

Licensing Sub-Committee

Supplementary Agenda

Wednesday 2 August 2023 at 6.30 pm

This meeting will be held remotely.

Watch the meeting live: [youtube.com/hammersmithandfulham](https://www.youtube.com/hammersmithandfulham)

MEMBERSHIP

Administration:	Opposition:
Councillor Mercy Umeh (Chair) Councillor Wesley Harcourt	Councillor Dominic Stanton

CONTACT OFFICER: Amrita White
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Public Notice

This meeting will be held remotely. Members of the press and public can watch the meeting live on YouTube: [youtube.com/hammersmithandfulham](https://www.youtube.com/hammersmithandfulham)

Speaking at Licensing meetings is restricted to those who have submitted a representation and registered to speak.

Date Issued: 01 August 2023

Licensing Sub-Committee Agenda

2 August 2023

Item

Pages

4. **WOODY GRILL, 1-3 UXBRIDGE ROAD, LONDON, W12 8LJ -
FURTHER INFORMATION FROM PREMISES LICENCE HOLDER**

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In the Hammersmith and Fulham Licensing Sub-Committee
In the Matter of Woody Grill, 1-3 Uxbridge Road, London W12 8LJ

**PREMISES LICENCE HOLDER'S SUPPORTING BUNDLE
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WITNESS STATEMENT OF [REDACTED]

Personal Introduction and Relevant Background

My name is [REDACTED]. English is my second language and I have made this statement with the benefit of an interpreter. I am the Group Operations Manager for the Woody Grill Group. We operate 5 restaurants in Central London under the Woody Grill brand, including the premises in this review. We also operate 2 steak restaurants and a fully licenced 1,000 capacity wedding venue.

I have worked for the Group for more than 10 years and my role includes maintaining standards and compliance with statutory requirements within the Group. As things stand, every restaurant in our group has a maximum 5 Star Food Hygiene rating and we have maintained this record for over five years. As for our Health & Safety at Work Act compliance, we have not had a reportable incident in 7 years. So far as ensuring we do not employ illegal workers, every one of our restaurants is in full compliance with the Right to Work regime; however, as is clearly set out by the Immigration Service in this application for a Review, that was not the case at our Shepherd's Bush branch for an 8-month period and I am both embarrassed and disappointed that this has happened. I offer my apologies to the Licensing Authority and the Immigration Service that the issues at the premises were not resolved sooner.

Premises History and Relevant Background

We opened Woody Grill Shepherd's Bush¹ on 28 February 2006 and it was initially managed by [REDACTED]. Today, the premises employs 12 staff, most of who live locally.

¹ Images of the Premises can be found in the Photographic Document at Exhibit 1.

On 3 January 202 the branch management was taken over by [REDACTED] and it was [REDACTED] who was the general manager of the restaurant at the time of the 3 inspections where Immigration Officers identified that workers who did not have the appropriate Right to Work were working in the premises.

Our Group of Restaurants is owned by two brothers, one of whom is [REDACTED], the Premises Licence Holder of our Shepherd's Bush branch. As Mr Erpolat does not speak English to conversational level, I am adopting his comments on this matter within my own statement. [REDACTED] is the nephew of Mr Erpolat.

After the first inspection on 17 March 2022, it was hoped by the owners of the Group that the issues could be addressed by supporting [REDACTED] rather than removing him from post. [REDACTED] was provided with additional training on the Right to Work requirements and I met with the Licensing Authority Officers in a Zoom meeting to discuss a way forward. We agreed on a number of appropriate conditions that could be added to the premises licence through the minor variation procedure. We subsequently made this application and received a revised licence.

It was hoped by the Group that [REDACTED] would be able to comply with these conditions and the legal requirements for hiring staff, following our discussions with him. It is unfortunate that it appears [REDACTED] was not able to comply with the conditions and other legal requirements resulting in illegal workers being found at the premises on the second inspection on 2 February 2023.

The Group were disappointed and [REDACTED] had identified his nephew was clearly struggling to comply with the conditions of the licence or the law on hiring workers. Thought was given to moving [REDACTED] along and identifying a new manager. However, in the current climate it is not particularly easy to find new staff. We had hoped to have somebody in place without an excessive delay.

Before we could put a new manager in place on the 19 May, a further visit was conducted to the premises finding further illegal workers resulting in this review application being submitted. In light of [REDACTED]' failure to comply with the licence requirements and the legal requirements for hiring staff, Mr Polat has removed [REDACTED] from his position as general manager of the branch and we apologise for the delay in doing this. We have now relocated the Group's highest achieving general manager from our Boga Steak Grill and installed him as general manager of the Shepherd's Bush branch. His role at the Boga Steak Grill being

taken on by his assistant general manager who has been trained up over the past three months.

Revision of Group Compliance System to Accommodate Auditing of Right to Work Checks.

To enhance our Group compliance procedures we have procured an on-line compliance system that can be interrogated and audited by Group Management and is also subject to an external audit by our compliance consultant, that requires the general manager to ensure that all relevant data, including the completion of Right to Work checks are filled and entered onto said system.

I have obtained a statement from our compliance consultant who has produced the system setting out its functions and features. I would ask the Committee members to consider this not only to be a demonstration of our commitment to ensuring best practice, but also as evidence that these unacceptable incidents will never happen again.

