

PREMISES – RECORD OF INSPECTION DATED:

Licence No:	LP2002385
Name:	RUTTS CONVENIENCE STORES
Address:	205 OXFORD ROAD READING, RG1 7PX
Type:	Premises Licence Club Premises Certificate

Licence Inspection

Summary on Display: ☐ Yes ☒ No PAGE 2 MISSING Correct Part A/Conditions held at Premises: ☐ Yes ☒ No

Premises Licence Holder: _____ DPS: _____

DPS as per Licence: ☒ Yes ☐ No DPS Present? ☐ Yes ☒ No

If No, Reason: _____ Authorised Person: MANMOHAN GROVER

Licensable Activities (Carried On)

Regulated Entertainment: Plays | Films | Indoor Sporting Events | Boxing/Wrestling | Live Music | Recorded Music | Performance of Dance | Anything Similar

Are there any gaming machines? If so, how many? _____
Gaming permit produced and correct? _____

Late Night Refreshment: ☐ Yes ☒ No Sale/Supply of Alcohol: ☒ Yes ☐ No Location: ☒ On | ☐ Off | ☐ Both

Does the Licence/Certificate permit activities carried on? ☐ Yes ☐ No

Conditions of Licence/Certificate

2) NOT PROVEN, 3) NOT PROVEN, 4) NOT PROVEN
ANNEX 3 A) INCOMPLETE, B) AS ABOVE, C) AS ABOVE, E) AS ABOVE
F) STAFF CANNOT WORK SYSTEM
IMPOSED CONDITION - UNKNOWN SEEN

Summary of Key Points Discussed

QUESTION SURROUNDING EMPLOYMENT OF ALL STAFF.
NO RECORDS OF MGMT TO WORK CHECKS
NO STAFF AWARE OF LICENSING OBJECTIVES

Document Checklist

☒ Age policy operated ☒ Section 57 ☒ Training Records ☒ Authorisation List W/K

Awareness of the Licensing Objectives by Licence Holder/DPS: A – Good | B – Fair | C – Bad (Circle Appropriate)

Inspection Outcome: ☐ Satisfactory ☒ Unsatisfactory

Lead Authority Inspecting Officer(s): PC STACY WHEELER

Signature of licensee or representative(s): Manmohan Singh

Date of Inspection: 26/08/2020

Time Started: _____ | Time Ended: _____

0/4



Reading
Borough Council
Working better with you



THAMES VALLEY
POLICE

CONTINUATION SHEET OF ISSUES DISCUSSED:

[REDACTED] KUNNAXUDILYAN

Date of Birth: [REDACTED] 1959 -
[REDACTED] Oxford Road.

Return log minimally completed

CCW could not be provided if requested -
only "BOSS" DS knows.

Staff present have not completed right
to work documentation.

Single cars ↑ older
Sell single cars ✓

Sells "only a little bit" singles all the time

INSPECTING OFFICER: PC 5789 WINEZON.

SIGNATURE OF LICENSEE/REPRESENTATIVE: Manmohan Singh

DATE OF INSPECTION: 26/08/2020



PC 5787 V **APPENDIX 3**
Reading L

Reading Police Station
Castle Street
Reading
Berkshire
RG1 7TH

Mr Daljit Khurana



Tel: 101 [REDACTED]
Email:
simon.wheeler@thamesvalley.pnn.police.uk

Tuesday 8th September 2020

Licensing Act 2003

Premises Licence Number: LP2002385

Premises: Butts Convenience Stores

Premises Address: 205 Oxford Road, Reading, Berkshire, RG1 7PX

Dear Mr Khurana

On the 26th August 2020 I inspected your premises licence with Mr Richard Hall from Reading Borough Council.

During the inspection I was assisted by the Mr Monmohan Grover whom stated that he was working at the premises whilst the "boss" was at the cash and carry and that he was helping out his friend and usually works at the "London" shop. Mr Grover also stated that he was not an official employee and that he was working for free.

It was noted that the summary of the licence was not correctly displayed. Three copies of the first page of the summary (Part B) were attached above the counter one behind the other. Page two of the summary was missing and not on display.

Next to the front page of the summary was displayed the front page of the Part A of your licence. I asked to see the full Part A copy of your licence as per legislation but Mr Grover was unaware of where to locate this and was later informed that it was at the premises licence holders home address "in a safe place". This is an offence within the Licensing Act 2003 as Part A of the licence should be available to be seen when requested by an authorised officer. This concern was compounded by a lack of Section 57 notice as a section 57 notice if utilised correctly ensures that named members of staff are both aware of the licence location and have knowledge of its content.

On this day the premises had been left under the control of an individual with no knowledge of the premises licence, its conditions or its location.

As part of the inspection Mr Grover stated that he was a Personal Licence Holder and showed his Licence issued by Hillingdon Borough Council. However he was

unable to recount any of the four licensing objectives or provide any knowledge of them.

Mr Grover confirmed that he was aware that the premises age verification standard was "Challenge 25" and that he had been issued verbal training in relation to that. Mr Grover also confirmed that in relation to this specific premises he had received no written training regarding any aspect of this premises licence.

Mr Grover stated further that he was unaware of any other staff training, how any other persons working within the shop are paid or if an authorisation list for staff authorised to sell alcohol was available. Mr Grover stated that "the Boss; he is sitting here he would know".

