

To: Councillor Woodward (Chair)
Councillors Leng and Keane

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3 June 2026

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NOTICE OF MEETING - LICENSING APPLICATIONS SUB-COMMITTEE 11 JUNE 2026

A meeting of the Licensing Applications Sub-Committee will be held on Thursday, 11 June 2026 at 9.30 am in the Council Chamber, Civic Centre, Bridge Street, Reading RG1 2LU. The Agenda for the meeting is set out below.

	<u>AFFECTED</u>	<u>Page No</u>
	<u>WARDS</u>	
1. DECLARATIONS OF INTEREST		
(a) Councillors to declare any disclosable pecuniary interests they may have in relation to the items for consideration;		
(b) Councillors to declare whether they wish to speak on the grounds they:		
i. Have submitted a relevant representation; or		
ii. Will be speaking on behalf of someone who has submitted a relevant representation.		
2. MINUTES		3 - 16
To confirm the Minutes of the Licensing Applications Sub-Committee meetings held on 26 March 2026 and 2 April 2026.		
3. APPLICATION FOR THE REVIEW OF A PREMISES LICENCE - DOLPHIN'S CARIBBEAN RESTAURANT AND BAR, 59-60 ST MARY'S BUTTS, READING		17 - 72

CIVIC CENTRE EMERGENCY EVACUATION: *If an alarm sounds, leave by the nearest fire exit quickly and calmly and assemble on the corner of Bridge Street and Fobney Street. You will be advised when it is safe to re-enter the building.*

To consider an application for the review of a Premises Licence in respect of Dolphin's Caribbean Restaurant and Bar, 59-60 St Marys Butts, Reading, RG1 2LG

4. APPLICATION FOR THE REVIEW OF A PREMISES LICENCE IN RESPECT OF READING EXPRESS, 102 OXFORD ROAD, READING, RG1 7LL

73 - 118

To consider an application for the review of a Premises Licence in respect of Reading Express, 102 Oxford Road, Reading, RG1 7LL

LICENSING APPLICATIONS SUB-COMMITTEE MEETING MINUTES 26 MARCH 2026

Present: Councillors Woodward (Chair), Keane and Stevens.

41. APPLICATION FOR THE GRANT OF A PREMISES LICENCE - RANCHEESE, 171 CAVERSHAM ROAD, READING, RG1 8BB

The Sub-Committee considered a report on an application for the grant of a premises licence in respect of Rancheese, 171 Caversham Road, Reading, RG1 8BB. A copy of the application submitted by Salman Khan on behalf of Rancheese Limited, dated 30 January 2026, was attached to the report at Appendix BDW001.

The report stated that there was currently no licence in force at the premises and that the business, which operated as a fast food takeaway, had applied for a licence to authorise the provision of late night refreshment.

The report explained that the Applicant had agreed to a set of conditions with the Council's Licensing Team, which included a reduction of hours to those that had originally been applied for. The amended application sought the grant of a premises licence to authorise the following licensable activities and hours:

Provision of late night refreshment:

Sunday to Thursday	from 2300hrs to 0200hrs
Friday to Saturday	from 2300hrs to 0400hrs

Hours the Premises is Open to the Public:

Sunday to Thursday	from 1100hrs to 0200hrs
Friday to Saturday	from 1100hrs to 0400hrs

A schedule of the conditions agreed by the Applicant, the Council's Licensing Team and Thames Valley Police was appended to the report at Appendix BDW002.

The report stated that the 28-day statutory consultation period for the application had closed on 27 February 2026. During that period one valid representation had been received from a local resident. A copy of the representation was attached to the report at Appendix BDW003.

The report highlighted that when considering any application, the Licensing Authority should be aware of the possible use of Temporary Event Notices (TENs) to authorise licensable activities and that a premises could extend the hours or scope of their operation by their usage.

The report set out the powers of the Licensing Authority when determining an application for the grant of a premises licence and explained that the Sub-Committee could:

- Grant the application as applied for;
- Grant the application with modifications;

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- Refuse the application.

The report stated when considering the representations received Licensing Authority had a duty to carry out its functions with a view to promoting the four licensing objectives:

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

The report also stated that any conditions that were placed on a premises licence needed to be appropriate and proportionate with a view to promoting the licensing objectives and that the Licensing Authority could amend, alter, or refuse an application in order to do so. In determining the application the Licensing Authority must also have regard to the representations received, the Licensing Authority's own Statement of Licensing Policy and to any relevant section of the statutory guidance issued to licensing authorities by the Secretary of State.

The report set out paragraphs from the Council's Statement of Licensing Policy (specifically paragraphs: 1.6, 3.1, 5.6, 5.7, 6.1, 6.2, 6.5, 6.19 to 6.23, 7.6, 7.7, 10.1 and 10.3) and from the Secretary of State's Guidance issued under Section 182 of the Licensing Act 2003 (specifically paragraphs: 1.2 to 1.5, 8.41 to 8.49, 9.12, 9.38 to 9.40, 9.42 and 9.43). The report also highlighted Section 18(6) of the Licensing Act 2003, which required that any relevant representations be considered in the context of the likely effect of the grant of the premises licence would have on the promotion of the licensing objectives. Relevant case law examples were also provided for consideration by the Sub-Committee.

Copies of email correspondence between the Applicant, their representative and the Council's Licensing Team had been circulated to members of the Sub-Committee after the publication of the agenda.

Ben Williams, Licensing Enforcement Officer, Reading Borough Council, attended the hearing, presented the report and addressed the Sub-Committee.

The Applicant was represented at the hearing by Bill Donne, Silver Fox Licensing Consultants, who addressed the Sub-Committee and responded to questions on behalf of the Applicant. The Applicant, Salman Khan, also attended the hearing and was accompanied by Muhammad Hamza.

Resolved –

- (1) That the application for the grant of a premises licence in respect of Rancheese Limited, 171 Caversham Road, Reading, RG1 8BB, be granted to authorise the following licensable activities and hours:

Provision of late night refreshment:

Sunday to Thursday from 2300hrs to 0200hrs

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Friday to Saturday from 2300hrs to 0400hrs

Hours the Premises is Open to the Public:

Sunday to Thursday from 1100hrs to 0200hrs

Friday to Saturday from 1100hrs to 0400hrs

subject to the agreed conditions set out in Appendix BDW002;

- (2) That the Sub-Committee's reasons be noted as follows:

REASONS:

- (a) The Sub-Committee had read and considered the report, including the application and all accompanying additional documents, and had listened carefully to the oral representations made by those present at the meeting;
- (b) In making its decision the Sub-Committee had had regard to the provisions of the Licensing Act 2003, the Secretary of State's Guidance issued under section 182 of that Act, and to Reading Borough Council's Statement of Licensing Policy;
- (c) The Sub-Committee had noted Paragraph 1.18 of the Secretary of State's Guidance issued under section 182 of the Licensing Act 2003 that required licensing authorities to consider the need to promote growth and deliver economic benefits;
- (d) The Sub-Committee had noted that the application had attracted one representation from a local resident, who opposed the grant of the licence on the grounds of potential public nuisance arising from traffic;
- (e) The Sub-Committee had noted that no representations had been received from any Responsible Authority;
- (f) The Sub-Committee had noted that the Applicant had agreed to a comprehensive set of conditions with the Council's Licensing Team and Thames Valley Police which had been designed to address the risks associated with the operation of late night food outlets;
- (g) The Sub-Committee had considered the likely effect of the granting of the application upon the promotion of the four licensing objectives and, in the view of the Sub-Committee, there was no evidence that the grant of the licence applied for would undermine the licensing objectives;
- (h) The decision of the Sub-Committee had therefore been to grant the application, subject to the agreed conditions.

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(At the meeting the Chair advised that any party to the hearing may appeal to the Magistrates' Court in writing, within 21 days).

(The meeting started at 9.30 am and closed at 9.52 am)

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Present: Councillors Woodward (Chair), Tarar and Thompson

42. MINUTES

The Minutes of the meeting held on 3 March 2026 were confirmed as a correct record and signed by the Chair.

43. EXCLUSION OF PRESS AND PUBLIC

Resolved –

That, pursuant to Section 100A of the Local Government Act 1972 (as amended), members of the press and public be excluded during consideration of the following item of business as it was likely that there would be disclosures of exempt information as defined in paragraphs 1, 2, 3 and 5 specified in Part 1 of Schedule 12A (as amended) to that Act.

44. APPLICATIONS FOR THE GRANT OF PRIVATE HIRE AND SCHOOL TRANSPORT VEHICLE DRIVER'S LICENCES AND REPORTS FOR THE CONSIDERATION OF THE SUSPENSION/REVOICATION OF PRIVATE HIRE AND SCHOOL TRANSPORT VEHICLE DRIVER'S LICENCES

The Sub-Committee considered a report that set out the cases relating to the following:

- An application for the grant of a Private Hire Driver's Licence. Applicant: MM. (Appendix 1);
- An application for the grant of a Private Hire (School Transport) Driver's Licence. Applicant: MY. (Appendix 2);
- An application for the grant of a Private Hire Driver's Licence. Applicant: HL (Appendix 3);
- A report to consider the suspension/revocation of a Private Hire (School Transport) Driver's Licence. Driver: AMD. (Appendix 4);
- A report to consider the suspension/revocation of a Private Hire Driver's Licence. Driver: MB. (Appendix 5).

Summaries detailing the circumstances relating to each of the cases were attached to the report at Appendices 1 to 5.

The cases at Appendix 4 included video evidence that members of the Sub-Committee had viewed prior to the meeting. Additional Information had been circulated to members of the Sub-Committee regarding the case at Appendix 3 after the publication of the agenda papers.

MM attended the hearing, addressed the Sub-Committee and responded to questions.

MY attended the hearing, addressed the Sub-Committee and responded to questions.

HL attended the hearing, addressed the Sub-Committee and responded to questions.

AMD did not attend the hearing and informed Nicola Butler via email during the meeting that he would be unable to attend and that the decision could be made in his absence.

MB attended the hearing, addressed the Sub-Committee and responded to questions.

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Nicola Butler, Senior Licensing Enforcement Officer, presented the reports to the Sub-Committee and asked and responded to questions. Robert Smalley and Mike Harding Licensing Enforcement Officers, also attended the hearing, addressed the Sub-Committee and asked and responded to questions.

In reaching its decisions the Sub-Committee endeavoured throughout to strike a fair balance between the interests of the applicant and licence holders and the concerns of the Licensing Officers, but its overriding consideration was to the safeguarding of the public.

The Sub-Committee also gave due consideration to the written material contained in the paperwork, the oral evidence provided at the meeting, and to relevant legislation, guidance and the policies of Reading Borough Council (RBC), this included but was not limited to:

- The Local Government (Miscellaneous Provisions Act) Act 1976;
- The Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022;
- The Equality Act 2010;
- The relevant Secretary of State's Guidance;
- RBC's Hackney Carriage and Private Hire Licensing Policy (February 2026), including the Hackney Carriage and Private Hire Vehicle Convictions Policy;
- The relevant RBC driver, vehicle and operator conditions and penalty points schemes;
- All of the documents provided for the meeting, including the video evidence provided in relation to the cases at Appendices 2 and 3, and the written Additional Information circulated to the Sub-Committee by email in relation to the case at Appendix 1; and
- The Fit and Proper Person Test.

Resolved –

- (1) That, having taken into consideration the need to safeguard the public, the Sub-Committee concluded that it was appropriate and proportionate to grant the application for a Private Hire Vehicle Driver's Licence in respect of MM (case at Appendix 1) for a period of three years:

REASONS:

- (a) On 4 September 2025, MM had applied to the Council for the grant of a 3-year private hire vehicle driver's licence.
- (b) An enhanced DBS check had shown three previous convictions for assault, false imprisonment and robbery when MM was aged under 18.
- (c) MM did not declare any convictions on his application form.
- (d) MM's convictions engaged Sections 32 and 34 of the Council's Hackney Carriage and Private Hire Criminal Convictions Policy. Although MM's previous convictions were over 20 years old, the Council must consider his history as a whole. The police had been unable to provide the Council with any detail as to the circumstances of the offences but these were serious offences as was reflected by the sentences imposed.
- (e) MM attended the hearing. He was unrepresented. He apologised for his convictions and for his failure to disclose them in his application. As to the convictions, he pointed to the fact that they were committed when he was young and had led a blameless life since. He was now married with

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children. He failed to disclose the convictions because he believed that they would be deleted from his records after 10 years.

- (f) The Sub-Committee considered this case very carefully and took into account everything it had read, together with the representations it heard from MM. The legal adviser to the Sub-Committee drew its attention to the case of *Nottingham City Council v Farooq*. The Sub-Committee was advised that it was not entitled to review the merits of convictions recorded in prior criminal proceedings or to go behind those convictions. Further, even if the Sub-Committee was to find that the failure to complete the form fully and accurately was through to foolishness and ignorance, rather than deliberate deception, this would nonetheless not be a basis upon which it could be satisfied that MM was a proper person to hold a licence.
- (g) The Sub-Committee recognised that these were serious matters but accepted that MM had made positive steps to turn around his life. He had led a conviction-free life for over 20 years. The failure to disclose the convictions in his application was deeply regrettable. A driver's licence came with significant responsibilities to ensure that the driver was fully conversant with all conditions, policies and legal requirements to which the licence was subject. It was therefore the decision of the Sub-Committee that MM be granted a three-year private hire driver's licence.

(MM was advised of the right of appeal against this decision to the Reading Magistrates' Court. Any such appeal should be made within the period of 21 days from receipt of these written reasons.)

- (2) That, having taken into consideration the need to safeguard the public, the Sub-Committee concluded that it was appropriate and proportionate to refuse MY's application for the grant of a Private Hire (School Transport) Vehicle Driver's Licence as he was not a fit and proper person to hold such a licence. The Sub-Committee's reasons were noted as follows:

REASONS:

- (a) On 18 September 2025, MY had applied to the Council for the grant of a three-year private hire vehicle driver's licence. He had first applied to the Council for a school transport driver's licence in December 2023. At that time, it had been noted that he had two convictions for common assault dating back to May 2014, for which a sentence of imprisonment was imposed together with a 10-year anti-social behaviour order and a restraining order made under the Protection from Harassment Act which was still in place.
- (b) On 13 March 2026, MY had notified the Council that he wished to amend his application to one for a school transport driver's licence.
- (c) MY's enhanced DBS certificate, received on 13 March 2026, had confirmed his previous convictions and the sentence imposed.

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- (d) MY had the right to work in the UK until 7 July 2026. He stated that he would apply for the extension of his right to work closer to the expiry date.
- (e) MY attended the hearing. He was unrepresented. He appeared to suggest that he ought not to have been convicted. He was not able to give the Sub-Committee a clear explanation as to what it was he did that had led to the conviction. He was not able to tell the Sub-Committee who the restraining order was made to protect. He provided the Sub-Committee with a copy of a cell sharing risk assessment, presumably from when he went into custody.
- (f) The Sub-Committee considered this case very carefully and took into account everything it read, together with the representations it had heard from MY. The Sub-Committee was advised that it was not entitled to review the merits of convictions recorded in prior criminal proceedings or to go behind those convictions.
- (g) MY must be taken as a person who had two convictions for offences involving violence against the person for which a significant sentence of imprisonment had been imposed, together with an anti-social behaviour order and a restraining order. The restraining order was still in place. In the view of the Sub-Committee, the public would not be protected by the grant of a licence to an applicant who remained subject to a restraining order.
- (h) It was therefore the decision of the Sub-Committee that MY's application be refused.

(MY was advised of the right of appeal against this decision to the Reading Magistrates' Court. Any such appeal should be made within the period of 21 days from receipt of these written reasons.)

- (3) That, having taken into consideration the need to safeguard the public, the Sub-Committee concluded that it was appropriate and proportionate to refuse HL's application for the grant of a Private Hire Vehicle Driver's Licence as he was not a fit and proper person to hold such a licence. The Sub-Committee's reasons were noted as follows:

REASONS

- (a) On 2 March 2026, HL had applied to the Council for the grant of a Private Hire Vehicle Driver's licence.
- (b) An enhanced DBS check showed convictions from February 2017 for offences involving dishonesty, driving otherwise than in accordance with a licence and no insurance. A total of two months' imprisonment had been imposed together with a period of disqualification of 14 months.
- (c) HL only declared the conviction for no insurance on his application form.
- (d) On 4 March 2026, Council officers had requested an explanation for the convictions from HL. Initially, HL had stated that he had only declared the no insurance matter because all the offences had arisen from a single

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incident and he felt that disclosing the no insurance matter was sufficient. He subsequently explained that at the time, he did not have lawful immigration status and had obtained false documents to allow him to drive.

- (e) The Sub-Committee understood the circumstances of the offences to be that on 2 December 2016, HL had been stopped by police whilst driving in the vicinity of Heathrow airport. He had been found to be in possession of false driving licence and identity card, containing his photograph but issued in a false name. He had been driving a vehicle registered under a false identity.
- (f) HL's convictions had engaged Sections 43 to 45 of the Council's Hackney Carriage and Private Hire Criminal Convictions Policy. The policy was that any application for a licence involving previous convictions for offences of dishonesty would not be granted until at least seven years had elapsed since the completion of any sentence imposed. Although HL's previous convictions were now over seven years old, the Council must consider his history as a whole. These were serious offences as had been reflected by the sentences imposed.
- (g) HL attended the hearing. He was unrepresented. He apologised for his convictions and for his failure to disclose them in his application. As to the convictions, he pointed to the fact that he was now a different person. He had not been convicted since 2017. He had failed to disclose all the convictions because he believed that disclosing the no insurance matter was sufficient.
- (h) The Sub-Committee considered this case very carefully and took into account everything it had read, together with the representations it heard from HL. It had reminded itself that the paramount consideration in licensing was public protection and honesty was integral to protecting the public who used licensed vehicles.
- (i) Officers were concerned about the serious nature of these offences, and in particular, that HL had been willing to misrepresent his identity to deceive authorities. Whilst the convictions arising from that conduct dated back to 2017, officers were concerned that he had compounded the lack of honesty by his failure fully to disclose these convictions in his recent application form. The Sub-Committee noted that this failure had occurred in spite of the very clear declaration as to the truth of the information he had provided.
- (j) Taking both the convictions and the failure to disclose into account, the Sub-Committee was not satisfied that HL was a fit and proper person to hold a licence. It was therefore the decision of the Sub-Committee that his application be refused.

(HL was advised of their right of appeal against this decision to the Reading Magistrates' Court. Any such appeal should be made within the period of 21 days from receipt of these written reasons.)

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- (4) That, having taken into consideration the need to safeguard the public, the Sub-Committee concluded that it was appropriate and proportionate to suspend AMD's Private Hire (School Transport) Driver's licence to until he had taken and passed an extended driving assessment, or for the period of 14 days, whichever is the later.

The Sub-Committee's reasons were noted as follows:

REASONS

- (a) AMD was the holder of a current private hire (school transport) vehicle driver's licence granted by the Council on 6 December 2023 and expiring on 5 December 2026.
- (b) AMD had been referred to the Licensing Sub-Committee following a complaint from a member of the public alleging dangerous driving. The complaint was received by the Council on 15 January 2026 and concerned an incident said to have occurred at 9.15am that morning. AMD was alleged to have driven aggressively, bumper to bumper behind the complainant's vehicle in a 30mph area, beeping his horn and flashing his headlights and to have made several attempts to overtake the complainant's vehicle notwithstanding the speed limit and prevailing road conditions. He was also alleged to have got out of his vehicle whilst at traffic lights, approaching the complainant's vehicle, swearing at him and threatening him. At the request of officers, the complainant provided video recording on 22 January 2026.
- (c) Council officers had written to AMD on 21 January 2026 to notify him of the complaint and to invite his comments within a seven-day period. AMD did not respond within that time and on 29 January, he had been written to again reminding him of the seriousness of the allegation and allowing him a further three days within which to respond.
- (d) On 29 January 2026, an email had been received from AMD, in which, AMD stated that he had taken his responsibilities extremely seriously and had always conducted himself in a safe and professional manner. He had denied tailgating, driving aggressively or in a way intended to intimidate the other driver. Instead, he said that the other vehicle had been driven well below the speed limit and so he briefly flashed his headlights to alert the driver to his presence. Only when it had been safe to do so did he begin to position his vehicle to overtake the other vehicle but the other vehicle had been positioned in such a way as to prevent this. When both vehicles had been stopped at traffic lights, AMD said that he had exited his vehicle but only to check on the welfare of the other driver. He had denied swearing or behaving aggressively or threateningly.
- (e) Further footage had been received from the complainant on 20 February 2026 together with the complainant's response to AMD's account.
- (f) Officers had met with AMD on 9 February 2026. In the meeting, he had maintained his initial account of the incident, but after viewing the footage

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of the incident held by the Council at the time, he had admitted making a mistake, apologised and said that his behaviour would not be repeated. He had denied that his actions in exiting the vehicle could be interpreted as aggressive. He had accepted that he would have been unhappy if his children were being carried in his vehicle at the time but had stated that no children were involved, only the passenger escort. He had denied receiving any similar complaints previously.

