regular basis by the PLH/DPS taking account of any peak periods in terms of sales, volume of customers, etc.

All staff selling alcohol shall be authorised to sell alcohol in writing and a record of the authorisation will be kept in the shop available for inspection.

The shop will not stock or sell any stronger beers, lagers and ciders over 6.5% (except for genuine artisan or craft beers, lagers, and ciders).

The PLH and/or the DPS will seek contact, and engage with, the Police and other authorities as appropriate to discuss and receive updates on any relevant issues in connection with the promotion of the licensing objectives.

An incident book shall be maintained to record any activity of a violent, criminal or anti-social nature, witnessed by staff or reported to staff. The record will contain the time and date, the

nature of the incident, the people involved, any action taken and details of the person responsible for the management of the premises at the time of the incident.

The incident book shall be available for inspection at all reasonable times by an authorised officer.

The premises shall operate a refusals policy as follows - alcohol will not be sold to;

(1) Any person recognised or identified as a street drinker (regardless of their level of inebriation at the time);

(2) Any person found to be drinking alcohol in the street;

(3) Any person who is drunk or appears to be drunk;

(4) Any person suspected of trying to buy alcohol for another person who is drunk or appears to be drunk;

(5) Any person unable to provide valid ID when requested by staff;

(6) Any person who is verbally or physically abusive towards staff or customers.

(7) To any person suspected of trying to buy alcohol for another person(s) who may be underage.

A notice advising customers of the refusals policy shall be on display.

Staff shall be vigilant and monitor the area immediately outside the premises to check that persons are not congregating/causing a nuisance.

'Crimestoppers' literature will be on display in the shop to promote the initiative.

The premises shall follow the Portman Group code of practice on rules for the naming, packaging and promotion of alcoholic drinks.

Public safety

No specific risks have been identified under the Licensing Act 2003 – the applicant is aware of other legislative requirements to ensure that the shop is safe for customers and staff

Prevention of public nuisance

A notice(s) will be on display in the premises asking customers to leave the premises quietly.

A notice(s) will be on display in the premises asking customers not to drop any litter in the street.

Staff will monitor the area immediately outside the premises on a regular basis to check for, and properly dispose of, any litter from the premises.

Deliveries to the premises will be arranged so as not to cause public nuisance.

Protection of children from harm

Challenge 25 shall be used.

Any person who appears to be under 25 years old who attempts to purchase alcohol will be asked to prove their age by producing an acceptable form of photographic ID such as a passport, photo driving licence, military ID and PASS accredited proof of age cards.

The premises shall display clear and prominent signage advising customers that a Challenge 25 policy is in operation.

An alcohol refusals register will be kept and maintained. The register will include details of the date of the refusal, the time, and the reason(s) for refusing the sale. It will be checked on a regular basis by the DPS and be made available for inspection by responsible authorities.

A notice(s) shall be displayed in the premises where they can be seen clearly to advise customers that it is unlawful for persons under 18 to purchase alcohol or for any persons to purchase alcohol on behalf of a person under 18 years of age.

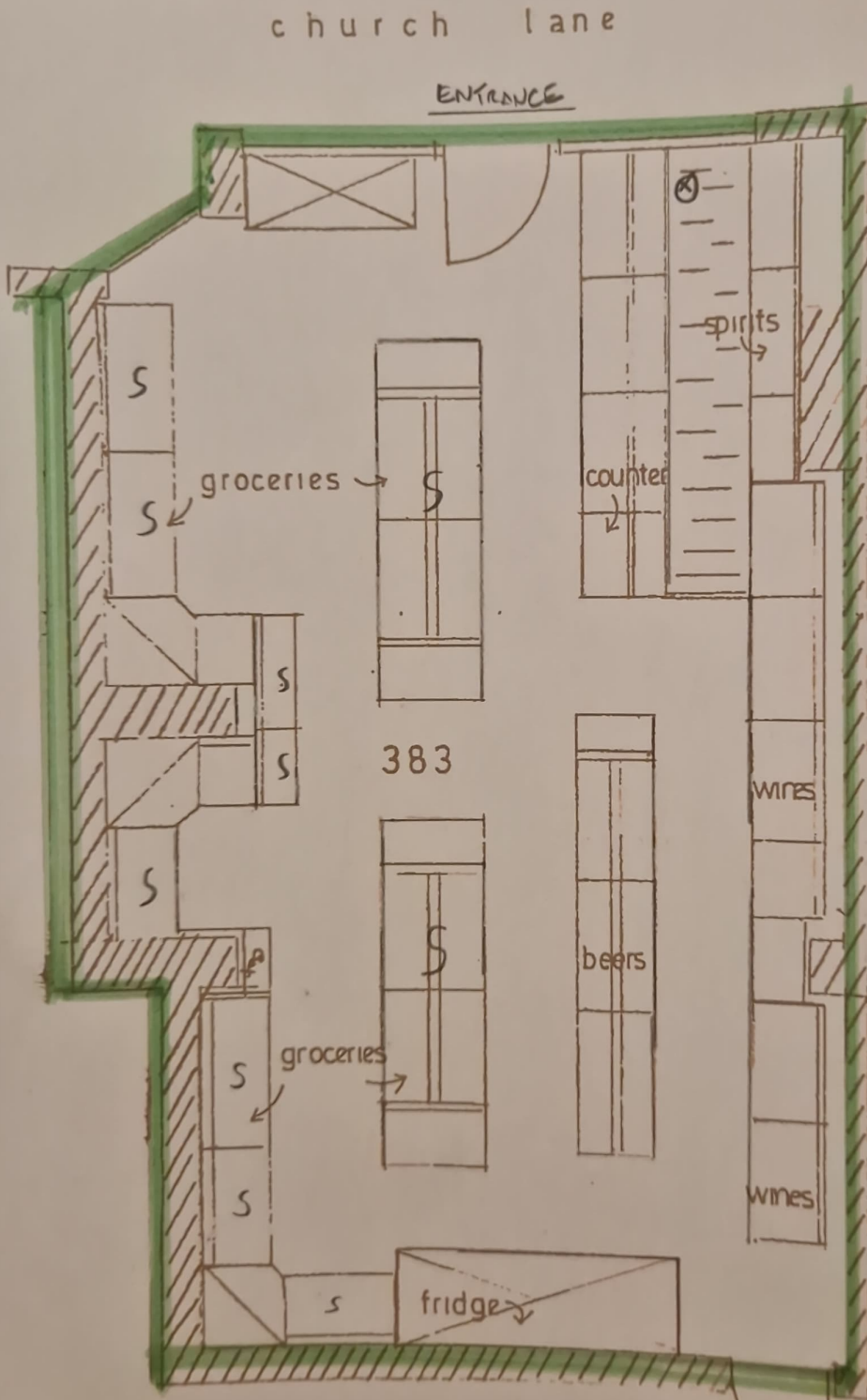
A due diligence checklist will be used to help ensure that all steps are in place to prevent underage sales.

All staff authorised for alcohol sales shall be trained prior to serving alcohol. The training will cover preventing underage sales, Challenge 25, proxy sales, refusing service and other matters as appropriate. Training will be refreshed every 12 months, records will be kept and be made available to responsible authorities upon request.

KEY

Api Api CONVENIENCE STORE

- ⊗ - FIRE EXTINGUISHER
- S - SHELVING/DISPLAY
- - LICENCE AREA



G.FL PLAN.

383 CHURCH LANE NW9 8JB

STORE

SCALE 1:50
Page 11

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From: Maldoom, Edwin

Sent: 12 March 2026 13:28

To: ijrushy

Cc: Business Licence; Legister, Linda

Subject: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Importance: High

Good afternoon Ian,

I hope you are keeping well.

As you may recall, I am the delegated officer on behalf of the Licensing Authority, in whose area the above-mentioned premises is situated, and who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

I'm sorry that it has taken some time for me to contact you – I have been outside of the country dealing with personal matters recently. During my absence, I understand that there was a fairly constructive and useful meeting between you, your client, the Met Police, and my Council colleagues on Thursday 5 March.

Whilst I am mindful that this application falls within a CIZ, and that the previous premises licence was revoked recently, I think there could be scope for reasonable justification to depart from the CIZ policy in this instance.

I am of the view that, to justify such a departure, there does need to be some fairly robust conditions in place. As such, I acknowledge for the ones that you have put forward in your supporting operating schedule document. However, I think that those conditions on their own might not be enough.

I would therefore be most grateful if you could let me know whether your client would consider accepting the attached proposed conditions to form Annex Two of the premises licence. I do not believe the conditions I have put forward are that different from those in the initial application/supporting document – I have just amended them slightly for clarity and consistency. I have also included a few additional conditions that I believe are proportionate, justifiable, and capable of being met.

Of course, I understand and appreciate that your client is free to accept, amend, or reject the attached Annex Two conditions. As such, I would be grateful if you could let me know your/their thoughts and I'm more than happy to discuss this with you.

I would also like to highlight condition 15, which prevents internal access between the ground-floor commercial area and the residential accommodation above. I believe that, during the meeting, it was confirmed that a toilet has been installed to achieve this. If you or your client could provide a photograph of these works – that would be much appreciated.

If you have any questions or would like to discuss this further, please feel free to let me know.

Best regards,

Edwin Maldoom

Licensing Enforcement Officer

Regulatory Services

Brent Council

Proposed Annex Two Conditions
New premises licence application: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

The prevention of crime and disorder

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. The CCTV system shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.
3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (i.e., USB, hard drive, CD etc..) or via digital transfer within 24 hours of request.
4. A notice stating that CCTV is in operation shall be clearly and prominently displayed.
5. An up-to-date incident log shall be kept and maintained at the premises which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any customers barred from the premises.
 - c. any complaints received.
 - d. any faults in the CCTV system
 - e. any visit by a relevant authority or emergency service.

Any entries into the log shall be made within 12 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. The incident log shall be available for inspection upon request by an authorised officer of Brent Council or the Police

6. 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.

7. Staff training shall be undertaken by all members of staff involved in licensable activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics:
 - a. age verification policy and prevention of proxy sales.
 - b. recognising signs of drunkenness, intoxication, and identifying habitual street drinkers.
 - c. procedures for recording refused sales relating to (a) or (b), and conflict management.
 - d. the four licensing objectives.
 - e. operating procedures, permitted hours, and premises licence conditions.

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 premises licence holder. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

8. The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.
9. There shall be no sales of spirit miniatures under 35cl or wine under 200ml. A notice advising customers of this policy shall be displayed at the point of sale.
10. There shall be no sales of beers, ales, lagers, or ciders above 6.5% ABV (except for genuine artisan or craft beers, lagers, and ciders).
11. There shall be no sales of any single cans or bottles of beer, or cider under 500ml (except for genuine artisan or craft beers, lagers, and ciders). A notice advising customers of this policy shall be displayed.
12. There shall also be no external advertising of alcohol displayed on or adjacent to the premises, including on windows, doors, signage, or street-facing structures.
13. All alcohol exposed for sale shall only be confined to the areas denoted on the premises plan.
14. Staff shall take reasonable steps to discourage street drinking of alcohol directly outside the premises and shall refuse service to individuals who engage in such behaviour.
15. Any internal access point between the ground-floor commercial area and the residential accommodation above shall be permanently sealed so as to prevent access between the two areas.
16. A notice shall be displayed warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.

Public safety

17. All entry and exit points (including fire exits) shall be free from any obstructions.

The prevention of public nuisance

18. Clear and legible notice shall be displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.

19. Clear and legible notice shall be displayed at the exit requesting customers not to drop any litter in the street.

The protection of children from harm

20. 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. A Challenge 25 notice shall be also conspicuously displayed at the point of sale.

21. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.

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TERRITORIAL POLICING

**Mr Thamotharampillai Tharmarasa
API AVI Convenience Store
383, Church Lane,
Kingsbury.
NW9 8JB**

NW BCU Licensing Department - Brent

Wembley Police Station
603, Harrow Road
Wembley
HA0 2HH

Tel: 07500 087 115

Email: Phil.S.Graves@met.police.uk

Web: www.met.police.uk

Your Ref: 37419

Our ref: 01QK/085/26/3122NW

Date: Friday 13th of March 2026

Police representations to the application for a new Premises Licence for 'API AVI Convenience Store, 383, Church Lane, Kingsbury NW9 8JB'

Police certify that we have considered the application shown above and wish to make representations that the likely effect of the grant of the application is detrimental to the Council's Licensing Objectives for the reasons indicated below.

Police are of the opinion that the risk to the Council's objectives can be mitigated by removing the requested variations or attaching conditions to the Licence as shown below. If these conditions were accepted in full, police would be in a position to withdraw their representations.