CCTV at the Premises

Our CCTV system on site can be viewed in 2 ways; by viewing on a monitor that we have set up next to the hard drive, and by viewing through any internet enabled device, such as a mobile phone or a tablet.

When the officers attended on 19 May 2023, it is correct that the hardwired monitor was not working (due to a fault with the cable that had been notified to the CCTV company previously) but the system was still operating and recording as it should. The footage on the system could be viewed on any internet connected device and staff in the premises would have been able to show the footage to officers, but I am informed that the officers did not want to see it on a mobile device.

Examples of the images as they are viewed on a mobile device can be seen at Exhibit 002. That exhibit also shows that we have appropriate CCTV signage up around the restaurant. The sign on the counter by the till has been there for some time, and the sign in the window was put up a week ago.

Comments from Other Parties

In light of the comments made by a number of local residents, I would like to address the issues they have raised.

Waste Management

It is correct that in 2021, we had a number of issues with our waste management company that resulted in them failing to collect our commercial waste (please note that this can only be disposed of through an appropriate commercial waste handling company) and we received a penalty charge notice that was then discontinued as I demonstrated to the Council that we had a waste management contract in place with a third party company and a Waste Transfer Note² for the relevant waste; however, the waste management company went on to let us down and we received a further penalty charge notice that we paid. As the waste management company continued to let us down, I moved our waste contract over to the London Borough of Hammersmith & Fulham; however, collections still seemed to be missed on occasion. I have continued to liaise with the waste management team and we have not had any problems with our waste collections since 16 December 2021.

Intoxicated Customers

Even though we do not sell alcohol at this site, we do on occasion have to deal with customers who are intoxicated. Our staff are trained to ensure that the welfare of any customer is always protected and, that customers are managed in such a way that we do not end up with incidents taking place in or around the premises. There are only three incidents in the past 8 years that I can identify. These are as follows:-

Incident: 17.07.2015

A passer-by broke our restaurant window in the mid-afternoon. They were outside the premises when they did it and were not one of our customers. We gave CCTV images of the incident to the Police and had to make a claim against our insurance company. I have attached a copy of the Victim Card we received as our business was the victim of this incident.

Incident: 31.12.2015

In the late evening, prior to the midnight New Year's Eve celebrations, passers-by who may have been drinking but were not customers of our premises, entered the premises and smashed a number of our plates and broke a display fridge. One of our staff called the Police and we provided the Police with the CCTV. Again, we were

² Please see Exhibit 003.

victims of a crime that was not associated with our operation and happened outside of our licensed hours.

Incident: 12.07.2023

A female came into our restaurant between 10:00pm and 10:30pm. She had an altercation with a customer as the customer was eating his food. The female took a knife from the table (a table knife for dining) and she was escorted from the premises by our staff who were in the process of calling the Police. By the time the Police Officer arrived, the female had run into a nearby park. The Police Officer then followed her to the park but did not see her as she had already left the area. No one was injured in this incident.

Parking

The vast majority of our customers, especially in the later hours, are locals who walk to the restaurant. We do not find that many, if any, of our customers in the late hours come to our premises by car. We operate through Deliveroo to provide food to people who are further away than they may want to walk, and so again, I cannot see why people would drive to our premises to buy food in the early hours. We are well aware that people do park in the neighbourhood to avoid having to pay to park in Westfield Shopping Centre³, if they are attending the restaurants and late-night entertainment venues nearby but those are destination venues unlike our restaurant which in the later hours caters for people who wish to buy food that they then take home.

Food Hygiene

I have seen that there is a claim that our premises is not clean and has been fined for breaching food hygiene standards. The incident people may be referring to happened back in 2015. At that time, I suffered from some health issues that took me away from work for around 2 years. During this time, we had employed a manager ([REDACTED]) to oversee our Acton branch and our Shepherd's Bush branch. Unfortunately, that manager was not able to meet our standards and failed a food hygiene inspection at Shepherd's Bush (they also had some issues in the Acton branch). I had to come back from sick leave in order to deal with the issues that this manager had left. The manager was dismissed and we remedied the issues resulting in a 4 Star rating at first which was upgraded to a 5 Star rating

³ A map of the surrounding area can be found at Exhibit 004.

in 2018 and has remained a 5 Star rating since then. A copy of our Food Safety Pack can be found at Exhibit 005.

Supporting the Police

As you will see in the attached documents, we have a number of CCTV cameras outside of our premises (as well as those we have inside) and this is the same throughout our Group. We have always been prepared to offer the Police 24-hour access to this system and have on several occasions provided footage of activities outside of our premises to assist the Police in investigations and on a small number of occasions, of footage from inside the premises where Police have been investigating any activities where it resulted in some form of incident inside the premises as I detailed above, or where it was to assist in an investigation in relation to incidents elsewhere.

I would also ask you to note that we have been a keen supporter of the Police Community Initiative to support children in local schools and our staff have been trained in and support the Ask for Angela initiative that gives women and vulnerable persons the ability to request support in a covert manner when they feel that they are not in a safe situation.

Conclusion

In conclusion, that illegal workers were employed at the premises is unacceptable. As a Group we should have removed [REDACTED] rather than try to retrain him. Once that retraining proved to have been ineffective, we should have moved him on sooner. We know this was our responsibility. I hope that the steps I and the team have set out in this statement demonstrate that we have taken a serious, considered look at the failings and developed an appropriate and effective way forward.