- (g) On reviewing the Council's records, officers had noted that in November 2025, a similar complaint had been made about AMD. It had alleged that at around 8.15am in the morning, with children on board his vehicle and the vehicle displaying the yellow school sticker, AMD had been said to have driven across lanes in stationary and slow-moving traffic, sounding his horn without reason. The complainant had alleged that AMD was tailgating the complainant's vehicle and sounding his horn before speeding past the vehicle.
- (h) At the time of receiving the earlier complaint, officers had written to AMD inviting a response within seven days. No response had been received, and so officers had imposed six penalty points on his private hire driver's licence under the Council's penalty points scheme. The scheme provided a right of appeal against the imposition of points but no appeal had been made by AMD.
- (i) Officers had contended that AMD's driving had fallen well below the standard of a licensed private hire driver with the potential to endanger other road users. Furthermore, AMD had shown a lack of insight into his behaviour, failing to engage with officers within required timescales and minimising his culpability.
- (j) AMD's case had been due to come before the Licensing Sub-Committee on 3 March 2026. He had attended on that date but had requested an adjournment of the hearing because he had been unable to find someone to accompany him. His application to adjourn had been granted and the hearing had been put over to 2 April 2026. On the morning of this hearing, the Council had received an email from AMD again requesting an adjournment of the hearing because he had been taken ill overnight. An offer had been made to AMD to put back his hearing to later in the day so that he might be able to attend if he felt better. He did not attend and the Sub-Committee had resolved to proceed in his absence noting that a balance had to be struck between giving AMD a reasonable opportunity to attend and the interests of public safety in dealing with allegations of poor driving without undue delay.
- (k) The Sub-Committee had considered this case very carefully and had taken into account everything it had read and the video footage it had viewed. It had regard to the Department of Transport's statutory taxi and private hire vehicle standards, and particularly, the guidance on the "fit and proper person test". It viewed his behaviour very seriously and noted that officers attending had invited the Sub-Committee to give consideration to revoking his licence. There had been similarities between the behaviour reported in January 2026 and the behaviour

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reported in November 2025 such that the Sub-Committee felt that it must act to protect the public. It was therefore the decision of the Sub-Committee that AMD's private hire vehicle (school transport) driver's licence should be suspended, pending his attendance on and passing (at his own expense) an extended driving assessment, or for the period of 14 days, whichever was the later.

(AMD would be advised of the right of appeal against this decision to the Reading Magistrates' Court. Any such appeal should be made within the period of 21 days from receipt of these written reasons.)

- (5) That, having taken into consideration the need to safeguard the public, the Sub-Committee concluded that it was appropriate and proportionate to take no further action in respect of the Private Hire Vehicle Driver's Licence held by MB. The Sub-Committee's reasons were noted as follows:

REASONS

- (a) MB had first applied to the Council for the grant of a private hire vehicle driver's licence in 2018. A DBS check conducted at the time had disclosed a conviction for indecent exposure dating back to 1993.
- (b) MB had failed to disclose this conviction on his application in 2018.
- (c) MB's application had been considered in line with the Council's convictions policy in force at the time, and he had been granted a licence from 26 February 2020 to 25 February 2023. MB had then applied to renew his licence and again had not disclosed his previous conviction. That renewal application had been considered in line with the Council's policy and had been granted, resulting in a licence being issued from 26 February 2023 to 25 February 2026.
- (d) On 7 November 2023, the Council had adopted a new convictions policy, and this policy had been amended on 12 February 2026.
- (e) MB had applied to renew his licence on 13 February 2026 and again had failed to disclose the conviction. It might have been that MB felt that he did not need to disclose the conviction again, but the Sub-Committee must remind him that it was imperative to complete his application forms for renewal fully and accurately. The standard application form contained a very important declaration that the contents of the application were true.
- (f) The Sub-Committee noted that the current policy had, as it stated at Paragraph 7, "raised the bar". This had led to the referral of MB's case to the Sub-Committee to consider what action, if any, was to be taken in relation to the conviction in the light of Paragraphs 38 to 42 of the Policy concerning sexual offences.
- (g) MB attended the hearing. He was unrepresented. He recognised the fact that the Sub-Committee was not allowed to go behind the 1993 conviction, even though he denied that he committed the offence for which he was convicted. He pointed to the fact that he was under 18

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years old at the time of the conviction and he was now married with a family. He had now been licensed by the Council as a driver for over six years. He had not been convicted since 1993 and there was no history of complaints about his conduct of his licence.

- (h) The Sub-Committee considered this case very carefully and took into account everything it had read, together with the representations it heard from MB. It had reminded itself that the paramount consideration in licensing was public protection and its current convictions policy was an important tool in protecting the public.
- (i) In all the circumstances, however, the Sub-Committee had decided that it needed to take no further action in relation to the conviction in the light of its age, the penalty imposed at the time and MB's history as a licensed driver.

(Exempt information as defined in paragraphs 1, 2, 3 and 5)

(The meeting started at 9.30 am and closed at 12.30 pm)

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LICENSING ACT 2003 HEARING THURSDAY 11 JUNE 2026 @ 09:30HRS
APPLICATION FOR THE REVIEW OF A PREMISES LICENCE

1. Premises:

Dolphin's Caribbean Restaurant & Bar
59-60 St. Mary's Butts
Reading
RG1 2LG

2. Applicant:

Mr Robert Smalley on behalf of Reading Borough Council's Licensing Team

3. Grounds for Review:

The application for a review of the premises licence for Dolphin's Caribbean Restaurant & Bar has been submitted by Reading Borough Council's Licensing Team who are a named responsible authority under the Licensing Act 2003.

The application has been submitted to prevent further undermining of the licensing objectives of: Prevention of Crime and Disorder, Protection of Children from Harm, and 'Public Safety'.

4. Background:

Dolphin's Caribbean Restaurant & Bar currently benefits from premises licence LP1001298 for the following activities:

- 1) Sale of Alcohol – On the Premises
- 2) Provision of Late Night refreshments - Indoors
- 3) Provision of Live Music – Indoors
- 4) Performance of Dance - Indoors
- 5) Provision of recorded Music - Indoors
- 6) Anything similar to Live music, recorded music or dance - Indoors

On the 24th February 2025 the premises was granted the licence after consultation and agreeing conditions with Licensing & Thames Valley Police.

5. Licensable activities and hours:

The premises currently benefits from a premises licence (no. LP1001298 attached as **Appendix LIC-2**) that authorises:

Sale of Alcohol – On the Premises

06:00hrs until 23:30hrs - Monday – Sunday

Provision of Late Night refreshments - Indoors

23:00hrs until 23:30hrs – Monday – Sunday

Provision of Live Music – Indoors

06:00hrs until 23:30hrs - Monday – Sunday

Performance of Dance - Indoors

06:00hrs until 23:30hrs - Monday – Sunday

Provision of recorded Music - Indoors

06:00hrs until 23:30hrs - Monday – Sunday

Anything similar to Live music, recorded music or dance - Indoors

06:00hrs until 23:30hrs - Monday – Sunday

Hours the Premises is Open to the Public

06:00hrs until 24:00hrs - Monday – Sunday

6. Date of receipt of application: 22 April 2026

7. Date of closure of period for representations: 20 May 2026

8. Representations received:

During the 28-day consultation period for the application, representations were received from:

1. Phil Thomas - Immigration Enforcement Licensing Compliance Team - Attached as **Appendix LIC-3**
2. Mr Declan Smyth- Thames Valley Police Licensing Team – Attached as **Appendix LIC-4**

9. Licensing Objectives and Reading Borough Council's Licensing Policy Statement

In determining this application the Licensing Authority has a duty to carry out its functions with a view to promoting the four licensing objectives, which are as follows:-

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

In determining this application the Licensing Authority must also have regard to the representations received, the Licensing Authority's statement of licensing policy and any relevant section of the statutory guidance to licensing authorities.

10. Power of Licensing Authority on the determination of a Review

In determining the review application the sub-committee can take such steps as it considers appropriate for the promotion of the licensing objectives, which are:

1. Take no further action
2. To issue formal warnings to the premises supervisor and/or premises licence holder
3. Modify the conditions of the licence (including, but not limited to hours of operation of licensable activities)

4. Exclude a licensable activity from the scope of the licence
5. Remove the designated premises licence supervisor
6. Suspend the licence for a period not exceeding three months
7. Revoke the licence.

Where the sub-committee takes a step mentioned in 3 or 4 it may provide that the modification or exclusion is to have effect for a period not exceeding three months or permanently.

11. Licensing Objectives and Reading Borough Council's Licensing Policy Statement

In considering representations received the Licensing Authority has a duty to carry out its functions with a view to promoting the four licensing objectives, which are as follows:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

Any conditions that are placed on a premises licence should be appropriate and proportionate with a view to promoting the licensing objectives. The Licensing Authority can amend, alter, or refuse an application should it be deemed appropriate for the promotion of the licensing objectives.

In determining this application, the Licensing Authority must also have regard to the representations received, the Licensing Authority's statement of licensing policy and any relevant section of the statutory guidance to licensing authorities.

12. The Council's Licensing Policy Statement (2023):

1.5 This licensing policy aims to make Reading's night-time economy an economy for all. A diverse range of responsibly run premises are to be encouraged. The licensing authority wishes to discourage drunkenness and a move away from alcohol led vertical drinking establishments. We would expect responsibly run premises to actively promote the licensing objectives through promoting extra seating at their premises; instigating effective dispersal from their premises at the conclusion of licensable activities and engagement with the licensing authority and other responsible authorities in policies, initiatives and strategies that promote Reading as a safe, healthy, diverse and vibrant night-time economy suitable for all.

1.6 The predominantly urban nature of Reading as a town means that an appropriate balance needs to be struck between the needs of local business and the needs of local residents. This licensing policy seeks to encourage all stakeholders to engage in the licensing process so that the needs of all can be taken into account and issues dealt with in a spirit of partnership and cooperation.

Crime and Disorder Act 1998

3.2 This Act requires local authorities and other bodies to consider crime and disorder

reduction. Section 17 of the Act states that it shall be the duty of each authority, to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that is reasonably can to prevent, crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment). This links specifically with the licensing objective of prevention of crime and disorder and the licensing authority will take into account all reasonable measures that actively promote this licensing objective.

Other Legislation that the Licensing Authority will consider

3.10 The Licensing Authority will also have cognisance to the following legislation when it decides to discharge its responsibilities under the Licensing Act. This list is not exhaustive:

- Environmental Protection Act 1990 which deals with noise and nuisance
- Regulatory Reform Order 2005 which deals with fire safety
- Highways Act 1980 which deals with pavement café licences
- Reading Borough Council Act 2013 which deals with street trading and touting
- Health and Safety at Work Act 1974 and Food Hygiene regulations
- Planning legislation (see paragraphs 2.2-2.9 of this policy)

Licensable Activities

4.15 This policy relates to all applications for the following licensable activities:

- The sale of alcohol by retail
- The supply of alcohol to club members
- The provision of regulated entertainment:
 - Performance of a play
 - Performance of a film
 - An indoor sporting event
 - Boxing or wrestling
 - Performance of live music
 - Performance of recorded music
 - Performance of dance
- The provision of late night refreshment (the sale of hot food and drink between 2300hrs and 0500hrs)

Review of a premises licence or club premises certificate

5.13 Any premises that has a premises licence or club premises certificate may have that licence reviewed by any of the named Responsible authorities – including the Licensing Authority in it's role as a Responsible Authority. Thames Valley Police may also submit a Summary Review if there is a premises associated with serious crime and disorder. When the Licensing Authority instigates a review it will ensure that there is a clear separation of functions between the officer acting as the licensing authority

and the officer acting as a responsible authority.

5.15 The Act provides strict guidelines, timescales and procedures for review applications and hearings and the Authority will deal with every review application in accordance with these rules.

Hours of sale in off licences

7.13 Shops, stores and supermarkets will generally be permitted to sell alcohol for consumption off the premises during their normal trading hours. However, in the case of individual shops that are suspected or known to be a focus of crime and disorder, anti-social behaviour or public nuisance, then subject to relevant representations being received, a limit on licensing hours and opening hours may be appropriate.

Enforcement Approach

9.12 Where offences are found to have been carried out on licensed premises, the Authority has a number of enforcement options available to it. The Authority will work with partner agencies to determine which enforcement option is appropriate for the promotion of the licensing objectives. The seriousness of the offences found will be taken into consideration as well as any previous issues of non-compliance or criminality that have taken place at the licensed premises.

9.13 The enforcement options available to the Authority are wide-ranging. The Authority may consider, for example, that a letter detailing the issues found during an inspection followed by a period of time to rectify them is sufficient to promote the licensing objectives. Similarly, the Authority may consider that the breaches are sufficiently serious to warrant an immediate performance meeting with a licence holder so that a discussion can take place about the adequacy of the processes in place at the premises. This could, for example, lead to recommendations being put to the licence holder to implement much more robust conditions and processes to avoid a repeat of the breaches found. The authority may also decide to prosecute relevant persons for offences being carried out on licensed premises. Licence holders should note that the authority can take one or more of these options available to it at the same time for the same offences should it be deemed appropriate to do so.

9.15 Licensed premises that have a history of non-compliance over a period of months and years and/or incidents of serious crime taking place at that premises, will likely find that the Authority will initiate a review with a view to asking for the licence to be considered for revocation.

9.16 When considering what enforcement action to take, the Authority will always consider what is the most appropriate and proportionate step to promote the licensing objectives. The Authority is not required to wait for offences to occur before deciding it needs to take appropriate action. Case law – notably *East Lindsey District Council v Abu Hanif* – states that the promotion of the licensing objectives requires a prospective consideration of what is warranted in the public interest having regard to the twin considerations of prevention and deterrence. Similarly, the Secretary of State's Guidance to the Licensing Act makes clear that there is no requirement for the Authority to wait for the outcome of any criminal proceedings before it initiates any

enforcement action. This is the approach that the Authority will take when considering what, if any, action should be taken when condition breaches and other criminal activity is found at licensed premises.

9.18 Any responsible authority or person defined as ‘any other person’ within the Act can initiate a review of any premises licence or club premises certificate. When another responsible authority or other person initiates a review, the Authority will deal with it as the Licensing Authority and may also wish to make representation in support of the review within its role as a responsible authority if it has relevant information.

9.20 The Authority shall endeavour to work with licence holders and applicants where it is believed that steps can be taken to rectify issues identified at licensed premises. However it cannot merely continue that approach if it has previously failed or the licence holder is unresponsive. It is the responsibility of all licence holders and responsible authorities to ensure that licensed premises are not undermining the promotion of the licensing objectives and that licensable activity is carried out lawfully. The Authority will work with partners to determine what action is appropriate for each premises where issues are discovered. Each premises and the action required for each will be assessed on its own individual merits.

9.21 The Council, in determining a review application can take the following steps in order to promote the licensing objectives:

- modify the conditions on the licence
- exclude a licensable activity from the scope of the licence
- remove the designated premises supervisor
- suspend the licence for a period not exceeding three months
- revoke the premises licence

13. Amended Guidance issued under section 182 of the Licensing Act 2003 (February 2025)

Licensing Objectives and Aims:

1.2 The legislation provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken.

1.3 The licensing objectives are:

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

1.4 Each objective is of equal importance. There are no other statutory licensing objectives, so that the promotion of the four objectives is a paramount consideration at all times.

1.5 However, the legislation also supports a number of other key aims and purposes. These are vitally important and should be principal aims for everyone involved in

licensing work. They include:

- protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed premises

Purpose

1.7 This Guidance is provided to licensing authorities in relation to the carrying out of their functions under the 2003 Act. It also provides information to magistrates' courts hearing appeals against licensing decisions and has been made widely available for the benefit of those who run licensed premises, their legal advisers and the general public. It is a key medium for promoting best practice, ensuring consistent application of licensing powers across England and Wales and for promoting fairness, equal treatment and proportionality.

1.8 The police remain key enforcers of licensing law. This Guidance does not bind police officers who, within the parameters of their force orders and the law, remain operationally independent. However, this Guidance is provided to support and assist police officers in interpreting and implementing the 2003 Act in the promotion of the four licensing objectives.

Protection of children from harm

2.28 The protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated directly with alcohol consumption but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Licensing authorities must also consider the need to protect children from sexual exploitation when undertaking licensing functions.

The role of responsible authorities (eg Police)

9.12 Each responsible authority will be an expert in their respective field, and in some cases it is likely that a particular responsible authority will be the licensing authority's main source of advice in relation to a particular licensing objective. For example, the police have a key role in managing the night-time economy and should have good working relationships with those operating in their local area. The police should usually therefore be the licensing authority's main source of advice on matters relating to the promotion of the crime and disorder licensing objective. However, any responsible authority under the 2003 Act may make representations with regard to any of the licensing objectives if they have evidence to support such representations. Licensing authorities must therefore consider all relevant representations from responsible authorities carefully, even where the reason for a particular responsible authority's interest or expertise in the promotion of a particular objective may not be immediately apparent. However, it remains incumbent on all responsible authorities to ensure that their representations can withstand the scrutiny to which they would be subject at a hearing.

Licensing authorities acting as responsible authorities

9.13 Licensing authorities are included in the list of responsible authorities. A similar framework exists in the Gambling Act 2005. The 2003 Act does not require responsible authorities to make representations about applications for the grant of premises licences or to take any other steps in respect of different licensing processes. It is, therefore, for the licensing authority to determine when it considers it appropriate to act in its capacity as a responsible authority; the licensing authority should make this decision in accordance with its duties under section 4 of the 2003 Act.

Determining actions that are appropriate for the promotion of the licensing objectives

9.42 Licensing authorities are best placed to determine what actions are appropriate for the promotion of the licensing objectives in their areas. All licensing determinations should be considered on a case-by-case basis. They should take into account any representations or objections that have been received from responsible authorities or other persons, and representations made by the applicant or premises user as the case may be.

9.43 The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.

The review process

11.1 The proceedings set out in the 2003 Act for reviewing premises licences and club premises certificates represent a key protection for the community where problems associated with the licensing objectives occur after the grant or variation of a premises licence or club premises certificate.

11.2 At any stage, following the grant of a premises licence or club premises certificate, a responsible authority, or any other person, may ask the licensing authority to review the licence or certificate because of a matter arising at the premises in connection with any of the four licensing objectives.

11.10 Where authorised persons and responsible authorities have concerns about problems identified at premises, it is good practice for them to give licence holders early warning of their concerns and the need for improvement, and where possible they should advise the licence or certificate holder of the steps they need to take to address those concerns. A failure by the holder to respond to such warnings is expected to lead to a decision to apply for a review. Co-operation at a local level in promoting the licensing objectives should be encouraged and reviews should not be used to undermine this co-operation.

Powers of a licensing authority on the determination of a review

11.16 The 2003 Act provides a range of powers for the licensing authority which it may exercise on determining a review where it considers them appropriate for the promotion of the licensing objectives.

11.17 The licensing authority may decide that the review does not require it to take any further steps appropriate to promoting the licensing objectives. In addition, there is nothing to prevent a licensing authority issuing an informal warning to the licence holder and/or to recommend improvement within a particular period of time. It is expected that licensing authorities will regard such informal warnings as an important mechanism for ensuring that the licensing objectives are effectively promoted and that warnings should be issued in writing to the licence holder.

11.18 However, where responsible authorities such as the police or environmental health officers have already issued warnings requiring improvement – either orally or in writing – that have failed as part of their own stepped approach to address concerns, licensing authorities should not merely repeat that approach and should take this into account when considering what further action is appropriate. Similarly, licensing authorities may take into account any civil immigration penalties which a licence holder has been required to pay for employing an illegal worker.

11.25 Reviews are part of the regulatory process introduced by the 2003 Act and they are not part of criminal law and procedure. There is, therefore, no reason why representations giving rise to a review of a premises licence need be delayed pending the outcome of any criminal proceedings. Some reviews will arise after the conviction in the criminal courts of certain individuals, but not all. In any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives. Where a review follows a conviction, it would also not be for the licensing authority to attempt to go beyond any finding by the courts, which should be treated as a matter of undisputed evidence before them.

