

Premises Licence Review

St Johns Mini-Market 90 St Johns Avenue NW10 4EG

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Case Summary

On the 23 November 2024, West London Immigration Compliance and Enforcement (ICE) team visited St Johns Mini-Market, 90 St Johns Avenue, NW10 4EG after intelligence was received that the premises employed illegal workers.

Entry to the premises was gained at approximately 15:14hrs under Section 179 of the Licensing Act 2003.

A civil penalty referral notice was served, and this is currently under consideration.

Licensed Premises History

The premises license number is 150414 issued by Brent Borough Council on 24 November 2005, with CETIN DOGAN named as the licence holder and Designated Premises Supervisor.

The company registration number for ST JONHS MINI-MARKET is 07897293 **under the name of** ST JONHS MINI MARKET LIMITED. Companies House shows that it was incorporated on 04 January 2012, is currently active and Cetin DOGAN was appointed the sole director on 04 January 2012.

The premises is licensed for the sale of alcohol between the hours of:

Mon-Sat - 08:00 - 23:00 Sun - 10:00 - 22:30.

Enforcement Visit: 23 November 2024

Upon entering the premises, at approximately 15:14hrs, the immigration officers encountered a total of two people working illegally. A third person, the owner was also at the premises.

was encountered whilst working within the shop premises.
An illegal working interview was conducted with been employed at the business for around one month. He works 6 days a week. 7 hours a day and is paid £360 in cash every Tuesday by the owner. He stated he was given the job by the owner who also advises on what days and hours should be worked.
When questioned about pre-employment checks, confirmed he showed his passport to and said, 'he knows I cannot work in this store'.
Home Office checks showed that entered the UK on a skilled worker visa to work in the IT industry, the visa was valid from March 2024 to April 2026. However, admitted that he had not worked for his sponsor for one and a half months. During interview when asked for the IT company managers name, he responded, 'I can't remember'. When asked if he could show any payments from the IT company responded 'No', this indicated that had never undertaken work for his sponsor company.
While the skilled worker visa allows for additional employment, this can only be undertaken for a similar role to that they've been sponsored for whilst working for their sponsored role. Working as a shop assistant does not meet the criteria for additional employment under this visa route. In this case was found working when he did not hold the right to work.
was encountered by immigration officers whilst working; unloading stock from a van parked outside the premises. It was later confirmed that this van belonged to the owner,
Home Office checks showed arrived in the UK on 10 March 2011 and had no right to work. has since made various further applications to regularise his stay which have all been refused, with the final application being refused on 12 October 2018.
An illegal working interview was conducted with that he had been working at the premises for 4/5 months helping with deliveries,

working 6 hours a day being paid £70 a day in cash. stated he gets called when he is needed and is paid £200/£250 a week cash in hand by the owner and does not pay income tax or National Insurance contributions.

stated that he was given the job by the owner, after visiting the premises as a customer. Confirmed that he did not provide any documents to prove his right to work. When questioned if the employer was aware he was not allowed to work. When finitely he does'.



Photograph of the van parked outside the premises from which was unloading stock when encountered.

Employer was working at the premises when the officers arrived and throughout the visit. An interview was conducted with regarding the employment of the two comes to his shop 2/3 times a illegal workers. admitted that week and helps with deliveries. stated he does not pay him any money, food, cigarettes, and beer. He stated but he gives not work at his shop he only helps, he also mentioned that he does not employ illegal people, and if he did employ he would have informed his accountant. He stated that he did not ask for any documentation as does not work for him. When questioned 'When did you last check the employee's employment status' responded 'I never did'. admitted that helps out in the shop helping with stocking £30/£50 depending on when he helps, he shelves, he stated he pays

stated he sometimes gives	food.	stated he	has not employed
and the money h	e pays	is pocket money	stated he
did not ask for an	y documents bed	ause he believes	does not
work for him and only helps	out.	•	
It was explained to work in the UK.	that	and	are not allowed to

Reasons for Review

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

There were two illegal workers encountered at the premises. In this case, claimed that both workers were 'helping out' and he did not request for any right to work documentation or conduct any checks. However, it must be noted that both individuals freely admitted to working at the premises and being paid to do so. 'Helping out' is considered as working and the license holder should be conducting right to work checks prior to employees commencing work. The license holder stated during his interview that he remunerated the employees the two workers with food, cigarettes, beer and pocket money. In contrast, the employees admitted to receiving weekly wages in return for their work. It is therefore considered that attempted to deceive immigration officers during his interview.

