



Home Office

Premises Licence Review

Flames
1-3 Rosemary Lane
Lancaster
Lancashire
LA1 1NR

Contents

Case Summary	3
Licensed Premises History	4
Enforcement Visit: 26 October 2022.....	5
Enforcement Visit: 15 December 2022.....	6
Enforcement Visit: 12 January 2023.....	6
Enforcement Visit: 22 May 2024	10
Reasons for Review	12
Outcome Sought	13
Appendix A – Supporting Evidence	14

Case Summary

The premises has been visited on five occasions between October 2022 and May 2024. Illegal working has been constant theme, there have been six illegal workers have been encountered.

On the most recent visit, a closure order was served.

Civil Penalties:

Civil penalty of £15,000 issued on 24 March 2023 for employing a person with no right to work in the UK. This was objected and the decision was maintained on 18 April 2023. No payment has been made yet.

Civil penalty of £40,000 issued on 17 January 2024 with a payment due date of 16/02/24 for employing two people, one in breach of their work conditions and the other with no right to work in the UK. No payment has been made yet.

Civil penalty of £55,000 issued on 21 June 2024 for employing a person with no right to work in the UK. No payment has been received yet but the penalty is not due for payment until 23 July 2024. The liable party has until 22 July 2024 to object to the penalty.

In each case the liable party is Rudolf Collaku. Civil penalties totalling £110,000 have been issued to the business which all still remain unpaid.

Licensed Premises History

The premises license has been held by Rudolf Collaku and has been held since 29 January 2020. License number LAPLNA0035.

The company registration number for FLAMES LANCASTER LTD is 09059461. However, this company which was incorporated on 28 May 2014, dissolved on 03 November 2015.

The company was also registered under another name, FLAMES (NW) LIMITED, registration number 12976264. Companies House show that it was incorporated on 27 October 2020 and dissolved on 29 March 2022.

There are no active companies on Companies House registered to the address and the director of the above two companies was Mr Rudolf Collaku.

Mr. Collaku has been the person described as the owner/manager either by the staff-members or admittedly confirmed by himself during each Enforcement Visit conducted.

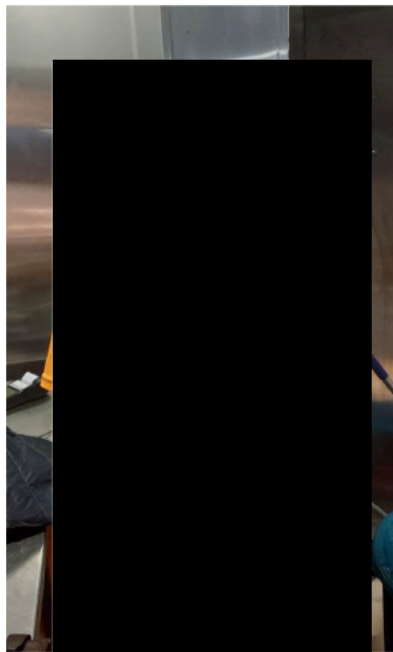
Enforcement Visit: 26 October 2022

Immigration Enforcement visited the premises on 26 October 2022 along with Lancashire Police, licensing and other partner agencies.

██████████

Officers encountered ██████████ in the kitchen when he attempted to abscond by the rear door.

██████████ admitted that he worked at the premises and his duties were to make pizzas and clean. He confirmed that he did not provide any documents or had any right to work checks conducted in order to work at the premises. Home Office records showed that ██████████ entered the UK illegally by boat in September 2021 and had an outstanding claim with no right to work in the UK at the time of the enforcement visit.



██████████ encountered in the kitchen wearing a 'Just Eat' t-shirt.

Rudolf Collaku - Employer

Rudolf Collaku was interviewed by immigration officers as he identified himself as the manager. Collaku confirmed that ██████████ started working at the premises on 25 October 2022 and claimed that he had requested ██████████ for identification documents multiple times but was not provided with them. Collaku also stated that he was planning to pay Collaku in cash at the end of the week.

Enforcement Visit: 15 December 2022

Immigration officers visited the premises on 15 December 2022 and encountered [REDACTED] sitting in the rear of the kitchen and he moved out of sight upon arrival of officers.

Enforcement Visit: 12 January 2023

Entry was gained to the premises at 19:11. Upon entering, immigration officers encountered the following individuals,

[REDACTED]

Immigration officers encountered [REDACTED] behind the counter in a staff only area. [REDACTED] has been encountered at the premises during previous enforcement visits to the premises and had already been advised to not be in a staff only area. [REDACTED] entered the UK illegally and had an outstanding claim at the time of the enforcement visit. However, his bail conditions do not permit him the right to work in the UK.

[REDACTED] maintained that he was not working at the premises and would occasionally help as the premises was run by his cousin. [REDACTED] claimed that he was at the premises to have food and had already placed the order, however, officers noted that his food wasn't ready even by the time officers left the premises.

This was the third instance [REDACTED] had been encountered by immigration officers and the police at the premises. It is considered that [REDACTED] is working at the premises as he was found in a staff only area along with his belongings and his claim of 'coming for food' was an attempt to deceive officers.

