

From: Michael.J.Sullivan@met.pnn.police.uk
Sent: 15 March 2018 13:45
To: info@rubio.co.uk; Patel, Yogini; Legister, Linda;
Business Licence
Subject: RE: Application to vary Premises licence - ref 10864

Hello Max

I have considered the information below, but still think it falls short to uphold the licensing objectives, who would be responsible for any breaches. I am surprised that both companies would not give you more information about the drivers training packages and I have concerns that the training might not be sufficient to protect your licence, or uphold the licensing objectives.

I feel having an independent company delivering alcohol on your behalf will be difficult to write up as a condition, as they are not employed by you directly and will therefore be unable to be held to account for any breaches, or for upholding any condition on your licence, although there might be criminal offences.

As the companies have refused to supply you with a copy of their training programs how can you be confident that they will meet the standards that your business would expect? Does the training involve any sort of test to show that the drivers understand their responsibilities and have a sufficient understanding of the licensing legislation to be able to supply alcohol on your behalf. And more importantly how will they know what conditions are attached to your licence and be able to uphold them, namely Challenge 25, as you are unaware what training they have been given.

I am unsure that the below conditions can be enforced on an independent company that are not named on your licence, and ultimately it will be you liable to uphold any conditions on your licence.

Regards

PC368QK
Michael Sullivan
Brent Police Licensing Team

From: Rubio London [<mailto:info@rubio.co.uk>]
Sent: 01 March 2018 10:53
To: Sullivan Michael J - QK <Michael.J.Sullivan@met.pnn.police.uk>
Subject: Re: Application to vary Premises licence - ref 10864

Hi Michael,

Good seeing the other day and sorry for my late reply but it's been taking a bit longer to speak with the drivers and the delivery companies. As discussed previously when you came down to Rubio, I've now worked out a plan that I'd feel comfortable with:

I've spoken with both UberEats and Deliveroo (drivers and management) and I feel that the drivers have more training and follows the rules more than Deliveroo does. So I've decided to only sell (if granted) with UberEats and not Deliveroo at all.

I also spoke with both the companies and they wouldn't send me their full drivers training for legal reasons but UberEats gave me the 4 mandatory actions needed for every single delivery that contained alcohol:

1. Check the ID of the recipient and enter the date of the birth in the app
2. Request signature from the eater, they will sign on the courier's phone
3. Deliver the item only if the customer is sober and meets the 2 previous criteria
4. Failed ID check will result in refusal of any drinks containing alcohol

I've also worked out a plan that we'll be doing at Rubio to protect children from harm:

1. On every order that contains alcohol, a member of staff will call and check with the customer if they are aware that the order contains alcohol. Preventing an underage person using their parents account without permission.
2. We'll stick a bright yellow sticker on a plastic bag that contains the alcohol, displaying: "ID check required, contains alcohol"
3. We'll only sell the alcohol via UberEats and limit it to a selection of two beers and two wines, priced at £4 and £20.

I also believe that only 1 in 10 orders (if that) will contain alcohol.

I know that the hearing is coming up very soon so please do let me know your thoughts and comments that you might have.

All the best
Max