In the past, where incidents have arisen, we have addressed them and ensured no repetition. This reflects our approach to compliance that has seen our group meet and exceed regulatory requirements. We only ask that the Committee considers the steps we have taken as a Group to ensure no illegal workers are ever employed at this or any of our branches moving forward, and allow us to continue operating our premises under its Premises Licence.

Losing our Licence will greatly reduce our operating hours, and likely result in a loss of jobs. We want to avoid this and we hope the Committee feels we have now shown that our late night operation does not create a nuisance to our neighbours, and will not result in illegal workers being employed. We want to move forward as a sustainable business able to allocate sufficient resources to promoting the Licensing Objectives and employing our 12

dedicated staff. We value the consideration and feedback of the Committee, and will always work to adopt any best practice the Committee proposes.

I and the Woody Grill team will be in attendance at the hearing on Wednesday, to answer any questions the Committee may have.

Statement of Truth

The facts set out in the above statement are true to the best of my knowledge and belief.


.....


31/07/2023

Date

In the Hammersmith and Fulham Licensing Sub-Committee
In the Matter of Woody Grill, 1-3 Uxbridge Road, London W12 8LJ

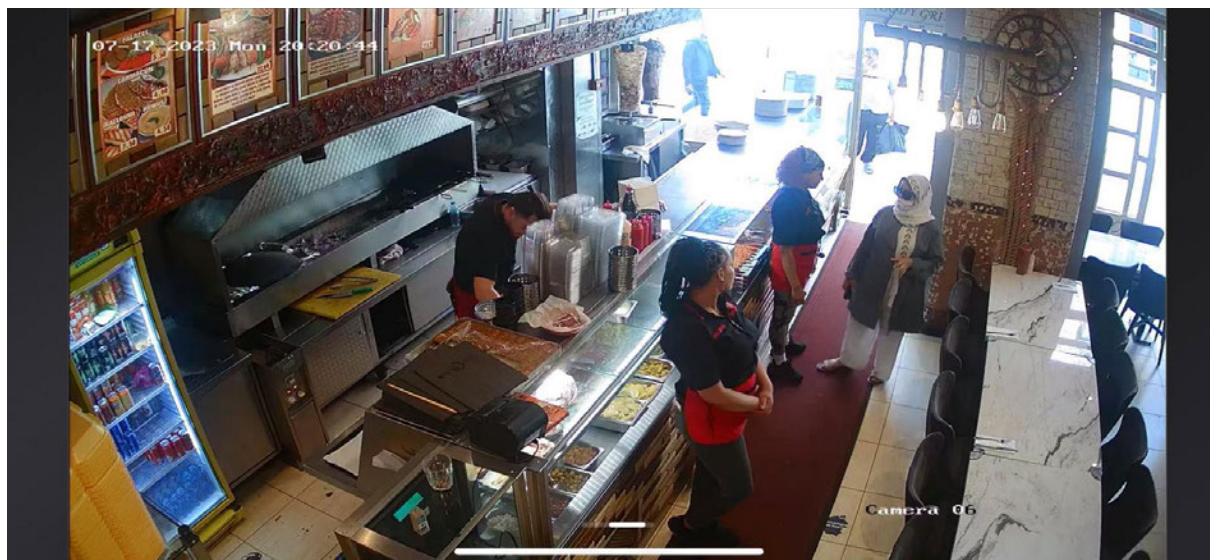
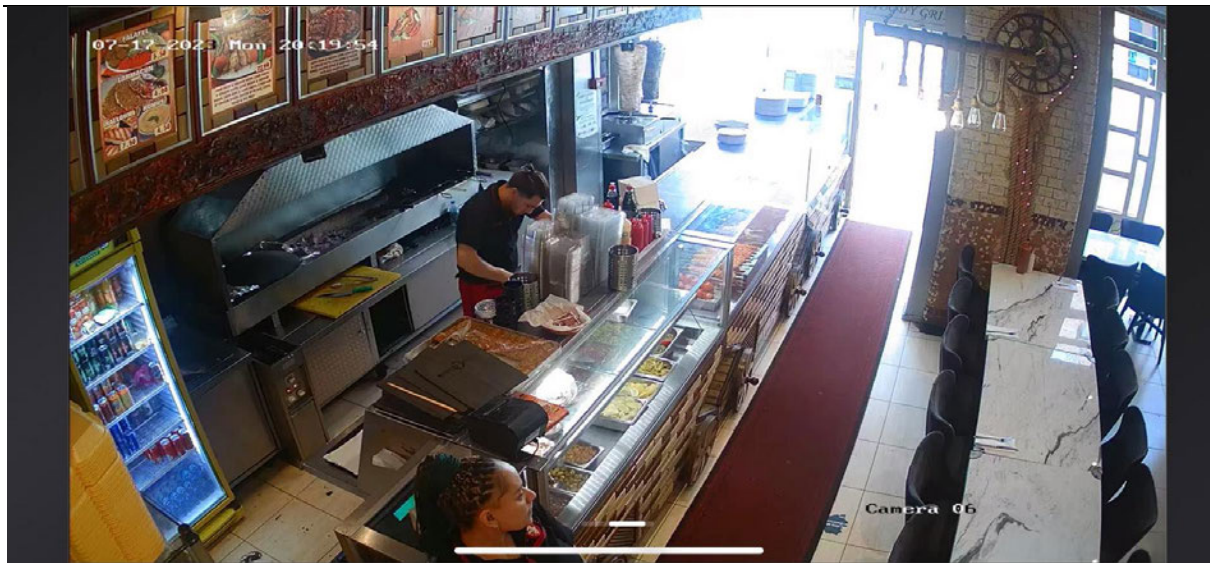
EXHIBIT 001
PHOTOGRAPHIC DOCUMENT







