

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

**1. Premises:**

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

**2. Applicant:**

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

**3. Grounds for Review:**

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

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

**4. Background:**

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

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

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

**5. Licensable activities and hours:**

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

**Sale of Alcohol – On the Premises**

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

**Provision of Late Night refreshments - Indoors**

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

**Provision of Live Music – Indoors**

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

**Performance of Dance - Indoors**

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

**Provision of recorded Music - Indoors**

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

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

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

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

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

**6. Date of receipt of application:** 22 April 2026

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

**8. Representations received:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **Crime and Disorder Act 1998**

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

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

### **Other Legislation that the Licensing Authority will consider**

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

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

### **Licensable Activities**

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

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

### **Review of a premises licence or club premises certificate**

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

and the officer acting as a responsible authority.

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

### **Hours of sale in off licences**

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

### **Enforcement Approach**

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

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

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

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

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

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

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

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

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

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

#### **Licensing Objectives and Aims:**

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

1.3 The licensing objectives are:

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

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

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

licensing work. They include:

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

### **Purpose**

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

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

### **Protection of children from harm**

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

### **The role of responsible authorities (eg Police)**

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

### **Licensing authorities acting as responsible authorities**

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

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

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

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

#### **The review process**

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

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

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

#### **Powers of a licensing authority on the determination of a review**

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

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

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

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

#### **14. Relevant Case law for consideration:**

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

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

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

#### **15. Appendices**

**Appendix LIC-1: Application to Review the Premises Licence**

**Appendix LIC-2: Current Premises Licence**

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

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

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

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

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

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

**I** Robert Smalley

*(Insert name of applicant)*

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

**Part 1 – Premises or club premises details**

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

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

<b>Number of premises licence or club premises certificate (if known)</b>
LP1001298

**Part 2 - Applicant details**

I am

Please tick ✓ yes

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

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

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

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

Please tick ✓ yes

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

**Surname**

**First names**

**I am 18 years old or over**

Please tick ✓ yes

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

**Post town**

**Post Code**

**Daytime contact telephone number**

**E-mail address  
(optional)**

**(B) DETAILS OF OTHER APPLICANT**

Name and address

Telephone number (if any)

E-mail address (optional)

**(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT**

**Name and address**

Mr Robert Smalley  
o.b.o Reading Borough Council - Licensing Department  
Bridge Street  
Reading  
RG1 2LU

**Telephone number (if any)**

**E-mail address (optional)**

Robert.Smalley@reading.gov.uk

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

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

**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. **LP1001298** (attached as **Appendix RS-1**), for Dolphin's Caribbean Restaurant & Bar

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

On 19/02/2026 Home Office Immigration Enforcement Officers visited Dolphin's Caribbean Restaurant & Bar to conduct an immigration enforcement inspection. During this visit, an employee from Grenada with no right to work was arrested. A Civil Penalty referral was served for the Civil Penalty Team to investigate and decide if a Civil Penalty Fine will be issued.

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

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

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

### **Licensing Officer's Comments**

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

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

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

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

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

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

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

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

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

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

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

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

*(i) is invalid,*

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

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

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

*(a) on conviction on indictment—*

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

*(ii) to a fine, or*

*(iii) to both*

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

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

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

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

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

#### **Licensing team's interactions with the premises:**

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

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

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

in order to promote the 4 licensing objectives.

The approach of the Licensing Team:

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

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

Immigration Act 2016

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

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

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

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

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

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

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

### **Enforcement Approach**

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

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

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

### **Secretary of State's Guidance (February 2026)**

#### Licensing Objectives and Aims:

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

1.3 The licensing objectives are:

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

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

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

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

#### Home Office Immigration Enforcement acting as a responsible authority

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

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

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

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

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

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

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

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

#### Reviews arising in connection with crime

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

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

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

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

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

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

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

### **Summary of Representation:**

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

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

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

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

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

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

- **Revocation of the licence;**

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

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

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

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

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

**Relevant Case law for consideration**

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

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

**Appendices:**

**Appendix RS-1 – Current Premises Licence**

**Appendix RS-2 – Premises Report Form**

**Appendix RS-3 – Premises Inspection Results Letter**

**Please tick ✓ yes**

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

If yes please state the date of that application

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

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

Please tick ✓ yes

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

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

**Part 3 – Signatures** (please read guidance note 4)

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

Signature   
.....

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

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

<b>Contact name (where not previously given) and postal address for correspondence associated with this application</b> (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>	

**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>LP1001298</b>
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**Premises Details**

**Trading name of Premises and Address**

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

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

N/A

**Licensable Activities**

**Licensable Activities authorised by the Licence**

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

**Authorised Hours for Licensable Activities**

**The times the licence authorises the carrying out of licensable activities**

**Hours for the Sale of Alcohol**

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

**Hours for Late Night Refreshments**

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

**Hours for Live Music**

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

**Hours for Recorded Music**

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

**Hours for anything similar to Live, Recorded Music or Dance**

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

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

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

**Alcohol**

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

On the Premises

**Premises Licence Holder**

**Name, (registered) address of holder of premises licence**

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

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

12430730

### Additional Details

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

Name: Randolph Bancroft

Address: [REDACTED]

### Designated Premises Supervisor

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

Personal Licence Number: LP2002707

Issuing Authority: Reading Borough Council

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

Dated: 07/04/2025

Signed on behalf of the issuing licensing authority



Emma Gee  
Acting Executive Director for Economic Growth and Neighbourhood Services

## **Mandatory Conditions**

### **Supply of Alcohol**

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

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

### **Film Exhibitions**

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

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

### **Door Supervisors**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Age Verification Policy (commencement 01/10/2014)**

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

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

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

(a) a holographic mark, or

(b) an ultraviolet feature.