**Officer: PC Phil Graves
Licensing Constable 3122NW**

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

The application has been made for a new premises licence under section 17 of the Licensing act 2003. The Police representations are concerned with all four of the licensing objectives, namely:

- The prevention of crime and disorder.
 - Public safety.
- The prevention of public nuisance; and
- The protection of children from harm.

The Application

The application has been made by Mr Tharmarasa for a new premises license to sell alcohol, off sales from 07.00 to 23.00 hours seven days a week.

The location of 383 Church Lane falls into the Kingsbury Cumulative Impact Zone (CIZ). CIZ's exist across the borough of Brent to help combat crime, street drinking and ASB in the worst areas. Below is a link to the CIZ web page. Any new or extended hours sales within Brent CIZ's are normally refused

by the police and local authority unless the applicant can prove there will be no negative effect on the licensing objectives.

www.brent.gov.uk/business/licences-and-permits/beer-club-and-entertainment-licences/premises-licence#ciz

On 26th of June 2025 a drugs warrant was executed at 383 Church Lane, which was then named Essentials and the flat above 383a Church Lane. As a result of these drugs warrant two (2) males who worked at the venue were arrested for possession with intent to supply drugs.

On 2nd of July 2025 a closure order was granted by Brent Magistrates Court, meaning the venue had to remain closed with no one was allowed access. This prompted a view of the premises license which was held at Brent Civic Centre on 14th of July 2025. The result of this hearing meant the license was revoked due to drugs related arrests and findings.

Due to the history of the venue when it was named Essentials a meeting was held at Brent Civic Centre on the 3rd of March this year. Present was myself, council representatives, Mr Tharmarasa and Mr Rushton (licensing agent). The application along with the history of the venue, Mr Tharmarasa's plans for the venue and the police and council's concerns over the previous owners and criminal activities were all discussed. Along with these discussions a proposed list of licensing conditions for a venue in a CIZ who's previous employees had have been arrested for drug offences was raised.

Below is a set of conditions that I believe will allow the venue to trade, uphold the licensing objectives and hopefully remove any concern of the previous workers / license holder causing any issues.

Personal License Holder

The sale of alcohol to drunken people and children is a major concern to Police and highlighted in the governments Alcohol Harm Reduction Strategy. Those who sell or provide alcohol should be fully aware of the legislation and issues around alcohol and should be fully trained to a national standard.

Closed Circuit Television (CCTV)

Good quality CCTV is a basic requirement to help deter and detect criminal activity for all reputable license holders. Therefore a decent quality CCTV system is an essential tool and should be installed and maintained in accordance with Home Office Guidance. The system should be fully operational during the hours of business, with a member of staff present who can operate and if required download footage upon request of the police or other recognised authority.

Police Representations

Police require the following points should be added as conditions on the premises licence as below:

1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and authorised Officers from Brent Council upon request.
2. CCTV camera shall be installed to cover all the entrances and exits of the premises
3. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading. This staff member shall be capable of making copies and downloading any footage immediately requested by the police of authorised Brent council officials.
4. The CCTV system shall display on any recordings the correct date and time of the recording.

5. The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulder image of every person entering or leaving the premises and all areas where alcohol is sold from.

6. The Licence holder /DPS/Manager shall inspect and test that the CCTV is operational and working correctly on a weekly basis. A signed and dated record of the CCTV examination and any findings shall be kept on the premises and made available to the police and authorised officers of the Local Authority on request

7. A suitable intruder alarm complete with panic button shall be fitted and maintained.

8. A 'Challenge 25' policy shall be adopted and adhered to at all times.

9. An incident log shall be kept at the premises and made available for inspection on request to an authorised officer of Brent Council of the police, which will record the following:

- a) Any complaints received.
- b) Any incidents of disorder.
- c) Any faults in the CCTV system.
- d) Any visit by a relevant authority or emergency service.

Any inputs recorded in this log shall be done within 24 hours of the incident

10. A refusal book detailing date and time of the refused sale (of alcohol), the name of the person refusing the sale and a description of the person attempting to purchase alcohol, shall be kept and maintained and made available for inspection by authorised officers from Brent Council or the police.

Any inputs recorded in this log shall be done within 24 hours of the incident

11. All staff working at the venue shall be trained on the basic / relevant licensing laws by a qualified licensing agent. This training shall be done every six months and documented and made available immediately upon request to the police or authorised officers from Brent Council. In addition to this the training records shall also contain the following information.

- (a) Staff member's name, signature and date
- (b) Name of person providing the training
- (c) Training on use of the incident log
- (d) Training on refusal of sale
- (e) Training on challenge 25 policy
- (f) Training on the use and downloading (providing copies) of the CCTV system

The need of a qualified licensing agent to conduct this training is only required for the first year of trade. After this time the training shall be conducted by the DPS.

12. A copy of the premises licence summary including the hours which licensable activities are permitted shall be visible from the outside of each entrance to the premises.

13. There shall be no high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.

14. There shall be no single cans of beer, lager or cider shall be sold at the premises, individual glass bottles of premium beer or lager are permitted.

15. There shall be no miniatures under 35cl of spirits or wine sold at the premises.

16. A personal license holder shall be present in the store any time the venue is open to the public.

17. All alcoholic drinks shall be clearly labelled with the name of the premises

18. A sign stating “No proof of age – No sale” shall be displayed at the point of sale

19. Acceptable proof of age shall include identification bearing the customer’s photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport. No ID – No delivery.

20. The following persons shall not be permitted to work at the venue in any capacity – [REDACTED]
[REDACTED]. Every effort should be made by staff at the venue to refuse access to these people. If entry is gained, they should be asked to leave, and this should be recorded in the incident management log. This condition does not stop the leasing of the said venue from [REDACTED] to any other individual [REDACTED]

21. The licensee shall ensure all public areas within (5) metres of the premises are cleared of litter arising from the premises daily.

If the above conditions are met in full, police would be able to withdraw representations.

Yours Sincerely,

PC Phil Graves 3122NW
NW BCU - Brent Licensing
Philip.Graves@met.police.uk

From: Agha, Councillor Amer <Cllr.Amer.Agha@brent.gov.uk>

Sent: 20 February 2026 16:26

To: Business Licence <business.licence@brent.gov.uk>

Subject: Re: New Premises Application - 37419 - Welsh Harp

Dear Colleagues, Hi

Thank you for your email.

We are already experiencing street drinking and ASB incidents in other parts of their church lane and local safer neighbourhood team along with police id tackling these issues

I object the application on the basis of following points;

1. Public nuisance, noise, ASB, litter etc
2. Proximity to a school - litter and safety concerns near schools and homes
3. it will increase street drinking and ASB, in the area.

Thank you

Regards

Cllr. Amer Agha

Labour Party councillor for Welsh Harp Ward

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Sent: 28 February 2026 16:02

To: Business Licence <business.licence@brent.gov.uk>

Subject: Representation Letter – Request for Refusal + Fallback Conditions + Redaction Request

To: Licensing Team, Brent Council

Re: Representation Opposing New Premises Licence – *API AVI Convenience Store*, 383 Church Lane, NW9 8JB

Application No.: 37419

Consultation End Date: 17 March 2026

Dear Licensing Team,

I am writing to make a formal representation regarding the new premises licence application for the supply of alcohol at **API AVI Convenience Store, 383 Church Lane, NW9 8JB**.

My representation is based on the **four licensing objectives**, with particular concern for **crime and disorder, public nuisance, public safety, and the protection of children from harm**. Given the history of this premises, I respectfully request that the licence be **refused**.

1. Prevention of Crime and Disorder

This address has a **long and serious history of licensing breaches** under previous operators. Brent Council has previously:

- **Revoked a premises licence** at this same address following a Metropolitan Police closure order, stating that continued operation would *undermine all licensing objectives*.
- Imposed **strict conditions** on another operator due to police concerns and repeated compliance failures.

These actions demonstrate a pattern of **non-compliance, enforcement intervention, and alcohol-related disorder** linked to this location. Granting a new alcohol licence at a premises with this history presents a **significant risk of recurring issues**, especially given the high footfall and vulnerability of the surrounding area.

2. Prevention of Public Nuisance

Previous operators at 383 Church Lane generated persistent nuisance, including:

- Congregation outside the shop
- Noise disturbance
- Littering and alcohol-related antisocial behaviour

Residents experienced repeated disruption, and the premises required council and police involvement. Reintroducing alcohol sales at this location risks **re-establishing the same pattern of nuisance**, particularly as the application seeks permission for off-sales.

3. Public Safety

The premises is located on a **busy stretch of Church Lane**, with:

- Heavy pedestrian traffic
- A bus stop directly outside
- A history of loitering and street drinking linked to previous licence holders

Reintroducing alcohol sales at a site with a proven record of enforcement problems raises concerns about **public safety**, especially during peak hours and evenings.

4. Protection of Children from Harm

The area includes:

- A nearby primary school
- Several tuition centres
- Families walking along Church Lane throughout the day

Past issues at this premises included behaviour that was **not compatible with safeguarding children**, including street drinking and disorder. Granting a new licence risks exposing children to similar harms.

Primary Position: The Licence Should Be Refused

Given the **significant enforcement history**, the **revocation of a previous licence**, and the **clear risk of undermining the licensing objectives**, I respectfully request that Brent Council **refuse this application in full**.

Fallback Position: Conditions Only If the Licence Is Granted

If the Licensing Committee is nevertheless minded to grant the licence, I request that the following conditions be imposed to prevent recurrence of the issues historically associated with this premises. These conditions are proposed **strictly as a fallback** and do not alter my primary position that the application should be refused.

- **No single cans or miniature bottles** to prevent street drinking.
- **No beers, lagers or ciders above 6% ABV.**
- **CCTV covering inside and outside**, with 31-day retention and staff trained to operate it.
- **A refusals log and incident log**, available to police and council officers on request.
- **Challenge 25 policy**, with staff training every 6 months.
- **No alcohol displayed near the entrance** to reduce theft and loitering.
- **No alcohol sales after 22:00**, even if the shop remains open later.
- **A named DPS present for at least 30 hours per week**, ensuring active management.
- **No deliveries of alcohol between 20:00 and 08:00.**
- **No external advertising of alcohol**, including posters or illuminated signs.

Yours faithfully,

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Basemap Map



1:1250

0 0.02 0.04 kilometres



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Sent via the Licensing Authority (by email)

29 March 2026

Dear Sir/Madam

**APPLICATION FOR A PREMISES LICENCE
API AVI CONVENIENCE STORE, 383 CHURCH LANE, KINGSBURY, NW9 8JB**

I write on behalf of my client, Mr Thamotheampillai Tharmarasa, in respect of his recent application for a new premises licence at the above shop.

The Licensing Authority have sent me a copy of your representation and I thought it would be useful to contact you to outline the application further and hopefully we may be able to alleviate your concerns.

As you are aware, the premises is currently empty and it will be refurbished as a new general convenience store which will sell a wide range of goods including snacks, magazines, sweets, dairy, soft drinks, household goods, cigarettes, toiletries, etc.

Mr Tharmarasa is the holder of a Personal Licence issued by Brent Council and he has plenty of retail/shop experience. He is taking over the shop and would just like to offer some alcohol for sale alongside the other goods to allow the business to provide a more complete all-round convenience service. The focus of the shop will be as a general convenience store with the proposed alcohol sales just being a part of the overall business.

Please note that he had absolutely no involvement in any of the previous issues at this shop (evidence of this has been provided to the satisfaction of the Authorities).

We have had positive dialogue with the Council Licensing Authority and the Police regarding this application. An extremely detailed, comprehensive and robust set of conditions has been agreed with the Licensing Authority – please see attached for your information and consideration.

These conditions would promote the licensing objectives and they include;

a CCTV camera system covering inside and outside the shop with images being kept for a minimum of 31 days;

Using the 'Challenge 25' underage policy to ensure that no-one under 18 is able to buy alcohol;

Using a refusals register and an incident log;

Regular staff training;

No sales of spirit miniatures under 20cl;

No single can sales of beers, ales, lagers, or ciders above 6.5% ABV (except for genuine artisan or craft beers, lagers, and ciders).

No single can/bottle sales of beer or cider under 500ml (except for genuine artisan or craft beers, lagers, and ciders) and;

Regular litter checks outside the shop.

The full set of proposed licence conditions are attached.

I can assure you that Mr Tharmarasa is a responsible operator and will do everything that he can to prevent any problems for the local community. For example, the CCTV images will be made available to the Police upon request, and staff will do regular litter checks outside the shop.

