

Agenda Item 3

LICENSING SUB COMMITTEE

DATE OF HEARING: 1 DECEMBER 2025

REVIEW OF THE PREMISES LICENCE FOR MUMBAI KITCHEN, 46 – 48 BAMPTON STREET, TIVERTON, DEVON, EX16 6AH

Cabinet Member(s): Cllr David Wulff, Cabinet Member for Community and Leisure

Responsible Officer: Simon Newcombe, Head of Housing and Health

Reason for Report: An application was received from the Home Office (Immigration Enforcement) to review the premises licence for Mumbai Kitchen, 46 – 48 Bampton Street, Tiverton, Devon, EX16 6AH. The hearing to consider this application was due to be held on 19 November 2025.

On 18 November 2025 the licensing authority (Mid Devon District Council) received notification from the South & West Devon Magistrates Court that an illegal working compliance order had been issued for the same premises. Under Section 167 of the Licensing Act 2003, this initiates a review of the premises licence.

As a result, the hearing due to take place on 19 November 2025 was adjourned and a new hearing date set for 1 December 2025. This gives relevant parties the chance to submit additional information and allows the Sub-Committee to consider everything at one hearing, supporting a fully informed and efficient decision-making process.

This is an addendum to the report previously circulated in relation to the adjourned hearing on 19 November 2025. The initial report can be found online here:

<https://democracy.middevon.gov.uk/ieListDocuments.aspx?CId=326&MId=2226>.

RECOMMENDATION: That the review of the licence be decided in accordance with the licensing objectives.

Financial Implications: The potential cost of defending an appeal in the courts.

Legal Implications: If there is an appeal against the decision Mid Devon District Council (the Council) could find itself bearing the costs.

Risk Assessment: If the decision is not reasonably and lawfully made it could be overturned on appeal to the Magistrates' Court.

Equality Impact Assessment: No equality issues identified for this report.

Relationship to Corporate Plan: Not applicable

Impact on climate change: Not applicable

Additional information relevant to this application: None

1.0 INTRODUCTION

- 1.1 The purpose of this hearing is to determine a review of the premises licence for Mumbai Kitchen, 46 – 48 Bampton Street, Tiverton, Devon, EX16 6AH. This is a consequence of:
 - a) An application to review the premises licence submitted by the Home Office (Immigration Enforcement “IE”) on 24 September 2025.
 - b) Notification of an illegal working compliance order made by the South & West Devon Magistrates Court. Notification of this was received on 18 November 2025.
- 1.2 The initial information relating to the application to review the premises licence submitted by the Home Office (IE) can be seen online here: <https://democracy.middevon.gov.uk/ieListDocuments.aspx?CId=326&MId=2226>. This includes information relating to the history of the premises and its premises licence.
- 1.3 Prior to the proposed hearing on 19 November 2025, both the Home Office (IE) and the premises licence holder submitted additional information. This information was circulated to the Sub-Committee at the time, and it is attached to this report for reference. The information submitted by the licence holder is attached as **Annex 1a and 1b** and the information submitted by the Home Office (IE) is attached as **Annex 2**.
- 1.4 The rest of this report will consider the illegal working compliance order, the impact it has on the licence and additional information received.

2.0 BACKGROUND INFORMATION AND DETAILS OF COMPLIANCE ORDER

- 2.1 The current premises licence holder is Mr Joy Abraham. He has held the licence since the premises was known as Mumbai Kitchen in 2020.
- 2.2 The current Designated Premises Supervisor (DPS) is Mr Jamal Ahmed and he has held this position since 2020.
- 2.3 The Home Office (IE) previously visited the premises in 2022 and 2024. Issues regarding illegal working at the time of these visits were highlighted in the review application submitted on 24 September 2025.

- 2.4 On 16 November 2025 the Home Office (IE) carried out another visit to the premises. This visit identified further issues regarding illegal working and as a result, a closure notice was served on the premises by Immigration Officers under Schedule 6 of the Immigration Act 2016.
- 2.5 Where an illegal working closure notice is issued, an application for an illegal working compliance order must be made to the court by the Home Office (IE) within 48 hours (unless the closure notice has been cancelled).
- 2.6 The application for the order was made on 17 November 2025 and granted by the South & West Devon Magistrates Court. On 18 November 2025 the Council received notification of this and a copy of the Order. A copy of the Order is attached to this report as **Annex 3**.
- 2.7 It should be noted that Mr Maroof Ahmed is the named party in the Order. He is not the premises licence holder nor the DPS. He is identified in various online news articles and the Annexes to this report as the owner or restaurant manager of Mumbai Kitchen.

3.0 ACTION FOLLOWING NOTIFICATION OF AN ILLEGAL WORKING COMPLIANCE ORDER

- 3.1 Following receipt of the Order under section 167 of the Licensing Act 2003, the licensing authority must review the premises licence. Consequently, it was decided to adjourn the hearing scheduled for 19 November 2025. This ensured both matters, the initial review application and the section 167 review, could be considered together at a single hearing.
- 3.2 When a licensing authority receives notice from the magistrates' court that it has issued a compliance order, it must commence a hearing within 10 working days of that notice.
- 3.3 The licensing authority must notify relevant parties of the review and advertise it, in accordance with the requirements of the Licensing Act 2003. In this case, the Council notified all Responsible Authorities and the licence holder via email, and placed a notice on the premises, at the Council offices and on the Council's website.
- 3.4 The period for representations to be made to the licensing team, ran between 19 November 2025 and 25 November 2025.

4.0 REPRESENTATIONS

- 4.1 The Council received ONE representation, and this was from the Home Office (IE). A copy of the information received is attached as **Annex 4**.

5.0 LICENSING POLICY AND GOVERNMENT GUIDANCE

- 5.1 As noted in the report for the hearing due to be held on 19 November 2025, the Sub-Committee must have regard to the Council's own licensing policy and the

Section 182 Guidance when considering a review of a premises licence. Further information about this can be found in Sections 7 and 8 of the previous report which can be seen here:

<https://democracy.middevon.gov.uk/documents/s34408/Report%20MK%20Review.pdf>.

6.0 DETERMINATION AND OPTIONS

6.1 Details of the decision-making process and options available to the Sub-Committee can be seen in the report prepared for the hearing on 19 November 2025 (link above).

6.2 For ease of reference, the Sub-Committee must take such steps considered appropriate to promote the licensing objectives. These possible steps are to:

- a) Take no action
- b) Issue an informal warning to the licence holder and/or to recommend improvement within a particular period of time
- c) Modify the conditions of the premises licence temporarily (for a period up to 3 months) or permanently
- d) Exclude a licensable activity from the scope of the licence temporarily (for a period up to 3 months) or permanently
- e) Remove the DPS from the licence
- f) Suspend the licence for a period not exceeding three months
- g) Revoke the licence

6.3 The Sub-Committee must make its determination at the conclusion of the hearing.

7.0 THE PROCESS FOR THIS HEARING

7.1 An 'order of play' document setting out how the hearing will run is attached at **Annex 5**. This replaces the order of play document provided as an annex to the report prepared for the hearing on 19 November 2025.

8.0 APPEAL

8.1 If any party is dissatisfied with the decision made then they have the right of appeal to the Magistrates' Court within 21 days of formal notification of the decision.

LIST OF ANNEXES TO THIS REPORT

Annex A and B: Licence holder information submitted 12 November 2025

Annex C: Home Office (IE) information submitted 14 November 2025

Annex D: Compliance Order issued 17 November 2025

Annex E: Home Office (IE) supplementary representation

Annex 5: Order of play

Contact for more information: Tom Keating (tkeating@middevon.gov.uk)

Circulation of the report: Legal / Sub-Committee / licence holder and their representative / those that made representations

List of background papers:

- Licensing Act 2003 - <https://www.legislation.gov.uk/ukpga/2003/17/contents>
- Section 182 Guidance - <https://www.gov.uk/government/publications/explanatory-memorandum-revised-guidance-issued-under-s-182-of-licensing-act-2003/revised-guidance-issued-under-section-182-of-the-licensing-act-2003-december-2023-accessible-version>
- Mid Devon District Council Licensing Act Policy - <https://www.middevon.gov.uk/business/licensing/statement-of-licensing-policy-licensing-act-2003/>
- Report for adjourned hearing on 19 November 2025 - <https://democracy.middevon.gov.uk/ieListDocuments.aspx?CId=326&Mid=2226>

Premises Licence MDV PR0074 Mumbai Kitchen**Application for Review of Licence - Notice of Hearing dated 4 November 2025****Response from Joy Abraham, Premises Licence Holder**

1. I am the Premises Licence Holder for the above premises licence MDV PR0074 (the “**Premises Licence**”) at 46-48 Bampton Street, Tiverton EX (the “**Premises**”). I have set out below my response to the Report and this Application for Review brought by the Home Office. I have also attached a paginated bundle of documents. References to **[PAGE #]** below are references to page numbers in that attachment. As referred to below, I will bring further material with me to the hearing of this Review, and will make it available for inspection by the Sub-Committee.
2. At the outset, I want to apologise that this has happened, and to say that I am grateful to the Home Office for bringing all of this to my attention. I had no idea about these problems at the Premises, and now that Mr Keating has informed me, I have made and am making many changes as I explain further below.

Response to Request for Information

3. I have been asked, at section 6 of the Report, to provide clarification on several number of matters. I do this briefly here, and further information is set out below.

Request 6.12: Details of what was in place, from my perspective, to ensure the relevant right to work checks were undertaken at the premises (if any).

4. As I explain below at paragraphs 13 - 14, I was not involved in the day to day running of the business and was not aware in any detail of the right to work checks that were being carried out prior to employment. I realise now that this was not appropriate, or sufficient for me to ensure compliance with my obligations as Premises Licence Holder. I apologise to the Sub-Committee for this, and steps to address this are detailed below.

Request 6.13: What information, if any, did I receive from the Home Office (Immigration Enforcement) following the visits undertaken in 2022 and 2024? Furthermore, was I made aware of any issues by staff working at the premises and if not, when and how did he become aware of the previous compliance issues?

5. I confirm that I have not received any information or correspondence from the Home Office (Immigration Enforcement) about these matters. I was not aware of either of the visits by Immigration Enforcement in 2022 or 2024, until I learned of this Application for Review from Mr Keating. Please see further paragraphs 15, 20 and 31-33 below.

Request 6.14: If staff at the premises failed to notify me of immigration issues being identified at the premises, I should, if not already, reflect on why this was the case and explain what action, if any, has been taken to address this.

6. As I explain at paragraph 20 below, I was not told about the Immigration Enforcement visits at the time, or about any difficulties with right to work checks. I believe that this was a combination of my not understanding properly the scope and importance of my role as Premises Licence Holder (for which I am deeply apologetic); failings by the Designated Premises Supervisor to ensure that I was made aware of matters that affect the Premises Licence; and the restaurant manager, [REDACTED], not realising that these issues were relevant to the Premises Licence. Once the issues with right to work checks were brought to my attention through this Application for Review, I carried out an investigation (see paragraphs 17-23 below). Remedial measures have been and continue to be implemented, as described further at paragraphs 14 and 24-30 below.

Request 6.15: Provide details of what I have in place now to ensure the premises complies with its obligations to conduct right to work checks.