14. Relevant Case law for consideration:

(R) on the application of Hope and Glory Public House v Westminster City Council (2011) EWCA Civ31

East Lindsey District Council v Abu Hanif (t/a Zara's Restaurant) (2016)

R (on application of Daniel Thwaites plc) v Wirral Magistrates' Court and Others (2008) EWHC 838 (Admin)

15. Appendices

Appendix LIC-1: Application to Review the Premises Licence

Appendix LIC-2: Current Premises Licence

Appendix LIC-3: Phil Thomas - Immigration Enforcement Licensing Compliance Team

Appendix LIC-4: Mr Declan Smyth- Thames Valley Police Licensing Team

Reading Borough Council, Civic Offices, Bridge Street, Reading, RG1 2LU

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

I Robert Smalley

(Insert name of applicant)

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

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description	
Dolphin's Caribbean Restaurant & Bar 59-60 St Mary's Butts	
Post town Reading	Post code (if known) RG1 2LG

Name of premises licence holder or club holding club premises certificate (if known)
Dolphin's Caribbean Cuisine Ltd

Number of premises licence or club premises certificate (if known)
LP1001298

Part 2 - Applicant details

I am

Please tick ✓ yes

1) an individual, body or business which is not a responsible authority (please read guidance note 1, and complete (A) or (B) below)

2) a responsible authority (please complete (C) below)

3) a member of the club to which this application relates (please complete (A) below)

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

Please tick ✓ yes

Mr Mrs Miss Ms Other title
(for example, Rev)

Surname

First names

I am 18 years old or over

Please tick ✓ yes

**Current postal
address if
different from
premises
address**

Post town

Post Code

Daytime contact telephone number

**E-mail address
(optional)**

(B) DETAILS OF OTHER APPLICANT

Name and address

Telephone number (if any)

E-mail address (optional)

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Name and address Mr Robert Smalley o.b.o Reading Borough Council - Licensing Department Bridge Street Reading RG1 2LU
Telephone number (if any)
E-mail address (optional) Robert.Smalley@reading.gov.uk

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

- | | |
|---|-------------------------------------|
| | Please tick one or more boxes ✓ |
| 1) the prevention of crime and disorder | <input checked="" type="checkbox"/> |
| 2) public safety | <input checked="" type="checkbox"/> |
| 3) the prevention of public nuisance | <input type="checkbox"/> |
| 4) the protection of children from harm | <input checked="" type="checkbox"/> |

<p>Please state the ground(s) for review (please read guidance note 2)</p> <p>Reading Borough Council, as a responsible authority under the Licensing Act 2003 and in order to promote the licensing objectives of prevention of crime and disorder, public safety and the protection of children from harm make an application for the review of Premises Licence No. LP1001298 (attached as Appendix RS-1), for Dolphin's Caribbean Restaurant & Bar</p> <p>Reading Borough Council Licensing submit this application for review in order to address illegal working at the premises:</p> <p>On 19/02/2026 Home Office Immigration Enforcement Officers visited Dolphin's Caribbean Restaurant & Bar to conduct an immigration enforcement inspection. During this visit, an employee from Grenada with no right to work was arrested. A Civil Penalty referral was served for the Civil Penalty Team to investigate and decide if a Civil Penalty Fine will be issued.</p> <p>It is our recommendation that the only way to prevent further undermining of the promotion of the licensing objectives is for the premises licence to be revoked.</p>

Please provide as much information as possible to support the application (please read guidance note 3)

During the visit on 19/02/2026, an employee from Grenada was encountered by officers working at the rear of the kitchen, wearing similar clothing to other workers. They were carrying a plate of food. The employee stated that she does not work at the premises and was only doing work experience for 2 weeks. This meant waiting, cleaning dishes, and serving tables. The employee stated that they did not get paid and they never showed anything to prove they had the right to work in the UK.

The owner of the premises, Mr Randolph Bancroft, stated that the employee had been working and being paid for approximately 7 months. He stated that they help to make food and work 4 days a week, between 5 to 6 hours per day. He stated that they are paid between £1000 and £1250 a month and payments are made via bank transfer. Mr Bancroft explained that 'the admin team' had completed the right to work checks on said employee but was not able to provide any evidence of what checks had taken place.

The employee entered the UK on the 14/04/2022 as a tourist, they are currently awaiting decisions on matters pertaining to their immigration status. As of 20/04/2026 they do not have a right to work in the UK.

Licensing Officer's Comments

Reading Borough Council, acting as a responsible authority, submit this application to review the premises licence for Dolphin's Caribbean Restaurant & Bar with the aim to revoke the premises licence. We believe that no other powers available to the sub-committee, namely, a suspension of the premises licence, addition of conditions and the removal of the Designated Premises Supervisor are sufficient to prevent the undermining of the Licensing Objectives at this premises.

The premises is situated on St Mary's Butts, in Reading town centre, in an area which suffers high levels of anti-social behaviour including street drinking and the consumption of super strength alcohol, drug usage and other associated signal crimes such as graffiti and shoplifting/theft.

The premises currently has the benefit of a premises licence (**LP1001298**) attached as **Appendix RS-1**, that authorises the Sale of Alcohol (On the Premises), Provision of Late Night Refreshment, Provision of Live & Recorded Music, Performance of Dance and Anything similar to Live Music, Recorded Music or Dance on Monday to Sunday from 0600hrs to 2330hrs. The premises licence holder utilises the licence to operate a restaurant and bar and has held the premises licence since 20/02/2025.

It is the job of any responsible employer to ensure that the correct right to work checks are carried out. As is quite apparent, right to work checks were not being carried out at this premises.

The Immigration Act 2016 amended Section 21 of the Immigration, Asylum and Nationality Act 2006 and is the relevant legislation that deals with the employment of illegal workers. It states:

1) A person commits an offence if he employs another ("the employee") knowing that the employee is [disqualified from employment by reason of the employee's immigration status].

(1A) A person commits an offence if the person—

(a) employs another person ("the employee") who is disqualified from employment by reason of the employee's immigration status, and

(b) has reasonable cause to believe that the employee is disqualified from employment by reason of the employee's immigration status.

(1B) For the purposes of subsections (1) and (1A) a person is disqualified from employment by reason of the person's immigration status if the person is an adult subject to immigration control and—

(a) the person has not been granted leave to enter or remain in the United Kingdom, or

(b) the person's leave to enter or remain in the United Kingdom—

(i) is invalid,

(ii) has ceased to have effect (whether by reason of curtailment, revocation, cancellation, passage of time or otherwise), or

(iii) is subject to a condition preventing the person from accepting the employment.]

(2) A person guilty of an offence under this section shall be liable—

(a) on conviction on indictment—

(i) to imprisonment for a term not exceeding [five] years,

(ii) to a fine, or

(iii) to both

The offence of employing illegal workers is a relevant offence in the Licensing Act 2003. The Licensing Act 2003 Guidance at 11.27 and 11.28 states that

the employment of illegal workers is to be regarded as a crime that should be taken particularly seriously and that revocation of the premises licence – even in the first instance – should be seriously considered. The licence holder is undermining the crime and disorder licensing objective as well as failing to ensure that the people he employs are legally in the country or entitled to work.

There are potentially numerous other criminal offences which may apply to the employment of illegal workers, and these are summarised as follows:

1. The exploitation of illegal workers by unscrupulous employers means that the only person who benefits from their employment is the licence holder through financial gain.
2. Illegal workers – being in the country illegally or working illegally – are unable to declare themselves to the authorities and seek public assistance should they require it.
3. Illegal workers are often paid ‘off the record’ by the employer meaning that the correct tax and national insurance deductions are not taken into account or declared to HMRC. This would be contrary to the Fraud Act 2006.
4. People who are living in the UK or who are working illegally are often not paid anything close to the Minimum wage which is illegal and again only benefits the employer financially.
5. Illegal workers – because of being deliberately underpaid by unscrupulous employers – are often only provided with the most basic accommodation and standard of living which is often linked to their continued employment at a licensed premises.
6. Illegal entrants into the country will not have been subject to the usual immigration checks and health screenings. This could seriously impact on public protection and the health and wellbeing of the general public as a whole. This could be particularly pertinent if the illegal entrant has arrived from a country with health issues and the employer has then decided to employ that person in a kitchen or other function where food is served to the public
7. The employment of illegal workers is often done at the expense of people who are living and working in the country legally and is only done to financially benefit the licence holder and to undercut legitimate, law abiding competitors.
8. Illegal entrants – who have not undergone appropriate checks or immigration clearance at the border – could be being unwittingly employed by

the licence holder despite them having current or previous criminal convictions which may endanger the public.

Licensing team's interactions with the premises:

The premises licence holder has, so far in 2026, regularly given Temporary Event Notices (TENs) to extend licensable activities to 0300hrs. There have been 9 such notices out of an annual limit of 15 submitted so far. One such notice was for an event held from 1200hrs on 31/01/2026 to 0300hrs on 01/02/2026. At 0310hrs on 01/02/2026 two Reading Borough Council Licensing Enforcement Officers were on patrol on St Mary's Butts when they walked passed Dolphin's Caribbean Restaurant and Bar. They were aware from earlier in the evening that the premises was operating under a TEN. At the time of their visit, the premises remained open, with lights on, music playing, and the venue still full of patrons. As can be seen at **Appendix RS-2**, the premises didn't close its doors until 0318hrs, with security leaving in a vehicle at 0325hrs, despite 50-60 patrons remaining outside the venue, following no attempt by security or the premises staff to disperse or otherwise manage their customers once they were outside the premises. At 0340hrs there were still approximately 30 patrons outside the premises.

On 03/04/2026 two Reading Borough Council Licensing Enforcement Officers were on patrol in Reading Town Centre and they spoke to the door supervisors at this premises and noted the following: Door supervisors not wearing high-vis tabards, not using Body Worn Cameras, 1 door supervisor not wearing his SIA badge, when officers requested that he wear his badge, the door supervisor left the premises. The head door supervisor did not know the name of the door supervisor that had just left and the door safe logbook was not fully completed. This raises concerns that the premises is hiring door supervisors that are not licensed by the SIA, which is an offence under section 136 of the Licensing Act 2003 and an offence under section 3 of Private Security Industry Act 2001.

On 15/04/2026, a Reading Borough Council Licensing Enforcement Officer conducted a premises licence inspection of this premises. As can be seen at **Appendix RS-3**, the premises was non-compliant with 11 of their 16 conditions. The areas of non-compliance include lack of staff training records, lack of an incident recording book, lack of refusal register, failure of door supervisors to wear high-vis jackets/tabards and to record their SIA numbers in the door safe logbook, failure of door supervisors to use Body Worn Cameras and having no written policy on closure and dispersal. This was a poor inspection and indicative of a premises licence holder that is unable to operate within the requirements of their licence conditions which were appropriately and proportionately attached to the licence, with his agreement,

in order to promote the 4 licensing objectives.

The approach of the Licensing Team:

The Responsible Authorities named in the Licensing Act 2003 must ensure that the licensing objectives are all actively promoted to prevent crime and disorder, prevent public nuisance, protect children from harm and ensure public safety. All four licensing objectives are of equal importance.

The Council's Statement of Licensing Policy (2023):

Immigration Act 2016

3.4 Section 36 and Schedule 4 of the Immigration Act 2016 amended the Licensing Act 2003 and made Home Office Immigration Enforcement a Responsible Authority concerned with the licensing objective of prevention of crime and disorder. They will exercise their power both in respect of being a consultee on new licence applications and having right of entry to licensed premises with a view to seeing whether an offence under any of the Immigration Acts is being committed on a licensed premises. This will primarily involve the detection and prevention of illegal working on premises that have an alcohol licence or a late night refreshment licence. The offence of employing people at a licensed premises who have no right to work in the UK is also now listed in the Secretary of State's guidance under Section 11.27 which covers criminal activity deemed to be particularly serious and where a licensing authority should consider revoking a premises licence even in the first instance. This Act clearly supports and actively promotes the licensing objective of preventing crime and disorder and the licensing authority will work with colleagues in the Immigration service and Thames Valley Police to enforce this.

5.13 Any premises that has a premises licence or club premises certificate may have that licence reviewed by any of the named Responsible authorities – including the Licensing Authority in its role as a Responsible Authority. Thames Valley Police may also submit a Summary Review if there is a premises associated with serious crime and disorder. When the Licensing Authority instigates a review it will ensure that there is a clear separation of functions between the officer acting as the licensing authority and the officer acting as a responsible authority.

9.1 It is the responsibility under the Act for all responsible authorities; licence holders and prospective licence holders to actively promote the four licensing objectives. The Council along with partner agencies, has a wider

responsibility to protect the public as a whole and prevent crime, harm or nuisance from taking place.

9.2 The Authority will carry out its licensing functions with a view to actively promoting the licensing objectives and maintaining public safety. This applies to the dual role the licensing authority has both as the administrator of the process and as a responsible authority.

9.3 The Licensing Authority has previously and will continue to work with other responsible authorities and partner agencies in order to ensure that the licensing objectives are promoted and that a consistent and joined up approach is taken to enforcement across Reading.

9.4 Reading Borough Council and Thames Valley Police work in partnership when carrying out work that involves licensed premises and any matter that undermines the licensing objectives. The Authority and Thames Valley Police also work in partnership with colleagues in the Home Office Immigration Enforcement team and Trading Standards on a variety of issues including the prevention and detection of illegal working in licensed premises and issues surrounding super strength alcoholic products and responsible alcohol retailing.

Enforcement Approach

9.14 Licence holders should be aware that some criminal activity on licensed premises is considered to be of such seriousness to warrant a licence being reviewed straight away. There is certain criminal activity stated within the Secretary of State's Guidance that should be taken particularly seriously and where revocation of a licence, even in the first instance, should be seriously considered. This can include the sale or storage of smuggled alcohol or cigarettes on a licensed premises; the employment of an illegal worker at a licensed premises and the use of a licensed premises to sell or distribute drugs and weapons. Clearly if a premises is found to be committing such serious offences, then the premises and licence holder is severely undermining the licensing objectives. It is likely, under such circumstances, that a licence review will be initiated by the Authority or colleagues within Thames Valley Police, Home Office Immigration Enforcement or the relevant responsible authority with a view to having the licence revoked.

9.15 Licensed premises that have a history of non-compliance over a period of months and years and/or incidents of serious crime taking place at that premises, will likely find that the Authority will initiate a review with a view to asking for the licence to be considered for revocation.

9.16 When considering what enforcement action to take, the Authority will always consider what is the most appropriate and proportionate step to promote the licensing objectives. The Authority is not required to wait for offences to occur before deciding it needs to take appropriate action. Case law – notably *East Lindsey District Council v Abu Hanif* – states that the promotion of the licensing objectives requires a prospective consideration of what is warranted in the public interest having regard to the twin considerations of prevention and deterrence. Similarly, the Secretary of State’s Guidance to the Licensing Act makes clear that there is no requirement for the Authority to wait for the outcome of any criminal proceedings before it initiates any enforcement action. This is the approach that the Authority will take when considering what, if any, action should be taken when condition breaches and other criminal activity is found at licensed premises.

Secretary of State’s Guidance (February 2026)

Licensing Objectives and Aims:

1.2 The legislation provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken.

1.3 The licensing objectives are:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

1.4 Each objective is of equal importance. There are no other statutory licensing objectives, so that the promotion of the four objectives is a paramount consideration at all times.

1.5 However, the legislation also supports a number of other key aims and purposes. These are vitally important and should be principal aims for everyone involved in licensing work. They include:

- protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed premises.

Home Office Immigration Enforcement acting as a responsible authority

9.25 The Immigration Act 2016 made the Secretary of State a responsible authority in respect of premises licensed to sell alcohol or late night

refreshment with effect from 6 April 2017. In effect this conveys the role of responsible authority to Home Office Immigration Enforcement who exercises the powers on the Secretary of State's behalf. When Immigration Enforcement exercises its powers as a responsible authority it will do so in respect of the prevention of crime and disorder licensing objective because it is concerned with the prevention of illegal working or immigration offences more broadly.

9.38 In determining the application with a view to promoting the licensing objectives in the overall interests of the local community, the licensing authority must give appropriate weight to:

- the steps that are appropriate to promote the licensing objectives.
- the representations (including supporting information) presented by all the parties.
- this Guidance.
- its own statement of licensing policy.

9.39 The licensing authority should give its decision within five working days of the conclusion of the hearing (or immediately in certain specified cases) and provide reasons to support it. This will be important if there is an appeal by any of the parties. Notification of a decision must be accompanied by information on the right of the party to appeal.

Determining actions that are appropriate for the promotion of the licensing objectives

9.42 Licensing authorities are best placed to determine what actions are appropriate for the promotion of the licensing objectives in their areas. All licensing determinations should be considered on a case-by-case basis. They should take into account any representations or objections that have been received from responsible authorities or other persons, and representations made by the applicant or premises user as the case may be.

9.43 The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.

Reviews arising in connection with crime

11.24 A number of reviews may arise in connection with crime that is not directly connected with licensable activities. For example, reviews may arise because of drugs problems at the premises, money laundering by criminal gangs, the sale of contraband or stolen goods, the sale of firearms, or the sexual exploitation of children. Licensing authorities do not have the power to

judge the criminality or otherwise of any issue. This is a matter for the courts. The licensing authority's role when determining such a review is not therefore to establish the guilt or innocence of any individual but to ensure the promotion of the crime prevention objective.

11.25 Reviews are part of the regulatory process introduced by the 2003 Act and they are not part of criminal law and procedure. There is, therefore, no reason why representations giving rise to a review of a premises licence need be delayed pending the outcome of any criminal proceedings. Some reviews will arise after the conviction in the criminal courts of certain individuals, but not all. In any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives. Where a review follows a conviction, it would also not be for the licensing authority to attempt to go beyond any finding by the courts, which should be treated as a matter of undisputed evidence before them.

11.26 Where the licensing authority is conducting a review on the grounds that the premises have been used for criminal purposes, its role is solely to determine what steps should be taken in connection with the premises licence for the promotion of the crime prevention objective. It is important to recognise that certain criminal activity or associated problems may be taking place or have taken place despite the best efforts of the licence holder and the staff working at the premises and despite full compliance with the conditions attached to the licence. In such circumstances, the licensing authority is still empowered to take any appropriate steps to remedy the problems. The licensing authority's duty is to take steps with a view to the promotion of the licensing objectives and the prevention of illegal working in the interests of the wider community and not those of the individual licence holder.

11.27 There is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of the licensed premises:

- for employing a person who is disqualified from that work by reason of their immigration status in the UK;

11.28 It is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence – even in the first instance – should be seriously considered.

Summary of Representation:

Reading Borough Council Licensing appreciates the serious nature of the offence of employing an individual with no right to work in the UK that took place at this premises and also appreciates that this warrants a serious response from the Licensing Authority. This offence has a major knock-on effect to other businesses and people who are the victims of such crime. Hiring illegal workers not only gives the premises an unfair commercial advantage, it also exploits those that are illegally working. We consider this offence serious enough to warrant revocation in the first instance and we do not consider any other power available to the sub-committee as appropriate to prevent this offence from reoccurring.

We appreciate that the determination of this review is solely down to those members of the sub-committee at the hearing, however, we respectfully provide the following breakdown of the powers available to the sub-committee, each accompanied by an explanation as to whether we consider the power appropriate or not to address the current undermining of the licensing objectives:

- **the modification of the conditions of the premises licence;**

We do not consider the addition or amending of the conditions attached to the licence to be a pragmatic solution due to the serious nature of the offence committed at this premises. It is considered likely that, if the premises continues to be licensed, the premises licence holder will continue to undermine the prevention of crime and disorder licensing objective.

- **the exclusion of a licensable activity from the scope of the licence;**

We do not consider that any particular licensable activity contained on the licence is the cause for the licensing objectives being undermined, and, therefore, we do not consider this power relevant in this case.

- **Revocation of the licence;**

For the previously stated reasons, we believe this is the only way to prevent further undermining of the licensing objectives.

- **the suspension of the licence for a period not exceeding 3 months;**

We do not believe that this option would serve as anything other than a punitive measure with the premises likely to return to how it currently operates at the end of the suspension period.

- **the removal of the designated premises supervisor;**

This premises is a relatively small, independently run business. To simply remove the current Designated Premises Supervisor, who is also the premises licence holder. only for another person to be named as the Designated Premises Supervisor will not result in any substantial change to how the premises is operated, when considering that any new Designated Premises Supervisor will be under the direct control of the premises licence holder. See 11.22 of the Secretary of State's section 182 guidance.

Relevant Case law for consideration

East Lindsey District Council v Abu Hanif (t/a Zara's Restaurant) (2016) this underpins the principles widely acknowledged within the Licensing Act 2003 that the licensing objectives are prospective, and that the prevention of crime and disorder requires a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence.

R (on application of Daniel Thwaites plc) v Wirral Magistrates' Court and Others (2008) EWHC 838 (Admin) The case recognises that Responsible Authorities are experts in their fields, and that weight should be attached to their representations.

Appendices:

Appendix RS-1 – Current Premises Licence

Appendix RS-2 – Premises Report Form

Appendix RS-3 – Premises Inspection Results Letter

Please tick ✓ yes

Have you made an application for review relating to the premises before

If yes please state the date of that application

Day Month Year

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If you have made representations before relating to the premises please state what they were and when you made them

Please tick ✓ yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

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

Part 3 – Signatures (please read guidance note 4)

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

Signature 
.....

Date **22/04/2026**
.....

Capacity **Senior Licensing Enforcement Officer**
.....

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 6)	
Post town	Post Code
Telephone number (if any)	
If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)	

Notes for Guidance

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

LICENSING ACT 2003 PREMISES LICENCE - PART A

Reading Borough Council being the Licensing Authority under the above Act,
HEREBY GRANT a **PREMISES LICENCE** as detailed in this licence.