Steps have been proposed to ensure that children under 18 are not able to purchase alcohol. The shop will use the the Challenge 25 policy to prevent underage sales, staff will be well trained, and the shop will keep a record of any refusals to sell alcohol.

Licensed premises are extremely well-regulated - they must promote the licensing objectives and comply with their licence conditions. Where this is any evidence of non-compliance or evidence that a premises is not promoting the licensing objectives, then the Authorities can take action as necessary – this includes spot checks, enforcement action, prosecution, a premises licence review, revocation etc.

The previous licence was revoked due to the actions and behaviour of the previous licence holder. Mr Tharmarasa had no involvement in any of those issues. He will run the shop well, and the shop would of course sell alcohol responsibly and within the law at all times.

I hope this information is helpful and informative. I ask you to consider this letter and the attached set of conditions and give Mr Tharmarasa the opportunity to demonstrate that the shop - with a licence - will promote the licensing objectives and not cause any issues.

I look forward to hearing from you and if you have any queries please let me know.

Yours sincerely

Ian Rushton
JL Licensing
07909 511953
Email - ijrushy@hotmail.com

Application for a premises licence

**API AVI CONVENIENCE STORE
383 CHURCH LANE, KINGSBURY, LONDON, NW9 8JB**

Operating schedule/proposed licence conditions

This operating schedule has been prepared having regard to the current information and guidance including the Council's Statement of Licensing Policy (including cumulative impact), and Home Office Guidance

This is a new business venture and the applicant is taking over the business. The shop, currently closed, will be a general convenience store selling a wide range of goods including soft drinks, confectionery, a variety of groceries, dairy goods, cigarettes, snacks, magazines etc. The proposed alcohol sales would be a part of the overall business to allow the shop to offer a more complete local general convenience service.

The applicant, Mr Tharmarasa, has plenty of retail experience and is a personal licence holder with Brent Council. He lives locally and so knows the area well. He is aware of the previous issues/problems at the shop which led to the revocation of the previous premises licence in July 2025. However, he had absolutely no involvement in any of those issues.

Prior to submitting this application, we approached and had some dialogue with the Police to discuss the application. The dialogue was positive and further dialogue is welcomed during the consultation period

Mr Tharmarasa is experienced and will run the business well moving forward. The proposed operating schedule is comprehensive and robust to ensure the promotion of the licensing objectives.

It is submitted that the granting of this licence will not add to any existing issues in the area, and the application, if approved, would not negatively impact on the licensing objectives. The proposed licence conditions are shown below and we would welcome any discussions with responsible authorities and/or interested parties on this application.

NOTE TO RESPONSIBLE AUTHORITIES AND INTERESTED PARTIES - IF YOU HAVE ANY QUERIES OR COMMENTS ON THESE PROPOSALS, PLEASE CONTACT IAN RUSHTON ON 07909 511953 OR BY EMAIL ijrushy@hotmail.com TO DISCUSS FURTHER, PRIOR TO MAKING ANY REPRESENTATIONS.

Proposed Operating schedule/proposed licence conditions (v2)

Prevention of crime and disorder

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. The CCTV system shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.
3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (i.e., USB, hard drive, CD etc.) or via digital transfer within 24 hours of request.
4. A notice stating that CCTV is in operation shall be clearly and prominently displayed.
5. An up-to-date incident log shall be kept and maintained at the premises which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any customers barred from the premises.
 - c. any complaints received.
 - d. any faults in the CCTV system
 - e. any visit by a relevant authority or emergency service.

Any entries into the log shall be made within 12 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. The incident log shall be available for inspection upon request by an authorised officer of Brent Council or the Police

6. 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.
7. Staff training shall be undertaken by all members of staff involved in licensable activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics:
 - a. age verification policy and prevention of proxy sales.

- b. recognising signs of drunkenness, intoxication, and identifying habitual street drinkers.
- c. procedures for recording refused sales relating to (a) or (b), and conflict management.
- d. the four licensing objectives.
- e. operating procedures, permitted hours, and premises licence conditions.

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 premises licence holder. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

- 8. The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.
- 9. There shall be no sales of spirit miniatures under 20cl. A notice advising customers of this policy shall be displayed at the point of sale.
- 10. There shall be no single can sales of beers, ales, lagers, or ciders above 6.5% ABV (except for genuine artisan or craft beers, lagers, and ciders). A minimum of 2 cans must be purchased
- 11. There shall be no sales of any single cans or bottles of beer, or cider under 500ml (except for genuine artisan or craft beers, lagers, and ciders). A minimum of 2 such cans/bottles must be purchased. A notice advising customers of this policy shall be displayed.
- 12. All alcohol exposed for sale shall only be confined to the areas denoted on the premises plan.
- 13. Staff shall take reasonable steps to discourage street drinking of alcohol directly outside the premises and shall refuse service to individuals who engage in such behaviour.
- 14. Any internal access point between the ground floor commercial area and the residential accommodation above shall be permanently sealed so as to prevent access between the two areas.
- 15. A notice shall be displayed warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.
- 16. An appropriate number of staff shall be on duty in the shop - the number of staff on duty will be assessed and determined on a regular basis by the PLH/DPS taking account of any peak periods in terms of sales, volume of customers, etc.
- 17. The PLH and/or the DPS will seek contact and engage with the Police and other authorities as appropriate to discuss and receive updates on any relevant issues in connection with the promotion of the licensing objectives.
- 18. The premises shall operate a refusals policy as follows - alcohol will not be sold to;

- (1) Any person recognised or identified as a street drinker (regardless of their level of inebriation at the time);
 - (2) Any person found to be drinking alcohol in the street;
 - (3) Any person who is drunk or appears to be drunk;
 - (4) Any person suspected of trying to buy alcohol for another person who is drunk or appears to be drunk;
 - (5) Any person unable to provide valid ID when requested by staff;
 - (6) Any person who is verbally or physically abusive towards staff or customers.
 - (7) To any person suspected of trying to buy alcohol for another person(s) who may be underage.
19. A notice advising customers of the refusals policy shall be on display.
 20. Staff shall be vigilant and monitor the area immediately outside the premises to check that persons are not congregating/causing a nuisance.
 21. 'Crimestoppers' literature will be on display in the shop to promote the initiative.
 22. The premises shall follow the Portman Group code of practice on rules for the naming, packaging and promotion of alcoholic drinks.

Public safety

23. All entry and exit points (including fire exits) shall be free from any obstructions.

Prevention of public nuisance

24. Clear and legible notice shall be displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.
25. Clear and legible notice shall be displayed at the exit requesting customers not to drop any litter in the street.
26. Staff will monitor the area immediately outside the premises on a regular basis to check for, and properly dispose of, any litter from the premises.
27. Deliveries to the premises will be arranged so as not to cause public nuisance.

Protection of children from harm

28. 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. A Challenge 25 notice shall be also conspicuously displayed at the point of sale.

29. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.
30. A due diligence checklist will be used to help ensure that all steps are in place to prevent underage sales.

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From: Agha, Councillor Amer

Sent: 02 April 2026 13:56

To: Legister, Linda

Subject: Re: API AVI Convenience Store, 383 Church Lane, NW9 8JB

Dear Linda

Hi

I am happy with the conditions linked to this application. In the light of all these measures I am going to withdraw my concerns

However, I want to add a condition to inspect the premises by the officers in 6 months' time to see the implementation of all these conditions and make sure these are in place, if possible

Thank you

Regards

Cllr. Amer Agha

Labour Party councillor for Welsh Harp Ward

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Dear Linda,

Thank you for your email.

I can confirm that I am not withdrawing my representation. My concerns remain unchanged, particularly regarding the long history associated with this premises and the potential risk to my wife and myself if my identity becomes known.

I have reviewed the documents provided by the applicant's representative. While I appreciate the information, the content consists of proposed conditions and general assurances. It does not provide any independent evidence regarding the operator's track record, police history, or the past incidents at this location. As such, the documents do not address the personal safety concerns I previously raised as a long-term neighbouring resident.

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From: Ian Rushton
Sent: 25 March 2026 15:26
To: Maldoom, Edwin
Cc: Legister, Linda; Business Licence
Subject: Re: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Hi Edwin

Thanks for you email - and for the quick response.

Yes, I can of course confirm our agreement to these conditions

Thanks for your help and consideration in this matter.

Regards, Ian

Ian Rushton

JL Licensing

From: Maldoom, Edwin
Sent: 25 March 2026 15:17
To: Ian Rushton
Cc: Legister, Linda ; Business Licence
Subject: RE: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Good afternoon Ian,

Thank you for sending this across — it's much appreciated.

Following our constructive telephone conversation earlier, and having read your reasoning below along with the proposed amalgamated conditions and policy, I believe that there is scope to justify a departure from the CIZ/Statement of Licensing Policy in this instance. The conditions put forward are sufficient to promote the four licensing objectives, thereby alleviating the concerns previously held.

Consequently, I can confirm that, on the proviso that we are in agreement with the attached conditions, the Licensing Authority withdraws its representation and has no further concerns.

Best regards,

Edwin Maldoom

Licensing Enforcement Officer

Regulatory Services

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Short Written Statement for the Hearing (Final Version)

Written Statement – API AVI Convenience Store, 383 Church Lane, NW9 8JB

Submitted by:

I am a long-term resident living close to this premises for over 50 years. I am unable to attend the hearing due to caring responsibilities for two critically ill family members, but I ask that the Sub-Committee considers the following points.

My representation is based on the long and serious history associated with this premises, including a police closure order, a licence revocation, and repeated issues of crime, disorder, and antisocial behaviour. These problems have directly affected the local community and have previously required significant intervention from both the Police and the Licensing Authority.

My wife and I are both over 70, and we have experienced hostility in the past from individuals connected to this location. Because of this, I remain genuinely concerned about the risk of repercussions if my identity becomes known. This is why I requested redaction of my personal details. Regardless of the outcome, the operators will see me daily, and this creates a real fear of intimidation or retaliation.

I have reviewed the documents provided by the applicant's representative. They consist of proposed conditions and assurances, but they do not provide independent evidence of the operator's track record or any information that addresses the safety concerns I have raised. The history of this premises is well-documented, and my concerns remain unchanged.

For these reasons, I respectfully ask the Sub-Committee to consider my representation in full.

Signed:

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From: Ian Rushton
Sent: 09 April 2026 14:01
To: Phil.S.Graves
Cc: Maldoom, Edwin; Legister, Linda
Subject: Re: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Hi again Phil

Also, could you just clarify your proposed condition below?

10. There shall be no high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold (except for genuine artisan or craft beers, lagers and ciders.) A minimum of 2 cans must be purchased

Are you saying that a minimum of 2 cans of beers/lagers/ciders over 6% can be sold?

Thanks, Ian

Ian Rushton
JL Licensing

From: Ian Rushton
Sent: 08 April 2026 22:27
To: [Phil.S.Graves](#)
Cc: [edwin.maldoom](#); [linda.legister](#)

Subject: Re: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Hi Phil

Thanks for your email, noted

I'll discuss with my client further and get back to you

In the meantime, just a couple of queries/comments.

In terms of labelling alcohol, do other shops already do this? If so, which ones?

Are you suggesting labelling cans or all alcoholic drinks? Your email refers to cans and also refers to all alcoholic drinks being labelled.

Whilst a variation application can be submitted to remove such a condition, it is also true that if there is evidence of a problem which requires labelling then you could submit a Review. Any recent Reviews involving this particular matter in the area?

You mention Mr Tharmarasa's '*lack of knowledge*'? Could you clarify what you mean?
He has had a personal licence for many years and plenty of retail experience

Edwin has already agreed the conditions on behalf of the Licensing Authority and withdrawn his rep.

As I say below, Mr Tharmarasa is more than happy to agree to ban the persons you name from the shop, and if Licensing advise that dates of birth can be included on a licence, that's fine.

Thanks, Ian

Ian Rushton
JL Licensing

From: [Phil.S.Graves](#)

Sent: 08 April 2026 20:36

To: [Ian](#) Rushton

Cc: [edwin.maldoom](#); [linda.legister](#)

Subject: RE: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Ian,

Sorry for the delay in getting back.

Attached is an amended version of the reps you agreed with Edwin, all amendments are highlighted in yellow.

Condition 10 – Edwin & Ian – I have reworded this to cover all cans not just single cans. Edwin, can you confirm you are okay with this?

Training / Personal License holder – I've removed the condition of having to have a personal license holder after our discussion the other week and tweaked the training requirements due to the lack of knowledge from Mr Tharmarasa.