Whether by negligence or wilful blindness illegal workers were engaged in activity on the premises, yet it is a simple process for an employer to ascertain what documents they should check before a person can work. All employers are dutybound by law to conduct these checks, and guidance can be found on the GOV.UK website or by using a search engine. Additional information on how to conduct these checks is available online, this includes the Home Office's official YouTube page. It is an offence to work when a person is disqualified to do so, and such an offence can only be committed with the co-operation of a premises licence holder or its agents. It is also an offence to employ illegal workers where there is reason to believe this is the case.

It must also be noted that one of the workers admitted to being paid £360, for working 7 hours a day, 6 days a week. This indicates the worker was paid £8.57 per hour when the national minimum wage at the time of the visit was £11.44. This contravenes employment law and further underscores the lack of compliance with legal obligations at the premises. Such practices not only exploit workers but also provide an unfair competitive advantage over businesses that adhere to wage regulations. The payment of below-minimum wages raises serious questions about the licence holder's commitment to lawful and ethical employment practices.

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

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

Outcome Sought

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

There are four licensing objectives which underpin the Licensing Act 2003, and which need to be considered and promoted throughout the licensing process.

The licensing objectives are:

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

St Johns Mini Market under the control of Cetin DOGAN has been found employing illegal workers. This business has clearly failed to meet the prevention of crime and disorder and public safety objectives. The license holder would have been aware of his responsibilities to uphold the licensing objectives as they are clearly defined as part of the premises license application.

Immigration Enforcement has submitted that the license holder failed to conduct right to work checks prior to commencing employment. Merely remedying the existing situation (for instance by the imposition of additional conditions or a different DPS), is insufficient to act as a deterrent to the licence holder and individuals involved in the management of the business from employing workers that lack the relevant permission to work in the UK.

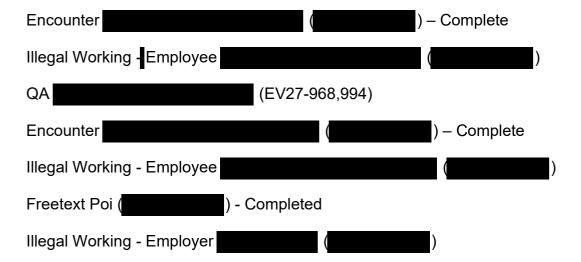
Significant levels of illegal working have taken place at the premises. As a starting point, this can be remedied by a suite of measures which act as a deterrent to the licence holder and others from employing illegal workers. The proposed measures include:

- 1. **Removal of the DPS:** The DPS failed to ensure that proper right to work checks were conducted and demonstrated a lack of regard for immigration and employment laws. Removing the DPS will ensure that a more responsible and compliant individual is appointed to oversee the premises.
- 2. **Adding conditions to the license:** To ensure compliance and improve operations standards, the following conditions should be added:
- All employees must have right- to work checks completed before starting employment, and copies must be retained on-site for inspection by relevant authorities.
- Regular training for the DPS, management, and staff on licensing and employment laws, including how to conduct proper right to work checks and making sure there is a log kept for this.

- A training log for staff must be maintained on-site, detailing the dates of training, topics covered and names of staff. This log should be made available for inspection by authorities upon request.
- Implementation of robust record keeping systems to track employee details, hours worked, and payments made, ensuring compliance with employment and tax regulations.
- 3. A period of suspension: A temporary suspension of the premises license would provide time for the business to implement the recommended changes. This period would allow for the appointment of a new DPS, the introduction of proper compliance measures, and the established of clear operational procedures to prevent future breaches.

These measures are considered proportionate and necessary to deter the premises from engaging in illegal practices and to uphold the integrity of the licensing objectives. The disregard for right- to- work checks and the employment of illegal workers not only undermines the law but also enables exploitative practices, such as the underpayment of wages, which significantly harms individuals and creates an unfair competitive advantage over compliant businesses.