7. Remedial actions are in place or are in progress (see paragraphs 14 and 24-30). I am taking a much more hands-on role in the business, including studying for my own personal licence so that I can understand and perform my obligations in full. [REDACTED] is introducing an onboarding process for new staff, which includes adopting the right to work checks set out in Government guidance and maintaining thorough records, and engaging a business adviser to assist with staying up-to-date on legal and regulatory changes. I will also carry out spot-checks on compliance with the business' procedures, in particular its right to work checks. I would agree to additional licencing conditions in this regard (see further paragraphs 37 and 38).

Background

8. I am a company director and mainly deal with property and St John's Healthcare (Devon) Ltd. My wife, who is a registered nurse, is also a director of our company, and together we work in the care sector providing services for elderly people in residential care homes. We have three children, one at university, one studying for A-levels and our youngest is at primary school. We are both British citizens and purchased our home in Sidmouth in 2005, where we have been based ever since. We are a family of modest means. My first commercial property in Sidmouth was leased around 2008-2009 and I later purchased the freehold. When that property was sold, the proceeds were used to the purchase of the Premises.
9. We initially leased the Premises around 2017, when the site was in a derelict condition. The Premises was almost completely rebuilt – apart from four walls – and

the works took approximately two years to complete. This was a very challenging period for us, particularly during the COVID-19 pandemic. We completed the freehold purchase in 2022.

10. The Premises is owned by XLN Properties Limited, which is wholly owned by L&J Corporate Limited, our holding company. My wife and I own all the shares in L&J Corporate Limited. I initially registered XLN Properties Ltd along with another company, XLN Investment Ltd, although the latter never commenced trading and was dissolved in 2020. On the advice of our solicitor, [REDACTED] of Gilbert Stephens Solicitors in Exeter, we established the holding company to facilitate simpler and more efficient inter-company transactions. Since then, we have also purchased the adjoining property, at 42-44 Bampton Street, where we are currently undertaking major renovation works. XLN Properties is also the leaseholder of another property in Exeter, which we took on in February 2023. In hindsight, I recognise that across these projects, I may have stretched myself a little too thinly.
11. The Premises is currently a restaurant, Mumbai Kitchen. This is my first property development project within the hospitality industry. The restaurant is run by the general manager, [REDACTED] who has 20 years' experience in the restaurant industry and used to run an Indian restaurant next door called The Ganges. While I was renovating the Premises, he approached me about taking on the lease and setting up an Indian restaurant there. In 2022, after we completed the freehold purchase of the Premises, a 15-year lease was granted by XLN Properties Ltd to [REDACTED]
12. Since then, the Premises has been a popular, family friendly Indian restaurant which contributes responsibly to the safe and vibrant local economy. Mumbai Kitchen was awarded a food hygiene rating of 5/5 at the last inspection in June 2025. It has over 100 reviews on Trip Advisor and a rating of 4.2/5, with diners praising the quality of the food and the service. Aside from the Home Office visits, there have not been any complaints related to the Premises Licence, whether for noise, antisocial behaviour or any other issue that might come up for licensed premises. There have been no representations by the local community in response to the Application for Review.
13. There was an existing Premises Licence for the site granted in 2005, which I took over in September 2020 [PAGE 2] although I am not directly involved in the running of the business. I took on the Premises Licence because [REDACTED] asked me to and said that the Premises Licence would be transferred from my name in the future (although this future transfer never took place). He also introduced me to [REDACTED] [REDACTED], who was to be the Designated Premises Supervisor. I thought that it was [REDACTED]

appropriate because our company is the landlord and it was a question of paperwork. I did not focus on my obligations as a licence holder, because [REDACTED] was appointed and I largely left it to him to comply with the licensing requirements. I visited the restaurant on around a weekly basis a lot to see how things were going and chat with [REDACTED] as I was interested in the tenant making a success of the business, and I have recently been doing the renovation next door. But I did not really know what to look for or ask about in a hospitality business.

14. I realise now that this was not the right approach. I should have undertaken some training and obtained my own personal licence, so that I understood what was involved in fulfilling the legal duties and see whether that was happening at the restaurant. I sincerely apologise for that. I have joined the British Institute of Innkeepers **[PAGE 3]**, and I am currently studying for their Level 2 Award for Personal Licence Holders **[PAGE 4]**, so that I can be much better informed about my legal responsibilities in future.
15. I was very shocked to hear about these issues. It had not occurred to me that there could be issues like this at the Premises, and I didn't know about the Immigration Enforcement visits. When Tom Keating, the Lead Officer with the Licensing Team, called me on Thursday 25 September 2025 to tell me that he needed to put a notice on the front of the Premises, I thought this was about the adjoining property which we are renovating. We spoke again the following day, Friday 26 September, when we arranged a meeting (for Wednesday 1 October) and Mr Keating helpfully sent me the Application Notice with the redacted Review Pack by email. I was in London at the time, helping my son to move into his university accommodation. I immediately called [REDACTED], told him to double check that the notice stayed in the window and arranged to meet him on the Monday (29 September).
16. The call, and subsequent email, from Mr Keating on 26 September was the first time I understood that Immigration Enforcement had come to the Premises and had identified potential problems with illegal workers. I was very shocked, as I am a responsible citizen who obeys the law and complies with all rules and regulations. I always wish well for others and want everyone to succeed in life. Throughout my life, I have tried to help people and do good things for the community. It had never occurred to me that something like this could have happened, let alone twice, and both times I was unaware of it. The Home Office had not written to me to tell me about the problems, and it had not sent me any of the civil penalty notices. Those notices were not issued against me, and I do not have any liability to pay them. If the Home Office had raised these issues with me, I would have taken steps straight away to address the problems.

My investigation into Immigration Enforcement Team visits to Mumbai Kitchen

17. My call with Mr Keating, and his email attaching the paperwork, made me realise that I needed to carry out an investigation to understand more about how [REDACTED] business was operating and what had happened. I sat down with [REDACTED] on 29 September 2025, and I met with Mr Keating as planned on 1 October 2025. [REDACTED] attended that meeting. I have also met with [REDACTED] and my legal adviser on several occasions since the Application for Review was issued. I read the documents that [REDACTED] has kept. From those investigations, I have now discovered the following:
18. According to [REDACTED] he was not aware of the civil penalty notices issued against him. I understand now that Immigration Enforcement first visited the Premises in September 2022. Immigration Enforcement identified one individual who they thought might not have the Right to Work ([REDACTED]). [REDACTED] showed me a copy of a Referral Notice for an Illegal Working Civil Penalty, which was a form completed in pen and given to him on the day [PAGE 5]. Immigration Enforcement did not contact me as Premises Licence Holder to tell me about the visit or what they had found.
19. [REDACTED] told me that that he did immigration checks before [REDACTED] started. He told me that there were different checks then, because the whole system has since changed and temporary Covid measures were still in place then. [REDACTED] showed me a copy of a letter from the Home Office stating that [REDACTED] had the right to work that did not mention any restrictions [PAGE 8] and said that he telephoned the Home Office to confirm [REDACTED] right to work. [REDACTED] also showed me a Request for Information that he received through the post after the Immigration Enforcement visit [PAGE 9]. [REDACTED] told me that he sent the form back with documents but that he did not keep a copy. [REDACTED] told me that he did not hear back from the Home Office, so he did not know that his checks were inadequate or that the Home Office had imposed a £10,000 civil penalty against him. According to [REDACTED] he has not heard from any debt collection agencies trying to enforce the civil penalty.
20. [REDACTED] did not tell me about the Immigration Enforcement visit or the paperwork at the time because he did not think it had anything to do with me. There is a long lease on the Premises, and having appointed a DPS, I was not involved in the daily running of the business. [REDACTED] did not think he needed to tell me. I was not informed by anyone else either.
21. [REDACTED] told me that he had no further contact with the Home Office until the Immigration Enforcement Team came to the restaurant in November 2024. They

identified two people who they were concerned might not be working in line with their Right to Work conditions. [REDACTED] has shown me a copy of another Referral Notice for a civil penalty [PAGE 11]. [REDACTED] explained to me that one individual ([REDACTED]) was not working. The other ([REDACTED]) had shown [REDACTED] his Applicant Registration Card and was employed part-time to pack takeaway containers. [REDACTED] believed that working as a packer was on the Shortage Occupation List at the time. The Review Pack also refers to a 15-year-old boy working on the premises. [REDACTED] told me that the police visited the boys' father to confirm that everything was in order and that no further action has been taken in relation to this individual.

22. According to [REDACTED] he later received a Request for Information [PAGE 14], to which he replied by email but did not keep a copy. [REDACTED] told me that he did not get a response from the Home Office, and he has not had any more correspondence. [REDACTED] told me that he did not know until this Application for Review that a second civil penalty for £60,000 had been imposed against him. He has not heard from the Home Office or a debt collection agency.
23. I do not know whether what I have been told by [REDACTED] is true or not. However, following my investigations I have concluded that there have been some serious issues with the management of the Premises while I have been Premises Licence Holder. I apologise that I was not aware of these and had not previously taken steps to address them.

Remedial action

24. I want to reiterate that I knew nothing of this, until Mr Keating brought this Application to my attention. That is when I learned about the Immigration Enforcement visits and the problems with the business. Following my investigations, I have taken extensive steps to address the issues and would like to make the following points:
25. There have not been any problems with alcohol sales on the Premises or any complaints about alcohol sales – like underage drinking, noise or local disturbance. This is why the DPS, [REDACTED], has not really been involved. I understand that the issues that have come up raise questions about the adequacy of the management to promote the licensing objective “prevention of crime and disorder” in respect of illegal working, and to appreciate the way everything that happens on the Premises impacts the Premises Licence. I am confident that these issues have now been resolved.

26. [REDACTED] record keeping was poor and his understanding of immigration law and right to work checks was not kept up-to-date. If he had understood the law, he would have been more aware of the issues. He would have assessed the risk of illegal working differently and would have understood the danger in lacking proper systems and processes for employing staff. [REDACTED] now recognises that he has not prioritised keeping on top of changes, ensuring that the right checks are carried out and keeping records up to date. This was not an issue that had occurred to me, and this experience has made me realise that this is a concern for me as Premises Licence Holder.

27. [REDACTED] told me that it is a very busy restaurant. He told me that the nature of the business means that sometimes employees are asked to work at short notice – if the restaurant is very busy one night – or shifts are ended earlier than planned if it is quiet. According to [REDACTED] this is all captured in the documentation which he sends to his account to produce payslips and maintain the books and records, but it might look a bit chaotic to someone looking in. [REDACTED] appreciates that this has not been good enough. He now understands how important it is for proper books and records to be maintained – not least so that he can show exactly what has been done when.

28. I found that there was no written system for carrying out staff checks before commencing employment. I am told by [REDACTED] that this has been addressed and have asked for proof that there is a clear process for the steps that need to be taken before any work starts, and the records that should be kept. Maintaining these records will also demonstrate how the appropriate checks have been performed. [REDACTED] has told me that, for right to work checks, ID is checked and copied, and copies kept on staff files. The right to work is also checked via the processes set out at [Checking a job applicant's right to work - GOV.UK](https://www.gov.uk/check-right-to-work), currently by using original documents, the share code process or via the Employer Checking Service. By going to this website each time, [REDACTED] can also be confident that he is adopting the most up-to-date, Government approved process for checking the right to work. Copies of the results of these checks are kept on staff files, as well as records of whether and when follow-up checks will be required. I will bring further documentation with me to the hearing, which I will make available for inspection. As part of my role as Premises Licence Holder, I also plan to carry out spot checks on these files and records, to confirm that procedures are being followed correctly.