Premises Licence Number	LP1001298
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Premises Details

Trading name of Premises and Address

Dolphin's Caribbean Restaurant/Bar
59 - 60 St Mary's Butts
Reading
RG1 2LG

Where the Licence is time limited the dates the Licence is valid

N/A

Licensable Activities

Licensable Activities authorised by the Licence

Sale of Alcohol - On the Premises
Provision of Late Night refreshments - Indoors
Provision of Live Music - Indoors
Performance of Dance - Indoors
Provision of recorded Music - Indoors
Anything similar to Live music, recorded music or dance - Indoors

Authorised Hours for Licensable Activities

The times the licence authorises the carrying out of licensable activities

Hours for the Sale of Alcohol

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Hours for Late Night Refreshments

Monday from 2300hrs until 2330hrs
Tuesday from 2300hrs until 2330hrs
Wednesday from 2300hrs until 2330hrs
Thursday from 2300hrs until 2330hrs
Friday from 2300hrs until 2330hrs
Saturday from 2300hrs until 2330hrs
Sunday from 2300hrs until 2330hrs

Hours for Live Music

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Hours for Recorded Music

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Hours for anything similar to Live, Recorded Music or Dance

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Opening Hours**Hours the Premises is Open to the Public**

Monday from 0600hrs until 2400hrs
Tuesday from 0600hrs until 2400hrs
Wednesday from 0600hrs until 2400hrs
Thursday from 0600hrs until 2400hrs
Friday from 0600hrs until 2400hrs
Saturday from 0600hrs until 2400hrs
Sunday from 0600hrs until 2400hrs

Alcohol

Where the licence authorises supplies of alcohol whether these are on and/or off supplies

On the Premises

Premises Licence Holder

Name, (registered) address of holder of premises licence

Name: Dolphin's Caribbean Cuisine Ltd
Address: [REDACTED]

Registered number of holders, for example company number or charity number [where applicable]

12430730

Additional Details

Name, address and telephone number of designated premises supervisor where the premises licence authorises the supply of alcohol

Name: Randolph Bancroft

Address: [REDACTED]

Designated Premises Supervisor

Personal Licence number and issuing authority of personal licence held by the designated premises supervisor where the premises licence authorises the supply of alcohol

Personal Licence Number: LP2002707

Issuing Authority: Reading Borough Council

This Licence shall continue in force from **04/04/2025** unless previously suspended or revoked.

Dated: 07/04/2025

Signed on behalf of the issuing licensing authority



Emma Gee
Acting Executive Director for Economic Growth and Neighbourhood Services

Mandatory Conditions

Supply of Alcohol

To be applied where a premises licence authorises the supply of alcohol

- 1 No supply of alcohol may be made under the premises licence:-
 - a) at a time when there is no designated premises supervisor in respect of the premises licence, or
 - b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended
- 2 Every supply of alcohol made under the premises licence must be made or authorised by a person who holds a personal licence.

Film Exhibitions

To be applied only where a premises licence or club premises certificate authorises the exhibitions of films

- 1 The admission of children to any exhibition of any film must be restricted in accordance with section 20 of Part 3 of the Licensing Act 2003.
- 2 In the case of films which have been classified by the British Board of Film Classification admission of children to films must be restricted in accordance with that classification.
- 3 In the case of films which have not been classified by the British Board of Film Classification, admission of children must be restricted in accordance with any recommendation made by the Licensing Authority.

Door Supervisors

To be applied where a premises licence or club premises certificate includes a condition that any person must be at the premises to carry out a security activity. [Except premises with a premises licence authorising only plays or films or premises used exclusively by a club].

- 1 Each individual present at the licensed premises to carry out a security activity must be licensed by the Security Industry Authority.

Responsible Drink Promotions (commencement date 01/10/2014)

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

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

(a) games or other activities which require or encourage, or are designed to require or encourage, individuals to—

(i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or

(ii) drink as much alcohol as possible (whether within a time limit or otherwise);

(b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;

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

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

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

Supply of Tap Water (commencement date 01/10/2014)

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

Age Verification Policy (commencement 01/10/2014)

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

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

3. The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—

(a) a holographic mark, or

(b) an ultraviolet feature.

Drink Measurements (commencement date 01/10/2014)

1. The responsible person must ensure that—

(a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures—

(i) beer or cider: ½ pint;

(ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and

(iii) still wine in a glass: 125 ml;

(b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and

(c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.”

Minimum Permitted Pricing (commencement 28th May 2014)

1. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

2. For the purposes of the condition set out in paragraph 1—

(a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;

(b) “permitted price” is the price found by applying the formula—

$$P = D + (D \times V)$$

where—

(i) P is the permitted price,

(ii) D is the rate of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and

(iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence—

(i) the holder of the premises licence,

(ii) the designated premises supervisor (if any) in respect of such a licence, or

(iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994

3. Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from the paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.

4. (2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

Conditions Consistent with the Operating Schedule

1. The premises licence holder shall ensure the premises' digitally recorded CCTV system cameras shall continually record whilst the premises are open to the public and recordings shall be kept for a minimum of 31 days with time and date stamping. The entire licensable area shall be covered by the CCTV. There shall be at least one camera positioned at each entry and exit point to monitor any external areas to the premises. This includes any areas designated for tables and chairs and/or a designated smoking area. Data recordings shall be made immediately available to an authorised officer of Thames Valley Police or Reading Borough Council together with facilities for viewing upon request subject to the provisions of the Data Protection Act and GDPR legislation. Recorded images shall be of such quality as to be able to identify the recorded person in any light. At least one member of staff on the premises at any time during operating hours shall be trained to access and download material from the CCTV system.

2. Signage advising customers that CCTV is in use shall be positioned in prominent positions.

3. The premises shall at all times operate a Challenge 25 policy to prevent any customers who attempt to purchase alcohol and who appear to the staff member to be under the age of 25 years from making such a purchase without having first provided identification. Only a valid driver's licence showing a photograph of the person, a valid passport, military ID or proof of age card showing the 'Pass' hologram (or any other nationally accredited scheme) are to be accepted as identification.

4. Posters advertising the premises' Challenge 25 age verification policy shall be displayed in prominent positions on the premises.

5. Staff employed to sell alcohol shall undergo training upon induction before they are allowed to sell alcohol. This shall include, but not be limited to:-

- The premises age verification policy
- Dealing with refusal of sales
- Proxy purchasing
- Recognising valid identity documents not in the English language
- Identifying attempts by intoxicated persons to purchase alcohol
- Identifying signs of intoxication
- Conflict management
- How to identify and safeguard vulnerable persons who attend and leave the premises
- Drug Policy, substance awareness and effects
- Four licensing objectives

a. In-house refresher training shall be provided every 12 (twelve) months.

b. Induction and refresher training records are to be kept for a minimum of 2 (Two) years of the date of training and made available for inspection by a Police Officer or authorised officer of Reading Borough Council upon request.

6. An incident book/register shall be maintained to record all incidents of crime and disorder occurring at the premises. The register shall record a description of the incident, a description of any persons involved in the incident, the person recording the incident and details of whether the police were called. This book/register shall be available to an authorised officer of Reading Borough Council or Thames valley Police officer upon request. A weekly review of the refusals book/register shall also be carried out and signed off by the Designated Premises Supervisor or their nominated representative.

7. An refusal book/register shall be maintained to record all incidents where the sale of alcohol is refused. The register/ book shall record a description of the any persons attempting to purchase alcohol, the reason for the refusal and the person recording the refusal. This book/register shall be available for inspection to an authorised officer of Reading Borough Council or Thames Valley Police upon request. A weekly review of the refusals book/register shall also be carried out and signed off by the Designated Premises Supervisor or their nominated representative.

8. A current written authorisation list shall be displayed in a prominent position on the premises confirming the details of all current staff that have been authorised to sell alcohol by a Personal Licence Holder. The authorisation list shall include, the name of the staff member authorised, the name and personal licence details of the person authorising them to sell alcohol. This list shall also contain the date and signature of the staff member authorised and countersigned by the authorising Personal Licence Holder.

9. The need for door supervisors to possibly be employed on any day when the premises is operating, shall be risk assessed. A written risk assessment for every day shall be carried out by the DPS or nominated representative and produced upon request to authorised officers of Reading Borough Council and Thames Valley Police.

10. The Premises Licence Holder (PLH) shall ensure that all door supervisors whilst employed at the premises shall wear hi visibility jackets/ tabards in bright green, yellow or orange in order that they can be clearly visible and identifiable at all times to the public. When tabards are worn, hi visibility armbands must also be worn that incorporate displaying SIA badges. If hi visibility full sleeved jackets are worn the PLH must ensure that all door supervisor's badges are also displayed via an easily visible arm band of a different hi visibility colour to the jacket that is being worn.

11. The Premises Licence Holder shall keep and maintain a register of door supervisors. The register will show the following details:

- The name and registration number of all door supervisors working at the premises.
- SIA registration number
- Date and time that the door supervisor commenced duty, countersigned by the DPS or duty manager.
- Any incident of crime and disorder must be recorded giving names of the door supervisors involved.
- Date and time the door supervisor finished work, countersigned by the DPS or duty manager.
- A record will be kept on site of all SIA checks, on the validity of all door staff licences. These checks shall be at a minimum interval of once a month.

- The door supervisor register must be kept at the premises and be made available for inspection to an officer of Thames Valley police or an authorised officer from Reading Borough Council.

12. All Door Supervisors employed at the premises will be deployed with digitally recording Body Worn Video (BWV). The BWV will be used to record all incidents which occur inside or outside of the premises involving customers, prospective customers or any staff member that impact on any of the four licensing objectives. Cameras shall continually record from when the Door Supervisor commences their duties until the premises is closed to the public. Data recordings shall be made immediately available to an authorised officer of Thames Valley Police or an officer from the Reading Borough Council together with facilities for viewing upon request, subject to the provisions of the Data Protection Act.

13. The total number of patrons permitted on the premises shall be risk assessed, this will include the capacity for the basement bar area and the restaurant area. The risk assessment will be in a written format and said risk assessment shall be produced to authorised officers of Reading Borough Council and Thames Valley Police upon request.

14. The premises licence holder shall ensure there is a written risk assessment for any special events including but not limited to; sporting fixtures, birthdays parties and any Temporary Event Notices.

15. A closure and dispersal policy for controlling the closing of the premises and the departure of customers from the premises at the conclusion of licensed activities shall be put in place and shall be actively operated. At the end of licensable activities, staff - including door staff - shall be available to disperse customers away from the premises in line with the dispersal policy. The policy shall be in written format and made available upon request to an authorised officer of Reading Borough Council and Thames Valley Police.

16. The licensee shall participate in any Pub Watch or equivalent scheme if such a scheme is operative.

Conditions attached after a hearing by the Licensing Authority


n/a

Annex 4

Plans

As attached plan no. submitted on 20.01.2025

Premises Report

Premises Name	Dolphin's Caribbean Restaurant And Bar
Licence Number	LP1001298
Date	01 February 2026
Officer	Mike Harding and Ben Williams
<p>At 03:10 on 01 February 2026, Ben Williams and I were on patrol on St Mary's Butts when we passed Dolphin's Caribbean Restaurant and Bar. We were aware from earlier in the evening that the premises was operating under a Temporary Event Notice (TEN), with extended opening and licensable activities due to cease at 03:00. At the time of our visit, the premises remained open, with lights on, music playing, and the venue still full of patrons.</p> <p>We spoke with the head door supervisor, Malik, who had earlier stated that he was running the event. He advised that the premises was in the process of closing. The door supervisor entered the premises and the music was stopped. However, the DJ continued speaking via a microphone. Over the following minutes, patrons began to exit the premises. At 03:18, the premises doors were closed.</p> <p>By this time, the premises had mostly emptied, with large groups of patrons congregating on the pavement and some in the road. There was shouting and a general noise nuisance.</p> <p>At 03:25, we observed security staff leave the premises, enter a vehicle, and drive away, leaving approximately 50–60 patrons outside the venue. No dispersal or management of customers was undertaken by security or premises staff.</p> <p>At 03:40, when we left the area, approximately 30 patrons remained on the pavement outside the premises.</p>	
Signed:	
	
Mike Harding, Licensing Enforcement Officer.	



Dolphin's Caribbean Restaurant/Bar
59 - 60 St Mary's Butts
Reading
RG1 2LG

Emma Gee
Director of Environment and
Neighbourhood Services

Civic Offices, Bridge St, Reading, RG1
2LU

Our Ref: PR202604-1188991

e-mail: [REDACTED]

Date: 15th April 2026

Your contact is:

Ben Williams, Licensing - Regulatory Services

Good Afternoon,

Licensing Act 2003

Premises Name: Dolphin's Caribbean Restaurant/Bar

Premises Address: 59 - 60 St Mary's Butts, Reading, RG1 2LG

On 15th April 2026, I visited your premises with my colleague Mike Harding to ensure you are complying with the above premises licence and to advise on any matters that may arise during the inspection.

During the inspection, I found the following issues:

Conditions agreed with licensing:

- Condition 5b on page 8 of your licence states "Induction and refresher training records are to be kept for a minimum of 2 (Two) years of the date of training and made available for inspection by a Police Officer or authorised officer of Reading Borough Council upon request." **You informed me that the training is all verbal and there are no records of this, please ensure you rectify this.**
- Condition 6 on page 9 of your licence states "An incident book/register shall be maintained to record all incidents of crime and disorder occurring at the premises. The register shall record a description of the incident, a description of any persons involved in the incident, the person recording the incident and details of whether the police were called. This book/register shall be available to an authorised officer of Reading Borough Council or Thames valley Police officer upon request. A weekly review of the refusals book/register shall also be carried out and signed off by the Designated Premises Supervisor or their nominated representative." **You were unable to produce an incident book/register, please rectify this.**
- Condition 7 on page 9 of your licence states "An refusal book/register shall be maintained to record all incidents where the sale of alcohol is refused. The register/ book shall record a description of the any persons attempting to purchase alcohol, the reason for the refusal and the person recording the refusal. This book/register shall be available for inspection to an authorised officer of Reading Borough Council or Thames Valley

Police upon request. A weekly review of the refusals book/register shall also be carried out and signed off by the Designated Premises Supervisor or their nominated representative.” **You were unable to produce an refusals book/register, please rectify this.**

- Condition 8 on page 9 of your licence states “A current written authorisation list shall be displayed in a prominent position on the premises confirming the details of all current staff that have been authorised to sell alcohol by a Personal Licence Holder. The authorisation list shall include, the name of the staff member authorised, the name and personal licence details of the person authorising them to sell alcohol. This list shall also contain the date and signature of the staff member authorised and countersigned by the authorising Personal Licence Holder.” **No authorisation list was in place, please rectify this.**
- Condition 9 on page 9 of your licence states “The need for door supervisors to possibly be employed on any day when the premises is operating, shall be risk assessed. A written risk assessment for every day shall be carried out by the DPS or nominated representative and produced upon request to authorised officers of Reading Borough Council and Thames Valley Police.” **No risk assessment was in place, please rectify this.**
- Condition 10 of your licence states “The Premises Licence Holder (PLH) shall ensure that all door supervisors whilst employed at the premises shall wear hi visibility jackets/ tabards in bright green, yellow or orange in order that they can be clearly visible and identifiable at all times to the public. When tabards are worn, hi visibility armbands must also be worn that incorporate displaying SIA badges. If hi visibility full sleeved jackets are worn the PLH must ensure that all door supervisor’s badges are also displayed via an easily visible arm band of a different hi visibility colour to the jacket that is being worn.” **It was noted on 3rd April doorstaff at the premises were witnessed by licensing officers not wearing hi-vis and one member of doorstaff did not have his badge, he was asked for his badge and he then left without providing it. Please ensure this does not occur again.**
- Condition 11 on page 9 of your licence states “The Premises Licence Holder shall keep and maintain a register of door supervisors. The register will show the following details:
 - The name and registration number of all door supervisors working at the premises.
 - SIA registration number
 - Date and time that the door supervisor commenced duty, countersigned by the DPS or duty manager.
 - Any incident of crime and disorder must be recorded giving names of the door supervisors involved.
 - Date and time the door supervisor finished work, countersigned by the DPS or duty manager.
 - A record will be kept on site of all SIA checks, on the validity of all door staff licences. These checks shall be at a minimum interval of once a month.
 - The door supervisor register must be kept at the premises and be made available for inspection to an officer of Thames Valley police or an authorised officer from Reading Borough Council.” **Full details of sia badge numbers were not included in the register, it is also noted that on 3rd April 2026 doorstaff removed a group from the premises and this is not noted in the register, Please ensure this does not occur again.**
- Condition 12 on page 10 of your licence states “All Door Supervisors employed at the premises will be deployed with digitally recording Body Worn Video (BWV). The BWV will be used to record all incidents which occur inside or outside of the premises involving customers, prospective customers or any staff member that impact on any of the four

licensing objectives. Cameras shall continually record from when the Door Supervisor commences their duties until the premises is closed to the public. Data recordings shall be made immediately available to an authorised officer of Thames Valley Police or an officer from the Reading Borough Council together with facilities for viewing upon request, subject to the provisions of the Data Protection Act.” **It is noted that on 3rd April all door staff were not wearing BWV Cameras. It is further noted that you stated the footage from and cameras is not given to the premises unless something occurs, you are required to keep this footage yourselves for immediate viewing by TVP or an authorised officer of RBC therefore you must ensure all footage is kept by yourselves.**

- Condition 13 on page 10 of your licence states “The total number of patrons permitted on the premises shall be risk assessed, this will include the capacity for the basement bar area and the restaurant area. The risk assessment will be in a written format and said risk assessment shall be produced to authorised officers of Reading Borough Council and Thames Valley Police upon request.” **You did not have a risk assessment for this in place, please rectify this.**
- Condition 14 on page 10 of your licence states “The premises licence holder shall ensure there is a written risk assessment for any special events including but not limited to; sporting fixtures, birthdays parties and any Temporary Event Notices.” **You did not have a specific risk assessment for the previous event you conducted, please ensure you comply with this moving forward.**
- Condition 15 on page 10 of your licence states “A closure and dispersal policy for controlling the closing of the premises and the departure of customers from the premises at the conclusion of licensed activities shall be put in place and shall be actively operated. At the end of licensable activities, staff - including door staff - shall be available to disperse customers away from the premises in line with the dispersal policy. The policy shall be in written format and made available upon request to an authorised officer of Reading Borough Council and Thames Valley Police.” **You did not have such a policy written down, please rectify this.**

Other:

- The fire exit route was obstructed by a number of objects, please ensure this area is kept clear.



Whilst we consider what, if any, further action to take in respect of the findings detailed in this letter, please rectify all of the above within 28 days. Once you believe all of the above has been rectified, please contact Ben Williams so that we can arrange a re-inspection.

If you have any questions please contact me on the email above.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ben Williams', with a long horizontal line extending to the right.

Ben Williams
Licensing & Enforcement Officer

LICENSING ACT 2003 PREMISES LICENCE - PART A

Reading Borough Council being the Licensing Authority under the above Act,
HEREBY GRANT a **PREMISES LICENCE** as detailed in this licence.

Premises Licence Number	LP1001298
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Premises Details

Trading name of Premises and Address

Dolphin's Caribbean Restaurant/Bar
59 - 60 St Mary's Butts
Reading
RG1 2LG

Where the Licence is time limited the dates the Licence is valid

N/A

Licensable Activities

Licensable Activities authorised by the Licence

Sale of Alcohol - On the Premises
Provision of Late Night refreshments - Indoors
Provision of Live Music - Indoors
Performance of Dance - Indoors
Provision of recorded Music - Indoors
Anything similar to Live music, recorded music or dance - Indoors

Authorised Hours for Licensable Activities

The times the licence authorises the carrying out of licensable activities

Hours for the Sale of Alcohol

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Hours for Late Night Refreshments

Monday from 2300hrs until 2330hrs
Tuesday from 2300hrs until 2330hrs
Wednesday from 2300hrs until 2330hrs
Thursday from 2300hrs until 2330hrs
Friday from 2300hrs until 2330hrs
Saturday from 2300hrs until 2330hrs
Sunday from 2300hrs until 2330hrs

Hours for Live Music

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Hours for Recorded Music

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Hours for anything similar to Live, Recorded Music or Dance

Monday from 0600hrs until 2330hrs
Tuesday from 0600hrs until 2330hrs
Wednesday from 0600hrs until 2330hrs
Thursday from 0600hrs until 2330hrs
Friday from 0600hrs until 2330hrs
Saturday from 0600hrs until 2330hrs
Sunday from 0600hrs until 2330hrs

Opening Hours**Hours the Premises is Open to the Public**

Monday from 0600hrs until 2400hrs
Tuesday from 0600hrs until 2400hrs
Wednesday from 0600hrs until 2400hrs
Thursday from 0600hrs until 2400hrs
Friday from 0600hrs until 2400hrs
Saturday from 0600hrs until 2400hrs
Sunday from 0600hrs until 2400hrs

Alcohol

Where the licence authorises supplies of alcohol whether these are on and/or off supplies

On the Premises

Premises Licence Holder

Name, (registered) address of holder of premises licence

Name: Dolphin's Caribbean Cuisine Ltd
Address: [REDACTED]

Registered number of holders, for example company number or charity number [where applicable]

12430730

Additional Details

Name, address and telephone number of designated premises supervisor where the premises licence authorises the supply of alcohol

Name: Randolph Bancroft

Address: [REDACTED]

Designated Premises Supervisor

Personal Licence number and issuing authority of personal licence held by the designated premises supervisor where the premises licence authorises the supply of alcohol

Personal Licence Number: LP2002707

Issuing Authority: Reading Borough Council

This Licence shall continue in force from **04/04/2025** unless previously suspended or revoked.

