

**LICENSING ACT 2003 HEARING THURSDAY 11<sup>TH</sup> 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 area<sup>5</sup>. 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)<sup>10</sup>;
- 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"/> |

**Please state the ground(s) for review (please read guidance note 2)**

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

Reading Borough Council Licensing submit this application for review in order to address illegal working at the premises:

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.

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.

**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**

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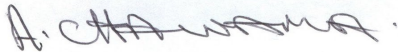
Please tick ✓ yes

- 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)

--	--

<b>Post town</b>	<b>Post Code</b>
------------------	------------------

<b>Telephone number (if any)</b>
----------------------------------

<b>If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)</b>
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**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.

<b>Premises Licence Number</b>	<b>LP2002949</b>
--------------------------------	------------------

### **Premises Details**

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

<b>Where the Licence is time limited the dates the Licence is valid</b>
N/A

### **Licensable Activities**

<b>Licensable Activities authorised by the Licence</b>
Sale of Alcohol by Retail - Off the Premises

### **Authorised Hours for Licensable Activities**

<b>The times the licence authorises the carrying out of licensable activities</b>
<b>Hours for the Sale by Retail of Alcohol</b>
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**

<b>Hours the Premises is Open to the Public</b>
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

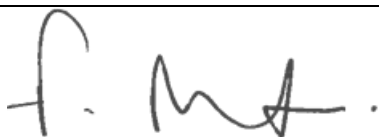
Personal Licence number and issuing authority of personal licence held by the designated premises supervisor where the premises licence authorises the supply of alcohol

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](mailto: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. CHAWANMA".

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](mailto: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 11<sup>th</sup> 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 :11<sup>th</sup> 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.		