29. [REDACTED] tells me that he is making further changes to improve the operation of the business more widely. For example, he is in the process of hiring a business adviser who will assist him in keeping on top of applicable law and regulation, and maintaining the right records. He has also arranged for all the staff to attend a full

day of formal staff training from an external provider covering a range of topics. This took place on 10 November. I can see from [REDACTED] response that going through this Review has made him focus on the way that the business is operated and make improvements where they are needed. This gives me confidence that there will be no repeat of the right to work issues.

30. I am also in the process of replacing the Designated Premises Supervisor and improving compliance in that area. As a result of this experience, I appreciate that this is a much wider responsibility than controlling the sale of alcohol. There needs to be a closer relationship between the DPS and the way in which the business is running generally, so that we can be confident the business is making every effort to promote all the licensing objectives. As I said above, I am booked onto a course to obtain a personal licence so that, if I am approved, I can become the DPS on an interim basis while a new appropriately qualified and experienced DPS is found. I will continue to have a much more hands-on role in the business going forwards.
31. As regards this Application for Review, there has not been any opportunity for engagement or discussion with a relevant authority prior to this Application. I wish that I had been notified by one of the responsible authorities in 2022 that there were problems arising with the Premises. It is noteworthy that as Premises Licence Holder, to my knowledge, I was not copied into any notices, letters or correspondence from the Immigration Authority or any other responsible authority. Had I been notified, I would have investigated, as I have done the moment it was brought to my attention by the Application for Review and the kindness and professionalism of Mr Keating. Whether or not he should have been, [REDACTED] told me that he was not aware his immigration checks were not adequate, and he seems to have interpreted events the other way around. According to [REDACTED], because he sent his documents to the Home Office and no-one replied to tell him there were problems, he believed that his checks were good enough.
32. Where a civil penalty is imposed, the process should be for notice of the penalty to be sent to the recipient (in this case, [REDACTED]), with reasons for the Home Office's decision, a Statement of Case setting out the evidence, and information about how the notice can be paid or challenged. Those documents have not been included in the Review Pack, nor has any of the correspondence referred to. [REDACTED] told me that he has never received any civil penalty notices, and nothing has happened to enforce payment of either of them.
33. I was not informed by the Home Office about any of the Immigration Enforcement visits, nor about the civil penalties issued to [REDACTED]. Home Office guidance on consideration for a review indicates that where illegal working is identified in a

licensed premises involving 1-2 illegal workers, and it is the licence holder's first identified instance of non-compliance with the licensing objectives, a warning letter will normally be issued. I have not received a warning letter and there has been no prior communication with me about any difficulties at the Premises or with the Premises Licence. Had I known about them, I would have investigated, and I would have asked Mr Keating for a meeting to discuss the issues in question.

The outcome of the Review

34. As I have said above, I am grateful to the Home Office for bringing all of this to my attention, so that these issues can be addressed.
35. I see that the Home Office is pressing for revocation of the Premises Licence. If the Premises Licence is revoked, the business will have to consider whether it could adapt to a model such as BYOB or whether to close completely. The restaurant is a family place, but it has an up-market atmosphere. The decoration is modern and stylish, including sophisticated planting and floral arrangements, white linen tablecloths and polished cutlery and glassware. The standard of presentation is very high, as well as the quality of food and the level of service that [REDACTED] aims to provide. It would completely change the ambience of the restaurant if diners could not buy a glass of wine or a beer here and instead brought in carrier bags of alcoholic beverages to store under the table while they eat. I am told by [REDACTED] that moving to an alcohol-free business model would significantly undermine the business, as almost every group of customers dining at the restaurant orders an alcoholic drink with their meal.
36. If the restaurant were to close for any significant length of time, all the present staff would lose their jobs, including the chef, waiting and kitchen staff and the cleaner. Suppliers to the restaurant will lose their contracts. There would be another empty premises on Bampton Street while alternative tenants are found and if necessary the Premises are refitted. It is not easy to find high-quality, long-term commercial tenants in the current economic circumstances, and the mortgage over the Premises is tied to the current lease. We have considerable outgoings at this time because of the renovations on the neighbouring property, and there would be considerable financial hardship to me personally if the restaurant were to cease trading and the income from the lease to stop.
37. I note that Home Office guidance on preventing illegal working in licensed premises proposes that the following conditions could be added to the licence to give confidence that there are proper measures now in place that will be complied with:

- a. the employer must carry out checks relating to the right to work of their employees at [46-48 Bampton Street, Tiverton EX16 6AH] and any prospective employees before entering into a contract of employment
- b. copies of these documents must be retained and stored securely by the employer at the premises or a digital copy be immediately accessible from the premises for ease of inspection by immigration officials
- c. the employer, or any person appearing to represent the employer, must be able to produce on demand copies of documents relating to the right to work of all staff, at the request of an immigration officer who enters the premises to carry out a compliance visit¹

38. I am content to agree that this, and any other condition which the Sub-Committee sees fit, should be added to the Premises Licence.

39. This process has brought home to me the difficulties that the business has faced, and how stringent my obligations as Premises Licence Holder are. I realise now that I should have been aware of this before, and I apologise to the Sub-Committee unreservedly that this has happened. I would ask the Sub-Committee not to revoke the Premises Licence. I hope that we can work together in partnership to keep the Mumbai Kitchen open and thriving in Tiverton, and in much stricter compliance with its licensing requirements in future.

I look forward to discussing this matter at the forthcoming hearing.

Joy Abraham

12 November 2025

¹ [Preventing illegal working in licensed premises and the Home Office role as a responsible authority in England and Wales \(accessible\) - GOV.UK](#)

Premises Licence MDV PR0074 Mumbai Kitchen

Application for Review of Licence - Notice of Hearing dated 4 November 2025

Response from Joy Abraham, Premises Licence Holder

Enclosure 1

You are here » Home » Licensing Act Premises Search » **Detail**

Licensing Act 2003 - Premises Licence Register as at 09:50 on 28 October 2025

Mumbai Kitchen

46-48 Bampton Street, Tiverton, Devon, EX16 6AH

[View on Map](#)

Click on Licence / Application Number for more details

Licence	Licence Type	From	To
MDV PR0074	Premises Licence	06/03/2023	indefinite

Application Type	Application Number	From	To	Status	Date of last Representation
Conversion (Grandfather Rights)	009322	24/11/2005	indefinite	Completed	N/A
Suspension after Non-Payment of Annual Fee/Levy	017415	24/11/2005	indefinite	Completed	18/02/2015
Transfer Application	024640	03/09/2020	indefinite	Completed	17/09/2020
Suspension after Non-Payment of Annual Fee/Levy	024641	03/09/2020	indefinite	Completed	24/09/2020
Change of DPS	024642	16/09/2020	indefinite	Completed	17/09/2020
Transfer Application	024680	16/09/2020	indefinite	Completed	30/09/2020
Minor Variation Application	027311	06/03/2023	indefinite	Completed	02/03/2023
Review of Licence/Certificate	030804			Open	N/A

Application Number	Process type	Licence type	Status	Date of last Representation
There is no data to display.				

MDV PR0074 - ENCLOSURE 1

Welcome to your BII Membership

From: membership@bii.org (membership@bii.org)

To: [REDACTED]

Date: Friday 31 October 2025 at 14:09 GMT



Member: Joy Abraham

Membership Number: [REDACTED]

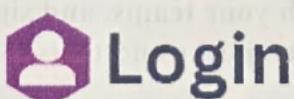
Username: [REDACTED]



Click here to login

Logging into the website will give you access to
all the amazing BII Member Benefits

Here are some instructions to get you started:

1. Head to www.bii.org2. To login, head over to the purple **"Login"** button on the top right hand corner
of your screen (as pictured below).3. Instead of filling in your usual email and password, please click **"forgot
password"** - from here, you can set up your online access by typing in your
username (email address).

4. You will then receive an email asking you to reset your password.

Mr Joy Abraham
46 - 48 Bampton Street
DEVON
EX16 6AH
UNITED KINGDOM

British Institute of Innkeeping

Sentinel House
Ancells Business Park
Harvest Crescent
Fleet
Hampshire
GU51 2UZ

General Enquiries: 01276 684449
Accounts: ar@bii.org

Invoice Number: [REDACTED]

Invoice Date: 31/10/2025

Payment Terms: PAID

Qty	Description	Unit price	Net Amount	VAT
1	Level 2 Award for Personal Licence Holders (APLH)	75.00	75.00	15.00
				Net Amount 75.00
				VAT Amount 15.00
				Invoice Total 90.00

Bank Details

Account Name: [REDACTED]

Sort Code: [REDACTED] Account No: [REDACTED]



Immigration Enforcement

Employer name: [REDACTED]

Employer address:

48 MUMBAI KITCHEN
BAMPTON STREET
TIVERTON EX16 6AH.

Business type: RESTAURANT

VAT number: —

Company number: —

Director(s)/Owner(s): SOLE TRADER

Referral Notice

Illegal Working Civil Penalty

This is an important notice. Please do not ignore it.

Your case will be referred for consideration of your liability for a civil penalty.

This Referral Notice is issued in respect of (a) suspected breach(es) under section 15 of the Immigration, Asylum and Nationality Act 2006

Tasking Reference: [REDACTED]

Notice given date: 01/09/22

Issued to: [REDACTED]

Position: OWNER / MANAGER

We have encountered suspected illegal working

We encountered (a) suspected breach(es) of section 15 on 01/09/22 at the following business address:

MUMBAI KITCHEN, BAMPSON STREET, TIVERTON, EX16 6AH.