Appendix: Supporting Documents



Encounter		
Details		
Type of work	Visit	
Visit reference		
Created by		
ProntolD		- India
Time	15:26	
Created at geolocation	Easting	521598
	Northing	183921
Creation date	23-11-2024 15:26:05	
Chosen Identity		
Identity source/type	Biographic	
Name		
DOB		
Gender	Male	
Nationality	India	
Languages		
Languages spoken	English	
Interpreter used?	No	
Encounter		
Encountering officer		
Is this encounter related to a Small Boats event?	No	
Is this person the subject of the visit?	No	
Do you suspect an immigration offence?	Yes	
Why do you suspect the person of an immigration offence?	Intelligence received that illegal working was occurring at this business premises. no named offenders. poi was inside the shop and admitted to helping out. ho checks conducted, which came back as poi having an skilled worker tier 2 as an it consultant. poi cannot work here	
Where was the person located?	Inside front of shop	
Declared immigration status	Tier 2 skilled worker	
How and when did the subject last enter the UK?	30 April 2024	
CIDPID/CEPR		
	•	

Are there any vulnerabilities/ trafficking/safeguarding issues?	No
Are you taking enforcement action?	Yes
References (Person ID, HO Ref, Port Ref, BRP)	
Biographic search results	Systems checked Atlas
	Result of checks Match
	Does the person have No
	an open absconder
	status on Atlas Person Alerts?
	Status returned by
	system checks
Photo of Subject	
Do you want to take a photograph of the subject?	Yes
Powers used	Paragraph 18(2) Schedule 2 Immigration Act 1971
Photo of subject	poi
Identity Documentation	·
Document 1	Identity

Document type

Name in document (if
different from above)

Document reference

Document expiry date

Country of issue (if
different from
nationality above)

Suspected fraudulent

Notes

Photos

Notes

No notes entered.

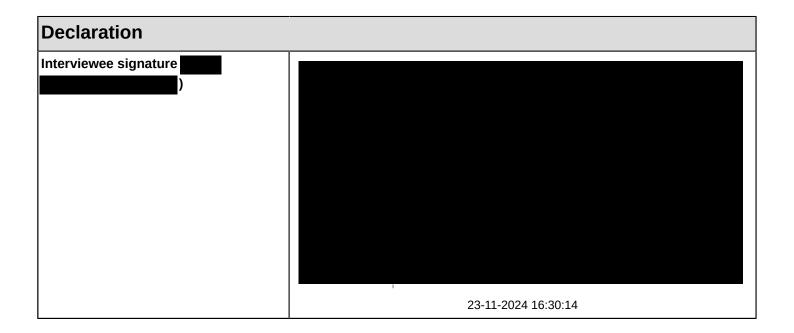
√isit
- India
Jnknown
ndia
Male
15:37
Easting 521599
Northing 183921
23-11-2024 15:37:17
English
No
have been working here for an month.
deal with the stock and stock levels.
work 6 days a week. I only have Wednesday off.
work the same days every week. I always have Wednesday off. I work around 7 hours every week.
gave me the job. He the owner here and he working on the till.
He tells me what hours to do and days. will tell me what days and nours I am required.
tell me what days and hours to do.

Remuneration	
How are you paid (money, accommodation, food)?	I am paid cash in hand.
If money, how much and how do you receive it?	I get paid £360 cash every week. I get paid cash in hand every Tuesday.
Who pays you?	pays me.
Do you pay income tax or have a National Insurance number?	No, I don't pay this.
Pre-employment Checks	
What name does the employer know you as?	He calls me
Did the employer check your right to work or immigration status before they offered you the job?	I showed him my passport, but he knows I can not work in this store.
Did you show documents or share a code with the employer to prove your right to work before being offered the job? If so, what did you show and were they originals?	I showed him my Indian passport only.
Does your employer know you're not allowed to work in the UK?	Yes, he knows that I can't work here.
Additional Questions	
Who else works here?	No
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the qu	estions and that the details are true and correct.
Interviewee signature (

	23-11-2024 15:50:13
Observations	
Observations	POI was in the shop and said that he didn't work here. He was wearing his own clothes as this is a small shop they don't provide uniform.
Do you suspect this person of illegal working?	Yes