With regards to the inspection of licence conditions compliance the following refers:

- Conditions 2 page 14 relating to staff training could not be proven as complied with as no evidence was provided.
- Condition 3 page 14 relating to BII Level 1 training for staff could not be proven and no evidence was provided.
- Condition 4 page 14/15 relating to refresher training could not be proven as no evidence was provided.
- Condition (a) requires an incident book; no incident book was available, however a refusals log was provided which had minimal entries included since March 2020. The condition requires an incident to be provided and as none could be produced this condition is in breach.
- Condition (b) is a duplicate of condition 3 page 14.
- Condition (c) relates to initial training for staff prior to BIIAB level 1 training being provided. No evidence was provided to prove compliance with this condition.
- Condition (d) relates to Challenge 25; a poster was displayed and Mr Grover was aware of this provision however we note that no written age verification policy was available.
- Condition (e) requires underage refresher training and no evidence was provided to prove compliance with this condition.
- Condition (f) relates to the provision of CCTV and the ability to provide recordings immediately upon request. No staff were on site that could work the system during the inspection.

We also discussed the super strength alcohol products that you were displaying for sale, and raised concerns that the sale of these products may be exacerbating community issues surrounding alcohol related anti-social behaviour in the area. This is both of serious concern to the localised immediate community and arguably also may undermine the four licensing objectives.

At the time of this discussion Mr Grover indicated that you only sell a very few of these products, but that you do sell single cans of super strength cider and beers "all of the time".

Overall the outcome of your inspection was unsatisfactory.

Your compliance with legislation and the due diligence available to be seen was poor with no incident register or up to date refusals log available. You had no written age verification policy, and staff were unable to work your CCTV system.

No right to work documentation had been completed with either of the two staff working within the shop. This fact was established via conversations with both of them.

You incorrectly displayed the licence summary and Part A of the licence was not available on site. No section 57 notice was available, there were no records of training available to be seen and no authorisation list was displayed or could be provided.

Evidentially it could NOT be proven that you were compliant with the majority of your licence conditions.

In relation to the super strength products, we recorded that you stock a number of them but state very few are sold. It is suspected that no risk assessment would have been made available in relation to the sale of these products if requested in relation to the impact that this has on the community and individuals consuming them.

As a result of this inspection Thames Valley Police believe that you are currently failing to promote the four licensing objectives and instead are seriously undermining them via these extremely poor processes.

Therefore, Thames Valley Police are recommending that you review your current licence conditions via a minor variation to both amend/replace some current conditions and add further conditions that shall enable you to promote the licensing objectives and aid compliant delivery of them.

These conditions are outlined below:

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) Staff authorised to sell alcohol shall be accredited to BII Level 1 award in responsible alcohol retailing (ARAR) or any other similarly nationally recognised approved accreditation curriculum within four weeks for existing and subsequent employees.

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.

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 (age verification policy).

7. No beers and ciders above 6.0% ABV shall be sold at any time during permitted licensing hours.

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.

Thames Valley Police believe that in order to promote the licensing objectives, and to ensure that your due diligence processes and licence condition compliance both improves and then remains at a suitable standard, that it is necessary for all of the above conditions to be applied to the premises licence.

With that in mind we would ask you to consider applying them to the licence via a minor variation (as discussed earlier) in order to both support this process and support the wider community by reducing alcohol related anti-social behaviour within the vicinity of your shop caused by the consumption of super strength beers and ciders within the public realm.

You may also be aware that Reading has a Public Space Protection Order (PSPO) in place which identifies the street consumption of alcohol as an issue serious enough to be included within the local legislation, and of course your agreement to reduce the strength of alcohol that you sell would also support this local legislative initiative.

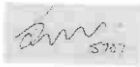
Please consider this proposal in detail and I would encourage you to contact us to either discuss any concerns you may have in relation to this proposal or your intention to support this process.

We are willing to discuss this with you via the telephone or to meet with you as part of a formal performance meeting process? You may also wish to obtain some licensing advice in the meantime. However, we would ask that you please contact us no later than Monday 21st September 2020 with your written formal decision via the email provided at the head of this letter.

Thames Valley Police are making this proposal as part of a formalised stepped approach. As such a failure to address the identified concerns in this letter via the manner proposed (via voluntary agreement) may result in further

action being considered if it is deemed necessary to ensure the promotion of the four licensing objectives.

Yours Faithfully

A small, rectangular stamp containing a handwritten signature in dark ink. The signature appears to be 'Simon Wheeler' and is written in a cursive, flowing style. The stamp is positioned below the 'Yours Faithfully' text.

PC 5787 Simon Wheeler

**Licensed Premises Summary Report****BUTTS CONVENIENCE STORE**

205 Oxford Road, Reading, RG1 7PX

Events dated between 01 August 2020 and 18 October 2020

PLEASE NOTE: The information below is OFFICIAL - SENSITIVE and should not be shared outside of Thames Valley Police without the express consent of the Licensing Team. The records in this summary are derived from a variety of sources. In some cases, multiple records may relate to the same incident and should not necessarily be counted individually. The report relates only to events which have been entered on Amandus at the time of the report being run and may not be a comprehensive list. All data entry is at the discretion of the Licensing Team.

Engagement: Visit by Police

Date/Time: Wednesday 26 August 2020

Inspection

Poor processes, lack of evidence to prove due diligence, concerns over right to work and possible illegal working

Engagement: Letter sent by Police (Tier 2)

Date/Time: Tuesday 08 September 2020

Letter sent to PLH/DPS as response to inspection.

Requesting inclusion of conditions via minor variation.

Awaiting response - letter within enforcement tier 2 folder -

Engagement: Telephone call from Licensee

Date/Time: Wednesday 23 September 2020

VOICEMAIL FROM MR PANCHAL REPRESENTATIVE OF PREMISES, FOR CONTACT.

TVP CALLED BACK AND LEFT VOICEMAIL FOR CONTACT ON 24/09/20.

Engagement: Telephone call from Police (Tier 2)

Date/Time: Wednesday 07 October 2020

Second phone voicemail left for Mr Panchal requesting contact back or written confirmation as to the proposed conditions contained within the TVP letter on 8th September 2020.

Awaiting response.