Who we suspect of working illegally

	Names of suspected workers	DOB	Reason
1	[REDACTED]	[REDACTED]	No right to work/Working in breach
2		[REDACTED]	No right to work/Working in breach
3			No right to work/Working in breach
4			No right to work/Working in breach
5			No right to work/Working in breach
6			No right to work/Working in breach
7			No right to work/Working in breach
8			No right to work/ Working in breach

Reason for referral	<p>Your case will be referred to the Home Office's Civil Penalty Compliance Team which will consider your liability for a civil penalty for employing the identified suspected illegal worker(s).</p> <p>It is illegal to employ an adult subject to immigration control if he has not been granted leave to enter or remain in the UK or his leave to enter or remain is invalid or has ceased to have effect, or he is subject to a condition preventing him from accepting the employment in question.</p>
What this means	<p>The Civil Penalty Compliance Team will consider whether you are liable for a civil penalty, and if so your penalty level.</p> <ul style="list-style-type: none"> • A Civil Penalty Notice will be issued if you are found liable. This Notice will require you to pay a penalty for a specified amount by a specified due date. • A Warning Notice may be issued if you meet the mitigating criteria set out in our Code of practice on preventing illegal working. • A No Action Notice will be issued if you are not liable for a civil penalty. This Notice will inform you that no civil penalty action will be taken against you on this occasion, and that your case has been closed.
What happens next	<p>You will receive an Information Request which requires you to provide information and evidence. You will be asked to confirm your business details and provide documentary evidence to demonstrate that you carried out the required right to work checks on the workers named in this Referral Notice. You will also be asked to provide the unique Home Office reference number you received if you reported your suspicions about these people working illegally to us.</p> <p>It is important that you respond to this request accurately, in full and before the deadline given in the Information Request, as this evidence will inform our decision in your case. You should respond to this request using the Response Form you will receive from us. If you actively co-operate with us in our investigations, any penalty for which you may be liable may be reduced.</p>
What factors do we consider	<p>We will consider the following factors when looking at your case:</p> <ol style="list-style-type: none"> 1. Are you liable for a civil penalty? You will have established an excuse against liability and will not be served with a civil penalty if you have correctly carried out document checks as set out in our Code of practice on preventing illegal working. 2. Have you been found to be employing illegal workers within the previous three years? This factor determines your breach level and the civil penalty calculator to be used in determining your penalty amount if you are found liable for employing illegal workers. 3. Have you reported suspected illegal working to us? This mitigating factor is considered when determining your penalty amount. You must have reported your suspicions about the workers in question before any visit by us is made known to you. 4. Have you actively co-operated with us? This mitigating factor is considered when determining your penalty amount. You must have complied accurately and timely with our investigations, and provided us with access to your premises, records and systems. 5. Do you have effective document checking practices in place? This mitigating factor is considered when determining whether you will be issued with a Warning Notice instead of a Civil Penalty Notice. It is only taken into consideration when you have not been found to be employing illegal workers within the previous three years, and where there is mitigating evidence <p>You can find out more about how these factors are considered in calculating your civil penalty in our Code of practice on preventing illegal working.</p>

What you do if you receive a penalty	<p>If you receive a Civil Penalty Notice you must either pay the penalty or object within 28 days. If you do not either pay your penalty or object by the due dates, enforcement action will be taken against you to recover the debt through the courts. This may have an adverse impact on your ability to obtain credit in the future and act in the capacity of a director in a company.</p> <p>The Civil Penalty Notice will set out why you are liable to pay a penalty and the amount. It will also set out how you should pay and by when or, if you wish to object, how you should do this and by when.</p>
What amount might you have to pay	<p>The maximum penalty amount you could receive is £20,000 per illegal worker. We will consider a number of factors which may reduce the amount you are required to pay. These are set out in our Code of practice on preventing illegal working.</p>
If you need more information	<p>You can call our employer enquiry helpline on 0300 790 6268 if you have any questions. You can visit our website on https://www.gov.uk/government/collections/illegal-working-penalties-codes-of-practice-for-employers to view our Code of practice on preventing illegal working and guidance for employers, including guidance which sets out how we administer illegal working civil penalties.</p> <p>You can use our online employers' toolkit to help you understand your responsibilities and how to carry out the correct right to work checks on your employees. You can conduct an online check on your employee or prospective employee, if they give you permission to do so. You can access the service here: https://www.gov.uk/view-right-to-work</p>



UK Visas and Immigration
RCM CSU Permission to Work Team
7th Floor - The Capital Building
Liverpool
L3 9PP
Tel 0300 123 2241
Web www.gov.uk/uk-visas-immigration

Lincolns Chambers Solicitors
First Floor
108a Whitechapel Road
London
E1 1JE

Our Ref [REDACTED]
Your Ref [REDACTED]
Case ID [REDACTED]
Date 20 July 2020

Dear Sirs

Re: [REDACTED]

As you are aware, you were granted Permission to Work (PTW). In order for Refused Case Management (RCM) to produce your PTW Applicant Registration Card (ARC) we require your Biometrics to be taken.

Unfortunately, due to the ongoing pandemic we are unable to capture your biometrics at present. You will be contacted by your local reporting centre at a later date to confirm recommencement of reporting. Once this is confirmed please inform RCM by emailing rcmptw@homeoffice.gov.uk. If you are not reporting you will need to contact your local reporting centre to where you live.

At this point your case will be investigated further to establish if you continue to qualify for an ARC. If this is the case then we will arrange for your Biometrics captured and issue you with an ARC.

Please confirm your full postal address, to ensure we hold your correct details.

Yours faithfully,

RCM - CSU
On behalf of the Secretary of State

The Data Protection Act 2018 governs how we use personal data. For details of how we will use your personal information and who we may share it with please see our Privacy Notice for the Border, Immigration and Citizenship system at <https://www.gov.uk/government/publications/personal-information-use-in-borders-immigration-and-citizenship>. This also explains your key rights under the Act, how you can access your personal information and how to complain if you have concerns.



Immigration
Enforcement

[REDACTED]
1/A Mumbai Kitchen
46-48 Bampton Street
Tiverton
EX16 6AH

Information Request

Illegal Working

This is an important request. Please do not ignore it.

You should provide a response by **22/09/2022**

This Information Request is issued in respect of (a) suspected breach(es) under section 15 of the Immigration, Asylum and Nationality Act 2006.

Request issue date: 13/09/2022

Reference [REDACTED]

You may be liable for a civil penalty

We encountered (a) suspected breach(es) of section 15 on **01/09/2022** at the following business address: **Mumbai Kitchen, 46-48 Bampton Street, Tiverton, EX16 6AH**

Who we suspect of working illegally

	Name(s) of suspected illegal workers	Date of Birth
1.	[REDACTED]	[REDACTED]

We are currently considering the evidence in your case to determine if you are liable for a civil penalty and if so for what amount. You can assist us in making an early, fully informed decision by promptly providing us with relevant information and evidence.

You should respond to this request accurately and no later than **22/09/2022** to be deemed to be actively co-operating with us in our investigations. Any penalty for which you may then be liable may be reduced by £5,000 per illegal worker.

IMPORTANT - Compliance with Data Protection legislation

Please only provide personal data and information regarding the individuals named above

How to respond

Please complete the sections in the enclosed Response Form, accurately and with as much detail as you can. You should sign the completed form and send it to us, together with any supporting evidence to the Civil Penalty Compliance Team, PO Box 665, Salford, M5 0LY.

We request where possible that you email the completed Response Form, together with any supporting evidence, to: CPCTenquiries@homeoffice.gov.uk or fax it to us on 0870 336 9287.

To enable us to take your information and evidence into consideration at the initial case decision stage we must receive it by **22/09/2022**. You should also note that this is the final date by which we will consider you to

be actively co-operating with our request for information. If you wish to allow a third party (e.g. a legal representative) to respond on your behalf you must ensure you send us a signed letter of authority.

More information about preventing illegal working

You can call our employer enquiry helpline on 0300 790 6268 if you have any questions. You can visit our website on <https://www.gov.uk/government/collections/illegal-working-penalties-codes-of-practice-for-employers> to view our Code of practice on preventing illegal working and guidance for employers, including guidance which sets out how we administer illegal working civil penalties.

You can use our online employers' toolkit to help you understand your responsibilities and how to carry out the correct right to work checks on your employees. You can conduct an online check on your employee or prospective employee if they give you permission to do so. You can access the service here <https://www.gov.uk/view-right-to-work>. The Home Office offers training packages to increase your understanding of the immigration system which includes courses on immigration awareness, right to work and document fraud. For further information please contact IE-CAS@homeoffice.gov.uk

The Data Protection Act 2018 governs how we use personal data. For details of how we will use your personal information and who we may share it with please see our Privacy Notice for the Border, Immigration and Citizenship system at <https://www.gov.uk/government/publications/personal-information-use-in-borders-immigration-and-citizenship>. This also explains your key rights under the Act, how you can access your personal information and how to complain if you have concerns.



Home Office

Referral Notice

Illegal Working Civil Penalty

To: [REDACTED]

Tasking Reference: [REDACTED]

Business address:

Mumbai Kitchen
46 - 48 Bampton street
Tiverton
EX16 6AT

Notice given date: 14/11/2024

Issued to: [REDACTED]

Position: Owner

This is an important notice.**Please do not ignore it.****Your case will be referred for consideration of your liability for a civil penalty**

This Referral Notice is issued in respect of (a) suspected breach(es) under section 15 of the Immigration, Asylum and Nationality Act 2006.

We have encountered suspected illegal working

We are aware of (a) suspected breach(es) of section 15 of the Immigration, Asylum and Nationality Act 2006 on
at the address shown above.

Who we suspect of working illegally

Names of suspected illegal workers	DOB	Reason
1 [REDACTED]	[REDACTED]	No right to work/Working in breach
2 [REDACTED]	[REDACTED]	No right to work /Working in breach
3 [REDACTED]	[REDACTED]	No right to work/Working in breach
4 [REDACTED]	[REDACTED]	No right to work/Working in breach
5 [REDACTED]	[REDACTED]	No right to work /Working in breach
6 [REDACTED]	[REDACTED]	No right to work/Working in breach
7 [REDACTED]	[REDACTED]	No right to work/Working in breach
8 [REDACTED]	[REDACTED]	No right to work/Working in breach

Reason for referral	<p>Your case will be referred to the Home Office's Civil Penalty Compliance Team which will consider your liability for a civil penalty for employing the identified suspected illegal worker(s).</p> <p>It is illegal to employ an adult subject to immigration control if he has not been granted leave to enter or remain in the UK or his leave to enter or remain is invalid or has ceased to have effect, or he is subject to a condition preventing him from accepting the employment in question.</p>
What this means	<p>The Civil Penalty Compliance Team will consider whether you are liable for a civil penalty, and if so your penalty level.</p> <ul style="list-style-type: none"> • A Civil Penalty Notice will be issued if you are found liable. This Notice will require you to pay a financial penalty for a specified amount by a specified due date. • A Warning Notice may be issued if you meet the mitigating criteria set out in our Code of practice on preventing illegal working which is on www.GOV.UK. • A No Action Notice will be issued if you are not liable for a civil penalty. This Notice will inform you that no civil penalty action will be taken against you on this occasion, and that your case has been closed.
What happens next	<p>You will receive an Information Request which requires you to provide information and evidence. You will be asked to confirm your business details and provide documentary evidence to demonstrate that you carried out the required right to work checks on the workers named in this Referral Notice. You will also be asked to provide the unique Home Office reference number you received if you reported your suspicions about these people working illegally to us.</p> <p>It is important that you respond to this request accurately, in full and before the deadline given in the Information Request, as this evidence will inform our decision in your case. You should respond to this request using the Response Form you will receive from us. If you actively co-operate with us in our investigations, any penalty for which you may be liable may be reduced.</p>
What factors do we consider	<p>We will consider the following factors when looking at your case:</p> <ol style="list-style-type: none"> 1. Are you liable for a civil penalty? You will have established an excuse against liability and will not be served with a civil penalty if you have correctly carried out document checks as set out in our Code of practice on preventing illegal working. 2. Have you been found to be employing illegal workers within the previous three years? This factor determines your breach level and will be used in determining your civil penalty amount if you are found liable for employing illegal workers. 3. Have you reported suspected illegal working to us? This mitigating factor is considered when determining your penalty amount. You must have reported your suspicions about the workers in question before any visit by us is made known to you. 4. Have you actively co-operated with us? This mitigating factor is considered when determining your penalty amount. You must have complied accurately and timely with our investigations, and provided us with access to your premises, records and systems. 5. Do you have effective document checking practices in place? This mitigating factor is considered when determining whether you will be issued with a Warning Notice instead of a Civil Penalty Notice. It is only taken into consideration when you have not been found to be employing illegal workers within the previous three years, and where there is mitigating evidence for factors 2 and 3 above. <p>You can find out more about how these factors are considered in calculating your civil penalty in our Code of practice on preventing illegal working which is on www.GOV.UK.</p> <p>Page 27</p>

What you do if you receive a penalty	<p>If you receive a Civil Penalty Notice you must either pay the penalty or object or appeal within 28 days.</p> <p>If you do not either pay your penalty or object or appeal by the due dates, enforcement action will be taken against you to recover the debt through the courts. This may have an adverse impact on your ability to obtain credit in the future and act in the capacity of a director in a company.</p> <p>The Civil Penalty Notice will set out why you are liable to pay a penalty and the amount. It will also set out how you should pay and by when or, if you wish to object or appeal, how you should do this and by when.</p>
What amount might you have to pay	The maximum penalty amount you could receive, and any factors which may reduce the amount you are required to pay, is set out in our Code of practice on preventing illegal working - https://www.gov.uk/government/collections/right-to-work-checks-employer-guidance .
If you need more information	You can call our Employer Enquiry helpline on 0300 790 6268 if you have any questions. You can view the Code of practice on preventing illegal working and the employer guidance at the link above. You can use our online employers' toolkit to help you understand your responsibilities and how to carry out the correct right to work checks on your employees.