Q&A		
Details		
Type of work	Visit	
Visit reference		
Created by		
ProntolD	- India	
Subject CIDPID/CEPR	Unknown	
Subject name		
Subject DOB		
Subject nationality	India	
Subject gender	Male	
Time	15:50	
Created at geolocation	Easting 521599	
	Northing 183922	
Creation date	23-11-2024 15:50:21	
Language of Interview		
What language is the interview carried out in?	English	
Interpreter used?	No	
Q&A		
Are you fit and well to be interviewed?	Yes	
How long have you been working here for?	I have been working in St John Mini Market for about an month.	
Who have you this job?	who is the owner gave me this job.	
what days do you work here?	I work here every day apart from Wednesday. I usually work around 7 hours a day u less I am required for more.	
What visa do you have to remain in the UK?	I have a skilled worker tier 2 visa as an it consultant. The company is for Infinite business solutions Ltd.	
Do you still work as an IT consultant.?	No. I have not worked there for over 1 and half month as they have no work.	
Have you told Home Office that you stopped working there?	I have not told them anything.	
Has your sponsor in Infinite business solutions Ltd. told you about any future work streams?	No. They said if we have any future work, then I can come back	

what is the name of your last manager at your it company which you was working at?	I can't remember.
What was your salary at your IT consultant?	My yearly salary was £38,000
How was you paid from your IT consu	I was paid in my bank account.
can you show me your payment into your bank account from your IT payment?	No.
Have you ever been paid by your IT consultant?	No
I can't see any payments of you getting paid from your IT consultant, this would lead me to believe you never worked at your IT consultant?	I'm looking for work.
is your sponsor fake?	I don't know.
where is your passport?	At home
You were found working in St John Mini Market, and you admitted to working here for about a month. you also stated that you were granted entery as a Tier 2 skilled worker as an IT consultant. You could not show me any payments being made from Infinite Solutions LTD. Later, you said you never been paid as a software developer, and you were looking for work. your leave will be cancelled now. Do you have any reply?	No.
Have you understood all the questions?	Yes



Encounter		
Details		
Type of work	Visit	
Visit reference		
Created by		
ProntolD	- Pakistan	
Time	15:18	
Created at geolocation	No geolocation available	
Creation date	23-11-2024 15:18:41	
Chosen Identity		
Identity source/type	Declared	
Name		
DOB		
Gender	Male	
Nationality	Pakistan	
Languages		
Languages spoken	English	
Interpreter used?	No	
Encounter		
Encountering officer	- Officer	
Is this encounter related to a Small Boats event?	No	
Is this person the subject of the visit?	No	
Do you suspect an immigration offence?	Yes	
Why do you suspect the person of an immigration offence?	Intel states no named offenders working illegally on Target premises. individual encountered unloading van outside Target premises	
Where was the person located?	Outside Target premises	
Declared immigration status	Overstayer	
How and when did the subject last enter the UK?	10/3/2011 via Heathrow	
CIDPID/CEPR		
Are there any vulnerabilities/ trafficking/safeguarding issues?	No	
Are you taking enforcement action?	Yes	

D. (D. 12.12.12.12.12.12.12.12.12.12.12.12.12.1	
References (Person ID, HO Ref, Port Ref, BRP)	
Biographic search results	Systems checked CRS, Atlas
	Result of checks Trace
	Does the person have No
	an open absconder status on Atlas Person
	Alerts?
	Status returned by
	system checks
Photo of Subject	
Do you want to take a photograph of the subject?	Yes
Powers used	Paragraph 18(2) Schedule 2 Immigration Act 1971
Photo of subject	photo
Identity Documentation	
Document 1	Identity
	Document type
	Name in document (if
	different from above)

Document reference
Document expiry date
Country of issue (if
different from
nationality above)
Suspected fraudulent
Notes
Photos

Notes

Entered UK on T4 student visa 25/01/11 expired 4/5/13. Subsequently made further applications to regularise his leave but these were refused. Poi has no further leave to remain in the UK

Management Checks Complete	
Date management checks complete	17-12-2024 16:17:05
Reviewer(s)	

Illegal Working - Employee		
Details		
Type of work	Visit	
Visit reference		
Created by		
ProntoID	- Pakistan	
Subject CIDPID/CEPR	Unknown	
Subject name		
Subject DOB		
Subject nationality	Pakistan	
Subject gender	Male	
Time	16:10	
Created at geolocation	No geolocation available	
Creation date	23-11-2024 16:10:05	
Language of Interview		
What language is the interview carried out in?	English	
Interpreter used?	No	
Obligation		
How long have you been working at St John's mini market	I started 4 or 5 months ago	
What is your job role/ what are your duties?	I just help with deliveries	
What days/ hours do you work each week?	Sometimes they call me when they need me, I work 6 hrs maximum	
Do you work the same hours/ days every week?	No it depends when they need me	
Control		
	the owner gave me the job	
Who gave you this job at St John's mini market shop		
	the owner tells me	
mini market shop Who tells you what days/ hours to	the owner tells me tells me what to do	