Dated: 07/04/2025

Signed on behalf of the issuing licensing authority



Emma Gee
Acting Executive Director for Economic Growth and Neighbourhood Services

Mandatory Conditions

Supply of Alcohol

To be applied where a premises licence authorises the supply of alcohol

- 1 No supply of alcohol may be made under the premises licence:-
 - a) at a time when there is no designated premises supervisor in respect of the premises licence, or
 - b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended
- 2 Every supply of alcohol made under the premises licence must be made or authorised by a person who holds a personal licence.

Film Exhibitions

To be applied only where a premises licence or club premises certificate authorises the exhibitions of films

- 1 The admission of children to any exhibition of any film must be restricted in accordance with section 20 of Part 3 of the Licensing Act 2003.
- 2 In the case of films which have been classified by the British Board of Film Classification admission of children to films must be restricted in accordance with that classification.
- 3 In the case of films which have not been classified by the British Board of Film Classification, admission of children must be restricted in accordance with any recommendation made by the Licensing Authority.

Door Supervisors

To be applied where a premises licence or club premises certificate includes a condition that any person must be at the premises to carry out a security activity. [Except premises with a premises licence authorising only plays or films or premises used exclusively by a club].

- 1 Each individual present at the licensed premises to carry out a security activity must be licensed by the Security Industry Authority.

Responsible Drink Promotions (commencement date 01/10/2014)

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

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

(a) games or other activities which require or encourage, or are designed to require or encourage, individuals to—

(i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or

(ii) drink as much alcohol as possible (whether within a time limit or otherwise);

(b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;

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

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

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

Supply of Tap Water (commencement date 01/10/2014)

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

Age Verification Policy (commencement 01/10/2014)

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

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

3. The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—

(a) a holographic mark, or

(b) an ultraviolet feature.

Drink Measurements (commencement date 01/10/2014)

1. The responsible person must ensure that—

(a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures—

(i) beer or cider: ½ pint;

(ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and

(iii) still wine in a glass: 125 ml;

(b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and

(c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.”

Minimum Permitted Pricing (commencement 28th May 2014)

1. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

2. For the purposes of the condition set out in paragraph 1—

(a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;

(b) “permitted price” is the price found by applying the formula—

$$P = D + (D \times V)$$

where—

(i) P is the permitted price,

(ii) D is the rate of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and

(iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence—

(i) the holder of the premises licence,

(ii) the designated premises supervisor (if any) in respect of such a licence, or

(iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994

3. Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from the paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.

4. (2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

Conditions Consistent with the Operating Schedule

1. The premises licence holder shall ensure the premises' digitally recorded CCTV system cameras shall continually record whilst the premises are open to the public and recordings shall be kept for a minimum of 31 days with time and date stamping. The entire licensable area shall be covered by the CCTV. There shall be at least one camera positioned at each entry and exit point to monitor any external areas to the premises. This includes any areas designated for tables and chairs and/or a designated smoking area. Data recordings shall be made immediately available to an authorised officer of Thames Valley Police or Reading Borough Council together with facilities for viewing upon request subject to the provisions of the Data Protection Act and GDPR legislation. Recorded images shall be of such quality as to be able to identify the recorded person in any light. At least one member of staff on the premises at any time during operating hours shall be trained to access and download material from the CCTV system.

2. Signage advising customers that CCTV is in use shall be positioned in prominent positions.

3. The premises shall at all times operate a Challenge 25 policy to prevent any customers who attempt to purchase alcohol and who appear to the staff member to be under the age of 25 years from making such a purchase without having first provided identification. Only a valid driver's licence showing a photograph of the person, a valid passport, military ID or proof of age card showing the 'Pass' hologram (or any other nationally accredited scheme) are to be accepted as identification.

4. Posters advertising the premises' Challenge 25 age verification policy shall be displayed in prominent positions on the premises.

5. Staff employed to sell alcohol shall undergo training upon induction before they are allowed to sell alcohol. This shall include, but not be limited to:-

- The premises age verification policy
- Dealing with refusal of sales
- Proxy purchasing
- Recognising valid identity documents not in the English language
- Identifying attempts by intoxicated persons to purchase alcohol
- Identifying signs of intoxication
- Conflict management
- How to identify and safeguard vulnerable persons who attend and leave the premises
- Drug Policy, substance awareness and effects
- Four licensing objectives

a. In-house refresher training shall be provided every 12 (twelve) months.

b. Induction and refresher training records are to be kept for a minimum of 2 (Two) years of the date of training and made available for inspection by a Police Officer or authorised officer of Reading Borough Council upon request.

6. An incident book/register shall be maintained to record all incidents of crime and disorder occurring at the premises. The register shall record a description of the incident, a description of any persons involved in the incident, the person recording the incident and details of whether the police were called. This book/register shall be available to an authorised officer of Reading Borough Council or Thames valley Police officer upon request. A weekly review of the refusals book/register shall also be carried out and signed off by the Designated Premises Supervisor or their nominated representative.

7. An refusal book/register shall be maintained to record all incidents where the sale of alcohol is refused. The register/ book shall record a description of the any persons attempting to purchase alcohol, the reason for the refusal and the person recording the refusal. This book/register shall be available for inspection to an authorised officer of Reading Borough Council or Thames Valley Police upon request. A weekly review of the refusals book/register shall also be carried out and signed off by the Designated Premises Supervisor or their nominated representative.

8. A current written authorisation list shall be displayed in a prominent position on the premises confirming the details of all current staff that have been authorised to sell alcohol by a Personal Licence Holder. The authorisation list shall include, the name of the staff member authorised, the name and personal licence details of the person authorising them to sell alcohol. This list shall also contain the date and signature of the staff member authorised and countersigned by the authorising Personal Licence Holder.

9. The need for door supervisors to possibly be employed on any day when the premises is operating, shall be risk assessed. A written risk assessment for every day shall be carried out by the DPS or nominated representative and produced upon request to authorised officers of Reading Borough Council and Thames Valley Police.

10. The Premises Licence Holder (PLH) shall ensure that all door supervisors whilst employed at the premises shall wear hi visibility jackets/ tabards in bright green, yellow or orange in order that they can be clearly visible and identifiable at all times to the public. When tabards are worn, hi visibility armbands must also be worn that incorporate displaying SIA badges. If hi visibility full sleeved jackets are worn the PLH must ensure that all door supervisor's badges are also displayed via an easily visible arm band of a different hi visibility colour to the jacket that is being worn.

11. The Premises Licence Holder shall keep and maintain a register of door supervisors. The register will show the following details:

- The name and registration number of all door supervisors working at the premises.
- SIA registration number
- Date and time that the door supervisor commenced duty, countersigned by the DPS or duty manager.
- Any incident of crime and disorder must be recorded giving names of the door supervisors involved.
- Date and time the door supervisor finished work, countersigned by the DPS or duty manager.
- A record will be kept on site of all SIA checks, on the validity of all door staff licences. These checks shall be at a minimum interval of once a month.

- The door supervisor register must be kept at the premises and be made available for inspection to an officer of Thames Valley police or an authorised officer from Reading Borough Council.

12. All Door Supervisors employed at the premises will be deployed with digitally recording Body Worn Video (BWV). The BWV will be used to record all incidents which occur inside or outside of the premises involving customers, prospective customers or any staff member that impact on any of the four licensing objectives. Cameras shall continually record from when the Door Supervisor commences their duties until the premises is closed to the public. Data recordings shall be made immediately available to an authorised officer of Thames Valley Police or an officer from the Reading Borough Council together with facilities for viewing upon request, subject to the provisions of the Data Protection Act.

13. The total number of patrons permitted on the premises shall be risk assessed, this will include the capacity for the basement bar area and the restaurant area. The risk assessment will be in a written format and said risk assessment shall be produced to authorised officers of Reading Borough Council and Thames Valley Police upon request.

14. The premises licence holder shall ensure there is a written risk assessment for any special events including but not limited to; sporting fixtures, birthdays parties and any Temporary Event Notices.

15. A closure and dispersal policy for controlling the closing of the premises and the departure of customers from the premises at the conclusion of licensed activities shall be put in place and shall be actively operated. At the end of licensable activities, staff - including door staff - shall be available to disperse customers away from the premises in line with the dispersal policy. The policy shall be in written format and made available upon request to an authorised officer of Reading Borough Council and Thames Valley Police.

16. The licensee shall participate in any Pub Watch or equivalent scheme if such a scheme is operative.

Conditions attached after a hearing by the Licensing Authority

n/a

Annex 4

Plans

As attached plan no. submitted on 20.01.2025



Immigration Enforcement

IMMIGRATION REPRESENTATION IN SUPPORT OF AN APPLICATION FOR THE REVIEW OF A PREMISES LICENCE

On behalf of the Secretary of State, Home Office (Immigration Enforcement) makes representations in support of the following application for the review of a premises licence, relating to the prevention of crime and disorder objective, including the prevention of illegal working and immigration crime in licensed premises.

IE wishes to make representations on an application for a review of a premises licence.

Details of Premises:			
Premises Licence Holder:			
Dolphin's Caribbean Cuisine Ltd			
Name and Address of Premises:			
Dolphin's Caribbean Restaurant & Bar			
59-60, St Mary's Butts			
Post Town:	Reading	Post Code:	RG1 2LG

Representations are being made for the following reasons:

The Licensing Act 2003 outlines four objectives that are to be upheld, the Home Office (Immigration Enforcement) is concerned regarding the prevention of crime and disorder.

Home Office (Immigration Enforcement) considers that **Dolphin's Caribbean Cuisine Ltd** are not taking suitable measures to prevent crime and disorder. The business has employed an illegal worker, which is prohibited under the Licensing Act 2003 and the Immigration Act 1971 (as amended).

Employing illegal workers in the UK has the following impact on the community and society as a whole: -

- It deprives HMRC and the Government of revenue by non-payment of tax and national insurance.
- It exploits the undocumented by paying them less than the minimum wage and provides no employment or income protection.
- It encourages those without permission to work to seek similar employment.
- It allows a business to unfairly undercut other businesses by employing cheap labor.
- Illegal workers are often housed in cramped and unsatisfactory conditions by the employer as part of their working arrangement.

Immigration Enforcement supports Reading Borough Council Licensing in bringing this review application for the above premises.

On 19 February 2026, officers from South Central Immigration Compliance and Enforcement conducted a visit to Dolphin's Caribbean Restaurant & Bar. During the visit one individual suspected of being employed illegally at the premises was arrested. It was subsequently discovered that the individual did not have the right to work in the UK. A Civil Penalty Referral Notice (CPRN) was issued in relation to the illegal working which is currently under consideration.

██████████ - Worker

██████████ was encountered in the kitchen area, she was seen by officers carrying a plate of food. She was wearing similar clothing to the front of house staff.

During the illegal working interview conducted with ██████████ she claimed that she was not working at the premises but was doing "work experience", which she had been doing for two weeks. She stated that the manager Rudolph BANCROFT allowed her to do work experience at the premises. Her duties included cleaning dishes, waiting and table service. ██████████ had no fixed schedule, and the manager would ask her to come and work depending on how busy it is. ██████████ confirmed that she did not get paid as it was "work experience". She also stated that no right to work checks were conducted prior to commencing work.

Home Office records showed that ██████████ had entered the UK in April 2022 where she was permitted entry as a visitor. She had claimed for protection in April 2023 which was refused in December 2023. She appealed this refusal which was later withdrawn in December 2024. There have been no outstanding applications for leave since. ██████████ has never held the right to work in the UK.

Randolph BANCROFT - Employer Interview

BANCROFT confirmed his role in the business as both the owner and director. He stated that ██████████ had been working at the premises for approximately seven months. She worked 5 to 6 hours a day, 4 days per week preparing food. BANCROFT claimed that a business investor had brought her to the restaurant. He stated that ██████████ was paid £1,000 - £1,200 per month by bank transfer.

When questioned if the right to work checks were conducted for ██████████ he stated "My new admin team said that they had completed the check". He also stated that his admin team conducts right to work checks every 3 months. BANCROFT claimed that he was unaware ██████████ did not hold the right to work in the UK.

RIGHT TO WORK CHECKS AND THE PREVENTION OF CRIME AND DISORDER

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

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

The licensing objectives are:

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

The premises has been found with one illegal worker – who was an overstayer with no right to work. This business has failed to meet the prevention of crime and disorder objective. The licence holder would have been aware of their responsibilities to uphold the licensing objectives as they are clearly defined as part of the premises licence application. 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.

The licence holder could have protected themselves and prevented crime and disorder by completing a straightforward right to work check. Should the licence holder have attempted these checks, they would have quickly and easily confirmed that the worker did not hold the right to work.

All employers are dutybound by law to conduct these checks if they wish to avoid being penalised if found to have employed someone who is prohibited from working, 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.

The use of illegal labour provides an unfair competitive edge and deprives the UK economy of tax revenue. Illegal workers are often paid below the minimum wage (itself an offence) and National Insurance payments are not paid. A key draw for illegal immigration is work and low-skilled migrants that are increasingly vulnerable to exploitation by unlawful enterprises, finding themselves in sub-standard accommodation and toiling in poor working conditions for long hours.

Whether by negligence or willful blindness, an illegal worker was engaged in activity on the premises. Section 182 guidance of the Licensing Act 2003 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.

Details of Responsible Authority

Name and Address:

Home Office Immigration Enforcement
 Licensing Compliance Team
 6th Floor, 2 Ruskin Square
 Dingwall Road
 Croydon
 CR0 2WF

Email address
(optional):

IE.licensing.reviews@homeoffice.gov.uk

Signatures

Signature of Responsible Authority

Home Office Immigration Enforcement

Date:

29/04/2026

Capacity:

Responsible Authority

Division/Station : Reading Police Station Licensing Dept

From : C2107 Declan Smyth

To : Reading Borough Council

Ref : Dolphin's Caribbean Restaurant & Bar, 59-60 St Mary's Butts, Reading, RG1 2LG

Date :30th April 2026

Subject :

Supportive review representation

I C2107 Declan Smyth on behalf of the Chief Officer of Thames Valley Police wish to provide this representation in support of the review process relating to Dolphin's Caribbean Restaurant & Bar, 59-60 St Mary's Butts, Reading, RG1 2LG.

Thames Valley Police ("TVP"), as a Responsible Authority, makes this representation to support the application for review submitted by Reading Borough Council Licensing in respect of the above premises. TVP's representation is made with the objective of promoting the licensing objectives, in particular:

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

TVP supports the review application and requests that the Licensing Sub-Committee revoke the premises licence as the appropriate and proportionate outcome.

Summary of TVP Position

TVP considers there to be a pattern of serious non-compliance and management failings at this premises, which cumulatively demonstrates that the premises is not being operated in a manner consistent with the licensing objectives. These concerns include:

- 1) **Illegal working / immigration offence concerns** following an enforcement visit where a worker was encountered who, as of April 2026, had no right to work in the UK, and the premises management could not evidence that right-to-work checks had been undertaken.
- 2) **Failure to manage dispersal and public nuisance impacts** following a Temporary Event Notice (TEN) where the premises continued operating beyond the TEN end time and then allowed large numbers of patrons to remain outside, shouting and causing disturbance, with door staff leaving and no active dispersal.
- 3) **Door supervision/SIA compliance concerns** including door supervisors not wearing high-visibility tabards, not using body-worn video, one door

supervisor not displaying an SIA badge and leaving when challenged, and incomplete door-safe/door staff records—raising concerns about potential unlicensed door supervision and poor control measures.

- 4) **A significant level of premises licence condition failures**, with an inspection identifying **non-compliance with 11 out of 16 conditions**, including missing training records, no incident/refusal records, lack of authorisation list, missing risk assessments, and the absence of a written dispersal policy.

TVP considers these matters, both individually and collectively, to seriously undermine the licensing objectives—particularly crime and disorder and public safety—and to indicate that lesser steps (conditions, suspension, or DPS removal) would not be effective.

Evidence and Matters Relied Upon

A) Illegal Working / Crime and Disorder

TVP notes that on 19/02/2026 Home Office Immigration Enforcement attended the premises and encountered an employee who was subsequently arrested for immigration matters; the premises operator stated the individual had been working and paid for approximately 7 months, yet could not provide evidence of right-to-work checks.

The review application states that as of 20/04/2026 the individual did not have the right to work in the UK.

TVP considers this to be a serious matter engaging the prevention of crime and disorder objective. The Secretary of State's Guidance referenced within the papers highlights that employing a person disqualified from work by immigration status is a type of criminal activity to be treated particularly seriously and where revocation should be seriously considered, even in the first instance.

B) TEN Operation / Dispersal Failures / Public Safety & Disorder

TVP notes the premises' use of multiple TENs to extend licensable activities until 03:00 hours, including on 31/01/2026–01/02/2026.

A premises report describes that at 03:10 the venue was still open, with music playing and patrons inside; doors did not close until 03:18.

Large numbers then congregated outside (approximately 50–60 initially), with shouting and noise nuisance, and security staff left, with no dispersal or customer management; approximately 30 remained outside at 03:40.

TVP considers this indicative of poor management control, raising risks around public order, safeguarding, and nuisance impacts—relevant to crime and disorder, public nuisance and public safety objectives.

C) Door Supervision / SIA / BWV and Record Keeping

The papers record concerns (03/04/2026) including door staff not wearing high-visibility clothing, not using body-worn cameras, one individual not wearing an

SIA badge and leaving when asked to display it, and incomplete door safe logbook entries—raising concerns about whether only appropriately licensed door staff are used and whether basic compliance systems exist. Further, an inspection outcome letter records multiple failures against conditions relating to door staff registers, SIA badge recording, BWV usage and retention, incident recording, and dispersal policy.

TVP views failures in these key controls as strongly linked to the licensing objectives, because they undermine prevention/deterrence, effective incident response, and safe dispersal.

D) General Conditions Non-Compliance / Management Failure

A licensing inspection on 15/04/2026 recorded non-compliance with 11 of 16 conditions, including absence of staff training records, no incident book, no refusal register, lack of written authorisation list, missing risk assessments (daily and capacity), and no written dispersal policy.

TVP regards this level of non-compliance as demonstrating a persistent failure to operate in accordance with the licence and undermining confidence that the premises can be promoted into compliance by further conditions alone.

Why Revocation is Sought (Appropriate and Proportionate Step)

TVP considers that the serious nature of the concerns—particularly illegal working and the breadth of compliance failures—means that:

- Additional conditions would not be sufficient where the premise has already failed to comply with existing conditions designed to promote the licensing objectives.
- Suspension would risk the premises re-opening with the same management approach after the suspension ends, without evidence of sustainable change.
- Removal of the DPS would not necessarily address the underlying management/operational culture where the licence holder controls day-to-day operations.

TVP notes the evidence in the papers referencing case law which supports a prospective and preventative approach to the licensing objectives (including prevention and deterrence).

Given the combination of illegal working concerns and repeated operational failings, TVP submits that revocation is the only step that is appropriate and proportionate to promote the licensing objectives and protect the community.

Requested Determination

For the reasons set out above, Thames Valley Police respectfully requests that the Licensing Sub-Committee:

Revoke Premises Licence LP1001298 (Dolphin's Caribbean Restaurant & Bar).

LICENSING ACT 2003 HEARING THURSDAY 11TH JUNE 2024 AT 09:30HRS
APPLICATION FOR THE REVIEW OF A PREMISES LICENCE

1. Premises:

Reading Express
102 Oxford Road
Reading
RG1 7LL

2. Applicants Requesting Review:

Mr Anthony Chawama on behalf of Reading Borough Council

3. Grounds for review

The application is for the review of a premises licence in respect of the above-mentioned premises. The application has been submitted by Reading Borough Council, who are a named responsible authority under the Licensing Act 2003, regarding the objectives of Prevention of Crime and Disorder, Public Safety and Protection of Children from Harm.

This application for review has been submitted to address the failure of the premises licence holder to promote the licensing objectives via their insufficient measures to ensure due diligence or compliance with their licence conditions. The application is attached as **appendix NB-1**.

4. Background:

The premises is a convenience store located on the Oxford Road in Reading and currently has the benefit of a premises licence (LP2002949) since 23 January 2023. Premises operates as an off-licence between 0600hrs and 2300 hours Monday to Sunday.

The designated premises supervisor is Mr Ravindar Singh Arora.

5. Licensable activities and hours:

Reading Express is currently licenced for the following activities:

Hours for the Sale by Retail of Alcohol – off the premises

Monday	from 0600hrs until 2300hrs
Tuesday	from 0600hrs until 2300hrs
Wednesday	from 0600hrs until 2300hrs
Thursday	from 0600hrs until 2300hrs
Friday	from 0600hrs until 2300hrs
Saturday	from 0600hrs until 2300hrs
Sunday	from 0600hrs until 2300hrs

Hours the Premises is Open to the Public

Monday	from 0600hrs until 2300hrs
Tuesday	from 0600hrs until 2300hrs
Wednesday	from 0600hrs until 2300hrs

Thursday	from 0600hrs until 2300hrs
Friday	from 0600hrs until 2300hrs
Saturday	from 0600hrs until 2300hrs
Sunday	from 0600hrs until 2300hrs

6. Date of receipt of application: 28 April 2026

7. Date of closure of period for representations: 26 May 2026

8. Representations received:

During the 28-day consultation period for the application, representations were received from:

1. Mr Declan Smyth – Alcohol Licensing Officer, Thames Valley Police attached as **Appendix NB – 2.**

9. Powers of the Licensing Authority on the determination of a Review

The Licensing authority, when determining an application for the review of a premises licence may:

1. take no further action
2. issue formal warnings to the premises supervisor and/or premises licence holder
3. modify the conditions of the licence (including, but not limited to hours of operation of licensable activities)
4. exclude a licensable activity from the scope of the licence
5. remove the designated premises licence supervisor
6. suspend the licence for a period not exceeding three months
7. revoke the licence.