Immigration
Enforcement

T/A Mumbai Kitchen
46-48 Bampton Street
Tiverton
EX16 6AH

Request issue date: 18/12/24

Information Request

Right to Work

This is an important request. Please do not ignore it.

You should provide a response by **27/12/24**

This Information Request is issued in respect of (a) suspected breach(es) under section 15 of the Immigration, Asylum and Nationality Act 2006.

Reference [REDACTED]

You may be liable for a civil penalty

We encountered (a) suspected breach(es) of section 15 on **14/11/24** at the following business address: **Mumbai Kitchen, 46-48 Bampton Street, Tiverton, EX16 6AH**

Who we suspect of working illegally

	Name(s) of suspected illegal workers	Date of Birth
1.	[REDACTED]	[REDACTED]
2.	[REDACTED]	[REDACTED]

We are currently considering the evidence in your case to determine if you are liable for a civil penalty and if so for what amount. You can assist us in making an early, fully informed decision by promptly providing us with relevant information and evidence.

You should respond to this request accurately and no later than **27/12/24**, to be deemed to be actively co-operating with us in our investigations. Any penalty for which you may then be liable may be reduced by £5,000 per illegal worker.

IMPORTANT - Compliance with Data Protection legislation

Please only provide personal data and information regarding the individuals named above

How to respond

Please complete the sections in the enclosed Response Form, accurately and with as much detail as you can. Where possible, please return a scanned, signed and completed copy of the form, together with any supporting evidence to: CPCTenquiries@homeoffice.gov.uk. This will ensure we receive your response promptly.

If you are unable to email the Response Form to us, you can send your signed and completed form, together with any supporting evidence to: Civil Penalty Compliance Team, PO Box 665, Salford, M5 0LY or fax it to us at 0870 336 9287.

To enable us to take your information and evidence into consideration at the initial case decision stage we must receive it by **27/12/24. If you wish to allow a third party (e.g. a legal representative) to respond on your behalf you must ensure you send us a signed letter of authority**

More information about preventing illegal working

You can call our employer enquiry helpline on 0300 790 6268 if you have any questions. You can visit our website on <https://www.gov.uk/government/collections/illegal-working-penalties-codes-of-practice-for-employers> to view our Code of practice on preventing illegal working and guidance for employers, including guidance which sets out how we administer illegal working civil penalties.

You can use our online employers' toolkit to help you understand your responsibilities and how to carry out the correct right to work checks on your employees. You can conduct an online check on your employee or prospective employee if they give you permission to do so. You can access the service here <https://www.gov.uk/view-right-to-work>. The Home Office offers training packages to increase your understanding of the immigration system which includes courses on immigration awareness, right to work and document fraud. For further information please contact IE-CAS@homeoffice.gov.uk

The Data Protection Act 2018 governs how we use personal data. For details of how we will use your personal information and who we may share it with please see our Privacy Notice for the Border, Immigration and Citizenship system at <https://www.gov.uk/government/publications/personal-information-use-in-borders-immigration-and-citizenship>. This also explains your key rights under the Act, how you can access your personal information and how to complain if you have concerns.



Immigration
Enforcement

IMPORTANT - PLEASE READ

Compliance with Data Protection Legislation

Data Protection Compliance

The inappropriate sharing of personal data can result in a data breach under the Data Protection Act 2018. To ensure you comply with Data Protection Legislation, it is important you only respond to requests for information with personal data regarding the individual(s) relating to the specific immigration activity outlined within this correspondence.

What is personal data?

Personal data includes information related to any identifiable living individual, (including yourself) and includes some of the following attributes:

- Name/s and date/s of birth
- Addresses, contact details and Next of Kin information
- National Insurance number
- Bank account/payment details/medical information
- Passport/BRP

What do I need to do?

You must only provide personal data/evidence regarding the individual(s) named in the information request to evidence a statutory excuse for employment.

What happens if I inappropriately share personal data?

All breaches are reported to the Home Office's Office of the Data Protection Officer. Serious incidents may be referred to the Information Commissioner's Office (ICO) for investigation. The ICO has the power to issue a range of sanctions including reprimands and financial penalties.

Response Form

You should provide a response by **27/12/24**

1. Confirm your business details

We have evidence which indicates that you are the owner of the business where we have encountered suspected illegal workers and therefore believe that you are the employer of the workers identified.

If this is correct, and you are the employer, you should complete the fields below in **section 1** to confirm your details and then complete **sections 2, 3 and 4**. If, however, you are **not** the employer of these workers then you should only complete **section 1** with the details of the correct employer, if this information is known by you.

Your business type is: Sole Trader Limited Company Franchise

Other:

Your trading name is:

Your trading address is:

Your registered company name is:

Your registered address is:

Your correspondence address is (the address where we will write to you), If you wish to nominate a representative you will need to provide a letter of authority authorising them to act on your behalf:

Your Companies House number is (if you are a limited company):

Your VAT number is (if you are registered to pay VAT):

Date you commenced trading/company incorporated on:

Your business owner's name is:

Your business owner's National Insurance number and/or PAYE reference number is:

Your business owner's date of birth is:

Your business owner's address is:

Your company director(s)/partners names are:

Your contact telephone numbers are:

Landline:

Mobile:

Your email address is:

2. Confirm if you have employed¹ the illegal worker(s)	For each of the suspected illegal workers below please indicate when you have employed them.		
	Employee(s) name	Date employment commenced	Dates employment ended (if applicable)
	[REDACTED] [REDACTED]		
3. Confirm if you carried out right to work checks	For each of the suspected illegal workers below please indicate whether you correctly carried out right to work checks for them and provide the dates on which all checks were conducted. You should enclose clear copies of the documents you checked <u>and</u> the record showing the date on which you conducted your checks e.g. dated declaration on the document. It is not sufficient just to complete this box.		
	Employee(s) name	Checks conducted and document copies enclosed?	Dates all right to work checks conducted

¹ Section 25(b) of the Immigration, Asylum and Nationality Act 2006 states "reference to "employment" is to employment under a contract of service or apprenticeship, whether express or implied and whether oral or written."

[REDACTED]		
[REDACTED]		

To show you have carried out the checks correctly you must have checked original acceptable documents and retained a clear copy of each. Where a person is a student with restrictions on the hours they can work, you must also have checked and retained a clear copy of their term and vacation dates covering their period of employment with you. Please submit a clear copy of the term and vacation dates for each student employee. If you have already provided this information to us you do not need to do so again.

COMMENTS:

4. Confirm if you reported suspicions of illegal working

For each suspected illegal worker below please indicate whether you reported your suspicions about them before we encountered the suspected breach(es) of section 15, and provide the Home Office unique reference you were given by the Sponsorship, Employers and Education helpline. If you suspected one or more of the named employees were working illegally and you reported this to the Sponsorship, Employers and Education helpline before we encountered the suspected breaches of section 15, then any penalty for which you may be liable may be reduced by £5,000 per illegal worker.

Employee(s) name	Suspected illegal working reported to us?	Home Office unique reference number
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

5. Additional Information

Please provide any additional comments [including any further reasons why you consider you are not liable for a civil penalty] or documentary evidence you hold regarding the employment of the individual(s) named above:

COMMENTS:

Sign here



I confirm that the above information is correct to the best of my knowledge and I understand that the Home Office may routinely share this information with other government departments and other agencies as required.

Signed: _____ Date: ____ / ____ / ____

Print name: _____

Position in business: _____

Thomas Keating

From: Raj Hundal <[REDACTED]>
Sent: 14 November 2025 19:49
To: Thomas Keating
Cc: Gary Farnan; IE Licensing and Compliance Reviews; Suha Monawar; Harriet Said
Subject: RE: Notice of Hearing - Mumbai Kitchen
Attachments: Civil Penalty Notice for Maroof Ahmed trading as Mumbai Kitchen 03 November 2022.pdf; Civil Penalty Notice - 28 Feb 2025.pdf; Penalty maintained letter 09 May 2025.pdf; Email from LA about rate payer.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED] [Learn why this is important](#)

Good evening Tom,

Please accept my apologies for the lateness of my reply.

Immigration Enforcement initially engaged with the manager and claimed owner Maroof Ahmed, as he was present during both visits in 2022 and 2024. Additionally, the Civil Penalty Compliance Team (CPCT) conducted enquiries with the local authority to establish who was responsible for business rates at the premises – email attached. Both of these avenues led to Maroof Ahmed. Media reporting also lists Maroof Ahmed as the owner of the premises:

[Takeaway boss tells fake reviewers 'I hope you die in a car crash' - Somerset Live](#)

[Takeaway boss says he has been plagued by 'fake bad reviewers' for a year - but social media is fuming at his vicious response | Daily Mail Online](#)

[Inside Devon Indian restaurant with a brand new look | Devon Live](#)

It must also be noted that Maroof Ahmed was visited and served with a civil penalty in 2022. It would have been incumbent on him at that stage to communicate these issues with the relevant parties involved in the premises, including the licence holder. The licence holder could have then taken remedial action, which may have included removing Maroof Ahmed.

The civil penalty notice served to Maroof Ahmed on 28 February 2025 states the following:

If you do not pay the penalty in full or by instalments, or object or appeal, by the specified due dates, the penalty will be registered with the civil court, after which enforcement action may commence immediately (see section 18 of the Immigration, Asylum and Nationality Act 2006). This action:

- may have an adverse impact on any premises or personal licence that you hold under the Licensing Act 2003. As a Responsible Authority the Home Office may make representations to the licensing authority to request a review of your licence under the licensing objective to prevent crime and disorder, which includes the prevention of illegal working in licensed premises. A licensing review could result in the addition of conditions to your licence, suspension, or revocation of your licence

Whilst Maroof Ahmed is not the licence holder. The above should have been ample grounds for Maroof Ahmed to inform the relevant parties involved in the premises. A risk to the licence would also have posed a financial risk to his operations.

