

Business Licence  
Regulatory Services  
Brent Council  
Engineers Way  
Wembley  
HA9 0FJ

3 June 2025

Ref: 35010

Dear Business Licence,

**Representation in support of the application to review the premises licence for Carlton Lounge (Tiger Bay), 232-234 Kingsbury Road, NW9 0BH (Premises licence number: 362998).**

The above-mentioned application has been made under section 53A of the Licensing Act 2003.

As the delegated officer of the Licensing Authority, acting as a defined 'Responsible Authority' under the Licensing Act 2003, I confirm my representation in support of the application submitted by Metropolitan Police Service.

This representation is made on the grounds that the continued operation of this premises licence, without further intervention, could undermine one out of the four below licensing objectives:

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

#### Licence History

The current premises licence is held by a limited company, namely, Carlton Lounge (UK) Limited. The sole listed director of the company is Thavatheva Thevarajah. Carlton Lounge (UK) Limited has held the premises licence since June 2016. Thavatheva Thevarajah is also the designated premises supervisor and has held that position since July 2013.

The premises licence was subject to a review hearing on 26 June 2014 following an application made by the Metropolitan Police Service. The review was sought on the grounds that all four licensing objectives were being undermined. The Licensing Sub-Committee subsequently agreed to adjourn the meeting on the condition that the premises implemented an effective action plan to improve management, including staff training and building improvements.

The Licensing Authority acknowledges that this review hearing took place over 10 years ago and is therefore of limited relevance to the current review application.

On 8 August 2024, an application to vary the premises licence was submitted to the Licensing Authority. The application sought to extend all licensable activities by one hour and to amend the condition relating to last entry, proposing an extension to 01:30 from Sunday to Thursday and to 02:30 on Fridays and Saturdays. A representation was initially made by the Licensing Authority; however, this was subsequently withdrawn following agreement on amended conditions prior to a Licensing Sub-Committee hearing.

A further minor variation application was submitted on 11 October 2024, seeking to amend the last entry times to 02:30 from Sunday to Thursday, and to 03:30 on Fridays and Saturdays.

### Summary

The Licensing Authority supports the Metropolitan Police Service's application for a summary review of the premises licence, following the tragic incident on 18 May 2025 in which a man lost his life. A review under section 53A of the Licensing Act 2003 is reserved for only the most serious cases involving crime and disorder, and the events of that night clearly meet this threshold. Both the victim and the suspect are believed to have been inside the premises prior to the incident.

It is accepted that premises cannot be held responsible for the actions of every individual customer. Nonetheless, there are significant concerns about how the premises was being managed and the extent to which it failed to uphold the licensing objective of the prevention of crime and disorder on the evening in question.

The Licensing Authority notes the following concerns raised in the Police's review application:

- Approximately 20–25 individuals were involved in the disorder.
- Security and staff were present and witnessed the events, yet no call was made to emergency services.
- CCTV shows the suspect entering the premises at 02:00. There is no evidence of any search or frisk being conducted. It is alleged that a large knife was in the suspect's possession whilst inside the premises.
- The suspect is later seen outside with a large knife, which was reportedly used to fatally wound the victim.
- Initial statements by management to attending Police Officers denied any altercation inside the premises. This was later retracted, with staff acknowledging that the individuals involved had in fact been inside and some were even ejected.
- A customer informed Police Officers that a knife had been pulled inside the premises. He was allegedly ushered away by staff.
- Local residents have reported concerns anti-social behaviour linked to the premises.

These issues point to a clear failure in management and alludes to a possible problematic operating culture on the night of the incident in which staff underestimated the seriousness of the incident that had unfolded. While it is acknowledged that the premises were not under a legal obligation to conduct searches of customers, the absence of any proactive measures to mitigate against such a risk, especially given the late hour, demonstrates poor judgement at best, and a clear disregard for the promotion of the licensing objectives at worst.

In addition to this, staff interactions with emergency services on that evening also raise further concern. Failing to notify the police of major disorder, initially misleading officers about the events, and the instance of ushering a member of the public who claimed that a knife had been pulled inside the premises before being ushered away by other staff – all represent a complete failure in how to deal with emergency responders and show a complete inability to act appropriately in a critical situation.