Where the sub-committee takes a step mentioned in 3 or 4 it may provide that the modification or exclusion is to have effect for a period not exceeding three months or permanently.

10. Licensing Objectives and Reading Borough Council’s Licensing Policy Statement

In considering representations received the Licensing Authority has a duty to carry out its functions with a view to promoting the four licensing objectives, which are as follows:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

Any decision made in relation to the premises licence should be appropriate and proportionate with a view to promoting the licensing objectives. The Licensing Authority can amend, alter, or refuse an application should it be deemed appropriate for the promotion of the licensing objectives.

In determining this application, the Licensing Authority must also have regard to the representations received, the Licensing Authority's statement of licensing policy and any relevant section of the statutory guidance to licensing authorities.

11. The Council's Licensing Policy Statement (2023):

1.5 This licensing policy aims to make Reading's night-time economy an economy for all. A diverse range of responsibly run premises are to be encouraged. The licensing authority wishes to discourage drunkenness and a move away from alcohol led vertical drinking establishments. We would expect responsibly run premises to actively promote the licensing objectives through promoting extra seating at their premises; instigating effective dispersal from their premises at the conclusion of licensable activities and engagement with the licensing authority and other responsible authorities in policies, initiatives and strategies that promote Reading as a safe, healthy, diverse and vibrant night-time economy suitable for all.

1.6 The predominantly urban nature of Reading as a town means that an appropriate balance needs to be struck between the needs of local business and the needs of local residents. This licensing policy seeks to encourage all stakeholders to engage in the licensing process so that the needs of all can be taken into account and issues dealt with in a spirit of partnership and cooperation.

2.26 Reading's night-time economy has achieved Purple Flag and Best Bar None status. These are nationally recognised schemes meaning the town has achieved a level of excellence and we would expect all licence holders and potential applicants to take cognisance of these standards and practices. The Authority and its partners shall seek to work with all stakeholders in the town to maintain these standards. The town also has a very successful and well attended Pubwatch scheme both in the town centre and in the outer areas of Reading. This scheme is supported by Thames Valley Police and Reading Borough Council and is a particularly useful forum for licence holders to share information, best practice and work in a collaborative manner so as to make the night-time economy as vibrant and safe as possible for all. The Authority would expect all prospective applicants and current licence holders to make use of their local Pubwatch scheme and engage fully in any relevant initiatives that stem from it.

3. Licensing and integration with other legislation

3.1 Many other pieces of legislation impact directly or indirectly on the licensing regime. The Licensing Authority must have regard to the following when it discharges its responsibilities under the Licensing Act 2003 and in relation to the promotion of the four licensing objectives:

Crime and Disorder Act 1998

3.2 This Act requires local authorities and other bodies to consider crime and disorder reduction. Section 17 of the Act states that it shall be the duty of each authority, to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area (including anti social and other behaviour) adversely affecting the local environment. This links specifically with the licensing objective of prevention of

crime and disorder and the licensing authority will take into account all reasonable measures that actively promote this licensing objective.

The Anti-social Behaviour, Crime and Policing Act 2014

3.3 This Act gives a wide range of powers to local authorities and the police to tackle incidents of crime, disorder and nuisance that may be impacting on residents. The Act introduced public spaces protection orders which allows the local authority to designate areas in the borough where anti-social behaviour such as street drinking will be prohibited. The Council has designated areas where street drinking is prohibited and is in the process of introducing a new public space protection order. The Act also gives powers to the local authority and police to close licensed premises where nuisance and anti-social behaviour is taking place or likely to take place. This Act therefore clearly supports and actively promotes the licensing objectives contained within the Licensing Act 2003.

Other Legislation that the Licensing Authority will consider

3.10 The Licensing Authority will also have cognisance to the following legislation when it decides to discharge its responsibilities under the Licensing Act. This list is not exhaustive:

- Environmental Protection Act 1990 which deals with noise and nuisance
- Regulatory Reform Order 2005 which deals with fire safety
- Highways Act 1980 which deals with pavement café licences
- Reading Borough Council Act 2013 which deals with street trading and touting
- Health and Safety at Work Act 1974 and Food Hygiene regulations
- Planning legislation (see paragraphs 2.2-2.9 of this policy)

Review of a premises licence or club premises certificate

5.13 Any premises that has a premises licence or club premises certificate may have that licence reviewed by any of the named Responsible authorities – including the Licensing Authority in its role as a Responsible Authority. Thames Valley Police may also submit a Summary Review if there is a premises associated with serious crime and disorder. When the Licensing Authority instigates a review it will ensure that there is a clear separation of functions between the officer acting as the licensing authority and the officer acting as a responsible authority.

5.15 The Act provides strict guidelines, timescales and procedures for review applications and hearings and the Authority will deal with every review application in accordance with these rules.

6. Licensing Conditions

General Approach

6.1 Conditions shall be appropriate and proportionate for the promotion of the licensing objectives and shall be unambiguous and clear in their stated aims. Conditions will also be tailored to the type, location and characteristics of the particular premises and the relevant licensable activities. Any condition imposed by the Authority shall also aim to

avoid duplication of other legislation unless there is a requirement to impose such a condition in order to promote the licensing objectives (for example, a capacity limit for public safety reasons). This shall apply to all relevant applications (grant/variation of a premises licence or club premises certificate)

6.5 Any conditions imposed upon a premises licence or club premises certificate will be tailored to that type of premises and the style of operation. Consideration will also be given to the locality of the premises; issues in the locality; the issues set out in the Guidance and any policy, initiative or other matter the licensing authority wishes to take into account in order to promote the four licensing objectives.

6.27 The licensing authority is of the opinion that premises that are alcohol led; provide limited seating for customers; provide little food and provide entertainment facilities have the strongest potential to undermine the promotion of the licensing objectives. The licensing authority believes that venues that encourage up right vertical drinking and the sale of alcohol – often at cheap prices – leads to a negative impact on the town and only serves to promote drunkenness and crime and disorder. Any applicant who wishes to operate such a venue will have to demonstrate that its proposed use does not undermine the promotion of the licensing objectives and the authority would expect any operating schedule to contain stringent policies and procedures to achieve this. Measures such as CCTV, employment of door supervisors and the use of a club scan device will be expected as a minimum requirement. Door staff will also be expected to wear high visibility jackets and armbands so that they can be easily identified as well utilising – where appropriate – body worn video to help promote the prevention of crime and disorder licensing objective. The use of breathalysers is also to be encouraged in venues that are alcohol led and should – where appropriate - be advertised as a condition of entry to a licensed premises – particularly given the current prevalence for pre-loading.

Drinking up/Winding down time/Dispersal

7.14 Premises that provide licensable activity that may undermine the promotion of the four licensing objectives; cause disturbance to residents or in any way exacerbate issues of anti-social behaviour and crime and disorder, are expected to adopt, implement and maintain a robust dispersal policy. Licensed premises in residential areas or within the Council's Cumulative Impact Areas (if there are any in force – see 4.3) are also expected to outline measures such as a suitable wind down time where licensable activities will come to a gradual conclusion before closing time to allow for a gradual and orderly dispersal from the premises and area. It is expected that all staff will be aware of any dispersal policy and wind down times so as to ensure that customers actively leave the premises and area within permitted hours and with the minimum of disturbance to local residents.

7.15 In the case of nightclubs, dance venues and similar premises, it is expected that licence holders and designated premises supervisors instigate and operate a wind down time starting at least thirty minutes before closing time. During this time, the pace, volume and type of music played should be slowed down and reduced to background levels. The sale of alcohol should also cease and staff should be available to assist in the gradual dispersal of patrons from the premises and the immediate area. It is expected that door supervisors should also assist with the gradual dispersal of

patrons from the premises and the area and direct people to public transport if appropriate.

9. Enforcement

Enforcement Approach

9.12 Where offences are found to have been carried out on licensed premises, the Authority has a number of enforcement options available to it. The Authority will work with partner agencies to determine which enforcement option is appropriate for the promotion of the licensing objectives. The seriousness of the offences found will be taken into consideration as well as any previous issues of non compliance or criminality that have taken place at the licensed premises.

9.13 The enforcement options available to the Authority are wide-ranging. The Authority may consider, for example, that a letter detailing the issues found during an inspection followed by a period of time to rectify them is sufficient to promote the licensing objectives. Similarly, the Authority may consider that the breaches are sufficiently serious to warrant an immediate performance meeting with a licence holder so that a discussion can take place about the adequacy of the processes in place at the premises. This could, for example, lead to recommendations being put to the licence holder to implement much more robust conditions and processes to avoid a repeat of the breaches found. The authority may also decide to prosecute relevant persons for offences being carried out on licensed premises. Licence holders should note that the authority can take one or more of these options available to it at the same time for the same offences should it be deemed appropriate to do so.

9.15 Licensed premises that have a history of non compliance over a period of months and years and/or incidents of serious crime taking place at that premises, will likely find that the Authority will initiate a review with a view to asking for the licence to be considered for revocation.

9.16 When considering what enforcement action to take, the Authority will always consider what is the most appropriate and proportionate step to promote the licensing objectives. The Authority is not required to wait for offences to occur before deciding it needs to take appropriate action. Case law – notably *East Lindsey District Council v Abu Hanif* – states that the promotion of the licensing objectives requires a prospective consideration of what is warranted in the public interest having regard to the twin considerations of prevention and deterrence. Similarly, the Secretary of State's Guidance to the Licensing Act makes clear that there is no requirement for the Authority to wait for the outcome of any criminal proceedings before it initiates any enforcement action. This is the approach that the Authority will take when considering what, if any, action should be taken when condition breaches and other criminal activity is found at licensed premises.

9.18 Any responsible authority or person defined as 'any other person' within the Act can initiate a review of any premises licence or club premises certificate. When another responsible authority or other person initiates a review, the Authority will deal with it as the Licensing Authority and may also wish to make representation in support of the review within its role as a responsible authority if it has relevant information.

9.20 The Authority shall endeavour to work with licence holders and applicants where it is believed that steps can be taken to rectify issues identified at licensed premises. However it cannot merely continue that approach if it has previously failed or the licence holder is unresponsive. It is the responsibility of all licence holders and responsible authorities to ensure that licensed premises are not undermining the promotion of the licensing objectives and that licensable activity is carried out lawfully. The Authority will work with partners to determine what action is appropriate for each premises where issues are discovered. Each premises and the action required for each will be assessed on its own individual merits.

10. Administration, Exercise and Delegation of Functions

10.1 The powers of the Licensing Authority under the Licensing Act 2003 may be carried out by the Licensing Committee; by a Sub Committee or by one or more officers acting under delegated authority. The Licensing Committee will consist of between 10-15 members and the committee may establish one or more sub-committees consisting of two or three members.

10.3 A Licensing Sub-Committee shall hear all applications where relevant representations have been received and applications for the review of a premises licence that may have been submitted by Responsible Authorities or any other persons.

12. Amended Guidance issued under section 182 of the Licensing Act 2003 (December 2023)

Licensing Objectives and Aims:

1.2 The legislation provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken.

1.3 The licensing objectives are:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

1.4 Each objective is of equal importance. There are no other statutory licensing objectives, so that the promotion of the four objectives is a paramount consideration at all times.

1.5 However, the legislation also supports a number of other key aims and purposes. These are vitally important and should be principal aims for everyone involved in licensing work. They include:

- protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed premises.

2. The licensing objectives

Crime and disorder

2.1 Licensing authorities should look to the police as the main source of advice on

crime and disorder. They should also seek to involve the local Community Safety Partnership (CSP).

2.2 In the exercise of their functions, licensing authorities should seek to co-operate with the Security Industry Authority (“SIA”) as far as possible and consider adding relevant conditions to licences where appropriate. The SIA also plays an important role in preventing crime and disorder by ensuring that door supervisors are properly licensed and, in partnership with police and other agencies, that security companies are not being used as fronts for serious and organised criminal activity. This may include making specific enquiries or visiting premises through intelligence led operations in conjunction with the police, local authorities and other partner agencies. Similarly, the provision of requirements for door supervision may be appropriate to ensure that people who are drunk, drug dealers or people carrying firearms do not enter the premises and ensuring that the police are kept informed.

2.7 The objective to crime under the Licensing Act 2003 would include taking measures to prevent incidents of spiking which would usually be prosecuted under section 23 and 24 of the Offences Against the Person Act 1861, and section 61 of the Sexual Offences Act 2003. The following examples are within the range of behaviours that would be considered spiking. This list is not exhaustive:

- Putting alcohol into someone’s drink without their knowledge or permission
- Putting prescription or illegal drugs into an alcoholic or non-alcoholic drink without their knowledge or permission
- Injecting another person with prescription or illegal drugs without their knowledge or permission
- Putting prescription or illegal drugs into another person's food without their knowledge or permission
- Putting prescription or illegal drugs into another person's cigarette or vape without their knowledge or permission

Licensing authorities acting as responsible authorities

9.12 Each responsible authority will be an expert in their respective field, and in some cases, it is likely that a particular responsible authority will be the licensing authority’s main source of advice in relation to a particular licensing objective. For example, the police have a key role in managing the night-time economy and should have good working relationships with those operating in their local area⁵. The police should usually therefore be the licensing authority’s main source of advice on matters relating to the promotion of the crime and disorder licensing objective. However, any responsible authority under the 2003 Act may make representations with regard to any of the licensing objectives if they have evidence to support such representations. Licensing authorities must therefore consider all relevant representations from responsible authorities carefully, even where the reason for a particular responsible authority’s interest or expertise in the promotion of a particular objective may not be immediately apparent. However, it remains incumbent on all responsible authorities to ensure that their representations can withstand the scrutiny to which they would be subject at a hearing.

9.13 Licensing authorities are included in the list of responsible authorities. A similar framework exists in the Gambling Act 2005. The 2003 Act does not require responsible

authorities to make representations about applications for the grant of premises licences or to take any other steps in respect of different licensing processes. It is, therefore, for the licensing authority to determine when it considers it appropriate to act in its capacity as a responsible authority; the licensing authority should make this decision in accordance with its duties under section 4 of the 2003 Act.

Hearings

9.38 In determining the application with a view to promoting the licensing objectives in the overall interests of the local community, the licensing authority must give appropriate weight to:

- the steps that are appropriate to promote the licensing objectives;
- the representations (including supporting information) presented by all the parties;
- this Guidance;
- its own statement of licensing policy.

9.39 The licensing authority should give its decision within five working days of the conclusion of the hearing (or immediately in certain specified cases) and provide reasons to support it. This will be important if there is an appeal by any of the parties. Notification of a decision must be accompanied by information on the right of the party to appeal. After considering all the relevant issues, the licensing authority may grant the application subject to such conditions that are consistent with the operating schedule. Any conditions imposed must be appropriate for the promotion of the licensing objectives; there is no power for the licensing authority to attach a condition that is merely aspirational. For example, conditions may not be attached which relate solely to the health of customers rather than their direct physical safety. Any conditions added to the licence must be those imposed at the hearing or those agreed when a hearing has not been necessary.

Determining actions that are appropriate for the promotion of the licensing objectives

9.42 Licensing authorities are best placed to determine what actions are appropriate for the promotion of the licensing objectives in their areas. All licensing determinations should be considered on a case-by-case basis. They should take into account any representations or objections that have been received from responsible authorities or other persons, and representations made by the applicant or premises user as the case may be.

9.43 The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.

Reviews

The review process

11.1 The proceedings set out in the 2003 Act for reviewing premises licences and club premises certificates represent a key protection for the community where problems associated with the licensing objectives occur after the grant or variation of a premises licence or club premises certificate.

11.2 At any stage, following the grant of a premises licence or club premises certificate, a responsible authority, or any other person, may ask the licensing authority to review the licence or certificate because of a matter arising at the premises in connection with any of the four licensing objectives.

11.3 An application for review may be made electronically, provided that the licensing authority agrees and the applicant submits a subsequent hard copy of the application, if the licensing authority requires one. The licensing authority may also agree in advance that the application need not be given in hard copy. However, these applications are outside the formal electronic application process and may not be submitted via GOV.UK or the licensing authority's electronic facility. The applicant must give notice of the review application to the responsible authorities and holder of the licence or certificate. The licensing authority is required to advertise a review application.

11.5 Any responsible authority under the 2003 Act may apply for a review of a premises licence or club premises certificate. Therefore, the relevant licensing authority may apply for a review if it is concerned about licensed activities at premises and wants to intervene early without waiting for representations from other persons. However, it is not expected that licensing authorities should normally act as responsible authorities in applying for reviews on behalf of other persons, such as local residents or community groups. These individuals or groups are entitled to apply for a review for a licence or certificate in their own right if they have grounds to do so. It is also reasonable for licensing authorities to expect other responsible authorities to intervene where the basis for the intervention falls within the remit of that other authority. For example, the police should take appropriate steps where the basis for the review is concern about crime and disorder or the sexual exploitation of children. Likewise, where there are concerns about noise nuisance, it is reasonable to expect the local authority exercising environmental health functions for the area in which the premises are situated to make the application for review.

11.10 Where authorised persons and responsible authorities have concerns about problems identified at premises, it is good practice for them to give licence holders early warning of their concerns and the need for improvement, and where possible they should advise the licence or certificate holder of the steps they need to take to address those concerns. A failure by the holder to respond to such warnings is expected to lead to a decision to apply for a review. Co-operation at a local level in promoting the licensing objectives should be encouraged and reviews should not be used to undermine this co-operation

Powers of a licensing authority on the determination of a review

11.16 The 2003 Act provides a range of powers for the licensing authority which it may exercise on determining a review where it considers them appropriate for the promotion of the licensing objectives.

11.17 The licensing authority may decide that the review does not require it to take any further steps appropriate to promoting the licensing objectives. In addition, there is nothing to prevent a licensing authority issuing an informal warning to the licence holder and/or to recommend improvement within a particular period of time. It is

expected that licensing authorities will regard such informal warnings as an important mechanism for ensuring that the licensing objectives are effectively promoted and that warnings should be issued in writing to the licence holder.

11.18 However, where responsible authorities such as the police or environmental health officers have already issued warnings requiring improvement – either orally or in writing – that have failed as part of their own stepped approach to address concerns, licensing authorities should not merely repeat that approach and should take this into account when considering what further action is appropriate. Similarly, licensing authorities may take into account any civil immigration penalties which a licence holder has been required to pay for employing an illegal worker.

11.19 Where the licensing authority considers that action under its statutory powers is appropriate, it may take any of the following steps:

- modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition), for example, by reducing the hours of opening or by requiring door supervisors at particular times;
- exclude a licensable activity from the scope of the licence, for example, to exclude the performance of live music or playing of recorded music (where it is not within the incidental live and recorded music exemption)¹⁰;
- remove the designated premises supervisor, for example, because they consider that the problems are the result of poor management;
- suspend the licence for a period not exceeding three months;
- revoke the licence.

Reviews arising in connection with crime

11.25 Reviews are part of the regulatory process introduced by the 2003 Act and they are not part of criminal law and procedure. There is, therefore, no reason why representations giving rise to a review of a premises licence need be delayed pending the outcome of any criminal proceedings. Some reviews will arise after the conviction in the criminal courts of certain individuals, but not all. In any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives. Where a review follows a conviction, it would also not be for the licensing authority to attempt to go beyond any finding by the courts, which should be treated as a matter of undisputed evidence before them.

13. Relevant Case law for consideration:

(R) on the application of Hope and Glory Public House v Westminster City Council (2011) EWCA Civ31 illustrates that licensed premises, and the activities that take place in those premises, exist in a dynamic environment and should not be looked at entirely in isolation and confirms that this can include the impact that licensable activities have on a range of factors such as crime, the quality of life for residents and visitors to the area, and demand for licensed premises.

East Lindsey District Council v Abu Hanif (t/a Zara's Restaurant) (2016) this underpins the principles widely acknowledged within the Licensing Act 2003 that the licensing objectives are prospective, and that the prevention of crime and disorder requires a

prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence.

R (on application of Daniel Thwaites plc) v Wirral Magistrates' Court and Others (2008) EWHC 838 (Admin) This case, referred to as 'the Thwaites case', is important because it emphasises the important role that Responsible Authorities have in providing information to decision makers to contextualise the issue before them. The purpose of the Act is to prevent problems from happening. Decisions can and should be based on well-informed common sense. The case recognises that Responsible Authorities are experts in their fields, and that weight should be attached to their representations.