**Drink Measurements (commencement date 01/10/2014)**

1. The responsible person must ensure that—

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

(i) beer or cider: ½ pint;

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

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

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

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

### Minimum Permitted Pricing (commencement 28th May 2014)

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

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

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

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

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

where—

(i) P is the permitted price,

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

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

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

(i) the holder of the premises licence,

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

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

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

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

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

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

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

### Conditions Consistent with the Operating Schedule

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Conditions attached after a hearing by the Licensing Authority**

n/a


**Annex 4**

**Plans**

As attached plan no. submitted on 20.01.2025

# Appendix RS-2

## Premises Report

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



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

Emma Gee  
Director of Environment and  
Neighbourhood Services

Civic Offices, Bridge St, Reading, RG1  
2LU

Our Ref: PR202604-1188991

e-mail: [REDACTED]

Date: 15<sup>th</sup> April 2026

Your contact is:

Ben Williams, Licensing - Regulatory Services

Good Afternoon,

### Licensing Act 2003

**Premises Name: Dolphin's Caribbean Restaurant/Bar**

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

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

During the inspection, I found the following issues:

### Conditions agreed with licensing:

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

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

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

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

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

**Other:**

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



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

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

Yours faithfully

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

Ben Williams  
Licensing & Enforcement Officer

**LICENSING ACT 2003 PREMISES LICENCE - PART A**

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

<b>Premises Licence Number</b>	<b>LP1001298</b>
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**Premises Details**

**Trading name of Premises and Address**

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

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

N/A

**Licensable Activities**

**Licensable Activities authorised by the Licence**

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

**Authorised Hours for Licensable Activities**

**The times the licence authorises the carrying out of licensable activities**

**Hours for the Sale of Alcohol**

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

**Hours for Late Night Refreshments**

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

**Hours for Live Music**

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

**Hours for Recorded Music**

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

**Hours for anything similar to Live, Recorded Music or Dance**

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

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

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

**Alcohol**

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

On the Premises

**Premises Licence Holder**

**Name, (registered) address of holder of premises licence**

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

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

12430730

**Additional Details**

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

**Name:** Randolph Bancroft

**Address:** [REDACTED]

**Designated Premises Supervisor**

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

**Personal Licence Number:** LP2002707

**Issuing Authority:** Reading Borough Council

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

Dated: 07/04/2025

**Signed on behalf of the issuing licensing authority**



Emma Gee  
Acting Executive Director for Economic Growth and Neighbourhood Services

## Mandatory Conditions

### Supply of Alcohol

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

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

### Film Exhibitions

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

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

### Door Supervisors

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Age Verification Policy (commencement 01/10/2014)**

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

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

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

(a) a holographic mark, or

(b) an ultraviolet feature.

**Drink Measurements (commencement date 01/10/2014)**

1. The responsible person must ensure that—

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

(i) beer or cider: ½ pint;

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

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

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

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

### Minimum Permitted Pricing (commencement 28th May 2014)

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

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

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

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

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

where—

(i) P is the permitted price,

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

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

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

(i) the holder of the premises licence,

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

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

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

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

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

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

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

### Conditions Consistent with the Operating Schedule

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Conditions attached after a hearing by the Licensing Authority**

n/a

**Annex 4**

**Plans**

As attached plan no. submitted on 20.01.2025



## Immigration Enforcement

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

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

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

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

Representations are being made for the following reasons:

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

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

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

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

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

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

#### ██████████ - Worker

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

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

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

#### Randolph BANCROFT - Employer Interview

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

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

#### RIGHT TO WORK CHECKS AND THE PREVENTION OF CRIME AND DISORDER

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

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

The licensing objectives are:

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

The premises has been found with one illegal worker – who was an overstayer with no right to work. This business has failed to meet the prevention of crime and disorder objective. The licence holder would have been aware of their responsibilities to uphold the licensing objectives as they are clearly defined as part of the premises licence application. It is an offence to work when a person is disqualified to do so, and such an offence can only be committed with the co-operation of a premises licence holder or its agents.

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

All employers are dutybound by law to conduct these checks if they wish to avoid being penalised if found to have employed someone who is prohibited from working, and guidance can be found on the gov.uk website or by using a search engine. Additional information on how to conduct these checks is available online, this includes the Home Office's official YouTube page.

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

Whether by negligence or willful blindness, an illegal worker was engaged in activity on the premises. Section 182 guidance of the Licensing Act 2003 at point 11.27 states that certain activity should be treated particularly seriously, and this includes employing someone who is disqualified from that work by reason of their immigration status in the UK. 11.28 of the guidance states that it is expected that revocation of the licence – even in the first instance – should be seriously considered.

#### Details of Responsible Authority

Name and Address:

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

Email address  
(optional):

IE.licensing.reviews@homeoffice.gov.uk

#### Signatures

Signature of Responsible Authority

Home Office Immigration Enforcement

Date:

29/04/2026

Capacity:

Responsible  
Authority

Division/Station : Reading Police Station Licensing Dept

From : C2107 Declan Smyth

To : Reading Borough Council

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

Date :30<sup>th</sup> April 2026

Subject :

### **Supportive review representation**

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

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

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

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

### **Summary of TVP Position**

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

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

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

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

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

### **Evidence and Matters Relied Upon**

#### **A) Illegal Working / Crime and Disorder**

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

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

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

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

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

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

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

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

#### **C) Door Supervision / SIA / BWV and Record Keeping**

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

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

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

#### **D) General Conditions Non-Compliance / Management Failure**

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

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

#### **Why Revocation is Sought (Appropriate and Proportionate Step)**

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

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

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

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

#### **Requested Determination**

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

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