Labelling of cans – I've spoken to the local policing team who have detailed issues of street drinking and littering along this stretch of Church Lane. Due to this I most insist of all alcohol drinks been labelled. Naturally a variation can be submitted in the future assuming there are no issues arising from the venue. I will leave Brent Council to decide if having the full DOB of the banned persons if acceptable. There's not really much more room for negotiation on my behalf, so hopefully we can find a compromise with the attached.

I doubt you will have any issues with the other amendments I've made.

Thanks,

Phil

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Proposed Operating schedule/proposed licence conditions (v3)

Prevention of crime and disorder

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. The CCTV system shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.
3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (i.e., USB, hard drive, CD etc..) or via digital transfer within 24 hours of request.
4. A notice stating that CCTV is in operation shall be clearly and prominently displayed.

The Licence holder /DPS/Manager shall inspect and test that the CCTV is operational and working correctly on a weekly basis. A signed and dated record of the CCTV examination and any findings shall be kept on the premises and made available to the police and authorised officers of the Local Authority on request

5. An up-to-date incident log shall be kept and maintained at the premises which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any customers barred from the premises.
 - c. any complaints received.
 - d. any faults in the CCTV system
 - e. any visit by a relevant authority or emergency service.

Any entries into the log shall be made within 12 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. The incident log shall be available for inspection upon request by an authorised officer of Brent Council or the Police. This record shall be kept on site and made immediately available to authorised persons.

6. 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. This record shall be kept on site and made immediately available to authorised persons.

7. Staff training shall be undertaken by all members of staff involved in licensable activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics:
 - a. age verification policy and prevention of proxy sales.
 - b. recognising signs of drunkenness, intoxication, and identifying habitual street drinkers.
 - c. procedures for recording refused sales relating to (a) or (b), and conflict management.
 - d. the four licensing objectives.
 - e. operating procedures, permitted hours, and premises licence conditions.
 - f. Training on the viewing, downloading and copying of the CCTV system

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 premises licence holder. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council and kept on site for immediate viewing. For the first twelve months this training shall be completed by a trained licensing agent. After this time the DPS shall be responsible.

Only staff that have completed this training shall be allowed to work at the venue.

8. The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.
9. There shall be no sales of spirit miniatures under 20cl. A notice advising customers of this policy shall be displayed at the point of sale.
- ~~10. There shall be no single can sales of beers, ales, lagers, or ciders above 6.5% ABV (except for genuine artisan or craft beers, lagers, and ciders). A minimum of 2 cans must be purchased~~

10 There shall be no high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold (except for genuine artisan or craft beers, lagers and ciders.) A minimum of 2 cans must be purchased.

11 There shall be no sales of any single cans or bottles of beer, or cider under 500ml (except for genuine artisan or craft beers, lagers, and ciders). A minimum of 2 such cans/bottles must be purchased. A notice advising customers of this policy shall be displayed.

All alcoholic drinks shall be clearly labelled with the name of the premises

12 All alcohol exposed for sale shall only be confined to the areas denoted on the premises plan.

- 13 Staff shall take reasonable steps to discourage street drinking of alcohol directly outside the premises and shall refuse service to individuals who engage in such behaviour.
- 14 Any internal access point between the ground floor commercial area and the residential accommodation above shall be permanently sealed so as to prevent access between the two areas.
- 15 A notice shall be displayed warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.
- 16 An appropriate number of staff shall be on duty in the shop - the number of staff on duty will be assessed and determined on a regular basis by the PLH/DPS taking account of any peak periods in terms of sales, volume of customers, etc.
- 17 The PLH and/or the DPS will seek contact and engage with the Police and other authorities as appropriate to discuss and receive updates on any relevant issues in connection with the promotion of the licensing objectives.
- 18 The premises shall operate a refusals policy as follows - alcohol will not be sold to;
 - (1) Any person recognised or identified as a street drinker (regardless of their level of inebriation at the time);
 - (2) Any person found to be drinking alcohol in the street;
 - (3) Any person who is drunk or appears to be drunk;
 - (4) Any person suspected of trying to buy alcohol for another person who is drunk or appears to be drunk;
 - (5) Any person unable to provide valid ID when requested by staff;
 - (6) Any person who is verbally or physically abusive towards staff or customers.
 - (7) To any person suspected of trying to buy alcohol for another person(s) who may be underage.
19. A notice advising customers of the refusals policy shall be on display.
20. Staff shall be vigilant and monitor the area immediately outside the premises to check that persons are not congregating/causing a nuisance.
21. 'Crimestoppers' literature will be on display in the shop to promote the initiative.
22. The premises shall follow the Portman Group code of practice on rules for the naming, packaging and promotion of alcoholic drinks.

23. All entry and exit points (including fire exits) shall be free from any obstructions.

Prevention of public nuisance

24. Clear and legible notice shall be displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.

25. Clear and legible notice shall be displayed at the exit requesting customers not to drop any litter in the street.

26. Staff will monitor the area immediately outside the premises on a regular basis to check for, and properly dispose of, any litter from the premises.

27. Deliveries to the premises will be arranged so as not to cause public nuisance.

Protection of children from harm

28. 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. A Challenge 25 notice shall be also conspicuously displayed at the point of sale.

29. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.

30. A due diligence checklist will be used to help ensure that all steps are in place to prevent underage sales.

The following persons shall not be permitted to work at the venue in any capacity –

Mr Rishi SHAH [REDACTED], Mr Punit SHAH [REDACTED], Mr Mahesh SHAH DOB [REDACTED], Ms Ranjan SHAH [REDACTED], Ms Sheena SHAH [REDACTED]

[REDACTED]. Every effort should be made by staff at the venue to refuse access to these people. If entry is gained, they should be asked to leave, and this should be recorded in the incident management log. This condition does not stop the leasing of the said venue from Mr Mahesh SHAH to any other individual

From: Ian Rushton

Sent: 09 April 2026 13:58

To: Legister, Linda

Subject: APPLICATION FOR A PREMISES LICENCE - CHURCH LANE, KINGSBURY -
SUPPORTING INFORMATION FOR HEARING

Importance: High

Hi Linda

Please see our supporting information for the above hearing consisting of;

Examples/samples of the types of due diligence records that would be used at the premises and;

Copy of a letter from the applicants Solicitors regarding the premises/new lease.

Thanks for publishing the details of subsequent agreements/updated conditions/letters to objectors on your website.

My client will be attending and will confirm who's representing him asap.

Thanks, Ian

Ian Rushton

JL Licensing

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UNDER 25?

Please be prepared to show
proof of age when buying
vaping products

Acceptable forms of ID



- Photographic driving licence
- Cards showing Pass hologram
- Passport



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Challenge 25 policy

Our **Challenge 25** policy applies to all age-related sales that occur on our premises. You are obliged to apply our **Challenge 25** policy when any customer who looks to be under the age of 25 attempts to purchase alcohol, either for themselves or for somebody else.



If you sell alcohol to anyone under 18, you are breaking the law. The consequences are very serious; you could receive a £90 Fixed Penalty Notice or if prosecuted be fined up to £5000, which may result in a conviction being recorded against your name. If you are a Personal Licence Holder, your Personal Licence is also at risk of forfeiture.

Additionally, both the pub and the Designated Premises Supervisor (DPS) or Owner could face prosecution as a result of your actions, as well as having its licence suspended or revoked.

Our **Challenge 25** policy requires you to use a 4-step approach every time you see someone who appears to be under the age of 25:

1. Assess the age of every customer.
2. If you think the customer *looks* under 25, ask for ID.

[Only the following documents are acceptable for proof of age purposes]:

- A valid Passport
- A valid photo drivers' licence
- A "Pass" approved card from the national Proof of Age Standards Scheme
- A British Military ID Card
- A National Identity Card

Only **Original Documents** can be accepted - photocopies, photographs or **Phone Apps** and out of date passports are **not acceptable**

3. If the customer cannot produce acceptable ID, refuse the sale of alcohol
4. When you refuse the sale you must record this in the refusals log book/EPOS system on the till

There are fake proof of age cards, so if you are unhappy with the ID for any reason or it looks fake or tampered with, or you think it belongs to someone else (eg a brother or sister), refuse the sale and bring the matter to the attention of your Duty Manager or Supervisor.

Challenge 25 applies at all times, even when:

- You think door staff has previously checked a customer's ID.
- You are busy.
- You believe you have seen acceptable ID from the customer on a previous occasion.

Remember, if you ask for ID from everyone you think looks under 25, then you will protect yourself from breaking the law. Practice **Challenge 25** and do not get caught out.

Please sign this document to acknowledge that you have understood your training and responsibilities and agree to always ask for ID from customers who appear to be under the age of 25.

Trainer's Name:

Trainer's Signature:

Trainee's Name:

Trainee's Signature:

Date:

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Drunkenness and Disorderly Behaviour Policy / Staff training Api Avi Convenience Store, 383 Church Lane, Kingsbury, NW9 8JB

Expected Standards

There are 4 licensing objectives which have equal importance:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

We are a general convenience store selling a wide range of goods including alcohol. We take our legal responsibilities very seriously and expect staff to take this seriously too. We sell alcohol in a responsible manner, within the law and in accordance with the conditions of our Premises Licence.

It is against the law to knowingly sell alcohol to someone who is drunk or appears to be drunk. It is an offence to knowingly buy or obtain alcohol for a drunken person on licensed premises.

It is an offence to sell alcohol to someone who is drunk - you could be prosecuted and fined. Do not under any circumstances sell alcohol to a person who you suspect is drunk. If you are a Personal Licence Holder, your licence is also at risk. Furthermore, the premises licence holder could also face prosecution and the premises licence could be reviewed, suspended or revoked as a result of your actions.

We want our customers to use the shop regularly. The vast majority of people/customers behave well but it is important that we are able to deal with any customers that misbehave or are thought to be drunk. Therefore, it is important that you know how to deal with drunkenness and disorderly behaviour if it should arise.

Some signs to look out for:

- Disruptive behaviour
- Raised voices and arguments outside the shop;
- Customers buying drinks in quick succession
- One or more people playing to a crowd
- People being helped/'held up' by their friends
- Glazed eyes
- Stumbling
- Slurred words

Keeping an eye on customers will help you to identify any potential problems early before they start to escalate and get out of control. However, please note that these are just some examples. Just because a person may have slurred speech or stumble, for example, doesn't automatically mean that the person is drunk. But if you believe that a person is drunk, then you must not sell them alcohol.

Our specific internal standards

- We try to create a positive friendly welcoming and inclusive environment in the premises
- We train staff to ensure that they can serve customers as quickly and professionally as possible, and are aware of their legal responsibilities regarding alcohol sales.

When to step in and what to do

Service MUST be refused to any customer who is or appears to be:

- drunk
- or any customer who is trying to buy a drink for someone who is or appears to be drunk
- or any customer(s) who are acting in a disorderly fashion that is related to drunkenness

It is better to intervene too early rather than too late. The steps should be as follows:

1. A quiet word with a problem customer(s) or group can often resolve the situation before an offence is committed. If you think someone is drunk;
 - a. Politely but firmly refuse them explaining that it is the law that you cannot serve alcohol to people who may have had too much to drink. Refer people to our notice on display.
 - b. If you think someone in a group of people is drunk, politely refuse them explaining that it is the law that you cannot serve them alcohol. The reason for this is because someone in the group may provide the drunk person with alcohol purchased from the shop.
2. If the person isn't listening or doesn't accept what you say, stay calm. Be polite but firm. Escalate the issue to a duty manager or DPS if need be. If it is a group, follow the same procedure and calmly advise them of your decision. If someone becomes aggressive, avoid being aggressive back or saying or doing anything to make the situation worse. Stay calm. Remind the person that the CCTV is recording.
3. If the situation escalates further and you have a concern about your safety or the safety of other persons, then you should call the Police immediately on 999.
4. Calling the Police should ideally be a last resort, but if it's necessary after you have tried everything to deal with and control the situation, you must call the Police. Make a note of the incident in the incident/refusals book so there's a record of it.

Refusal logbook

Remember to log the refusal in the refusals book. You must make a note of the date and time, why you refused the sale plus any other details that may be useful to others in future such as a description of the person(s).

Incident book/log

If you witness any incidents of anti social behaviour/crime at the premises, or immediately outside, you must make a note of it in the incident book – make a note of the date, time, what happened and any action that staff took, including whether the Police were called.

Please sign this document below to acknowledge that you have understood your responsibilities in regard to any drunk and disorderly behaviour.

Staff name: Signature: Date

Staff name: Signature: Date

Staff name: Signature: Date

Staff name: Signature: Date

Staff name: Signature: Date

Staff name: Signature: Date

Staff name: Signature: Date

Staff name: Signature: Date

Staff name: Signature: Date

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PREMISES LICENCE **DUE DILIGENCE CHECKLIST**

Is the premises licence summary on display?