EXHIBIT 002
CCTV IMAGES







HALAL

TURKI



**ON A DATE
THAT ISN'T
WORKING
OUT?**

**FEEL LIKE
YOU'RE NOT
IN A SAFE
SITUATION?**

**GETTING UNWANTED
ATTENTION OR
PEOPLE NOT TAKING
'NO' FOR AN ANSWER?**

For discreet help, speak to
a member of our team and

ASK FOR ANGELA

They will know you need help and will
get you out of the situation without fuss.

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PARTNERSHIP
part of SaferBusinessNetwork

Supported by

**METROPOLITAN
POLICE**



Food
Standards
Agency
food.gov.uk/ratings

This scheme is operated
in partnership with your
local authority

FOOD HYGIENE RATING

**In the Hammersmith and Fulham Licensing Sub-Committee
In the Matter of Woody Grill, 1-3 Uxbridge Road, London W12 8LJ**

**EXHIBIT 003
WASTE MANAGEMENT EMAIL**

Dear Sir/Madam,

Reference Number: [REDACTED]

Thank you for your correspondence and for supplying your valid waste transfer note.

I can confirm that notice number [REDACTED] has now been closed and you will not receive any further correspondence regarding this matter.

Kind regards,

[REDACTED]
Waste Enforcement Team

From: [REDACTED]
Sent: Friday, January 29, 2021 11:30 AM
To: waste enforcement <waste@nationalenforcementsolutions.co.uk>
Subject: Fw: CheaperWaste BP058771 [ref:_00D4JGOil,_5004JM6gaH:ref]

RE: WOODY GRILL
1 UXBRIDGE
W12 8LJ

DEAR SIR/MADAM

PLEASE SEE ATTECHMENTS FOR WASTE CONTRACT OF WOODY GRILL RESTAURANT WHICH IS YOU REQUIRE
WHEN YOU HAD VISIT THE RESTAURAT 27/01/2021
WITH REGDARDS

From: Customer Services Inbox <customerservice@cheaperwaste.co.uk>
Sent: 29 January 2021 11:22
To: [REDACTED]
Subject: CheaperWaste BP058771 [ref:_00D4JGOil,_5004JM6gaH:ref]

Good Morning,

Please find attached your Contract

Regards,

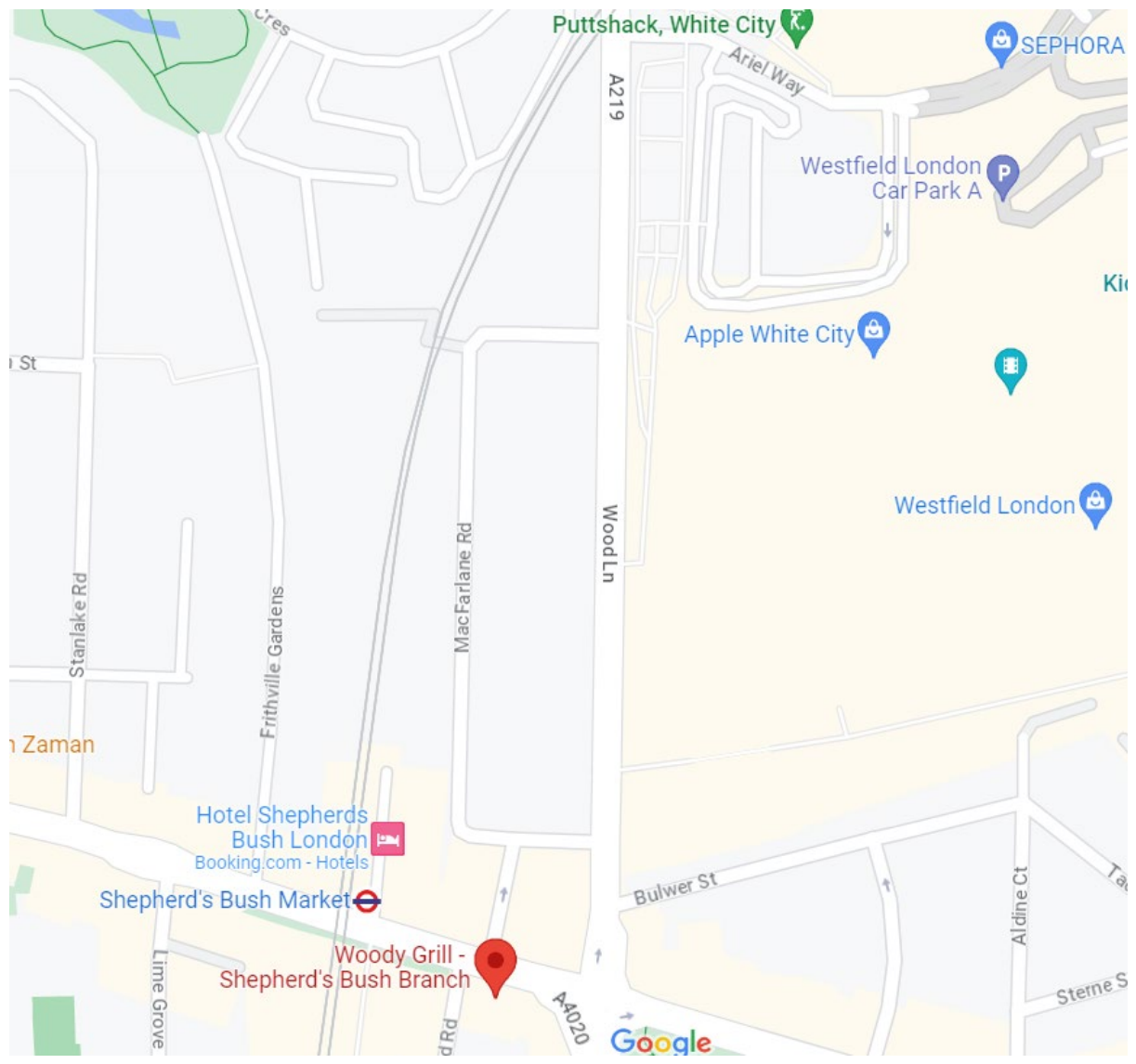
[REDACTED]
In-Service Support
CheaperWaste