All correspondence relating to the civil penalty were sent to the premises address, including a response to an objection Mr Ahmed raised. This letter is dated 09 May 2025. It is concerning that the DPS, who should have had day-to-day responsibility and involvement, did not intervene or communicate any issues with the licence holder.

The civil penalty process was allowed to conclude and correspondence surrounding that ran up to May 2025. The licence review was considered following that.

The licence holder and DPS have clearly not been involved in this premises enough to know that two Immigration Enforcement visits took place, and two civil penalties were subsequently issued. While the penalties themselves were issued to the party deemed responsible for employing the illegal workers, illegal working is considered to be particularly serious at point 11.27 of the section 182 guidance. The licence holder and DPS's disassociation with the premises has contributed to the licensing objectives being repeatedly undermined.

The seriousness of illegal working, repeated undermining the crime and disorder objective, and failure to comply with the civil penalty process led to the decision to review the licence.

I hope that provides clarification.

Kind regards,

Raj Hundal
Lead for IE Licensing Compliance
Interventions, Sanctions & Compliance
Enforcement, Compliance and Crime
Immigration Enforcement
Home Office

www.gov.uk/home-office

Enforcement Compliance and Crime

We enforce Immigration Law and drive compliance to protect and deliver for the communities we serve



Immigration
Enforcement

From: Thomas Keating <tkeating@middevon.gov.uk>

Sent: 13 November 2025 13:02

To: IE Licensing and Compliance Reviews <IE.licensing.reviews@homeoffice.gov.uk>

Cc: Harriet Said <hsaid@middevon.gov.uk>

Subject: FW: Notice of Hearing - Mumbai Kitchen

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Dear Suha

The Notice of Hearing stated that the Licensing Authority would like a response to the information requested in section 6 of the report.

Your response to the Notice of Hearing (copy below) does not address any of these points.



Maroof Ahmed
T/A Mumbai Kitchen
48 Bampton Street
Tiverton
Devon
EX16 6AH

Civil Penalty Notice

Illegal Working

This is an important notice. Please do not ignore it. You must either pay a penalty or object within 28 days of the date this notice is given.

This Civil Penalty Notice is issued in respect of (a) breach(es) under section 15 of the Immigration, Asylum and Nationality Act 2006.

Notice issue date: 01/11/2022

Notice given date: 03/11/2022

Reference: [REDACTED]

You are liable for a civil penalty

We encountered (a) suspected breach(es) of section 15 by your business on 01/09/2022. We have considered the information and evidence in your case, and concluded that **you have breached section 15 of the Immigration, Asylum and Nationality Act 2006** by employing (an) adult(s) subject to immigration control who has a) not been granted leave to enter or remain in the UK, or b) their leave to enter or remain in the UK is invalid or has ceased to have effect, or c) who is subject to a condition preventing them from accepting the employment in question.

Your penalty amount

Your penalty is £10000.00. You must pay on or before 01/12/2022. However, your penalty amount is discounted by 30% to £7000.00 if you pay your penalty within 21 days (on or before 24/11/2022) under the Fast Payment Option.

Your penalty breakdown

	Name	Date of Birth	Penalty value	Penalty reason
1.	[REDACTED]	[REDACTED]	£10000.00	No right to work

Evidence of (a) breach(es) of the law

We hold the following evidence, as indicated by the presence of a cross [X] in the applicable box(es) below, that you have employed (an) illegal worker(s) in breach of section 15 of the Immigration, Asylum and Nationality Act 2006:

Interview records from officials who visited your business premises

Photographic evidence

Other: .

This evidence shows that the illegal worker(s) identified was employed by you under a contract of service or apprenticeship and carried out work for which they did not have permission to undertake. The attached **Statement of Case** sets out the reasons for the breach for each worker and the supporting evidence.

What you need to do

You must pay your penalty of £10000.00 on or before 01/12/2022. However, if you pay on or before 24/11/2022 the amount is discounted to £7000.00. If you wish to object you must do so by 30/11/2022.

If we don't hear from you

If you do not pay your penalty, set up an instalment plan by 01/12/2022, or object by 30/11/2022, the penalty will be registered with the civil court, after which enforcement action may be commenced immediately (see section 18 of the Immigration, Asylum and Nationality Act 2006). This may have an adverse impact on your ability to obtain future credit and act in the capacity of a director in a company.

Your information may be placed into the public domain as a non-compliant employer. Regardless of payment of the civil penalty you should also be aware that your information may be shared with other government departments and agencies, for example the Insolvency Service. This may result in company director disqualification and if you have a sponsor licence, this could also be suspended or revoked. If you are subject to immigration control, your civil penalty liability may be considered in any future immigration application you make.

The Data Protection Act 2018 governs how we use personal data. For details of how we will use your personal information and who we may share it with please see our Privacy Notice for the Border, Immigration and Citizenship system at [Borders, immigration and citizenship: privacy information notice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/collections/immigration-and-citizenship-privacy-information-notice). This also explains your key rights under the Act, how you can access your personal information and how to complain if you have concerns.

How you pay

How you object

You may object to this **Civil Penalty Notice** on three grounds. These are set out in the enclosed **Objection Form**. We must receive your objection on or before **30/11/2022**. Please cross the box against one or more of the possible grounds on which you want to object, provide your reasons and sign at the bottom. You should send this form to us, together with any **supporting evidence** to: Civil Penalty Compliance Team, PO Box 665, Salford, M5 0LY. Or you can email it to us with scanned documents at CPCTenquiries@homeoffice.gov.uk or fax it to us on **0370 336 9287**.

If you would like a third party (e.g. a legal representative) to object on your behalf, you must ensure you send us a signed letter of authority. We will then send all communications to your authorised representatives. We will consider your objection and inform you of our decision within 28 days. You will not have to pay the penalty while we consider your objection. If you object to your penalty before the due date in this notice, you will continue to be eligible for a discounted penalty amount through the fast payment option. This option is only available where you have not been found employing illegal workers within the last three years.

If you need more information to ensure your future compliance

You can call our employer enquiry helpline on **0300 790 6268** if you have any questions.

You can visit our website on

<https://www.gov.uk/government/collections/illegal-working-penalties-codes-of-practice-for-employers> to view our Code of practice on preventing illegal working and guidance for employers, including guidance which sets out how we administer illegal working civil penalties. You can use our online employers' toolkit to help you understand your responsibilities and how to carry out the correct right to work checks on your employees. You can conduct an online check on your employee or prospective employee if they give you permission to do so. You can access the service here: <https://www.gov.uk/view-right-to-work>.

The Home Office offers training packages to increase your understanding of the immigration system which includes courses on immigration awareness, right to work and document fraud. For further information please contact IE-CAS@homeoffice.gov.uk.



Maroof Ahmed
T/A Mumbai Kitchen
46-48 Bampton Street
Tiverton
EX16 6AH

Civil Penalty Notice

Illegal Working

This is an important notice. Please do not ignore it. You must either pay a penalty or object within 28 days of the date this notice is given.

This Civil Penalty Notice is issued in respect of (a) breach(es) under section 15 of the Immigration, Asylum and Nationality Act 2006.

Notice issue date: 26/02/2025

Notice given date: 28/02/2025

Reference: [REDACTED]

You are liable for a civil penalty

We encountered (a) suspected breach(es) of section 15 on 14/11/2024 at the following address: **Mumbai Kitchen, 46-48 Bampton Street, Tiverton, EX16 6AH.**

We have considered the information and evidence in your case, and concluded that you have breached section 15 of the Immigration, Asylum and Nationality Act 2006 by employing (an) adult(s) subject to immigration control who has a) not been granted leave to enter or remain in the UK, or b) their leave to enter or remain in the UK is invalid or has ceased to have effect, or c) who is subject to a condition preventing them from accepting the employment.

Your penalty amount

Your penalty is £60000.00. You must pay on or before 28/03/2025.

Your penalty breakdown

	Name	Date of Birth	Penalty value	Penalty reason
1.	[REDACTED]	[REDACTED]	£60000.00	Breach of work restrictions
2.	[REDACTED]	[REDACTED]	£0.00	Section 15 Not Applicable

Evidence of (a) breach(es) of the law

We hold the following evidence, as indicated by the presence of a cross [X] in the applicable box(es) below, that you have employed (an) illegal worker(s) in breach of section 15 of the Immigration, Asylum and Nationality Act 2006:

Interview records from officials who visited your business premises

Photographic evidence

Other: .

This evidence shows that the illegal worker(s) identified was employed by you under a contract of service or apprenticeship and carried out work for which they did not have permission to undertake. The attached **Statement of Case** sets out the reasons for the breach for each worker and the supporting evidence.

What you need to do

You must pay your penalty of £60000.00 on or before 28/03/2025.

If we don't hear from you

If you do not pay your penalty, set up an instalment plan by 28/03/2025, or object by 27/03/2025, the penalty will be registered with the civil court, after which enforcement action may be commenced immediately (see section 18 of the Immigration, Asylum and Nationality Act 2006). This may have an adverse impact on your ability to obtain future credit and act in the capacity of a director in a company.

Your information may be placed into the public domain as a non-compliant employer. Regardless of payment of the civil penalty you should also be aware that your information may be shared with other government departments and agencies, for example the Insolvency Service. This may result in company director disqualification and if you have a sponsor licence, this could also be suspended or revoked. If you are subject to immigration control, your civil penalty liability may be considered in any future immigration application you make.

The Data Protection Act 2018 governs how we use personal data. For details of how we will use your personal information and who we may share it with please see our Privacy Notice for the Border, Immigration and Citizenship system at <https://www.gov.uk/government/publications/personal-information-use-in-borders-immigration-and-citizenship>. This also explains your key rights under the Act, how you can access your personal information and how to complain if you have concerns.

How you pay

[REDACTED]

How you object

You may object to this **Civil Penalty Notice** on three grounds. These are set out in the enclosed **Objection Form**. We must receive your objection on or before **27/03/2025**. Please cross the box against one or more of the possible grounds on which you want to object, provide your reasons and sign at the bottom. You should send this form to us, together with any **supporting evidence** to: Civil Penalty Compliance Team, PO Box 665, Salford, M5 0LY. Or you can email it to us with scanned documents at CPCTenquiries@homeoffice.gov.uk or fax it to us on **0370 336 9287**.

If you would like a third party (e.g. a legal representative) to object on your behalf, you must ensure you send us a signed letter of authority. We will then send all communications to your authorised representatives. We will consider your objection and inform you of our decision within 28 days. You will not have to pay the penalty while we consider your objection. If you object to your penalty before the due date in this notice, you will continue to be eligible for a discounted penalty amount through the fast payment option. This option is only available where you have not been found employing illegal workers within the last three years.

If you need more information to ensure your future compliance

You can call our employer enquiry helpline on **0300 790 6268** if you have any questions.

You can visit our website on <https://www.gov.uk/government/collections/illegal-working-penalties-codes-of-practice-for-employers> to view our Code of practice on preventing illegal working and guidance for employers, including guidance which sets out how we administer illegal working civil penalties. You can use our online employers' toolkit to help you understand your responsibilities and how to carry out the correct right to work checks on your employees. You can conduct an online check on your employee or prospective employee if they give you permission to do so. You can access the service here: <https://www.gov.uk/view-right-to-work>.