Is the full premises licence available in the shop?

Are the Challenge 25 posters displayed properly?

Are statutory notices on display? (cigarettes etc)?

Is the refusals register available? (paper or electronic)?

Is the premises licence file available for inspection?

Is the staff training up to date?

Are the staff training records available?

Are all the various notices (as required by licence conditions) on display? Check the conditions.

Have you checked the refusals register?

Have you checked the incident log?

Is the CCTV system working ok? Check images are being stored as required.

Are the fire extinguishers due for a check/service?

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Age Verification Scheme Challenge 25

Sales of Alcohol at the premises

1: When a customer asks to buy alcohol, if the customer appears to look 25 or younger, the customer **MUST** be asked at the time of ordering if they are over 18 years of age. If the customer either refuses to answer, becomes verbally aggressive or replies no, then the sale **MUST** be refused and you **MUST** enter the refusal details in the Red Refusal Log book kept in the shop.

2: If the customer confirms that they are over 18, you must ask the customer for valid Identification.

(VALID MEANS – NOT DAMAGED, TAMPERED WITH AND NOT OUT OF DATE)

3: The only types of I.D. that can be accepted are:

- ✓ Valid passport (any nationality)
- ✓ Valid **BRITISH** Driving Licence (Full or Provisional)
- ✓ HM Services Warrant Card
- ✓ PASS Accredited Proof of Age Card
- ✓ Any other reliable photo ID that is approved for acceptance by the Police or other Authorised Officers.

It is our policy that we are unable to accept any other type of I.D.

You must check that the I.D. is VALID (within date), has not been tampered with and belongs to that person. You can then check by following this procedure.

- ✓ Check the date of birth to make sure the person is over 18.
- ✓ Check the photograph for a match.
- ✓ Check the personal details with the person – ask for their postcode or date of birth, address etc.
- ✓ **The easiest and best way to check is to take the I.D. from the person and ask the person to sign the ID Signature Book. Then check that both signatures match. You can ask the person to sign the ID Signature book again for your records if you are not sure.**

4: If you **100%** believe that the I.D. belongs to that person and they are over 18, then you can sell the alcohol.

5: If you have any doubts, you must refuse to sell the alcohol and immediately complete the refusals register.

6: If you believe or think that another person is attempting to buy alcohol for another person who may be underage, you must tell the customer that it is illegal and if they are you will report them to the police and inform them that they can be prosecuted and fined up to a £5000.

If you have any doubts, you must refuse to sell the alcohol unless the person can produce additional valid acceptable I.D.

7: If the customer becomes verbally abusive or aggressive, then refuse to sell and report this to your Manager

8: If the customer produces I.D. which you in your opinion does not belong to them, then this must be logged into the refusals book and reported to the police.

9: **DO NOT BECOME PERSONALLY INVOLVED IN ANY ARGUMENT OR DISCUSSION WITH THE PERSON.**
If the person becomes physically aggressive, then call the Police for assistance.

REMEMBER: IF IN DOUBT - DO NOT SELL

Premises Age Verification Policy
(This premises operates the Challenge 25 scheme)

Name of Premises Licence Holder

.....

This policy applies in relation to the sale or supply of alcohol on this premise.

For this policy the responsible person is one of the following:

- a] The holder of the premises licence -
- b] The designated premises supervisor -
- c] A person aged 18 or over who is authorised to allow the sale or supply of alcohol by a person. No persons under the age of 18 are allowed to work behind the till.

The Age Verification Scheme this premises will be Challenge 25. The premises will train all staff prior to commencement of employment and re-training of all staff at regular intervals using the documented system.

Staff selling alcohol to customers must require any individuals who appear to the responsible person to be under the age of 25 years of age to produce on request, before being served alcohol, identification bearing their photograph, date of birth, and a holographic mark.

Examples of appropriate identification include:

A photo card driving licence

A passport

A proof of age card bearing the PASS hologram (Citizencard)

The premises licence holder will ensure that all staff are made aware of the existence and content of this policy.

This business fully supports our Police and Trading Standards in the prevention and detection of crime and disorder using our CCTV system

CHALLENGE 25

You might think you look over 18
but we don't – and it's 'MY' licence

No ID - No Serve

Don't try to buy
alcohol for kids

We will report you



All ID presented must contain the following as outlined by the Home Office.

Photograph, date of birth, signature, holographic mark and issued by a government department.



Staff Induction Log book

I (name).....confirm

That I have read and fully understand the following

	Document Name	Date of completion
1	The 4 Licensing Objectives	
2	Premises Licence and Conditions	
3	Age Verification Policy	
4	Age Verification Scheme and signage	
5	Refusals Policy Sale and Service of Alcohol to under 18's	
6.	Section 57 & Business Names Notice	
7.	Alcohol Authorisation Log book	
8	Customer Refusals Log Book	
9	Incident Report Log Book	
10	-	
11	-	
12	Age Restricted Products, Cigarettes & Tobacco Training & Age Verification Questions and Answers	
13	Staff Induction log sheets	
	Any Further Training received ie: PSPO's etc/ Imposed conditions etc (list details)	

I have read & understand how this business can be affected and damaged by not adhering to them. I agree to abide by them at all times.

I also agree that whilst employed at these premises, I agree to abide by the policies that have been implemented by the management and will not deliberately carry out any actions that may cause concern for the business and Premises Licence.

Signed.....

Date.....

Age Verification Training

Questions with Multiple choice answers (the answers are on the back)

1	<p>What is an Age Verification Policy?</p> <p>A: It's a new entrance scheme for getting young people into night clubs quicker</p> <p>B: It's the name of a new European National identity card</p> <p>C: It's a mandatory written policy adopted by all licensed premises (that sell alcohol), to identify how the premises preventing alcohol being illegally sold or supplied to under 18's</p> <p>D: It's a policy to stop all under 18's from claiming family tax credits' and child benefits</p>
2	<p>Who is responsible for making sure an Age Verification policy is being carried out on the premises?</p> <p>A: The Home Office</p> <p>B: The Premises Licence Holder</p> <p>C: Any nominated member of staff that works on the premises</p> <p>D: The Designated Premises Supervisor</p>
3	<p>What does the owner of a licensed premise need to do to operate this Age Verification Policy?</p> <p>A: Complete the relevant registration form and submit it to their local Licensing Authority and wait for further instructions</p> <p>B: Send a weekly report to the police on www.nowtellyoueverythingyouknow.gov.uk</p> <p>C: Put a system in place to make sure all sellers of alcohol ask, view and record all ID challenges of any person whom they suspect to be under 18 years old</p> <p>D: Wait for the local Trading Standards Officer to visit you, who will fully explain what you must do to comply</p>
4	<p>What types of Identification am I allowed to accept?</p> <p>A: Any document that bears the holders full name</p> <p>B: Passport or driving licence in any condition</p> <p>C: Any type of ID card bearing their full name and passport sized photograph</p> <p>D: Any type of ID but it must contain their photograph, date of birth and a holographic mark</p>

- 5** **Can I accept ID that has been bought off the internet?**
- A: No
- B: Yes
- C: Yes, as long as it bears their name and photograph
- D: Sometimes, it depends on which one is shown to you and how attractive the card is
-
- 6** **How do I decide if I need to ask someone for ID?**
- A: Appearances can be deceiving, just ask everyone
- B: Look for poor fashion sense and cheap smelling perfumes or deodorants
- C: It is very difficult, but basically if you need to think about their age when you look at them, then you must ask for ID
- D: Check to see if you can recognize their school uniform and look for sweet wrappers in their Pockets
-
- 7** **How do I ask someone for ID without upsetting them?**
- A: By being very polite, confident and professional. Inform the customer that it is not personal, and it is part of your job
- B: Just ask, because it doesn't matter if you upset them as they are only customers and they should be used to it by now
- C: By saying loudly "show me your ID or your not getting served".
- D: Ask them for their parent's telephone number and call them to check their age
-
- 8** **What are the best methods for checking a persons ID?**
- A: Follow the procedure shown to you by your Manager, be very thorough and if in doubt do not serve.
- B: Flick it against the counter to see if it bends without breaking
- C: Dip it into a glass of gin or cider to see if the ink runs
- D: There is no best method, young people are very clever and can easily deceive you

9 What is a good method to be really sure if the ID shown to me is genuine and really does belong to that person?

- A: Stare at the young person to see if they start fidgeting
- B: It is impossible to be 100% sure, so you must assume that the customer is telling the truth
- C: Ring the police and ask them to come and check the ID as you are not sure
- D: Ask the customer for their signature using the customer refusal book. Most people are unable to copy another person's signature without looking at the original one at the same time

10 How can I check if a persons ID is fake, has been forged or tampered with?

- A: Search on Google to see if anything has been reported on Crime Watch
- B: Ask the customer if he/she has tampered with it
- C: Place under a UV light and check for genuine watermarks. Look for water stains, frayed edges, the plastic developing air bubbles or becoming detached from the paper on the document. Raised edges on the card can also be signs of tampering
- D: Official documents like passports or driving licenses are virtually impossible to forge, so there is no need to check

11 Who must I by law, refuse the sale of alcohol to?

- A: Anyone who you don't like
- B: Police and authorised officers, either on or off duty
- C: Any person who is drunk, appears to be drunk or a person who you believe to be is buying alcohol for a drunk. Any young person whom you suspect of being underage and are unable to produce valid ID, or any person whom you believe is attempting to purchase alcohol for underage persons. You must refuse the sale of alcohol to 'everyone' if it is outside the hours stated on the Premises Licence
- D: Any person who is wearing a fancy dress costume

12 What is the best way to refuse the sale of alcohol to someone with no ID?

- A: Tell them you are not serving them with no explanation and ask them to leave
- B: Ask them to find a friend to buy the alcohol for them
- C: Take their photograph and upload it to Facebook
- D: Take the item from the customer (if in a shop), then politely inform the customer that you are unable to sell them the alcohol as they cannot produce valid ID.

13	<p>What is a proxy sale?</p> <p>A: The latest sale at the Pound shop</p> <p>B: A promotion offering 10% off all alcohol drinks purchased before 6pm</p> <p>C: The purchase of alcohol by an adult on behalf of an under 18 year old</p> <p>D: Buying alcohol with no ID</p>
14	<p>How can I tell if an adult is buying or attempting to buy alcohol for an under 18 ? (called a proxy sale)</p> <p>A: By following all customers out of the shop to see where they are going</p> <p>B: By paying for the alcohol with lots of small change</p> <p>C: Be vigilant and look for signs for example, young people hanging around outside the premises or a customer buying unusual alcoholic drinks or quantities of drinks. Paying for the drinks separately to their own purchases and sometimes other customers will tell you</p> <p>D: It is difficult, because there is no way of ever knowing</p>
15	<p>Are there any other products I cannot sell to underage persons without producing valid ID?</p> <p>A: Yes, just cigarettes and tobacco products only</p> <p>B: Yes, you must not sell them eggs due to salmonella contamination</p> <p>C: Yes, there are several other products you cannot sell to a suspected underage persons without valid ID</p> <p>D: No, because of the Human Rights Act, there are no restrictions to what an underage person is allowed to purchase</p>
16	<p>What is the best way to deal with angry, aggressive or violent customers?</p> <p>A: By being polite, remaining calm and assertive</p> <p>B: Learn self defence techniques so you can defend yourself more effectively</p> <p>C: Argue with them, then ask other customers to help you escort them out</p> <p>D: Just give them what they want and ask no questions because the customer is always right</p>
17	<p>What is a customer refusal register?</p> <p>A: It's a book for keeping a list of customer's names in who won't be invited to the staff Christmas party</p> <p>B: It's a police database for storing all names of known local criminal and drunks</p> <p>C: It's a register for recording all refusals of sales of alcohol and other products in</p> <p>D: It's a register for recording all the customers' names in that have been barred for fighting</p>

18 Can a person under 18 'sell' alcohol on a licensed premise?

A: Never

B: Yes, with the verbal or written approval of trading standards and the police

C: Yes, but they must be a member of Facebook and have a minimum of 8,000 friends

D: Yes, but only under certain conditions

19 Can a 16/17 year old 'drink' alcohol on a licensed premise? (on sales only)

A: Yes; but only under certain conditions

B: Only if they buy alcohol during a 'Happy Hour'

C: No

D: Yes: if the Manager believes them to be a responsible person who won't start fighting

20 What is a test purchase?

A: It's a drinking game between friends

B: It's an under-cover operation carried out by Weights & Measures Officers (trading standards) and the police to test if a premise will sell to an underage person