03301 242 535

customerservice@cheaperwaste.co.uk

In the Hammersmith and Fulham Licensing Sub-Committee
In the Matter of Woody Grill, 1-3 Uxbridge Road, London W12 8LJ

EXHIBIT 004
LOCATION MAP



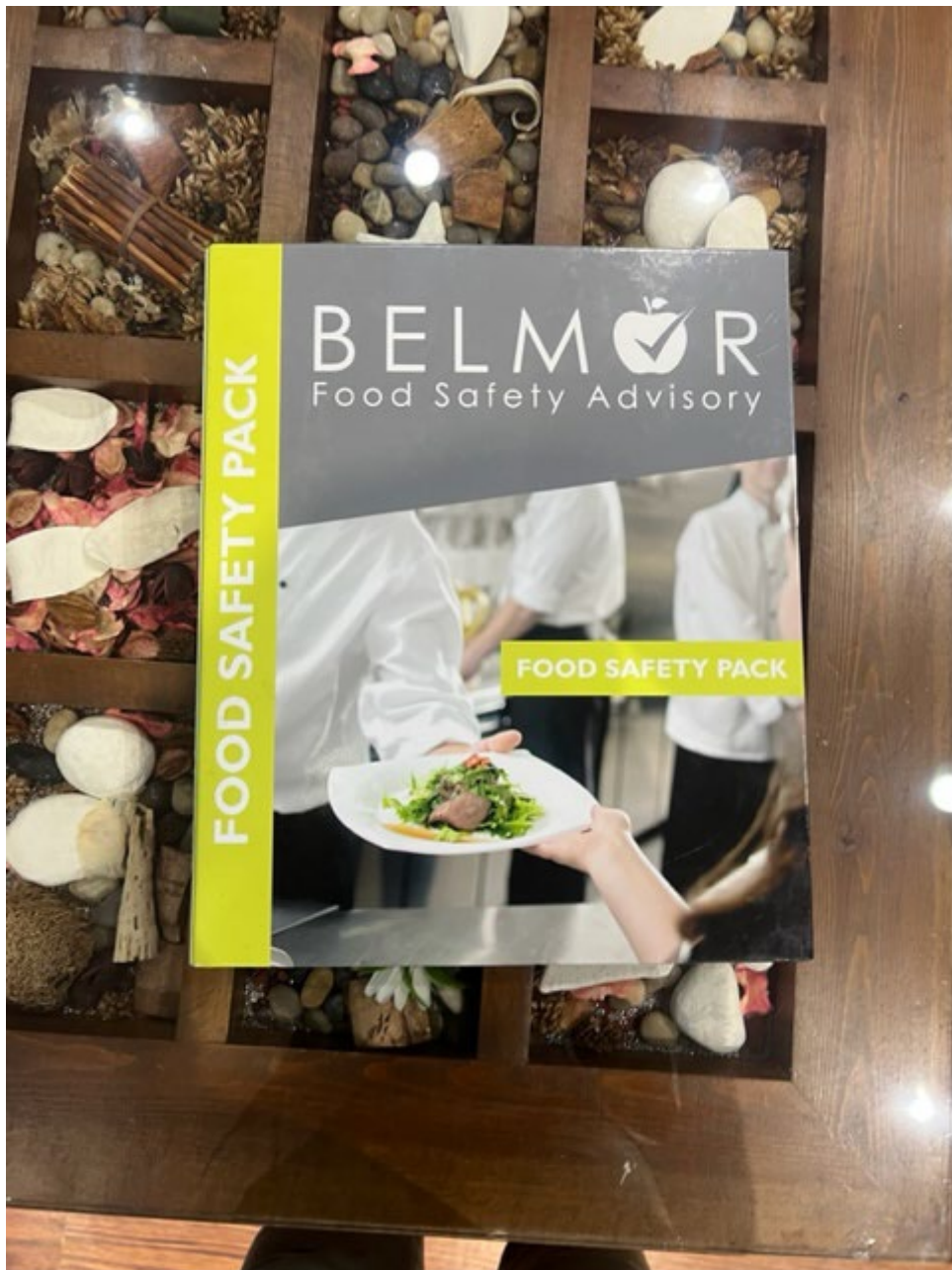


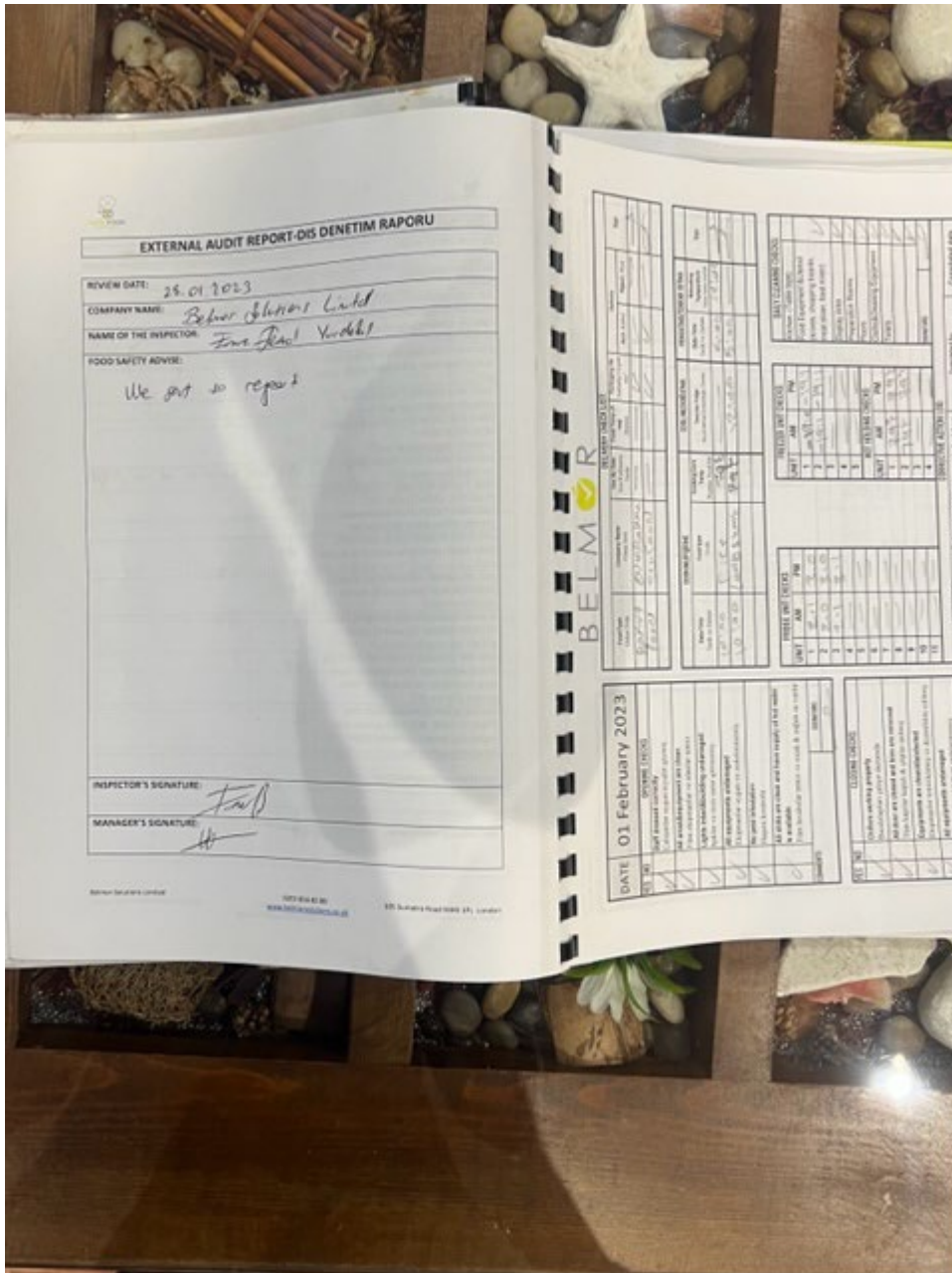
VIEW FROM PREMISES, LOOKING INTO HOPGOOD STREET



In the Hammersmith and Fulham Licensing Sub-Committee
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EXHIBIT 005
IMAGES OF FOOD SAFETY PACK





ALLERGEN LIST

NAME OF THE COMPANY	WOODY GRILL														
DISHES/Menu	CELERY/KEPEYIZ	CERIALS CONTAINING GLUTEN/ GLUTEN ICEKREM TAHI	CRUSTACEANS /FENIZ	KABUKULLARI	EGGS/YUMURTA	FISH/BALIK	LUPIN/ACI BAKLA	MILK/SUT	MOLLUSK/ POMPUZGICALAR	MUSTARD /MAREAL	NIITS/CEKIZ	PEANUTS /YER POTISI	SESAME SEEDS / SUSAM	SOYA/SOYA	SULPHUR DIOXIDE/ SULFUR DIOKSID
	COLD MEZE														
HUMUS															
CACIK								YES					YES		
BARBUNYA PILAKI															
PATLICAN SALAD															
DOLMA															
AMERICAN SALAD					YES										
MARINATED OLIVES														YES	
POTATO SALAD														YES	
ISPANAK TARATOR								YES							
MIX COLD MEZE FOR 2					YES			YES				YES	YES		

BELMOR SOLUTIONS LIMITED 185 SUMATRA ROAD NAWA 1PL DIRECT: 0201 856 80 89 MOBILE: 0791 784 74 66
All above are shared for general guidance purposes. The Allergen list should be revised regularly. BELMOR Solutions Limited does not accept responsibility for potential allergen reactions.