Remuneration		
How are you paid (money, accommodation, food)?	I get paid cash by at the end of the week	
If money, how much and how do you receive it?	I get paid at the end of the week about £200 to £250 cash depending on what hrs I do	
Who pays you?	THE OWNER	
Do you pay income tax or have a National Insurance number?	No	
Pre-employment Checks		
What name does the employer know you as?		
Did the employer check your right to work or immigration status before they offered you the job?	No I come as a customer and he offired me the job	
Did you show documents or share a code with the employer to prove your right to work before being offered the job? If so, what did you show and were they originals?	No	
Does your employer know you're not allowed to work in the UK?	Definitely he does	
Have you understood all the questions today	Yes	
I've read you back all the questions, do you understand them	Yes	
Additional Questions		
Who else works here?		
how long has worked St John's mini market	I'm not sure	

Photographs photo 2



Exhibit Ref

Declaration

I confirm that I have understood all the questions and that the details are true and correct.

Interviewee signature



23-11-2024 16:29:43

Observations

Observations	Individual observed unloading van outside shop by
Do you suspect this person of illegal working?	Yes

Management Checks Complete	
Date management checks complete	17-12-2024 16:17:06
Reviewer(s)	

Freetext	
Details	
Type of work	Visit
Visit reference	
Created by	
Address	St Johns Mini Market, 90 St Johns Avenue, Harlesden, London, NW10 4EG (Visit Address)
Subject CIDPID/CEPR	Unknown
Subject name	
Subject DOB	
Subject nationality	Pakistan
Subject gender	Male
Time	16:57
Created at geolocation	Easting 521597
	Northing 183921
Creation date	23-11-2024 16:56:48
Is this entry related to a Critical Incident?	No
Entry	
Title	Poi
Text	As I was approaching the premises I saw the Asian male who I now know as unloading shop stock such as drinks and other items from a silver Vito van. The can belongs to the owner of the shop. I approached and identified myself as an immigration officer and asked him to come into the shop.



Illegal Working - Employer		
Details		
Type of work	Visit	
Visit reference		
Created by		
ProntoID	- British Citizen	
Subject CIDPID/CEPR	Unknown	
Employer		
Subject DOB		
Subject nationality	British Citizen	
Subject gender	Male	
Time	16:18	
Created at geolocation	Easting 521599	
	Northing 183921	
Creation date	23-11-2024 16:18:19	
Language of Interview		
What language is the interview carried out in?	English	
Interpreter used?	No	
Employer Details		
What is the name of the business?	St John's mini market LTD NW10 4EG.	
If the business is owned by a company what is the name of the company?	just limited.	
What are the Companies House and VAT numbers of the business?	VAT 133204168.	
What is your position here?	Director.	

Declaration by Employer	Declaration by Employer	
I confirm that I have understood all the questions and that the details are true and correct.		
Signed by	23-11-2024 16:59:26	
Employee -		
Known to employer as	I call him	
Obligation		
How long has the been working at this business?	He does not work long. He comes a cpuple of times for help and before 2 times he came. 3 or 4 times he came he don't work I call him to help. 3 weeks now before 1 week.	
How often do you call him to help?	When the delivery comes, I call him half an hour before. We are due it 2-3 times a week.	
When was the last time he helped you with your delivery?	He helped today, he came couple of hours before. I phoned him and told him the delivery is coming in.	
When is the next time you will call him to help you?	I don't know it depends on the delivery. Sometimes I call him not always.	
Do they help often?	Sometimes yes.	
What days do they usually help here?	Weekends sometimes he comes before. Depends on the delivery.	
What days/ hours do they work each week?	Maybe 2 or 3 hours depends on delivery.	
Are their days/ hours the same every week?	Not every week depends on the delivery. He does not work everyday here.	
What days does he work if not everyday?	Sometimes Saturday, Wednesday. 2 or 3 times when there is delivery.	
Control		
Who gave the employee this job?	I call him. I did not give him a job. I call him to help.	
Who tells them what days and hours to work?	I tell him when the delivery is coming.	