C: It's a way of promoting new products that come onto the market to see if they sell

D: It's a new method for checking if drinks have been spiked

21 When is it is legal for a person under the age of 18 to purchase or attempt to purchase alcohol?

A: When the underage person is working as part of a team with Weights & Measures Officers and the police during a test purchase operation

B: When the under age person is accompanied by an adult

C: When the young person is having a table meal in a restaurant

D: When purchasing alcohol for parties or a special occasion

22	<p>What are the penalties for a failed a test purchase?</p> <p>A: The premise is immediately closed, everyone is arrested, handcuffed, taken to the police station and possibly kept in the cells overnight for questioning</p> <p>B: On the spot fines, possible prosecution for the DPS and the Premises Licence Holder. In addition, following a conviction, the Premises Licence may also be forfeited.</p> <p>C: Loose the right to attend the weights & measures annual Christmas dinner dance</p> <p>D: The owner of the business and all the staff must attend a 1 week alcohol rehabilitation training course</p>
23	<p>What can happen to a person if they are caught selling alcohol to an underage person?</p> <p>A: Their name and photograph will appear in the local newspaper</p> <p>B: A person must take an eye test and send the results off within 21 days to police web site, www.tellmeallyouknow.gov.uk</p> <p>C: Verbal warning from the manager for getting caught.</p> <p>D: First offence is usually a caution or fixed penalty of £80. The second offence could be prosecution. A review of the Premises Licence may also be held.</p>
24	<p>What is Due Diligence?</p> <p>A: The name of the horse that won the Grand National in 1985</p> <p>B: Doing everything you can to prevent an offence against the Licensing Act 2003 from taking place</p> <p>C: A tracking device for catching local drug dealers</p> <p>D: A system of how to identify plain clothes Police Officers on your premises.</p>
25	<p>Is it a legal requirement for the Premises Licence Holder to train staff in the Age Verification Policy?</p> <p>A: Yes, it is part of the Age Verification Policy of the premises that all staff receives adequate training on the contents of the policy</p> <p>B: No, the only legal requirement is that the owner of the Premises Licence must make the staff aware of the policy and it's contents</p> <p>C: Yes, but only for new staff</p> <p>D: Yes, but only if the owners of the business have a criminal record for smuggling</p>

Age Verification Training

Answers to multiple choice questions

- | | |
|---|---|
| 1 | <p>What is an Age Verification Policy?
<i>Answer: C</i></p> <p>Summary</p> <p>In October 2010, an additional mandatory condition was automatically added on all Premises Licenses making it a legal requirement that all premises that sell or supply alcohol in England and Wales, must by law, adopt and operate a written Age Verification Policy.</p> |
| 2 | <p>Who is responsible for making sure an Age Verification policy is being carried out on the premises?
<i>Answer: B</i></p> <p>Summary</p> <p>The Age Verification policy is one of the mandatory conditions of the Premises Licence, it must be signed by the Premises Licence Holder, kept securely on the premises and produced on demand to a Police Constable or an officer authorised by the Licensing Authority.</p> <p>Failure of the owner of a licensed premise to operate an Age Verification Policy would be viewed as breach of conditions of the Premises Licence and is a punishable offence, which can eventually lead to the closure of the premises.</p> |
| 3 | <p>What does the owner of a licensed premise need to do to operate this Age Verification Policy?
<i>Answer: C</i></p> <p>Summary</p> <p>It is the responsibility of the owner of the business to put in place a checking system whereby all sellers of alcohol must be asked to request valid identification from individuals whom they suspect to be under the age of 18. Premises can adopt different schemes and the ones most widely used are Challenge 21 or Challenge 25.</p> <p>The scheme that is chosen by your premise, depends on the risk assessment that has been completed by the owner of the business. Posters or signage must be displayed in a prominent position on the premises and all refusals of the sale of alcohol must be documented in the customer refusal register.</p> |
| 4 | <p>What types of Identification am I allowed to accept?
<i>Answer: D</i></p> <p>Summary</p> <p>The most accepted forms of ID are passport, driving licence (provisional or full) and card issued by local schemes such as Citizencard or Validate UK bearing the official PASS hologram. It must not have been damaged or show signs of tampering or alterations.</p> <p>However, some Licensing Authorities have agreed to accept additional forms of ID such as the UK Forces ID card. Some premises will refuse to accept any form of ID that has been issued outside the UK. A 'driving permit' or a 'motorcycle driving licence' are not legal forms of ID. To be sure premises must check with your local authority to verify exactly what you can accept. The penalties for accepting the invalid ID are severe.</p> |

5	<p>Can I accept ID that has been bought off the internet?</p>
	<p>Answer: A</p>
	<p>Summary</p>
	<p>There are thousands of different types of ID that can be bought over the internet. These cards are illegal to use and are sold as novelty cards.</p>
	<p>The police and trading standards office will prosecute you if you accept them.</p>
	<p>Learn to recognize what you can and cannot accept.</p>
6	<p>How do I decide if I need to ask someone for ID?</p>
	<p>Answer: C</p>
	<p>Summary</p>
	<p>Don't try to guess their age, that's not your job!</p>
	<p>Young people sometimes look much older than they really are especially if they are dressed for a night out on the town. Look for any signs of nervousness or maybe their friends are hanging around outside. Young people will try anything, use any methods to obtain alcohol or gain entry into a club. The rule of thumb is if you thought about their age when you first looked at them, then you need to check. This must be done before you sell them alcohol. Even after checking their ID, if they still cannot convince you they are 18 or over, then you must refuse to sell and log the refusal into your customer refusal book.</p>
7	<p>How do I ask someone for ID without upsetting them?</p>
	<p>Answer: A</p>
	<p>Summary</p>
	<p>Most people will normally always carry ID as they will be used to being asked and will not become upset. However, others some will be offended and make nasty comments or even become aggressive.</p>
	<p>Never ask a customer their age or apologise for asking for ID. By staying calm and not becoming involved in the argument will help to de-escalate the situation.</p>
	<p>You must always follow the code of practice that your company has in place for dealing with conflict situations.</p>
8	<p>What are the best methods for checking a persons ID?</p>
	<p>Answer: A</p>
	<p>Summary</p>
	<p>The Licensing Act 2003 does not say in detail of how you must check a persons ID. Premises must adopt their own methods as what they believe to be 'best practice'. Hold the card and look at it carefully. Does it feel genuine? Check the photograph against the person. Look for any damage or evidence of tampering. Check their date of birth, ask the person to confirm their personal details. If the ID shown to you contains an unusual name, ask them spell it. Most mis-users tend to forget the postcode. A good method is to obtain their signature in the customer refusal register.</p>

<p>9</p>	<p>What is a good method to be really sure if the ID shown to me is genuine and really does belong to that person? Answer: D</p> <p>Summary</p> <p>Premises that have adopted this method of obtaining signatures witnessed a huge reduction in mis-users as it appeared to frighten people off. Some people do not write their signature exactly the same, so you can give them an opportunity to repeat just to make sure.</p> <p>If it happens that you are accused or charged with selling alcohol to a young person by mistake, the signature obtained can be used as your evidence in court in your defence as the 'evidence produced would have convinced a reasonable person'.</p> <p>This is called due diligence.</p>
<p>10</p>	<p>How can I check if a persons ID is fake, has been forged or tampered with? Answer: C</p> <p>Summary</p> <p>Fake ID's are widely available for anyone to purchase over the internet and can appear to be quite realistic. Some people even have equipment that can 'clone' ID's.</p> <p>Driving licenses and passports are easy to verify. The hologram will show if you hold the driving licence or the covers of a passport under a UV money detector machine. Learn to recognize the different types of acceptable ID that you can and can't accept. Have a list of acceptable ID's (with photos) next to the point of sale on the premises. It is not illegal to use a damaged passport, but not recommended to accept it as valid ID.</p>
<p>11</p>	<p>Who must I by law, refuse the sale of alcohol to? Answer: C</p> <p>Summary</p> <p>The law is very strict as to who you must refuse the sale of alcohol to and the penalties are severe for not just you but possibly your colleagues (if they were in a position to prevent the sale taking place). The Designated Premises Supervisor and even the Premises Licence Holder may also be prosecuted if you are caught selling in these circumstances.</p>
<p>12</p>	<p>What is the best way to refuse the sale of alcohol to someone with no ID? Answer: D</p> <p>Summary</p> <p>By law you have the right to refuse to sell to any customer and you do not have to give a reason. However, this can create a conflict situation as customers need to have an understanding of why you will not sell to them. Do not apologise or enter into an argument with the customer, remain polite, calm and professional at all times. Call a colleague or a line Manager for assistance if necessary. Always follow your company's code of practice for these situations. Remember no ID, no sale every time.</p>

13	<p>What is a proxy sale? Answer: C <u>Summary</u> As it is becoming increasingly difficult for under 18's to purchase alcohol, adults are now being pressurised outside shops to buy alcohol for young persons. Most young people hide in back rooms or corners of pubs hoping not to be seen as their friends buy their drinks. This is a dangerous practice for the owner of the business even if the young person appears to be nice and nearly old enough.</p> <p>The penalty for purchasing alcohol for an underage person is up to £1,000. The seller and other staff may also be prosecuted if it can be proved they knew at the time who the alcohol was purchased for and turned a blind eye to the sale.</p>
14	<p>How can I tell if an adult is buying or attempting to buy alcohol for an under 18 ? (called a proxy sale) Answer: C <u>Summary</u> Staff must learn to be more vigilant about who is on the premises and who is hanging around outside. At busy times it is difficult, however, you can always ask your customers questions about outside the premises. Displaying posters in prominent positions near the point of sale, warning customers of the penalties can also help.</p> <p>By law, the premises must do everything they can to prevent all illegal sales from taking place.</p>
15	<p>Are there any other products I cannot sell to underage persons without producing valid ID? Answer: C <u>Summary</u> By law, the age restrictions are as follows: Restricted age - 18 Cigarettes, tobacco products, knives and other offensive weapons, fireworks or sparklers, solvents or volatile substances, lighter refills containing butane, crossbows, airguns and pellets. Restricted age - 16 Lottery tickets, scratch cards, aerosol paints, caps, party poppers, cracker snaps, novelty matches and throw downs.</p> <p>There are severe penalties for those who are caught selling these items to underage persons without valid ID, with fines of up to £5,000 and 6 months imprisonment. Lottery tickets can be up to 2 years imprisonment. Video games are sold as shown on the age of certificate identified on the box.</p>
16	<p>What is the best way to deal with angry, aggressive or violent customers? Answer: A <u>Summary</u> The majority of people who become angry when asked for ID do so because they are usually under 18. They become frustrated which can easily escalate to anger and aggression, sometimes even violence. It can be very frightening and intimidating to be confronted by an angry or aggressive customer. For your own personal safety, all staff must develop the skills they need to deal with these volatile situations.</p> <p>By becoming verbally engaged with the customer in what is really 'their' argument only feeds the situation. Once you know the customer is becoming increasingly angry then call for assistance. If assistance is not available, then find an excuse to leave the area (called an exit strategy). 'I'll get the Manager to help you' is always a good excuse, or using 'inhibitors' e.g. informing the customer that he is being taped on CCTV can sometimes help to prevent the situation from escalating. Always follow your company's code of practice for these situations. Always refuse service and record the incident in the customer refusal register.</p>
17	<p>What is a customer refusal register? Answer: C <u>Summary</u> Part of all Age Verification Policy schemes operated on a premise, means that the owner of a business must keep written records of all refused sales on the premises for a minimum period agreed by the owner. This is usually around 12 months.</p> <p>The customer refusal register must record the date, item refused, description of person, reason for refusal, name of member of staff who refused the sale together with the staff's signature.</p> <p>By keeping these records, it allows the owner to demonstrate 'due diligence' to Trading Standards Officers, police and in addition it also provides evidence in that the policy is being operated, which can be produced in court following a prosecution.</p>