ISSUE DATE 18.09.2017

VERSION 00

STAFF TRAINING RECORDS- EGITIM KAYITLARI

Food Safety Induction Training will include the following topics:

- PREPARATION AND HANDLING/ HAZIRLAMA VE ELLEÇLEME
- COOKING/ PIZIRMA
- COOKING/FREEZING- SOĞUTMA, DERİN DONDURUCU
- HOT HOLD/DISPLAY- SICAKTA BAKILTME
- REHEATING- TEKRAR ISITMA
- TEMPERATURE CONTROL-DERECE KONTROLU
- TEMPERATURE CONTROL-DERECE KONTROLU
- PERSONAL HYGIENE-PERSONEL HUYENI
- CROSS CONTAMINATION-COLOR CODED EQUIPMENT/ ÇAPRAZ BULAŞMA
- CLEANING AND DISINFECTON/ TEMIZLIK VE DEZENFEKSİYON
- PEST CONTROL/ PEST KONTROL
- FOOD ALLERGIES/GIDA ALLERJİLERİ
- FOOD SAFETY MANAGEMENT SYSTEM/GIDA GUVENLUSI SİSTEMI
- HEALTHSAFETY/ İŞ GUVENLUSI

Training Records:

Name of Training	Date of Training	Employee Name	Recommended Refreshment Date	Manager
Level 2 Food Safety		Ali Haydar Gungor		
Level 2 Food Safety		Shaizab Akter		
Level 2 Food Safety	09.11.2022	Betelhem Amrazal Mohamed	09.11.2026	
Level 2 Food Safety	09.11.2022	Sara Mohamed	09.11.2025	
Level 2 Food Safety	09.11.2022	Ibrar Shakhzai	09.11.2025	

VISITORS AND CONTRACTORS RECORD- ZİYARETCİ KAYITLARI

VISITORS AND CONTRACTORS

All visitors and contractors must read the important information below before signing and they must sign out when leaving the premises.

Important information:

For Food Safety reasons, by signing the log you confirm the following and declare to be fit to enter a food premise:

- You have not suffered from diarrhoea and/or vomiting in the past 7 days.
- You have never had or are known to be a carrier of typhoid or paratyphoid.
- You are currently suffering from skin problems affecting hands, arms or face, fingers or hands.
- You are not currently suffering from boils, infected cuts or septic lesions to the gums/mouth.

Date	Time In	Time Out	Company Name	I've read the important information (sign to confirm)	If filing equipment, detail serial no
14.02.13	14:30		BEIMOR	✓	-
12.02.13					
16.02.13			BEIMOR	✓	
12.02.13			BEIMOR	✓	L
15.02.13			BEIMOR	✓	L
05.06.13			BEIMOR	✓	L
13.06.13			BEIMOR	✓	L
14.06.13			BEIMOR	✓	L
10.02.13			BEIMOR	✓	L



ON A DATE THAT ISN'T WORKING OUT?

FEEL LIKE YOU'RE NOT IN A SAFE SITUATION?

GETTING UNWANTED
PEOPLE NOT TAKING NO FOR AN ANSWER?

For discreet help, speak to a member of our team and

ANGELA

They will know you need help and will get you out of the situation without fuss.

SAFERSOUNDS PARTNERSHIP

Sponsored by

Metropolitan Police

Food Standards Agency
food.gov.uk/ratings

This scheme is operated in partnership with your local authority

FOOD HYGIENE RATING

0 1 2 3 4 5

VERY GOOD

It is an offence liable on conviction to a fine under the Licensing Act 2003 to knowingly or recklessly provide false information in connection with this application

NOTICE OF A REVIEW OF A SECTION 51

Notice is hereby given that The Compliance & Enforcement Team of Fulham Council for a Licence Review is situated at 1-3 Duxbridge Road London. The grounds for this application are: Made by Central London Immigration Team on the grounds of: the prevention of public safety. Immigration conducted on occasion employees were found to be right to work in the United Kingdom. A record of the application details and may be inspected at www.131f.gov.uk/office/3753-1031 at Hammersmith and Fulham London, W6 9BL.

Anyone wishing to make a representation should give notice in writing specifying the ground on which the representation is made to the Licensing Team, Town Hall, King Street, 21st June 2023 - 18th July 2023

Date: 21st June 2023

Signed: Mr. [Name], Licensing Team Manager. The Council will not entertain representations where the writer requests that his identity and all representations will be included in the Licensing Sub Committee and will therefore

Representations must relate to one of the following: the prevention of crime and disorder, public safety, nuisance and the protection of children from