The Home Office offers training packages to increase your understanding of the immigration system which includes courses on immigration awareness, right to work and document fraud. For further information please contact IE-CAS@homeoffice.gov.uk.

Enforcement and other consequences of a civil penalty

If you do not pay the penalty in full or by instalments, or object or appeal, by the specified due dates, the penalty will be registered with the civil court, after which enforcement action may commence immediately (see section 18 of the Immigration, Asylum and Nationality Act 2006). This action :

- may have an adverse impact on your ability to obtain future credit and act in the capacity of a director in a company.
- may have an adverse impact on any premises or personal licence that you hold under the Licensing Act 2003. As a Responsible Authority the Home Office may make representations to the licensing authority to request a review of your licence under the licensing objective to prevent crime and disorder, which includes the prevention of illegal working in licensed premises. A licensing review could result in the addition of conditions to your licence, suspension, or revocation of your licence.
- will be recorded on Home Office systems and, if you are subject to immigration control, may be taken into account when considering any future immigration application that you make
- may affect your ability to sponsor migrants who come to the UK in the future, including those who wish to work for you under the skilled worker route via the points-based immigration system, or impact your ability to hold a Gangmaster licence
- will result in your information may be placed into the public domain as a non-compliant employer

Regardless of payment of the civil penalty you should also be aware that your information may be shared with other government departments and agencies, for example the Insolvency Service.



Maroof Ahmed
T/A Mumbai Kitchen
46-48 Bampton Street
Tiverton
EX16 6AH

Civil Penalty Compliance Team
PO BOX 665
Salford
M5 0LY

Fax: 0870 336 9287
CPCTenquiries@homeoffice.gov.uk
www.gov.uk/home-office

9 May 2025

Our Ref: [REDACTED]

Dear Mr Ahmed

You remain liable for a civil penalty

You were issued with a Civil Penalty Notice on 26 February 2025 for the value of **£60,000.00** for breaching section 15 of the Immigration, Asylum and Nationality Act 2006. You have since submitted correspondence outside of the statutory consideration process which we received on 1 May 2025.

We have considered all the points raised in your correspondence following our previous consideration of your case and we have concluded that you **remain liable for a civil penalty of the same amount**.

This means that you must pay your penalty of £60,000.00 immediately as this is now overdue.

As you have not paid the outstanding penalty within the statutory timeframe, you have been referred to a third party debt recovery specialist for debt recovery action to be taken against you. In order to make immediate arrangements for payment, or to raise any queries, you must contact CCSCollect directly. You can find information on how to do this within the accompanying information leaflet.

When contacting CCSCollect, please ensure that you have your reference available. You may be held liable for any consequential costs incurred by the Home Office in pursuing debt recovery action for the failure to make payment of the penalty within the timescale identified.

Our response to the point raised within your correspondence is as follows:

You stated that:

We have made a mistake on the decision as the person has the right to work. You have enclosed a copy of the Civil Penalty Notice and screenshots showing [REDACTED] status as a refugee from 27 February 2025 until 26 February 2030 and that he can work in the UK.

We have considered the point above:

The Civil Penalty Notice has been issued correctly to you.

When Immigration Enforcement officials visited your premises on 14 November 2024, Home Office records show that [REDACTED] did have the right to work in the UK at the time of the visit, but this was restricted to a job on the Shortage Occupation List (SOL).

The evidence we hold demonstrates that [REDACTED] was employed as a kitchen porter. This job role is not listed on the SOL and therefore he was working in breach of their work restrictions.

His current right to work status is not applicable as this was valid from 27 February 2025 which was after the visit that took place on 14 November 2024.

You can call our employer enquiry helpline on 0300 790 6268 if you have any questions. You can visit our website on <https://www.gov.uk/government/collections/illegal-working-penalties-codes-of-practice-for-employers> to view our Code of practice on preventing illegal working and guidance for employers, including guidance which sets out how we administer illegal working civil penalties.

You can use our online employers' toolkit to help you understand your responsibilities and how to carry out the correct right to work checks on your employees. You can conduct an online check on your employee or prospective employee, if they give you permission to do so. You can access the service here <https://www.gov.uk/view-right-to-work>

The Home Office offers training packages to increase your understanding of the immigration system which includes courses on immigration awareness, right to work and document fraud. For further information please contact IE-CAS@homeoffice.gov.uk

Yours sincerely

C Lee

Civil Penalty Compliance Team

From: Data Protection Officer <DPO@middevon.gov.uk>
Sent: 25 November 2024 15:00
To: [REDACTED]
Cc: Data Protection Officer
Subject: Data Processing Request (Response)

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear [REDACTED]

Thank you for your request for information under the Data Protection Act 2018. We have processed you request for information and can confirm we hold the information in question. The Requested Information is as follows: for Mumbai Kitchen, 46-48 Bampton Street , Tiverton, EX16 6AH the Rate Payer is Maroof Ahmed who has been liable for business rates since 21/9/2020

Kind Regards,

Ewan

Ewan Girling | Senior Information Officer | Mid Devon District Council | Phoenix House | Phoenix Lane | Tiverton | EX16 6PP |
Direct: 01884 234371 | Switchboard 01884 255255 | E: egirling@middevon.gov.uk | W: www.middevon.gov.uk

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South and West Devon Magistrates Court (1302)
 sitting at South and West Devon Magistrates Court
 St Andrew Street
 Plymouth. PL1 2DP
 Telephone: 0330 808 4407

Maroof AHMED
 Mumbai Kitchen
 46-48 Bampton Street
 Tiverton
 EX16 6AH

Case number: **502500064154**

Orders

The court has heard the matters shown below and made the orders listed.

Mr Alessandro Roveri, Head of Legal Operations (South West)

Date: 17 November 2025

Justices' Clerk

Matters and orders

502500064154/1

Application for an illegal working compliance order in respect of premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH.

Pursuant to Paragraph 5 of Schedule 6 of the Immigration Act 2016.

It is ordered that ILLEGAL WORKING COMPLIANCE ORDER MADE 1.An Immigration Officer, so far as is practicable, shall remove all copies of the illegal working closure notice fixed on the above premises and replaces each notice with a copy of this order. 2.Whilst access to the premises is restricted by virtue of this order, no person is to remove a copy of this order which is fixed to the premises without the permission of an immigration officer or the court. 3.The Respondent must carry out checks relating to the right to work in accordance with the Illegal Working Compliance Orders Regulations 2016 in respect of each of the respondent's employees or all the Respondent's employees who work at the premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH 4.Such right to work checks are to be completed by 4pm on the 24 November 2025 5.The Respondent must carry out checks relating to the right to work in accordance with the Illegal Working Compliance Order Regulations 2016 in respect any prospective employees before entering into a contract of employment with the prospective employee. 6.Any copies of documents retained by the Respondent as a result of conducting checks relating to the right to work in accordance with the Illegal Working Compliance Orders Regulations 2016 are to be stored securely by the Respondent on the premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH 7.Any employee required to provide documentation by the Respondent as a result of obligations imposed on the Respondent by this Order must use all reasonable endeavours to promptly comply with such a requirement. 8.An Immigration Officer may enter the premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH in order to inspect whether the terms of this order have been complied with. 9.An Immigration Officer inspecting premises in accordance with this Order may be accompanied by other Immigration Officers or Constables or interpreters for the purpose of inspecting compliance with this Order. 10.Such entry is only permitted between 16:30 and 23:00 on any day, or any time that an Immigration Officer has reasonable grounds for believing that work is being carried out on the premises, but entry may only be made bi-monthly for a period of 12 months, commencing on the date this Order is made. 11.Any Immigration Officer who enters the premises to

carry out an inspection under this Order may require the Respondent, or person appearing to represent the Respondent, to produce on demand documents relating to the right to work in accordance with the Illegal Working Compliance Orders Regulations 2016. 12. Any Immigration Officer who enters the premises to carry out an inspection under this Order may require any person whom they have reasonable grounds to suspect is working on the premises to co-operate with a biometric scan of their fingerprints for the purpose of ascertaining their identity and immigration status. No biometric information may be retained as a result of this scan. 13. Before the Respondent operates a business at premises other than MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH the Respondent must notify an Immigration Officer by emailing SWICE.Plymouth@homeoffice.gov.uk 14. This Order shall cease to have effect at 4pm, twelve months from date of Order, unless extended by Order of the Court. 15. The Respondent do pay the Secretary of State for the Home Department the sum of £226 by 4pm on 24 November 2025 on account of the Respondent's costs in making the application for this Order.



Premises Licence Review – Supplementary Representation

Mumbai Kitchen
46 – 48 Bampton Street Tiverton
Devon
EX16 6AH

On 24 September 2025, a licence review application was raised by the Home Office Licensing Compliance Team, which had an initial hearing date of 19 November 2025.

Before the initial hearing took place, a third enforcement visit took place on **16 November 2025**. Entry was gained by section 179 of the Licensing Act 2003 and officers encountered three males. Two workers were working in breach of conditions, and one worker did not have the right to work. **A closure notice was served on the premises by Immigration Officers.**

On **17 November 2025**, the South and West Devon Magistrates Court (1302) sitting at South and West Devon Magistrates Court issued an illegal working Compliance Order for the premises. This Order shall cease to have effect at 4pm on 17 November 2026 unless extended by the Court.

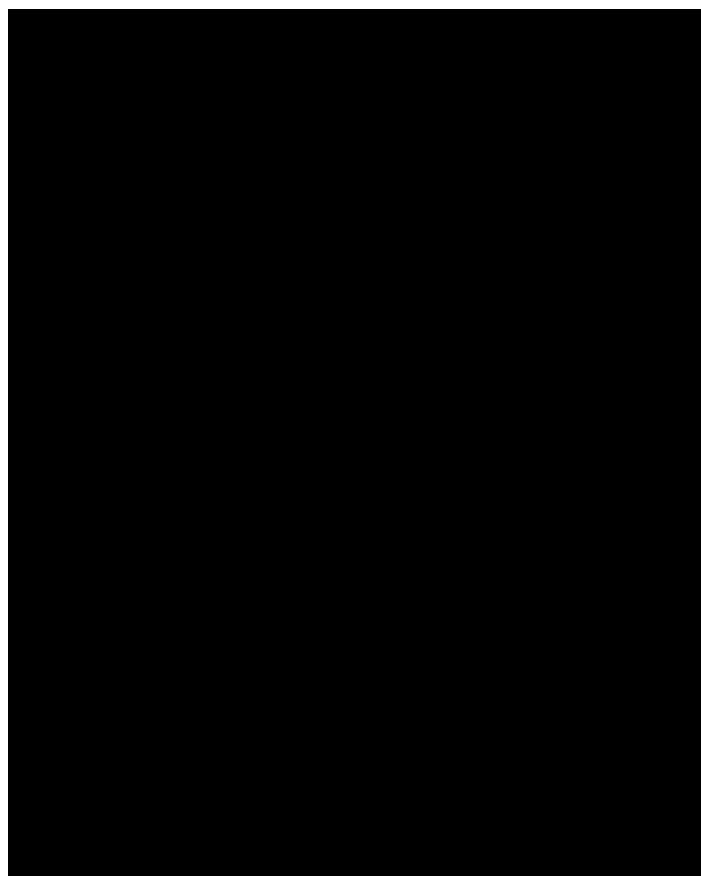
Home Office Immigration Enforcement are submitting this supplementary representation in relation to the illegal working Compliance Order.