14. Appendices

Appendix NB-1: Premises licence review application form

**Appendix NB-2: Representation by Mr Declan Smyth – Alcohol Licensing Officer,
Thames Valley Police**

Appendix NB-1

Reading Borough Council, Civic Offices, Bridge Street, Reading, RG1 2LU

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

I Anthony Chawama

(Insert name of applicant)

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

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description	
Reading Express 102 Oxford Road	
Post town Reading	Post code (if known) RG1 7LL

Name of premises licence holder or club holding club premises certificate (if known)
Reading Express

Number of premises licence or club premises certificate (if known)
LP2002949

Part 2 - Applicant details

I am

Please tick ✓ yes

1) an individual, body or business which is not a responsible authority (please read guidance note 1, and complete (A) or (B) below)

2) a responsible authority (please complete (C) below)

3) a member of the club to which this application relates (please complete (A) below)

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

Please tick ✓ yes

Mr Mrs Miss Ms Other title
(for example, Rev)

Surname

First names

I am 18 years old or over

Please tick ✓ yes

**Current postal
address if
different from
premises
address**

Post town

Post Code

Daytime contact telephone number

**E-mail address
(optional)**

(B) DETAILS OF OTHER APPLICANT

Name and address

Telephone number (if any)

E-mail address (optional)

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Name and address Mr Anthony Chawama o.b.o Reading Borough Council - Licensing Department Bridge Street Reading RG1 2LU
Telephone number (if any)
E-mail address (optional) Anthony.Chawama@reading.gov.uk

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

- | | |
|---|-------------------------------------|
| | Please tick one or more boxes ✓ |
| 1) the prevention of crime and disorder | <input checked="" type="checkbox"/> |
| 2) public safety | <input checked="" type="checkbox"/> |
| 3) the prevention of public nuisance | <input type="checkbox"/> |
| 4) the protection of children from harm | <input checked="" type="checkbox"/> |

<p>Please state the ground(s) for review (please read guidance note 2)</p> <p>Reading Borough Council, as a responsible authority under the Licensing Act 2003 and in order to promote the licensing objectives of prevention of crime and disorder, public safety and the protection of children from harm make an application for the review of Premises Licence No. LP2002949 (attached as Appendix AC-1), for Reading Express</p> <p>Reading Borough Council Licensing submit this application for review in order to address illegal working at the premises:</p> <p>On 11/03/2026 a joint visit by Reading Borough Council Officer and Home Office Immigration Enforcement Officers visited Reading Express to conduct an immigration enforcement inspection. During this visit, an employee from Afghanistan with no right to work was escorted out of the premises. A Civil Penalty referral was served for the Civil Penalty Team to investigate and decide if a Civil Penalty Fine will be issued.</p> <p>It is our recommendation that the only way to prevent further undermining of the promotion of the licensing objectives is for the premises licence to be revoked.</p>
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Please provide as much information as possible to support the application (please read guidance note 3)

During the visit on 11 March 2026, officers encountered an employee from Afghanistan working behind the counter and serving customers. The individual stated that he was not employed at the premises and was only assisting the shop owner. He further explained that he lives in Scotland and was visiting the shop owner, staying in the flat above the premises, which belongs to the owner. He added that he was helping out because the owner's wife had a hospital appointment.

The owner of the premises, Mr Ravindar Singh Arora, stated that the illegal worker had been assisting him that day, as his wife had suffered an asthma attack and he had to take her to hospital.

The employee entered the UK in May 2018 with no documents and claimed Asylum which was refused in July 2020. He appeals the refusal and he is currently awaiting decisions on matters pertaining to their immigration status. As of 11/03/2026 they do not have a right to work in the UK.

Licensing Officer's Comments

Reading Borough Council, acting as a responsible authority, submit this application to review the premises licence for Maahi Food & Wine Ltd with the aim to revoke the premises licence. We believe that no other powers available to the sub-committee, namely, a suspension of the premises licence, addition of conditions and the removal of the Designated Premises Supervisor are sufficient to prevent the undermining of the Licensing Objectives at this premises.

The premises is situated on Oxford Road, in Reading, in an area which suffers high levels of anti-social behaviour including street drinking and the consumption of super strength alcohol, drug usage and other associated signal crimes such as graffiti and shoplifting/theft.

The premises currently has the benefit of a premises licence (**LP2002949**) attached as **Appendix AC-1**, that authorises the Sale of Alcohol on Monday to Sunday from 0600hrs to 2300hrs. The premises licence holder utilises the licence to operate off licence and has held the premises licence since 23/01/2023.

It is the job of any responsible employer to ensure that the correct right to work checks are carried out. As is quite apparent, right to work checks were not being carried out at this premises.

The Immigration Act 2016 amended Section 21 of the Immigration, Asylum

and Nationality Act 2006 and is the relevant legislation that deals with the employment of illegal workers. It states:

1) A person commits an offence if he employs another ("the employee") knowing that the employee is [disqualified from employment by reason of the employee's immigration status].

(1A) A person commits an offence if the person—

(a) employs another person ("the employee") who is disqualified from employment by reason of the employee's immigration status, and

(b) has reasonable cause to believe that the employee is disqualified from employment by reason of the employee's immigration status.

(1B) For the purposes of subsections (1) and (1A) a person is disqualified from employment by reason of the person's immigration status if the person is an adult subject to immigration control and—

(a) the person has not been granted leave to enter or remain in the United Kingdom, or

(b) the person's leave to enter or remain in the United Kingdom—

(i) is invalid,

(ii) has ceased to have effect (whether by reason of curtailment, revocation, cancellation, passage of time or otherwise), or

(iii) is subject to a condition preventing the person from accepting the employment.]

(2) A person guilty of an offence under this section shall be liable—

(a) on conviction on indictment—

(i) to imprisonment for a term not exceeding [five] years,

(ii) to a fine, or

(iii) to both

The offence of employing illegal workers is a relevant offence in the Licensing Act 2003. The Licensing Act 2003 Guidance at 11.27 and 11.28 states that the employment of illegal workers is to be regarded as a crime that should be taken particularly seriously and that revocation of the premises licence – even in the first instance – should be seriously considered. The licence holder is undermining the crime and disorder licensing objective as well as failing to ensure that the people he employs are legally in the country or entitled to

work.

There are potentially numerous other criminal offences which may apply to the employment of illegal workers, and these are summarised as follows:

1. The exploitation of illegal workers by unscrupulous employers means that the only person who benefits from their employment is the licence holder through financial gain.
2. Illegal workers – being in the country illegally or working illegally – are unable to declare themselves to the authorities and seek public assistance should they require it.
3. Illegal workers are often paid ‘off the record’ by the employer meaning that the correct tax and national insurance deductions are not taken into account or declared to HMRC. This would be contrary to the Fraud Act 2006.
4. People who are living in the UK or who are working illegally are often not paid anything close to the Minimum wage which is illegal and again only benefits the employer financially.
5. Illegal workers – because of being deliberately underpaid by unscrupulous employers – are often only provided with the most basic accommodation and standard of living which is often linked to their continued employment at a licensed premises.
6. Illegal entrants into the country will not have been subject to the usual immigration checks and health screenings. This could seriously impact on public protection and the health and wellbeing of the general public as a whole. This could be particularly pertinent if the illegal entrant has arrived from a country with health issues and the employer has then decided to employ that person in a kitchen or other function where food is served to the public
7. The employment of illegal workers is often done at the expense of people who are living and working in the country legally and is only done to financially benefit the licence holder and to undercut legitimate, law abiding competitors.
8. Illegal entrants – who have not undergone appropriate checks or immigration clearance at the border – could be being unwittingly employed by the licence holder despite them having current or previous criminal convictions which may endanger the public.

The licence holder is exploiting potentially vulnerable people and engaging in a multitude of criminal offences by employing them at this premises.

Licensing team's interactions with the premises:

On 19/03/2026, a Reading Borough Council Licensing Enforcement Officer conducted a follow up premises licence inspection of this premises. As can be seen at **Appendix AC-2 and Appendix AC-3**, the premises was compliant with their licence conditions.

The approach of the Licensing Team:

The Responsible Authorities named in the Licensing Act 2003 must ensure that the licensing objectives are all actively promoted to prevent crime and disorder, prevent public nuisance, protect children from harm and ensure public safety. All four licensing objectives are of equal importance.

The Council's Statement of Licensing Policy (2023):

Immigration Act 2016

3.4 Section 36 and Schedule 4 of the Immigration Act 2016 amended the Licensing Act 2003 and made Home Office Immigration Enforcement a Responsible Authority concerned with the licensing objective of prevention of crime and disorder. They will exercise their power both in respect of being a consultee on new licence applications and having right of entry to licensed premises with a view to seeing whether an offence under any of the Immigration Acts is being committed on a licensed premises. This will primarily involve the detection and prevention of illegal working on premises that have an alcohol licence or a late night refreshment licence. The offence of employing people at a licensed premises who have no right to work in the UK is also now listed in the Secretary of State's guidance under Section 11.27 which covers criminal activity deemed to be particularly serious and where a licensing authority should consider revoking a premises licence even in the first instance. This Act clearly supports and actively promotes the licensing objective of preventing crime and disorder and the licensing authority will work with colleagues in the Immigration service and Thames Valley Police to enforce this.

5.13 Any premises that has a premises licence or club premises certificate may have that licence reviewed by any of the named Responsible authorities – including the Licensing Authority in its role as a Responsible Authority. Thames Valley Police may also submit a Summary Review if there is a premises associated with serious crime and disorder. When the Licensing Authority instigates a review it will ensure that there is a clear separation of

functions between the officer acting as the licensing authority and the officer acting as a responsible authority.

9.1 It is the responsibility under the Act for all responsible authorities; licence holders and prospective licence holders to actively promote the four licensing objectives. The Council along with partner agencies, has a wider responsibility to protect the public as a whole and prevent crime, harm or nuisance from taking place.

9.2 The Authority will carry out its licensing functions with a view to actively promoting the licensing objectives and maintaining public safety. This applies to the dual role the licensing authority has both as the administrator of the process and as a responsible authority.

9.3 The Licensing Authority has previously and will continue to work with other responsible authorities and partner agencies in order to ensure that the licensing objectives are promoted and that a consistent and joined up approach is taken to enforcement across Reading.

9.4 Reading Borough Council and Thames Valley Police work in partnership when carrying out work that involves licensed premises and any matter that undermines the licensing objectives. The Authority and Thames Valley Police also work in partnership with colleagues in the Home Office Immigration Enforcement team and Trading Standards on a variety of issues including the prevention and detection of illegal working in licensed premises and issues surrounding super strength alcoholic products and responsible alcohol retailing.

Enforcement Approach

9.14 Licence holders should be aware that some criminal activity on licensed premises is considered to be of such seriousness to warrant a licence being reviewed straight away. There is certain criminal activity stated within the Secretary of State's Guidance that should be taken particularly seriously and where revocation of a licence, even in the first instance, should be seriously considered. This can include the sale or storage of smuggled alcohol or cigarettes on a licensed premises; the employment of an illegal worker at a licensed premises and the use of a licensed premises to sell or distribute drugs and weapons. Clearly if a premises is found to be committing such serious offences, then the premises and licence holder is severely undermining the licensing objectives. It is likely, under such circumstances, that a licence review will be initiated by the Authority or colleagues within Thames Valley Police, Home Office Immigration Enforcement or the relevant responsible authority with a view to having the licence revoked.

9.15 Licensed premises that have a history of non-compliance over a period of months and years and/or incidents of serious crime taking place at that premises, will likely find that the Authority will initiate a review with a view to asking for the licence to be considered for revocation.

9.16 When considering what enforcement action to take, the Authority will always consider what is the most appropriate and proportionate step to promote the licensing objectives. The Authority is not required to wait for offences to occur before deciding it needs to take appropriate action. Case law – notably *East Lindsey District Council v Abu Hanif* – states that the promotion of the licensing objectives requires a prospective consideration of what is warranted in the public interest having regard to the twin considerations of prevention and deterrence. Similarly, the Secretary of State’s Guidance to the Licensing Act makes clear that there is no requirement for the Authority to wait for the outcome of any criminal proceedings before it initiates any enforcement action. This is the approach that the Authority will take when considering what, if any, action should be taken when condition breaches and other criminal activity is found at licensed premises.

Secretary of State’s Guidance (February 2026)

Licensing Objectives and Aims:

1.2 The legislation provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken.

1.3 The licensing objectives are:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

1.4 Each objective is of equal importance. There are no other statutory licensing objectives, so that the promotion of the four objectives is a paramount consideration at all times.

1.5 However, the legislation also supports a number of other key aims and purposes. These are vitally important and should be principal aims for everyone involved in licensing work. They include:

- protecting the public and local residents from crime, anti-social

behaviour and noise nuisance caused by irresponsible licensed premises.

Home Office Immigration Enforcement acting as a responsible authority

9.25 The Immigration Act 2016 made the Secretary of State a responsible authority in respect of premises licensed to sell alcohol or late night refreshment with effect from 6 April 2017. In effect this conveys the role of responsible authority to Home Office Immigration Enforcement who exercises the powers on the Secretary of State's behalf. When Immigration Enforcement exercises its powers as a responsible authority it will do so in respect of the prevention of crime and disorder licensing objective because it is concerned with the prevention of illegal working or immigration offences more broadly.

9.38 In determining the application with a view to promoting the licensing objectives in the overall interests of the local community, the licensing authority must give appropriate weight to:

- the steps that are appropriate to promote the licensing objectives.
- the representations (including supporting information) presented by all the parties.
- this Guidance.
- its own statement of licensing policy.

9.39 The licensing authority should give its decision within five working days of the conclusion of the hearing (or immediately in certain specified cases) and provide reasons to support it. This will be important if there is an appeal by any of the parties. Notification of a decision must be accompanied by information on the right of the party to appeal.

Determining actions that are appropriate for the promotion of the licensing objectives

9.42 Licensing authorities are best placed to determine what actions are appropriate for the promotion of the licensing objectives in their areas. All licensing determinations should be considered on a case-by-case basis. They should take into account any representations or objections that have been received from responsible authorities or other persons, and representations made by the applicant or premises user as the case may be.

9.43 The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.

Reviews arising in connection with crime

11.24 A number of reviews may arise in connection with crime that is not directly connected with licensable activities. For example, reviews may arise because of drugs problems at the premises, money laundering by criminal gangs, the sale of contraband or stolen goods, the sale of firearms, or the sexual exploitation of children. Licensing authorities do not have the power to judge the criminality or otherwise of any issue. This is a matter for the courts. The licensing authority's role when determining such a review is not therefore to establish the guilt or innocence of any individual but to ensure the promotion of the crime prevention objective.

11.25 Reviews are part of the regulatory process introduced by the 2003 Act and they are not part of criminal law and procedure. There is, therefore, no reason why representations giving rise to a review of a premises licence need be delayed pending the outcome of any criminal proceedings. Some reviews will arise after the conviction in the criminal courts of certain individuals, but not all. In any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives. Where a review follows a conviction, it would also not be for the licensing authority to attempt to go beyond any finding by the courts, which should be treated as a matter of undisputed evidence before them.

11.26 Where the licensing authority is conducting a review on the grounds that the premises have been used for criminal purposes, its role is solely to determine what steps should be taken in connection with the premises licence for the promotion of the crime prevention objective. It is important to recognise that certain criminal activity or associated problems may be taking place or have taken place despite the best efforts of the licence holder and the staff working at the premises and despite full compliance with the conditions attached to the licence. In such circumstances, the licensing authority is still empowered to take any appropriate steps to remedy the problems. The licensing authority's duty is to take steps with a view to the promotion of the licensing objectives and the prevention of illegal working in the interests of the wider community and not those of the individual licence holder.

11.27 There is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of the licensed premises:

- for employing a person who is disqualified from that work by reason of their immigration status in the UK;

11.28 It is envisaged that licensing authorities, the police, the Home Office

(Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence – even in the first instance – should be seriously considered.

Summary of Representation:

Reading Borough Council Licensing appreciates the serious nature of the offence of employing an individual with no right to work in the UK that took place at this premises and also appreciates that this warrants a serious response from the Licensing Authority. This offence has a major knock-on effect to other businesses and people who are the victims of such crime. Hiring illegal workers not only gives the premises an unfair commercial advantage, it also exploits those that are illegally working. We consider this offence serious enough to warrant revocation in the first instance and we do not consider any other power available to the sub-committee as appropriate to prevent this offence from reoccurring.

We appreciate that the determination of this review is solely down to those members of the sub-committee at the hearing, however, we respectfully provide the following breakdown of the powers available to the sub-committee, each accompanied by an explanation as to whether we consider the power appropriate or not to address the current undermining of the licensing objectives:

- **the modification of the conditions of the premises licence;**

We do not consider the addition or amending of the conditions attached to the licence to be a pragmatic solution due to the serious nature of the offence committed at this premises. It is considered likely that, if the premises continues to be licensed, the premises licence holder will continue to undermine the prevention of crime and disorder licensing objective.

- **the exclusion of a licensable activity from the scope of the licence;**

There is only 1 licensable activity on the licence and therefore this option would render the licence redundant and, in practice, would have the same effect as revocation.

- **Revocation of the licence;**

For the previously stated reasons, we believe this is the only way to prevent

further undermining of the licensing objectives.

- **the suspension of the licence for a period not exceeding 3 months;**

We do not believe that this option would serve as anything other than a punitive measure with the premises likely to return to how it currently operates at the end of the suspension period.

- **the removal of the designated premises supervisor;**

This premises is a relatively small, independently run business. To simply remove the current Designated Premises Supervisor, who is also the premises licence holder. only for another person to be named as the Designated Premises Supervisor will not result in any substantial change to how the premises is operated, when considering that any new Designated Premises Supervisor will be under the direct control of the premises licence holder. See 11.22 of the Secretary of State's section 182 guidance.

Relevant Case law for consideration

East Lindsey District Council v Abu Hanif (t/a Zara's Restaurant) (2016) this underpins the principles widely acknowledged within the Licensing Act 2003 that the licensing objectives are prospective, and that the prevention of crime and disorder requires a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence.

R (on application of Daniel Thwaites plc) v Wirral Magistrates' Court and Others (2008) EWHC 838 (Admin) The case recognises that Responsible Authorities are experts in their fields, and that weight should be attached to their representations.

Appendices:

Appendix AC-1 – Current Premises Licence

Appendix AC-2 and AC-3 – Premises Inspection Results Letter

Please tick ✓ yes

Have you made an application for review relating to the premises before

If yes please state the date of that application

Day Month Year

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If you have made representations before relating to the premises please state what they were and when you made them

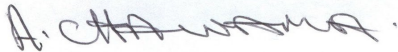
Please tick ✓ yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

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

Part 3 – Signatures (please read guidance note 4)

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



Signature

.....

Date **28/04/2026**

.....

Capacity **Licensing Enforcement Officer**

.....

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 6)

--	--

Post town	Post Code
------------------	------------------

Telephone number (if any)

If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)

Notes for Guidance

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

LICENSING ACT 2003 PREMISES LICENCE - PART A

Reading Borough Council being the Licensing Authority under the above Act,
HEREBY GRANT a **PREMISES LICENCE** as detailed in this licence.

Premises Licence Number	LP2002949
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Premises Details

Trading name of Premises and Address	
Reading Express 102 Oxford Road Reading RG1 7LL	
Telephone Number	0118 375 7425

Where the Licence is time limited the dates the Licence is valid
N/A

Licensable Activities

Licensable Activities authorised by the Licence
Sale of Alcohol by Retail - Off the Premises

Authorised Hours for Licensable Activities

The times the licence authorises the carrying out of licensable activities
Hours for the Sale by Retail of Alcohol
Monday from 0600hrs until 2300hrs
Tuesday from 0600hrs until 2300hrs
Wednesday from 0600hrs until 2300hrs
Thursday from 0600hrs until 2300hrs
Friday from 0600hrs until 2300hrs
Saturday from 0600hrs until 2300hrs
Sunday from 0600hrs until 2300hrs

Opening Hours

Hours the Premises is Open to the Public
Monday from 0600hrs until 2300hrs
Tuesday from 0600hrs until 2300hrs
Wednesday from 0600hrs until 2300hrs
Thursday from 0600hrs until 2300hrs
Friday from 0600hrs until 2300hrs
Saturday from 0600hrs until 2300hrs
Sunday from 0600hrs until 2300hrs

Alcohol

Where the licence authorises supplies of alcohol whether these are on and/or off supplies

Sale of Alcohol by Retail - Off the Premises

Premises Licence Holder

Name, (registered) address of holder of premises licence

Name: Maahi Food & Wine Ltd
Address: 102a Oxford Road, Reading, RG1 7LL

Registered number of holder, for example company number or charity number [where applicable]

14354508

Additional Details

Name, address and telephone number of designated premises supervisor where the premises licence authorises the supply of alcohol

Name: Ravindar Singh Arora
Address: [REDACTED]

Designated Premises Supervisor

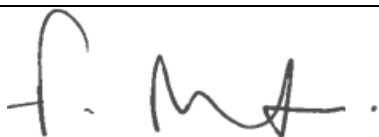
Personal Licence number and issuing authority of personal licence held by the designated premises supervisor where the premises licence authorises the supply of alcohol

Personal Licence Number: 21LIC20081PERS
Issuing Authority: London Borough of Ealing

This Licence shall continue in force from **07/02/2023** unless previously suspended or revoked.

Dated: 7 February 2023

Signed on behalf of the issuing licensing authority



Frances Martin
Executive Director for Economic Growth and Neighbourhood Services

Annex 1

Mandatory Conditions

Supply of Alcohol

To be applied where a premises licence authorises the supply of alcohol

- 1 No supply of alcohol may be made under the premises licence:-
 - a) at a time when there is no designated premises supervisor in respect of the premises licence, or
 - b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended
- 2 Every supply of alcohol made under the premises licence must be made or authorised by a person who holds a personal licence.