18	<p>Can a person under 18 'sell' alcohol on a licensed premise? Answer: D</p> <p><u>Summary</u></p> <p>Under the Licensing Act 2003, if permission is obtained from the Premises Licence Holder and DPS, an under 18 year old can legally sell alcohol on a licensed premises as long as they are supervised at all times by a nominated responsible person. They must never be left to work on their own and each individual sale must be authorised by the nominated responsible person.</p> <p>The law is different for under 18's that are serving alcohol to tables' ancillary to a meal; under these circumstances no supervision is necessary.</p>
19	<p>Can a 16/17 year old 'drink' alcohol on a licensed premise? (on sales only) Answer: A</p> <p><u>Summary</u></p> <p>Under the Licensing Act 2003, it is illegal for an under 18 to consume alcohol on a licensed premises, except under the following conditions.</p> <p>A 16/17 can legally 'order and consume' beer, wine or cider if they are having a table meal and accompanied by an adult. The adult must pay for the drink. However, they may still need to produce ID to prove that they are 16 or 17.</p> <p>The penalties for allowing an underage persons to consume alcohol on a licensed premises is a maximum fine up to £1,000 for the seller and £500 for the young person.</p>
20	<p>What is a test purchase? Answer: B</p> <p><u>Summary</u></p> <p>It is the legal duty of every local Weights and Measures Authority to make checks that all licensed premises are staying within the law and are not selling alcohol or allowing them to consume alcohol on licensed premises.</p> <p>This involves a joint exercise between Weights & Measures Officer and the police who visit premises with an underage person who then tries to purchase the alcohol.</p> <p>All types of licensed premises are tested from shops to restaurants, no premises are exempt.</p>
21	<p>When is it is legal for a person under the age of 18 to purchase or attempt to purchase alcohol? Answer: A</p> <p><u>Summary</u></p> <p>These young people are volunteers and must be between 15 and 16 ½ years of age. They must work in close supervision with Officers and in accordance with best practice procedures set down in clear guidelines.</p> <p>They will visit always premises in a different town to where they live, so they will not be recognized. Parental permission is also required.</p>

22	<p>What are the penalties for a failed a test purchase?</p> <p>Answer: B</p> <p>Summary</p> <p>The seller, Designated Premises Supervisor, Premises Licence Holder and any member of staff who was in a position to prevent the offence from happening (called turning a blind eye) may all be held liable for this offence and upon conviction may lead up to a fine of £5,000.</p> <p>Under the Policing and Crime Act 2009, there is an offence called 'persistent selling to under 18's' whereby the offence will be committed if a named premise is caught selling alcohol to an under 18 twice within a period of three consecutive months. If this happens, the Premises Licence can be brought under 'review' by the Licensing Authority who then have the powers to either impose additional conditions, remove the Designated Premises Supervisor, suspend the licence for a period of up to 3 months or revoke the Premises Licence in addition to substantial fines or even imprisonment. In addition to this the holder of the Premises Licence could be fined up to £20,000 for breach of condition of their Premises Licence.</p> <p>Staff could also loose their jobs for not following the correct procedure of the Age Verification Policy scheme operated at their premises.</p>
23	<p>What can happen to a person if they are caught selling alcohol to an underage person?</p> <p>Answer: D</p> <p>Summary</p> <p>It is an offence to 'knowingly' sell alcohol to a person under 18. Where a person is charged with this offence, your defence in court is that: 'you believed the person was 18 or over and either a) you took all reasonable steps to establish their age or: b) nobody would reasonably have suspected from the person's appearance that he/she was under 18.</p> <p>Under a), reasonable steps would be the steps you took to convince yourself that the person was under 18. Checking the ID, photogra ph, asking questions about their date of birth are methods of good practice, but it will not provide the evidence that you need when defending yourself in court. Obtaining their signature in the customer refusal book is the best method you can use as this can then be used as evidence in your defence. If a person is found guilty then they are liable to a fine of up to £5,000. (Go back and review question 21)</p>
24	<p>What is Due Diligence?</p> <p>Answer: B</p> <p>Due diligence is the systems that are in place to prevent offences from happening. When a person is charged with an offence, they will be prosecuted if it can be proved that they showed an intention of doing something wrong. It doesn't necessarily mean a person deliberately did something wrong, the fact that you broke the law is enough to prosecute. However, a person can defend themselves by proving they followed due diligence procedures that have been put in at their workplace. To prove this you must produce evidence to the courts. The types of evidence that can be used is the system for checking ID that is used at the premises, CCTV, customer refusal registers, training records and any other written evidence that is relevant. If the evidence produced to the courts is poor or inadequate a conviction will follow.</p>
25	<p>Is it a legal requirement for the Premises Licence Holder to train staff in the Age Verification Policy?</p> <p>Answer: B</p> <p>Summary</p> <p>Under the Licensing Act 2003, there is no legal requirement to train the staff in the Age Verification Policy. The only requirement is that the owners of Premises Licenses must make all their staff aware of the existence and the contents of the policy. However, many Premises Licenses now have special conditions on their licence that does make it a legal requirement to train all staff not only in age verification systems but also licensing law. It is best practice that all training that happens on licensed premises to be well documented as this can be used as evidence in your defence following a prosecution. Failure to carry out the training would be seen as breach of condition of the Premises Licence followed by severe penalties.</p>

LICENSING ACT 2003
Refusals Policy

The Management & Staff

Welcomes all our customers, however please note

WE WILL NOT SELL ALCOHOL TO:

- 1: Persons who are drunk (or appear to be drunk)
- 2: Persons who are attempting to purchase alcohol for another person who is drunk or appears to be drunk
- 3: Persons who are either verbally or physically abusive to the staff or other customers
- 4: Persons who are unable to produce valid ID when asked
- 5: Persons who behave in an anti-social manner towards any customer, staff or the premises.

This Premises fully supports the local Police and Council in the prevention and detection of crime and disorder using our CCTV system.

Any person who is in breach of this policy on these premises may be reported to the police and your details given including an image from the CCTV

Staff Induction Log book

I (name).....confirm

That I have read and fully understand the following

	Document Name	Date of completion
1	The 4 Licensing Objectives	
2	Premises Licence and Conditions	
3	Age Verification Policy	
4	Age Verification Scheme and signage	
5	Refusals Policy Sale and Service of Alcohol to under 18's	
6.	Section 57 & Business Names Notice	
7.	Alcohol Authorisation Log book	
8	Customer Refusals Log Book	
9	Incident Report Log Book	
10	-	
11	-	
12	Age Restricted Products, Cigarettes & Tobacco Training & Age Verification Questions and Answers	
13	Staff Induction log sheets	
	Any Further Training received ie: PSPO's etc/ Imposed conditions etc (list details)	

I have read & understand how this business can be affected and damaged by not adhering to them. I agree to abide by them at all times.

I also agree that whilst employed at these premises, I agree to abide by the policies that have been implemented by the management and will not deliberately carry out any actions that may cause concern for the business and Premises Licence.

Signed..... Date.....

In the UK it is illegal to buy alcohol on behalf of anyone under the age of 18. Purchases of this type are called 'Proxy' purchases.

Retailers found to be supplying alcohol to minors, including via proxy purchases, could face a fine and/or have their license removed.

- This is an example of a Proxy sign. You will see these around the Point of Sale and near any Alcohol on display.

WARNING PROXY SIGN FOR ADULTS

If you are buying alcohol for underage people

THEN DON'T!

because it's an criminal offence

We **WILL** report you and give the police a copy of your photograph taken by our CCTV cameras

The penalty is £5000 fine

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Our Ref: DS/LAT/NLP/7735

Date: 20th February 2026

Mr. Thamothersampillai Tharmarasa and
Miss. Thushani Tharmarasa

[REDACTED]
Kingsbury
London
NW9 8AP

Dear Mr T Tharmarasa & Miss T Tharmarasa

RE: 383 Church Lane, Kingsbury, London, NW9 8JB

Thank you for your instructions, which we are pleased to accept. This letter and the accompanying Terms of Business sets out the terms on which we will act for you.

Person responsible for your work

Mr Dinesh Somasuntharam, a Solicitor and a Director, is responsible for your work and will be your day-to-day contact. Your matter will be overall supervised by Mrs. Chandra Somasuntharam, who is a Solicitor and the Managing Director of the firm.

The office is open 9.30am to 5.30pm from Monday to Friday. Should you wish to contact us during business hours, our telephone number and email address is shown at the head of this letter. For a personal visit, please make an appointment to ensure availability.

What you have asked us to do

You have asked us to act for you on your proposed New Lease purchase and business of the above property from **(Landlord's Name)** for a nil premium. We will start by writing to the Landlord solicitors to say that we are acting for you and to request the Landlord's requirements.

The next steps

- When we receive the Landlord's requirements from the Landlord solicitors, we will review it and advise you accordingly.
- We will apply for the relevant references and carry out the appropriate searches (e.g. local, drainage, environmental). Once all the search results are back, we will raise relevant enquiries with the Landlord's solicitors to check anything that needs to be investigated from the search results and from the contract papers.

- We will verify the loan documents (if applicable) and prepare replies accordingly.
- Set the date for exchange of contracts.

- We will then:
 - ✓ send you a ‘Report to Client’
 - ✓ invite you to a meeting to discuss the report and to sign the contract
 - ✓ arrange for you to transfer the deposit money to us

- Exchange of contracts will then take place. We will send your deposit to the Landlord’s solicitor and the completion date (when you will own the property) will be set.
- Between exchange and completion, we will:
 - ✓ carry out a ‘priority search’ – this lodges your interest in the property for 30 days, allowing time to complete the purchase.
 - ✓ send you a completion statement showing the final figure you need to pay

- After completion of your purchase, we will:
 - ✓ pay the Stamp Duty (if applicable)
 - ✓ register your title at the Land Registry (which generally takes a few months)
 - ✓ Once registration is complete, we will dispatch the Office Copies to you.

Timescales

We estimate that completion of the purchase should take place on average within approximately 8-10 weeks. Please bear in mind that this is only an estimate and we depend on your prompt response to our requests for information. Similarly, we might encounter delay in obtaining service charge and ground rent information from your Landlord’s managing agents or solicitors. We are not responsible for any such delays. We cannot guarantee any particular completion date as it is affected by matters beyond our control. We are not responsible for any losses caused by completion delays.

What we will not do

In a purchase of property, our searches and enquiries are specific to the particular property. Searches will not, for example, disclose planning proposals affecting any adjoining property or the neighborhood generally. Unless you specifically request in writing, we will not carry out any searches in respect of any neighboring or adjoining property nor in respect of the neighborhood generally, and such matters are exclusively your responsibility. If you do instruct us to carry out wider enquiries, this is at an additional cost, which we will be pleased to estimate at the relevant time. Further, please note the quote below regarding the Local Authority search has been prepared as a personal search opposed to a Council provided search. If either yourself or your lender requires a Council search the cost may be higher.

Furthermore, any work that we do for you may involve tax implications or necessitate the consideration of tax planning strategies. We will not advise you on the tax implications of a matter or the likelihood of them arising and you must obtain independent taxation advice from

someone qualified to give it. We are not qualified to advise you on the tax implications of a transaction that you instruct us to carry out, or the likelihood of them arising. If you have any concerns, please raise them with us immediately and we may be able to identify a source of assistance for you. We cannot advise on Stamp Duty Land Tax savings or avoidance schemes and we will not become involved in such matters under any circumstances.

Please also let us know if you require any trade contracts to be transferred to you on completion, such as Lottery, PayPoint, ATM etc by the Seller. However, please note we will **not** be carrying out any work in relation to the actual transfer itself with the relevant contract providers to your name, and this is a matter for you to deal with directly. Having said that, please note that it usually takes around 6-8 weeks for the Lottery transfer procedure to take place as they may require credit checks to be made against you. Therefore, it is up to you to ensure that you have been accepted prior to completion should you wish to carry on with these trade contracts after completing. We strongly suggest you make the necessary arrangements with regards to registering or transferring any trade contracts well in advance, prior to your anticipated completion date.

What it will cost

The estimate of our charges in the above transaction is as follows:

Professional fees for acting for you (£2000.00 + VAT)	£ 2,400.00
Local Authority Search	£ 99.00
Indemnity Cover Charges (£200.00 + VAT)	£ 240.00
SDLT completion (£200.00 + VAT)	£ 240.00
Bank Charges & Handling (£30.00 + VAT)	<u>£ 36.00</u>
Total	£ 3,015.00

Please may we have your remittance for £1,500.00 in order to carry out preliminary work.

It is normal practice for law firms to request payment on account of costs and disbursements. We will keep this money on our firm's client account and your signature on the enclosed acceptance form is your irrevocable authority for us to apply this to our firm's invoices.

Please note that the above are only estimates including our professional fee, and we reserve the right to vary the same should further work be required such as first registration, transfer of licence and/or business, guarantor or if the transaction involves a company purchase/sale, tenancies, retention, underleases, deed of covenant, stock transfer/share certificate etc or if other unforeseen circumstances arise.

In addition, you may also incur additional charges if we are required to undertake further work above our general standard such as attending excessive telephone calls which will be charged per telephone call. Please be advised that this occurs only rarely. In such an event, we shall endeavour to inform you of any possible increase in our charges.