Woody Grill
1-3 Uxbridge Road London W12 8LJ

Introduction

1. I, Michael Watson, of Better Compliance (formerly Licence Consultants Limited), make this statement to provide relevant information regarding a Review of the Premises Licence under section 51 Licensing Act 2003, for Woody Grill.
2. I have been a licensing consultant since 2004. My consultancy service has a respected reputation amongst the Police, local authorities, and our private clients.
3. Previously, I was:
 - a. a civilian licensing officer with the Metropolitan Police Clubs and Vice Unit (CO14) from 1994 to 2001; and
 - b. a licensing officer at the London Borough of Islington from February 2001 to June 2004.
4. I have attained the Certificate of Higher Education in Licensing Law from Birmingham University and I am a member of the Institute of Licensing (MIoL). I am also an Associate of the Chartered Institute of Environmental Health (ACIEH). My role as a consultant is to work in partnership with the statutory authorities. I have given evidence at Licensing Committees, planning appeals, and licensing appeals before Magistrates and the Crown Court.
5. I have been an independent licensing consultant for over seventeen years. I have worked with a wide variety of premises including

nightclubs, bars, restaurants, and hotels. My retainer clients include The London Park Lane Hilton (Westminster), the Truman Brewery complex (Tower Hamlets), The Outernet – HERE and The Lower Third (Camden), The Piano Works (Islington and Westminster), The Windmill Theatre Soho (Westminster), Tape London (Westminster), The Box Soho (Westminster), Cirque Le Soir (Westminster), Reign (Westminster), Raffles (Royal Borough of Kensington and Chelsea), Tabu (Westminster), Swingers Golf (City of London and Westminster), Lio London (Westminster) and The Night Group – Night Tales and NTs Loft (Hackney).

6. I am the co-author of the book, *“Staying Open – An Essential Guide for Managers of Licensed Premises”*.
7. I have worked with many venues, in many different environments, to design successful management procedures to ensure the promotion of the Four Licensing Objectives, current best practice and compliance with legislation and regulations.

Instructions and Scope of Work

8. I am instructed by Mr Marcus Lavell, Keystone Law, regarding the Review.
9. I have been provided with the Review application and the premises licence for Woody Grill.
10. My instructions are to provide a report on the compliance plan for Woody Grill that would ensure compliance with premises licence conditions, Right to Work requirements, and promotion of the four Licensing Objectives.
11. I confirm that, notwithstanding that I have been engaged as a consultant, I have prepared this Witness Statement together with all opinions expressed herein, as an independent professional licensing consultant.

Licensing Compliance Plan

12. The plan is in two parts; (1) implementation of an online compliance system, and (2) conduct regular audits of right to work records for the premises.

Online Compliance System

13. Report Support is a unique online compliance system for licensed premises. It has been designed by a team of experts with vast experience in licensing enforcement, working with leading night-time economy operators.
14. Report is a secure digital system for licensing due diligence, providing a centralised platform for recording all compliance activities.
15. Key features of Report Support include a digital daily records system, for compliance checks, safety checklists, positive guest welfare interventions, and incident reports.
16. We have created a section within the Report Support system to record right to work compliance checks and documentation.
17. The right to work section of Report Support allows the following information to be recorded for each member of staff;
- Full name:*
- Employee number:*
- Nationality:*
- Is right to work required? **Yes/No***
- If yes, original proof of right to work documents checked and colour copies date stamped? **Yes/No***
- Document(s) uploaded? **Yes/No***
- Checked by (manager's name):*
- Date checked: XX/XX/XXXX*
- Expiry date of right to work XX/XX/XXXX*
- Maximum hours allowed to work per week? **Yes/No***

If yes, what is maximum number of hours? XX

Hourly wage rate: £XX:XX

18. The system allows for the secure digital storage of employees' right to work documents.
19. The system will send an automatic e-mail alert to a prescribed list of e-mail recipients when an employee's right to work expires.
20. The manager in charge of the premises needs to confirm two statements on the system in regard to employees' right to work:

*Right to work checks carried out on all persons that are carrying out work within the Premises, whether paid or otherwise, temporary, or permanent, before those persons commence work. **Yes/No***

*Documentation uploaded for each employee: date stamped colour copies of all documents produced, the name of the person who has checked the original documents and confirmation that the said person has seen the original documents, any enquiries made and a right to work checklist with the relevant box (es) ticked. **Yes/No***

21. There are different user permissions. A normal user will be able to add and view records. A user with admin permission will be able to add, view and amend records.
22. The system has the functionality to run reports of all employees' right to work statuses and their respective expiry dates. This enables audits of the staff working at the premises. The system automatically sends an alert to a prescribed list of e-mail recipients when the next annual audit is due.
23. Users can access the system on any device with a browser. It works on portable devices with either IOS or Android operating systems.

24. Multiple users can access the system at any one time, viewing records and entries in real time, allowing for oversight and supervision by operational management and head office.
25. The system can quickly and easily show enforcement officers right to work records and checks at any time.

Audits


26. Comprehensive audits of the right to work checks at the premises will be conducted by a qualified consultant to ensure compliance with right to work requirements and specific conditions attached to the Premises Licence.
27. The audits measure the success and effectiveness of operational procedures and aim to build a body of positive due diligence evidence for the premises. They also serve as a management tool; giving confidence that the premises is compliant and acts as an early warning system if issues are identified.
28. The audits are conducted at a minimum of once every 6 months.
29. The audits are unannounced and are carried out when the venue is trading at peak times.
30. The audits will check the right to work of all persons working at the premises at the time of the audit as well as checking historical records for the previous 6 months.

Conclusions

31. The measures detailed in this statement will give the business a highly effective means of managing right to work compliance.
32. The compliance plan requires a clear commitment from the leadership of the business. I have seen that the business has been fully committed to implementing and enthusiastically maintaining the compliance plan.

33. As such, I have no reason to believe that there is any risk of a repetition of the events which triggered the review.

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

Signed:  Dated: 30th July 2023

Michael Watson