Film Exhibitions

To be applied only where a premises licence or club premises certificate authorises the exhibitions of films

- 1 The admission of children to any exhibition of any film must be restricted in accordance with section 20 of Part 3 of the Licensing Act 2003.
- 2 In the case of films which have been classified by the British Board of Film Classification admission of children to films must be restricted in accordance with that classification.
- 3 In the case of films which have not been classified by the British Board of Film Classification, admission of children must be restricted in accordance with any recommendation made by the Licensing Authority.

Door Supervisors

To be applied where a premises licence or club premises certificate includes a condition that any person must be at the premises to carry out a security activity. [Except premises with a premises licence authorising only plays or films or premises used exclusively by a club].

- 1 Each individual present at the licensed premises to carry out a security activity must be licensed by the Security Industry Authority.

Responsible Drink Promotions (commencement date 01/10/2014)

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

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

(a) games or other activities which require or encourage, or are designed to require or encourage, individuals to—

(i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or

(ii) drink as much alcohol as possible (whether within a time limit or otherwise);

(b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;

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

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

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

Supply of Tap Water (commencement date 01/10/2014)

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

Age Verification Policy (commencement 01/10/2014)

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

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

3. The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—

(a) a holographic mark, or

(b) an ultraviolet feature.

Drink Measurements (commencement date 01/10/2014)

1. The responsible person must ensure that—

(a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures—

(i) beer or cider: ½ pint;

(ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and

(iii) still wine in a glass: 125 ml;

(b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and

(c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.”

Minimum Permitted Pricing (commencement 28th May 2014)

1. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

2. For the purposes of the condition set out in paragraph 1—

(a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;

(b) “permitted price” is the price found by applying the formula—

$$P = D + (D \times V)$$

where—

(i) P is the permitted price,

(ii) D is the rate of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and

(iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence—

(i) the holder of the premises licence,

(ii) the designated premises supervisor (if any) in respect of such a licence, or

(iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994

3. Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from the paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.

4. (2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

Annex 2

Conditions Consistent with the Operating Schedule

Annex 3

Conditions attached after a hearing by the Licensing Authority

1. Staff employed to sell alcohol shall undergo training upon induction before they are allowed to sell alcohol. This shall include, but not be limited to:

- The premises age verification policy
- The Four Licensing objectives
- Dealing with refusal of sales
- Proxy purchasing
- Recognising valid identity documents not in the English language
- Identifying attempts by intoxicated persons to purchase alcohol
- Identifying signs of intoxication
- Conflict management
- How to identify and safeguard vulnerable persons who attend and leave the premises.

- a) Refresher training shall be provided every 6 (six) months;
- b) Signed induction and refresher training records are to be kept for a minimum of 2 (Two) years of the date of training and made available for inspection by a Police Officer or authorised officer of Reading Borough Council upon request;
- c) All staff authorised to sell alcohol shall be trained in responsible alcohol retailing (ARAR) or any other similarly nationally recognised approved accreditation curriculum or syllabus within 4 weeks for existing and subsequent employees of 18 November 2020 and provide evidence of such training having been undertaken and completed within 2 weeks of completion to Thames Valley Police and any authorised officer of Reading Borough Council's licensing team.

2. All staff to be trained to record refusals of sales of alcohol in a refusals book or electronic register. The book/register shall contain:

- Details of the time and date the refusal was made
- The identity of the staff member refusing the sale
- Details of the alcohol the person attempted to purchase

- a) This book/register shall be available for inspection to an authorised officer of Reading Borough Council or Thames Valley Police. A weekly review of the refusals book/register shall also be carried out and signed off by the Designated Premises Supervisor or their nominated representative.

3. An incident register/log shall be used, maintained and kept on the premises to record any incident which has an impact on any of the four licensing objectives, or instances when the police have had to attend the premises.

- a) The register shall be made available for inspection to authorised officers of Reading Borough Council and Thames Valley Police upon request.

4. The premises shall at all times operate a Challenge 25 age verification policy to prevent any customers who attempt to purchase alcohol and who appear to the staff member to be under the age of 25 years from making such a purchase without having first provided identification. Only a valid British driver's licence showing a photograph of the person, a valid passport, military ID or proof of age card showing the 'Pass' hologram (or any other nationally accredited scheme) are to be accepted as identification. The age verification policy shall be in a written form and displayed in a prominent position.

5. Posters advertising the premises' Challenge 25 age verification policy shall be displayed in prominent positions on the premises.

6. The Premises Licence Holder shall display in a prominent position a copy of their written policy on checking proof of age.

7. No beers and ciders above 6.5% ABV shall be sold at any time during permitted licensing hours, in line with Reading Borough Council's current policy.

8. The premises licence holder shall ensure the premises' digitally recorded CCTV system cameras shall continually record whilst the premises are open to the public and recordings shall be kept for a minimum of 31 days with time and date stamping. The entire licensable area shall be covered by the CCTV and an appropriate number of cameras shall be installed to cover the external areas immediately outside of the premises. Data recordings shall be made immediately available to an authorised officer of Thames Valley Police or Reading Borough Council together with facilities for viewing upon request, subject to the provisions of the Data Protection Act. Recorded images shall be of such quality as to be able to identify the recorded person in any light. At least one member of staff on the premises at any time during operating hours shall be trained to access and download material from the CCTV system.

9. The premises licence holder or nominated representative shall keep and maintain all right to work documents for all staff members. Right to work documents shall be kept at the premises and produced to authorised officers of Reading Borough Council and Thames Valley Police upon request.

10. A current written authorisation list shall be displayed in a prominent position on the premises confirming the details of all current staff that have been authorised to sell alcohol by a Personal Licence Holder. The authorisation list shall include, the name of the staff member authorised, the name and personal licence details of the person authorising them to sell alcohol. This list shall also contain the date and signature of the staff member authorised and countersigned by the authorising Personal Licence Holder.

11. The premises licence holder/designated premises supervisor shall ensure that they and staff who are authorised to sell alcohol, are able to converse with customers and representatives of Statutory Agencies to a level that they are able to satisfactorily meet the four licensing objectives as contained in the Licensing Act 2003.

- I. The Prevention of Crime and Disorder
- II. Public Safety
- III. Public Nuisance
- IV. The Protection of Children from Harm

12. A section 57 notice shall be displayed in a prominent position detailing the location of the Part A of the premises licence, and a list of staff members that have an awareness of its location and content.

13. Before any person is employed at the premises sufficient checks will be made of their bona fides to ensure they are legally entitled to employment in the UK. Such checks shall include:

- Proof of identity (such as a copy of their passport)
- Nationality
- Current immigration status

Employment checks will be subject to making copies of any relevant documents produced by the employee, which will be retained on the premises and kept for a minimum period of one year. Employment records as they relate to the checking of a person's right to work will be made available to an authorised officer of Reading Borough Council, Thames Valley Police or Home Office Immigration upon request.

Annex 4

Plans

As attached plan 'Ground Floor' and rear flat roof dated November 2007

Appendix AC-2



Emma Gee
Interim Director of Environment and
Neighbourhood Services
Civic Offices, Bridge St, Reading, RG1 2LU

Reading Express/Anrish News
102 Oxford Road
Reading
RG1 7LL

Our Ref: PR202603-1185786

e-mail: anthony.chawama@reading.gov.uk

Date: 12 March 2026

┌ e-mail: [REDACTED] └

Your contact is: Anthony Chawama, Licensing - Regulatory Services

Dear Reading Express/Anrish News,

Licensing Act 2003
Premises Licence Number: LP
Premises: Reading Express/Anrish News
Premises Address: 102 Oxford Road, Reading, RG1 7LL

On 12/03/2026, I visited your premises with Immigration Officers to ensure compliance with the above premises licence and to provide advice on any matters identified during the inspection. Your staff member, [REDACTED], who was in charge at the time, assisted us on arrival.

Immigration Officers reviewed the right-to-work documentation for all employees present at the time of the visit. During these checks, one illegal worker was identified as working at the premises, namely [REDACTED]. This constitutes a breach of the Immigration Act and is also a matter relevant to the Licensing Act.

As the only individual found working at the premises at the time of the visit was identified as an illegal worker, I was unable to carry out the licensing inspection.

I will be revisiting your premises on 19 March 2026 at 10:00am. Please ensure that you, or a member of staff, are available to assist me with the inspection.

- You are advised to ensure that all of your staff have the correct right to work documents and that they are kept on site should they need to be produced to officers from the Home Office. Home Office Immigration Enforcement have the same right of entry to your premises as we and the police do so keeping the documents securely on site will assist in their inspection if they choose to undertake one.

Please note that a failure to comply with the requirements of the Licensing Act 2003, associated regulations and the terms and conditions of the premises licence is a criminal offence. If formal legal proceedings are brought against you, upon conviction, the

maximum sentence is an unlimited fine and/or a prison sentence not exceeding six months for each individual offence.

Whilst we consider what, if any, further action to take in respect of the findings detailed in this letter, please rectify all of the above within 7 days. Once you believe all of the above has been rectified, please contact me so that we can arrange a re-inspection.

If you have any questions in relation to the contents of this letter then please contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read "A. CHAWANNA".

Licensing Enforcement

CC: Declan Smyth

CC: Glenn Brackstone-Dokury

Appendix AC-3



Emma Gee
Interim Director of Environment and
Neighbourhood Services
Civic Offices, Bridge St, Reading, RG1 2LU

Reading Express
102 Oxford Road
Reading
RG1 7LL

Our Ref: PR202603-1186697

e-mail: anthony.chawama@reading.gov.uk

Date: 19 March 2026

┌ e-mail: [REDACTED] ┐

Your contact is: Anthony Chawama, Licensing - Regulatory Services

Dear Reading Express,

Licensing Act 2003
Premises Licence Number: LPLP2002949/LP9000521
Premises: Reading Express
Premises Address: 102 Oxford Road, Reading, RG1 7LL

I visited your premises today to ensure compliance with the above premises licence and to provide advice on any matters identified during the inspection.

I can confirm that today's inspection did not identify any areas of concern, and you are fully compliant with the conditions attached to your licence. You were able to provide valid work permit documentation for both members of staff currently employed at your shop, as well as for yourself.

However, during a joint inspection carried out on the 11th March 2026 in conjunction with Immigration Enforcement, an individual Mr [REDACTED] was found working on the premises without the appropriate legal documentation verifying the individual's identity or right to work in the UK.

I understand that you explained the person was a family friend who was helping temporarily due to an emergency involving your wife's hospital visit. While I acknowledge the circumstances you described, this does not exempt you from your legal responsibility and conditions attached to your licence to ensure that anyone working on your premises has the legal right and training to do so.

At this stage, we will await the outcome of any action that Immigration Enforcement may decide to take in relation to this matter. From a licensing perspective, you are currently compliant with today's inspection; however, further action may be considered depending on the findings and decisions made by Immigration Enforcement.

We will update you once any further information becomes available.

- You are advised to ensure that all of your staff have the correct right to work documents and that they are kept on site should they need to be produced to officers from the Home Office. Home Office Immigration Enforcement have the same right of entry to your premises as we and the police do so keeping the documents securely on site will assist in their inspection if they choose to undertake one.

Please note that a failure to comply with the requirements of the Licensing Act 2003, associated regulations and the terms and conditions of the premises licence is a criminal offence. If formal legal proceedings are brought against you, upon conviction, the maximum sentence is an unlimited fine and/or a prison sentence not exceeding six months for each individual offence.

If you have any questions in relation to the contents of this letter, then please contact me.

Yours faithfully,



Licensing Enforcement

CC: Declan Smyth

CC: Glenn Brackstone-Dokury

Division/Station: Reading Police Station Licensing Dept

From: C2107 Declan Smyth

To: Reading Borough Council

Ref: Reading Express, 102 Oxford Road, Reading, RG1 7LL Date :11th May 2026

Subject :

Supportive review representation

I C2107 Declan Smyth on behalf of the Chief Officer of Thames Valley Police wish to provide this representation in support of the review process relating to Reading Express, 102 Oxford Road, Reading, RG1 7LL.

Thames Valley Police (“TVP”), as a Responsible Authority, makes this representation to support the application for review submitted by Reading Borough Council Licensing in respect of the above premises. TVP’s representation is made with the objective of promoting the licensing objectives, in particular:

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

TVP supports the review application and requests that the Licensing Sub-Committee revoke the premises licence as the appropriate and proportionate outcome.

Summary of TVP Position

TVP considers there to be a pattern of serious non-compliance and management failings at this premises, which cumulatively demonstrates that the premises is not being operated in a manner consistent with the licensing objectives.

These concerns include:

- 1) **Illegal working / immigration offence concerns:**
Following an immigration enforcement inspection in March 2026, the review papers record an individual encountered working/assisting behind the counter who had no right to work in the UK at the time of the visit.
- 2) **Underage sale / child harm concerns:**
A test purchase operation on 22/08/2025 records a sale of alcohol to a 16-year-old with no age verification or ID request, resulting in enforcement action.
- 3) **CCTV / management control concern:**

Police engagement records indicate that CCTV was requested in October 2020 and the premises later stated the footage could not be provided, citing the need for a new CCTV system.

4) Crime and disorder / incident-linked risks:

Records include incidents of violence/disorder and criminal damage associated with the premises (including assaults and fighting outside, and criminal damage within).

5) Public nuisance context:

In TVP's view, the combination of repeated incident demand, alcohol-related issues, and management shortcomings increases the risk of nuisance impacts in the locality (including disturbance associated with disorder and alcohol misuse in the vicinity), engaging the prevention of public nuisance objective.

Thames Valley Police considers these matters, both individually and collectively, to undermine the licensing objectives—particularly the prevention of crime and disorder, prevention of public nuisance and the protection of children from harm—and to indicate that lesser steps would not be sufficient.

Evidence and Matters Relied Upon

A) Illegal Working / Prevention of Crime and Disorder

- The review documentation records that on 11/03/2026 a joint visit by Reading Borough Council and Home Office Immigration Enforcement took place to conduct an immigration enforcement inspection, during which an individual with no right to work was identified.
- The same papers record that the individual was encountered working behind the counter and serving customers; the premises licence holder stated the person was “assisting” that day, but the papers assert that appropriate right-to-work checks were not being carried out.

TVP considers the employment/engagement of illegal workers at licensed premises to be a serious matter engaging the prevention of crime and disorder objective, and one that the Licensing Sub-Committee is entitled to treat as particularly serious within the review process.

B) Underage Sales / Protection of Children from Harm

- The premises history records that on 22/08/2025, during a test purchase operation, the shop assistant sold alcohol to a 16-year-old without any attempt to obtain age verification or check ID; enforcement action was taken.

- TVP considers this failure to apply age-verification controls to directly engage the protection of children from harm objective and to demonstrate inadequate safeguards around alcohol sales.

C) CCTV / Evidential Support and Deterrence (Prevention of Crime and Disorder)

- Police engagement logs record that officers attended to request CCTV footage and that the premises later stated the requested footage could not be provided.

TVP considers reliable CCTV provision to be a key control in deterring and detecting crime and in supporting effective investigations, and that failure to provide footage when requested is indicative of poor management control.

D) Recorded Incidents Relevant to Crime and Disorder / Public Safety / Public Nuisance

The premises history includes recorded incidents associated with the premises, including:

- Criminal damage within the premises involving aggressive behaviour and damage to protective screening.
- Theft of alcohol and assault on staff members.
- Fighting outside the premises with broken bottles and injuries reported.

TVP relies on these entries as further evidence of the risks that arise where management controls are not sufficiently robust. Such incidents also have the potential to impact the local area through disturbance, anti-social behaviour and nuisance effects, thereby engaging the prevention of public nuisance objective as well as crime and disorder and public safety.

Why Revocation is Sought (Appropriate and Proportionate Step)

TVP's primary position is that revocation is the only step that is appropriate and proportionate to promote the licensing objectives in this case, for the following reasons:

- The illegal working/immigration concerns are serious and engage the prevention of crime and disorder objective.
- The premises has a recorded failure in respect of underage alcohol sales, undermining the protection of children from harm objective and demonstrating inadequate retail controls.
- The recorded history indicates weaknesses in management controls (including CCTV availability) and a recurring risk profile associated with crime/disorder that can also give rise to disturbance in the locality, engaging the prevention of public nuisance objective.

- In TVP's view, additional conditions would not provide sufficient assurance of sustainable compliance in light of the seriousness and the pattern of concerns.

For these reasons, TVP submits that revocation is necessary to prevent further undermining of the licensing objectives.

Requested Determination

For the reasons set out above, Thames Valley Police respectfully requests that the Licensing Sub-Committee:

REVOKE Premises Licence LP2002949 (Reading Express, 102 Oxford Road, Reading, RG1 7LL).

Reading Express

102 Oxford Road, Reading, Berkshire, RG1 7LL

Applications

Count: 3

Application Date:	26/01/2023	Application Type:	Transfer and DPS Change
Basic Details:	From Best Food and Wine Ltd to Maahi Food & Wine Ltd and from Mr Balbir Singh GHABA to Mr Ravindar Singh ARORA.		
Objection:	No Objection	Objection Details:	PNC/Niche/Amandus checks completed
Application Date:	28/07/2017	Application Type:	Transfer and DPS Change
Basic Details:	From Anrish News Limited to Best Food & Wine Reading Limited and From Kripleshkumar Patwa to Balbir Ghaba		
Objection:	No Objection	Objection Details:	PNC/Niche/Amandus checks completed
Application Date:	02/07/2015	Application Type:	Transfer
Basic Details:	From Kripleshkumar Patwa & Purvi Patwa To Anrish News Limited		
Objection:	No Objection	Objection Details:	

Incidents and Intelligence

Count: 8

Date/Time:	12/03/2026	Type:	Other (specify in notes)
Crime Ref:		OIC/Contact:	Anthony Chawama, RBC Licensing
Comments:	Immigration Officers reviewed the right-to-work documentation for all employees present at the time of the visit. During these checks, one illegal worker was identified as working at the premises, namely [REDACTED]. This constitutes a breach of the Immigration Act and is also a matter relevant to the Licensing Act.		
Date/Time:	22/08/2025 11:12	Type:	Breach of Licence
Crime Ref:	43250430025	OIC/Contact:	P5787 Wheeler
Comments:	During Test Purchase Operation the shop assistant at Reading Express sold alcohol to a person(16 years old) without making any attempt at obtaining age verification or checking ID. Seller identified as RSA admitted sale. All checks completed on seller PNC and Niche - No trace and suitable for PND PND issued for sale of alcohol to a person under 18 years of age contrary to Sec 146(1) of the Licensing Act 2003 Reference 043 80 3 0119867 0 18 TP1, 1x Kopparberg Mango @ Â£2.69 DPS & PLH served TP1 *Reading Festival 2025* TP1 entered the store, selected age restricted goods, TP1 made their way to the service counter, TP1 was not challenged by staff, no ID requested, Sale completed. Â£90 PND issued to DPS.		
Date/Time:	17/01/2022 23:30	Type:	Underage Sales/Drinking

Crime Ref:	43220024001	OIC/Contact:	
Comments:	2 young females aged 14 & 15yrs were located at Newbury Racecourse Train Station, late at night and intoxicated -Whilst reported Missing by parents, 1 of the girls phones was tracked earlier in the evening to this store		
Date/Time:	11/03/2021 16:27	Type:	Other (specify in notes)
Crime Ref:	43210102479	OIC/Contact:	
Comments:	CRIMINAL DAMAGE - A CUSTOMER HAS BEEN BANNED BUT CAME IN ASKING FOR A BAG. THE BAG WAS NOT GIVEN. THE MALE GOT REALLY UPSET ABOUT IT AND STARTED SWEARING AT AGGD. HE THEN SMASHED THE COVID PROTECTION SCREEN WHICH HAS CAUSED A CRACK IN THE PLASTIC.		
Date/Time:	03/02/2020 22:05	Type:	Assault - Less Serious
Crime Ref:	43200038804	OIC/Contact:	P0553 Hurst
Comments:	MALE HAS STOLEN 2 BOTTLES OF WINE AND 4 BEERS HE IS STILL AT SIG AT BACK OF SHOP - THE MALE HAS KICKED AND ASSAULTED BOTH STAFF MEMBERS		
Date/Time:	30/04/2019 22:10	Type:	Assault - Serious
Crime Ref:		OIC/Contact:	P3803 Alderson
Comments:	2 MALES FIGHTING O/S SIG. SMASHING BOTTLES. ONE MALE IS BLEEDING ON HIS FACE. 2 X IC1M POLISH MALES.		
Date/Time:	02/03/2017 18:29	Type:	Other (specify in notes)
Crime Ref:		OIC/Contact:	
Comments:	[REDACTED] witnessed the sale of alcohol to a male who appeared to be drunk. She asked the seller if he thought the male was sober or not and replied that he did not understand.		
Date/Time:	18/08/2014 09:08	Type:	Intoxication
Crime Ref:		OIC/Contact:	PC6888 Harkins-Lord
Comments:	Report from a MOP of a male challenged for drinking in the street. CCTV viewed but the suspect could not be seen purchasing the alcohol from the premises.		