Furthermore, the estimate does not include items such as copy planning permissions or building regulation approvals, all of which may be essential for potential loans. Similarly, please be aware that your Landlord or the Managing Agent may also charge for the provision of essential information. We do not know how much this will be at this time, and any such charge will be in addition to those stated.

We review our charges on 1 January each year and we will let you know if they increase. All our charges are plus VAT.

Should the transaction fail to proceed to completion, then this firm's charges for the transaction will be such sum as is reasonable, having regard to the amount of work done by that stage in the transaction, together with VAT and any disbursements incurred. However, please note that the minimum abortive fee that we shall charge is £250.00 plus VAT.

Please be informed that in certain instances, we may have to deal with two firms of Solicitors; one for the purchase of the new Lease and the other for the surrender of the existing Lease. If this occurs, then our costs for dealing with this matter shall also increase.

Acting for Lender

We are also acting for your proposed lender in this transaction. We have a duty to disclose all relevant facts about the purchase and mortgage to your lender. This includes any differences between your mortgage application and information we receive during the transaction, and any cash back payments, discount schemes or other incentives that a Seller is giving you. Your return of the signed acceptance form is your consent to us doing this. If you withdraw consent, we will cease acting for you.

Terms and Conditions of Business

We enclose a copy of the Firm's Terms and Conditions. This letter and the accompanying conditions set out the terms upon which we are willing to deal with the transaction on your behalf. Please sign a copy of this letter and return it to us as confirmation that you accept these terms. Please note that without this confirmation we cannot start work on your matter.

We are also required by Law to verify on how you obtained funds for your proposed transaction for money laundering purposes. Therefore, together with the signed copy of the Engagement Letter and Terms of Business, please also provide evidence of your proof and source of funds. The statement must show the period and source of which the funds have accumulated. Please also note that we are only able to accept monies relating to the above transaction from your own account.

In accordance with the latest guidance issued by the Solicitors Regulation Authority and the Law Society on requirements to verify identity of firms in transactions, we will be providing our client account details in the very first instance in our client care letter as illustrated below. We will never disclose our client account details in an email so please do not ask us to do so

Cybercrime Security Measures

We are committed to working to minimise the risks posed by Cybercrime to our clients, third parties and to our business. Scammers can hack into the email communications between clients and their solicitors. They then send the buyers an email, which appears to come from their solicitor, telling them to transfer the money into a different account. The fraudsters then withdraw the money and quickly disappear. Emails can be hacked fairly easily, and fake messages sent to recipients containing fraudulent details can often appear very real. Therefore, all email requests for payment or sensitive information should be double-checked with the sender, using a channel other than email, such as the phone.

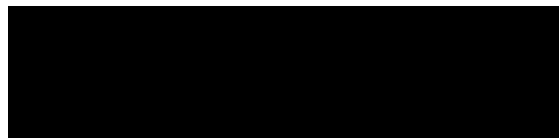
Please do not rely on email notification of payment requests or bank account changes without direct verbal confirmation from Soma Solicitors. Soma Solicitors will never change or supply our bank details via email. If you receive an email or suspicious telephone call informing you to make a payment or notifying you the change of the Bank Account details, please let us know immediately by telephone us using the contact details on our letterhead.

The new policy sets out Soma Solicitors' commitment to ensuring safe payments.

1. If you receive a request for payment from us or before making a payment, you should call/visit us to confirm the request.
2. We will **verify your details and provide an authorisation code.**
3. **You should include this Authorisation code to your payment reference along with your file reference number when transferring funds.**
4. Please call us to confirm receipt of the transferred funds.

SOMA SOLICITORS CLIENTS ACCOUNT DETAILS

Bank -
Sort Code -
Account No -
Account Name -



When transferring the funds please quote **Our Ref: DS/LAT/NLP/7735**

Soma Solicitors will not be responsible for any payment made without referring the correct authorisation code or for payments made to fraudulent bank accounts. Please ensure that you do not rely on email negotiation of bank account details without direct verbal confirmation from us. Therefore, please ensure all monies are only transferred to the account details mentioned above and upon receiving verbal confirmation from us. We will

not be providing bank details via email and will not accept responsibility if you transfer money into an incorrect bank account.

What you must do

In a purchase of property, the normal rule is ‘let the buyer beware.’ This means that the risk of structural or other defects is yours. We strongly advise you to obtain a structural survey of the property, from an independent and qualified buildings surveyor. This is particularly important in a leasehold purchase such as this, as the lease is likely to make you responsible for repairs. Whilst we have not yet seen the lease, it is likely to oblige you to put and to keep the property in repair and to allow the landlord access to prepare and to serve on you a schedule of dilapidations and demand compensation. We strongly advise you to ensure that the property is in good repair before you buy it as you will inherit responsibility for any existing disrepair.

Further, please ensure that you provide us with any information in relation to the Property and Business as we do not view the same ourselves. Please be informed that the Landlord/Seller’s may not be aware of the responsibilities of maintaining the boundaries. Therefore, we advise you to go to the property and check all the boundaries, fences, driveways, shared access ways and also check the same are in good condition and make enquiries to see if there are any disputes or issues.

As previously mentioned, you must also make the necessary arrangements with regards to registering or transferring trade contracts should you wish to carry on with these trade contracts after completing.

Please contact us with your instructions once you have done this and let us know if you have any more concerns. If there are any disputes regarding the boundaries it will be difficult and expensive to resolve once you buy the property and may reduce the value of the property. We do not view the property, and so it is of utmost importance that you carry out a visual inspection and that you obtain professional advice from a qualified surveyor on its state of repair.

The next stages

If you are happy to proceed with terms set out in the Client Care letter and our Terms of Business, please sign and return this Client Care letter, together with the enclosed Client Consent at your earliest opportunity in order for us commence your legal work.

We will keep you informed as matters progress. We want you to feel that you are informed and in control, so if there is any aspect of the firm’s services, which you do not understand or feel uncomfortable about, please do not hesitate to contact any one of our team. If you have any more serious concerns, the firm has a written complaints procedure, details are set out in the attached Terms of Business.

You may rest assured that we shall do all we could to ensure that the transaction proceeds as smoothly and quickly as possible. If you have any queries or require any advice, please do not hesitate to contact us.

Please note the reference on the top of this letter must be quoted whenever you write or phone us.

Yours Sincerely,

Soma Solicitors

Dinesh Somasuntharam
SOMA SOLICITORS
info@somasolicitors.co.uk

NB: Please sign the authority below and return it to us by return.

I/we confirm that I/we have read the above terms and understand them and sign below to accept them.

Signed:

Dated:

Print Name:

Signed:

Dated:

Print Name:

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From: Ian Rushton

Sent: 11 April 2026 13:13

To: Phil.S.Graves; Business Licence

Cc: Legister, Linda

Subject: Re: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Hi all

Phil - thanks for your email and for your ongoing dialogue in this matter

Licensing - I can confirm our agreement to these conditions.

I think the only (minor) matter in respect of the conditions is whether the dates of birth of the named individuals can be included should the application be approved. Will leave that up to yourselves.

Also, just for info, the numbering of the conditions just needs to be updated - there are 2 condition numbers 10 and no number 18.

Thanks, Ian

Ian Rushton

JL Licensing

07909 511953

From: Phil.S.Graves

Sent: 11 April 2026 12:52

To: business.licence@brent.gov.uk

Cc: linda.legister@brent.gov.uk; ijrushy@hotmail.com

Subject: Api Avi Convenience Store, 383 Church Lane, NW9 8JB (REF: 37419)

Good afternoon Brent,

I've spoken to Ian yesterday and I am now in agreement with the attached conditions.

Ian, I have removed the three conditions that we were discussing, assuming we are now in agreement?

Police now withdraw reps with the attached reps in place.

Thanks,

Phil

Proposed Operating schedule/proposed licence conditions (v3)

Prevention of crime and disorder

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. The CCTV system shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.
3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (i.e., USB, hard drive, CD etc.) or via digital transfer within 24 hours of request.
4. A notice stating that CCTV is in operation shall be clearly and prominently displayed.

The Licence holder /DPS/Manager shall inspect and test that the CCTV is operational and working correctly on a weekly basis. A signed and dated record of the CCTV examination and any findings shall be kept on the premises and made available to the police and authorised officers of the Local Authority on request

5. An up-to-date incident log shall be kept and maintained at the premises which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any customers barred from the premises.
 - c. any complaints received.
 - d. any faults in the CCTV system
 - e. any visit by a relevant authority or emergency service.

Any entries into the log shall be made within 12 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. The incident log shall be available for inspection upon request by an authorised officer of Brent Council or the Police. This record shall be kept on site and made immediately available to authorised persons.

6. 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. This record shall be kept on site and made immediately available to authorised persons.

7. Staff training shall be undertaken by all members of staff involved in licensable activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics:
 - a. age verification policy and prevention of proxy sales.
 - b. recognising signs of drunkenness, intoxication, and identifying habitual street drinkers.
 - c. procedures for recording refused sales relating to (a) or (b), and conflict management.
 - d. the four licensing objectives.
 - e. operating procedures, permitted hours, and premises licence conditions.
 - f. Training on the viewing, downloading and copying of the CCTV system

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 premises licence holder. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council and kept on site for immediate viewing.

Only staff that have completed this training shall be allowed to work at the venue.

8. The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.
9. There shall be no sales of spirit miniatures under 20cl. A notice advising customers of this policy shall be displayed at the point of sale.
10. There shall be no single can sales of beers, ales, lagers, or ciders above 6.5% ABV (except for genuine artisan or craft beers, lagers, and ciders). A minimum of 2 cans must be purchased
- 10 There shall be no sales of any single cans or bottles of beer, or cider under 500ml (except for genuine artisan or craft beers, lagers, and ciders). A minimum of 2 such cans/bottles must be purchased. A notice advising customers of this policy shall be displayed.
- 11 All alcohol exposed for sale shall only be confined to the areas denoted on the premises plan.
- 12 Staff shall take reasonable steps to discourage street drinking of alcohol directly outside the premises and shall refuse service to individuals who engage in such behaviour.
- 13 Any internal access point between the ground floor commercial area and the residential accommodation above shall be permanently sealed so as to prevent access between the two areas.

- 14 A notice shall be displayed warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.
- 15 An appropriate number of staff shall be on duty in the shop - the number of staff on duty will be assessed and determined on a regular basis by the PLH/DPS taking account of any peak periods in terms of sales, volume of customers, etc.
- 16 The PLH and/or the DPS will seek contact and engage with the Police and other authorities as appropriate to discuss and receive updates on any relevant issues in connection with the promotion of the licensing objectives.
- 17 The premises shall operate a refusals policy as follows - alcohol will not be sold to;
 - (1) Any person recognised or identified as a street drinker (regardless of their level of inebriation at the time);
 - (2) Any person found to be drinking alcohol in the street;
 - (3) Any person who is drunk or appears to be drunk;
 - (4) Any person suspected of trying to buy alcohol for another person who is drunk or appears to be drunk;
 - (5) Any person unable to provide valid ID when requested by staff;
 - (6) Any person who is verbally or physically abusive towards staff or customers.
 - (7) To any person suspected of trying to buy alcohol for another person(s) who may be underage.
19. A notice advising customers of the refusals policy shall be on display.
20. Staff shall be vigilant and monitor the area immediately outside the premises to check that persons are not congregating/causing a nuisance.
21. 'Crimestoppers' literature will be on display in the shop to promote the initiative.
22. The premises shall follow the Portman Group code of practice on rules for the naming, packaging and promotion of alcoholic drinks.

Public safety

23. All entry and exit points (including fire exits) shall be free from any obstructions.

Prevention of public nuisance

24. Clear and legible notice shall be displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.
25. Clear and legible notice shall be displayed at the exit requesting customers not to drop any litter in the street.
26. Staff will monitor the area immediately outside the premises on a regular basis to check for, and properly dispose of, any litter from the premises.
27. Deliveries to the premises will be arranged so as not to cause public nuisance.

Protection of children from harm

28. 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. A Challenge 25 notice shall be also conspicuously displayed at the point of sale.
29. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.
30. A due diligence checklist will be used to help ensure that all steps are in place to prevent underage sales.

The following persons shall not be permitted to work at the venue in any capacity – Mr Rishi SHAH, Mr Punit SHAH, Mr Mahesh SHAH, Ms Ranjan SHAH, Ms Sheena SHAH. Every effort should be made by staff at the venue to refuse access to these people. If entry is gained, they should be asked to leave, and this should be recorded in the incident management log. This condition does not stop the leasing of the said venue from Mr Mahesh SHAH to any other individual