The Licensing Authority refers the Licensing Sub-Committee to paragraph 11.23 of the Section 182 Guidance, which advises where premises are found to be trading irresponsibly, the Licensing Sub-Committee should not hesitate, where appropriate to do so, to take tough action to tackle the problems at the premises and, where other measures might be deemed insufficient, to revoke the premises licence.

While the Police have not explicitly requested revocation, the Licensing Authority recommends that the Sub-Committee give serious consideration to this option. If the Sub-Committee does not consider revocation to be a proportionate or necessary course of action, it is the view of the Licensing Authority that a number of robust conditions should be imposed. These conditions should go beyond the interim steps already taken and be aimed at preventing a recurrence of the failings identified. A list of proposed conditions recommended by the Licensing Authority can be found at the rear of this representation. In addition, the Licensing Authority also invites the Sub-Committee to consider bringing forward the terminal hour for all licensable activities.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'E. Maldoom', with a horizontal line drawn underneath it.

Edwin Maldoom  
Licensing Enforcement Officer

Licensing Authority's Proposed Conditions for Annex Three – For Consideration by the Licensing Sub-Committee.

1. The CCTV system shall be capable of capturing clear images of all patrons entering and exiting the premises. Additional CCTV cameras shall cover all publicly accessible internal and external areas, as outlined on the premises plan. A further CCTV camera shall be installed to monitor the immediate frontage of the premises on Kingsbury Road.

*[Additional]*

2. A member of staff who is conversant with the operation of the CCTV system shall always be available at the premises whilst the premises are open to the public. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council. *[Additional]*

3. CCTV footage shall be provided immediately upon request by 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.

*[To replace Annex Two, Condition 2]*

4. An incident log shall be kept at the premises, and made available for inspection on request by an authorised officer of Brent Council or the Police, which shall record the following:

- a. any incidents of crime and disorder.
- b. any ejections from the premises.
- c. any complaints received.
- d. any faults in the CCTV system.
- e. any seizures of drugs or offensive weapon.
- f. any visit by a relevant authority or emergency service.

*[To replace Annex Two, Condition 7]*

5. Any entries into the log shall be made as soon as reasonably possible after 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.

*[To replace Annex Two, Condition 7]*

6. There shall be no entry to the premises by patrons after 00:30 on Sunday to Thursday and after 01:30 on Friday and Saturday. Re-entry to the premises shall not be permitted to any patron after these times. *[To Replace Annex Two, Condition 11]*

7. A personal licence holder from senior management shall be always present whilst the premises are undertaking licensable activities.

*[Additional]*

8. An ID scanning system shall be in operation from 21:00 each day. All individuals entering the premises via either the Tiger Bay or Carlton Lounge entrance must present verifiable I.D, which shall be scanned and recorded on the system prior to entry.

*[Additional]*

9. The premises licence holder shall undertake a written search policy as a preventative measure to negate patrons from bringing in any illicit drugs, weapons, or any other unlawful item onto the premises. Such measures shall include the use of a detection wand after 21:00.

*[Additional]*

10. Notices shall be conspicuously displayed at the entrance notifying patrons that the premises reserves the right to undertake searches upon entry to the premises and that the premises has a "no weapons policy".

*[Additional]*

11. A log shall be kept of the SIA door supervisors working on any night to include their full name, date of birth, Security Industry Authority licence number, company and booking on-off times. A copy of SIA door supervisor log shall be available upon request by Police and authorised officers from Brent Council.

*[Additional]*

12. All staff involved in licensable activities shall receive training relevant to their role. Refresher training shall be provided at least every 12 months. Training shall include, but not be limited to, the following topics:

- a. Age verification policy
- b. CCTV operation (If deemed appropriate by management)
- c. Conflict management
- d. Operating procedures
- e. Permitted hours and relevant conditions
- f. Responding to emergency situations

*[To Replace Annex Two, Condition 27 & Annex Three, Condition 31]*

13. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the respective premises licence holder/designated premises supervisor/duty manager. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

*[To Replace Annex Two, Condition 27 & Annex Three, Condition 31]*