Enforcement Visit: 16 November 2025

Entry was gained to the premises at 17:21hrs. Upon entering, immigration officers encountered the following individuals:

[REDACTED]

[REDACTED] was initially encountered in the kitchen preparation area.



[REDACTED] removed work apron during interview.

During initial interview, [REDACTED] stated that he works as a chef at Mumbai Kitchen and was paid cash on a Sunday, as well as getting accommodation at the premises. He stated he was called by Maroof Ahmed for work, and states that he was asked if he had the right to work, for which [REDACTED] informed AHMED that he had an outstanding case with the Home Office. [REDACTED] claims he lives with his sister in East London, however it was clear he was living at the premises.

Home Office checks showed that [REDACTED] has been an overstayer in the UK since 2018 and has had several applications refused since this date. The last application was refused on 20 May 2025, which means he has No Right to Work in the UK.

[REDACTED]

[REDACTED] had an adverse reaction to Immigration Officers as they entered the kitchen area, and as they turned their backs as they looked into the storeroom, [REDACTED] stopped what he was doing and opened a side door in an attempt to leave the premises, whereupon he was arrested by Immigration Officers.

[REDACTED]

[REDACTED] in storeroom & meat prep area where he was standing and door.

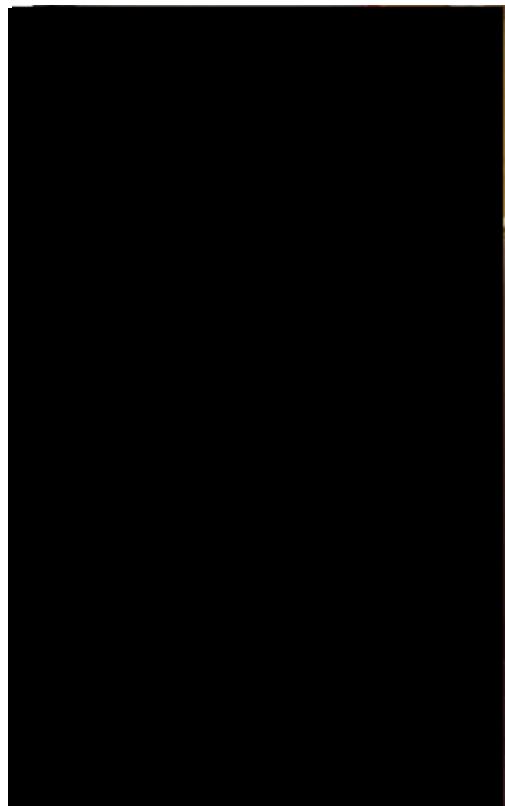
On interview [REDACTED] stated that he was not working in the premises and was just about to go on a break which was the reason he was leaving. Immigration Officers noted that he had greasy hands, and that he had been initially cutting up meat covered in sauce, in the prep area.

[REDACTED] claims that he only came to the premises the day before, for some food for which he was making for himself, as his cousin Maroof AHMED allows him to. He states he does not work or get paid, but is staying there for the day, before he was heading back to his home in Weston Super Mare.

Home Office checks show [REDACTED] is an asylum seeker in the UK, and produced his ARC card to officers to identify himself, which clearly states "No Work".

[REDACTED]

On entering the premises, it was noted that [REDACTED] was standing behind the main bar area which is front of house at Mumbai Kitchen. [REDACTED] main were taking orders from customers and serving alcohol.



[REDACTED] sitting in front of house area.

On interview, [REDACTED] stated that he was working at Mumbai Kitchen for 20 hours per week and had only been doing so, whilst he was having a one-month break from his main sponsor which is based in East London. It was also noted that [REDACTED] was also working at the restaurant when it was last visited by Immigration Officers on 14 November 2024. [REDACTED] later informed Officers that he had been working at Mumbai Kitchen since the last encounter.

Home Office checks show [REDACTED] is a Sponsored as a tandoori chef, from a business in the Romford area, however, [REDACTED] could not provide details of the restaurant he worked and could only provide payslips up to June 2024 from the sponsored business. With his own admission of working at Mumbai Kitchen, this means he is Working in Breach of his visa conditions.

Additional Concerns

Immigration officers also encountered a 15-year-old male in the kitchen premises, who was also seen on the previous enforcement visit. The 15-year-old stated that he usually worked 2 hours per day and around 2 days a week, so around 4 hours per week. The owner Maroof AHMED calls him on different days, and is given £50 for the week, which was given to his father who is a friend of AHMED.

In response to the representation provided by the premises holder Joy Abraham

It is noted throughout the response made by the premises holder Joy Abraham, he has not been connected to the day to day running of the business Mumbai Kitchen. He has only engaged in the running of the restaurant once informed by the licensing team at Devon Council of the review application raised by the Home Office.

It is stated in para 11, that a 15-year premises lease was granted to Maroof AHMED's wife [REDACTED] in 2022. Maroof AHMED asked Joy ABRAHAM to take on the premises licence in 2020 on the promise it would be transferred from his name in future. This never happened. Maroof AHMED also introduced Jamal AHMED the designated premises supervisor (DPS) and as ABRAHAM was the landlord, he did not focus on his obligations as a licence holder and largely left it to the manager and DPS to comply with the licensing requirements. (Para 13) even though he has visited on a weekly basis whilst renovating the property next door.

(Para 14) Joy ABRAHAM has now stated that he has made efforts to obtain a personal licence, and paid for a course on 31 October 2025, however there is no further evidence that this licence has been obtained, and this action has only been taken once a licence review was requested. He also relates to the potential of becoming the DPS for the premises (para 30), however this would only be an interim whilst another is found who can take on a more hands on approach.

(Paras 17-23) Even though Joy ABRAHAM has taken steps on 29 September 2025 to discuss the illegal working that has taken place at Mumbai Kitchen with Manager Maroof AHMED, and a detailed discussion surrounding illegal working on the premises. Joy ABRAHAM has stated in para 23

"I do not know whether what I have been told by Maroof is true or not. However, following my investigations I have concluded that there have been some serious issues with management of the premises while I have been premises licence holder."

There are still two separate civil penalty notices that remain unpaid, and Maroof AHMED has taken no steps to pay or engage with the debt collection agency.

Since the date of this discussion between the premises licence holder, solicitor and restaurant manager, a further Immigration Enforcement visit took place at Mumbai Kitchen on 16 November 2025, three further illegal workers were found which prompted a closure notice to be served on the day. A further civil penalty referral notice was also issued.

It is clear and evident that nothing has been learnt by the manager Maroof AHMED, despite discussion a few weeks prior, whereby Maroof AHMED informed Joy ABRAHAM that there is now a clear process for checks to be carried out before employment, improved record keeping, and spots checks would be carried out by the premises licence holder (para 28).

Considering the upcoming licence review, it would have been sensible for Joy ABRAHAM to see evidence of these checks, and/or conduct assurance checks on the claimed improvements. This would have allowed him to practically see that illegal workers were still actively employed at the premises, which would have in turn prevented the closure order.

Considering the findings of the most recent visit, and coupled with the execution of a closure order¹, followed by a 12-month compliance order – the Home Office has no confidence that the licence holder, the DPS or the operator at the premises will be able to uphold the licensing objectives in the future. This further underlines why revocation of the licence is considered appropriate and proportional.

Joy ABRAHAM the Premises Licence holder has suggested that the revocation of the premises licence would cause financial hardship for himself and for those employed or connected to the Mumbai Kitchen business (paras 35-39). Maroof AHMED has also stated that moving to an alcohol-free business would undermine the business model. While revocation may have a financial impact, it is necessary to promote the licensing objectives and prevent further crime and disorder.

¹ [Illegal working closure notices and compliance orders: guidance for frontline professionals \(accessible\) - GOV.UK](#)



South and West Devon Magistrates Court (1302)
sitting at South and West Devon Magistrates Court
St Andrew Street
Plymouth PL1 2DP
Telephone: 0330 808 4407

Mumbai Kitchen
46-48 Bampton Street
Tiverton
EX16 6AH

Case number: [REDACTED]

Orders

The court has heard the matters shown below and made the orders listed.

**Mr Alessandro Roveri, Head of Legal
Operations (South West)**

Justices' Clerk

Date: 17 November 2025

Matters and orders

Application for an illegal working compliance order in respect of premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH.

Pursuant to Paragraph 5 of Schedule 6 of the Immigration Act 2016.

It is ordered that **ILLEGAL WORKING COMPLIANCE ORDER MADE** 1. An Immigration Officer, so far as is practicable, shall remove all copies of the illegal working closure notice fixed on the above premises and replaces each notice with a copy of this order. 2. Whilst access to the premises is restricted by virtue of this order, no person is to remove a copy of this order which is fixed to the premises without the permission of an immigration officer or the court. 3. The Respondent must carry out checks relating to the right to work in accordance with the Illegal Working Compliance Orders Regulations 2016 in respect of each of the respondent's employees or all the Respondent's employees who work at the premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH 4. Such right to work checks are to be completed by 4pm on the 24 November 2025 5. The Respondent must carry out checks relating to the right to work in accordance with the Illegal Working Compliance Order Regulations 2016 in respect any prospective employees before entering into a contract of employment with the prospective employee. 6. Any copies of documents retained by the Respondent as a result of conducting checks relating to the right to work in accordance with the Illegal Working Compliance Orders Regulations 2016 are to be stored securely by the Respondent on the premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH 7. Any employee required to provide documentation by the Respondent as a result of obligations imposed on the Respondent by this Order must use all reasonable endeavours to promptly comply with such a requirement. 8. An Immigration Officer may enter the premises at MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH in order to inspect whether the terms of this order have been complied with. 9. An Immigration Officer inspecting premises in accordance with this Order may be accompanied by other Immigration Officers or Constables or interpreters for the purpose of inspecting compliance with this Order. 10. Such entry is only permitted between 16:30 and 23:00 on any day, or any time that an Immigration Officer has reasonable grounds for believing that work is being carried out on the premises, but entry may only be made bi-monthly for a period of 12 months, commencing on the date this Order is made. 11. Any Immigration Officer who enters the premises to

carry out an inspection under this Order may require the Respondent, or person appearing to represent the Respondent, to produce on demand documents relating to the right to work in accordance with the Illegal Working Compliance Orders Regulations 2016. 12. Any Immigration Officer who enters the premises to carry out an inspection under this Order may require any person whom they have reasonable grounds to suspect is working on the premises to co-operate with a biometric scan of their fingerprints for the purpose of ascertaining their identity and immigration status. No biometric information may be retained as a result of this scan. 13. Before the Respondent operates a business at premises other than MUMBAI KITCHEN, 46 Bampton Street, Tiverton, EX16 6AH the Respondent must notify an Immigration Officer by emailing SWICE.Plymouth@homeoffice.gov.uk 14. This Order shall cease to have effect at 4pm, twelve months from date of Order, unless extended by Order of the Court. 15. The Respondent do pay the Secretary of State for the Home Department the sum of £226 by 4pm on 24 November 2025 on account of the Respondent's costs in making the application for this Order.