	1
Who tells them what tasks or duties to perform each day?	l do.
Where are the employee records?	Everything is with the account. He keeps everything.
How do you contact to inform	By phone. I call him.
him of the deliveries?	By priorie. I can film.
The encountered employer advised	N/A
me during the Q&A that they would	
show me their messages on their	
mobile app, which would show me the	
hours and weeks the employee works.	
I noted that there was no	
conversations or call logs with	
I asked for permission to see this chat	
on their phone, to which the employer	
agreed and provided me with	
permission to see these chats. No	
chats were clearly visible nor were call logs.	
Remuneration	
What is the employee given in return	Sometimes I give him food. He never asks for money. He asks for cigarettes
for their tasks and duties?	sometimes I give him. Sometimes he asks for beer I give him.
Who pays this employee?	I don't pay him. He don't work here.
How is this employee paid – cash,	I don't pay him.
bank transfer?	
Does HMRC know that this employee	No he does not work. If he does then I would tell my accountant. I don't give
works at your business?	illegal people a job.
Pre-employment Checks	
Did you check the right to work or	No. I didn't ask if he wanted to work here. For helping I said he can help with
immigration status before you offered	deliveries. If I gave him a job I'd give my accountant everything.
the employee the job?	
Did the employee share a digital code	No.
with you to enable you to check their	
right to work in the UK?	
Did you ask to see any documents	No. I didn't ask him to work. He is just helping.
from the employee to demonstrate	
their right to work in the UK?	
What documents did you ask to see	I didn't ask for anything because he isn't working here.
and what were you shown before	
offering employment?	
When did you last check the	When he came he said he is here 2-3 months with a visa but I don't know
employee's employment status?	which visa. He is here for help only.
	The state of the s

Did you know that the employee is allowed to work in the UK, but he cannot work here at this premise?	He said I am allowed to work in the UK but not here. He said he has visa that's why I said he can help sometimes.
Do you have any questions for me or would like any clarifications on anything I have asked you?	No, he has been here 2 or 3 weeks to help.
Would you like to read through this interview, before you sign to confirm all the information you have provided is correct or if it requires any ammendments?	No it's okay. You've wrote down what j have said.
Employee -	
Known to employer as	
Obligation	
How long has the employee been working at this business?	I know more then him he just helps aswel. Sometimes I give him mo ey 30-50pounds depending when he helps. I give him money.
What is their job role/ duties?	Helping like with the shelving.
Are their days/ hours the same every week?	Depends. Monday Wednesday Thursday or weekends. When my wife drops my kids to school he helps out.
Are their days/ hours the same every week?	Sometimes depends. When I need help. When my wife goes home he comes to help because I call him.
Do they help often?	Yes. He dont have another job.
When will they be helping next?	He helped yesterday and today. When I call him. Again when the delivery comes but I don't know when.
What days do they usually help here?	Depends Wednesday, Friday again depending on delivery.
Control	
Who gave the employee this job?	l did.
Who tells them what days and hours to work?	I do. I tell him to come and help.
Who tells them what tasks or duties to perform each day?	I do.
Where are the employee records?	No he don't work here.
How do you contact Hafiz to come here?	I phone him.
Remuneration	
What is the employee given in return for their tasks and duties?	Sometimes I give him pocket money, or food. When he helps I help him.
If the payment includes money, how much is paid?	When he works, if he works 3 hours I give £30-40. He don't ask for it. I give him pocket money.

Does HMRC know that this employee works at your business?	No. He don't work here.	
Do you transfer money into his account?	No.	
Pre-employment Checks		
Did you check the right to work or immigration status before you offered the employee the job?	No. He said I can do for you.	
Did the employee share a digital code with you to enable you to check their right to work in the UK?	No.	
Did you ask to see any documents from the employee to demonstrate their right to work in the UK?	No. When he helps I can't ask for this and that. He just helps.	
When did you last check the employee's employment status?	I never did.	
Did you know that the employee was not allowed to work in the UK?	No. He said he is here a long time and he's been here for 10 years. When someone comes to ask for help I don't ask for anything.	
Do you have any questions for me or would like any clarifications on anything I have asked you?	No.	
Would you like to read through this interview, before you sign to confirm all the information you have provided is correct or if it requires any ammendments?	Yes.	
Are you happy with the interview?	Yes thank you.	
Have you understood the questions I have asked you?	Yes.	
Observations	Observations	
Observations		
Management Checks Complete		
Date management checks complete	19-12-2024 19:37:42	
Reviewer(s)		