[REDACTED]

[REDACTED] was encountered by immigration officers whilst behind the counter entered in a staff only area. Home Office checks show that [REDACTED] entered the UK illegally and had an outstanding claim at the time of the enforcement visit. His bail conditions did not permit him the right to work in the UK.

[REDACTED] claimed that he had only worked at the premises for one day and his duties were cutting pizzas and salad preparation. [REDACTED] stated that he was unsure of the amount he would be paid in return for his work and confirmed that no documents were checked despite him informing he did not hold the right to work.

██████████ - Employer Interview

██████████ identified himself as the manager of the premises, subsequently an illegal working interview as an employer was conducted.

██████████ stated to immigration officers that ██████████ had helped at the premises for approximately one week. He claimed that ██████████ was not paid money and was only provided with food in return for his work. When questioned ██████████ stated that ██████████ had worked at the premises for a couple of days, and he was also only receiving food in return for his work.

It is considered that ██████████ attempted to deceive officers about the duration of employment of at the premises as it was the third instance since 2022 that ██████████ was encountered at the premises.

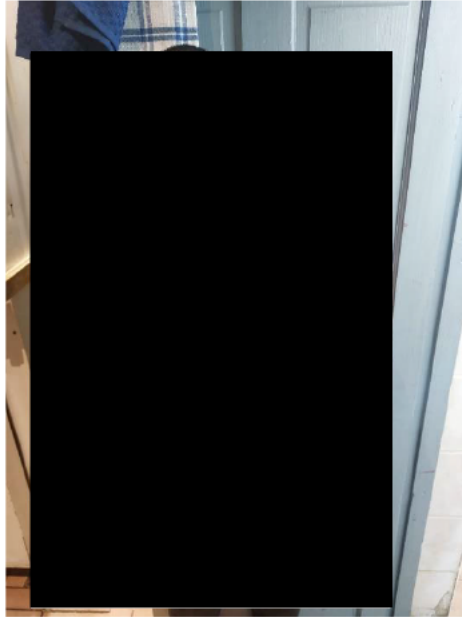
Enforcement Visit: 23 November 2023

Entry was gained to the premises at 16:55. Upon entering, immigration officers encountered the following individuals:

██████████

██████████ was encountered by immigration officers in a staff only area. Officers noticed that he attempted to walk away he was stopped and interviewed. ██████████ admitted to working at the premises and stated his role was to fold pizza boxes and have been working for the past two days. He stated that the boss (Rudolf Collaku) employed him, and he had not provided any right to work documentation prior to commencing work. ██████████ stated that he received food in return for his work and the boss agreed to pay him once ██████████ showed him his passport.

Home Office checks show that ██████████ was granted tier 2 leave to remain as a care worker from 23 February 2023 to 18 February 2028, but his work was restricted to his sponsor "Support Haven Ltd" trading as "Kare plus Ipswich" only. ██████████ had no permission to work in a takeaway/restaurant and was only permitted to work as care worker for his listed sponsor. Therefore, it is considered that ██████████ was working in breach of his visa conditions.



██████████ encountered at the premises wearing a 'Just Eat' t-shirt.

██████████

██████████ was encountered by immigration officers in the kitchen. ██████████ appeared to be nervous and attempted to move away from officers. Upon questioning ██████████ stated that he had worked at the premises for the past 3 days and his role was to make pizzas. ██████████ stated that the owner 'Rudy' employed him but did not conduct any right to work checks prior to commencing work. ██████████ stated that he receives food in return for his work and is expecting to receive £70 per day from the following week onwards.

Home Office records show that ██████████ was granted student visa from 11 September 2022 to 25 January 2024 with work restricted to 20 hours per week term time. ██████████ student visa was curtailed on 26 September 2023 as he failed to enrol at his university. Therefore, ██████████ is an overstayer with no right to work in the UK.

As such, out of the three members of staff that were present, two were identified as working illegally. A Civil Penalty Referral Notice was issued to the business on the basis that they were believed to be employing illegal workers and, following an investigation, the Home Office's Civil Penalty Compliance Team issued a civil penalty of £40,000 to 'Flames (inclusive of Rudolf COLLAKU)' on 17 January 2024, as of 23 May 2024 no payment has been made towards this civil penalty.

Rudolf Collaku - Employer Interview

Rudolf Collaku identified himself as the owner/manager for the premises. An illegal working interview as an employer was conducted with Collaku.

Collaku stated that [REDACTED] had been working at the premises for 3 months. [REDACTED] duties were to make pizzas and cleaning at night. When questioned in relation to [REDACTED], Collaku stated that [REDACTED] had been working at the premises for approximately 3 months and his role was to make pizzas. Collaku claimed that [REDACTED] and [REDACTED] only worked 18 – 20 hours per week as they were on student visas and were paid £11 per hour. Collaku confirmed that he employed both workers but held no employee records and could not recall conducting right to work checks on them.

It is considered that Collaku employed the workers without conducting the relevant right to work checks. If these were conducted it would've clearly showed that both employees were not eligible to work at the premises.

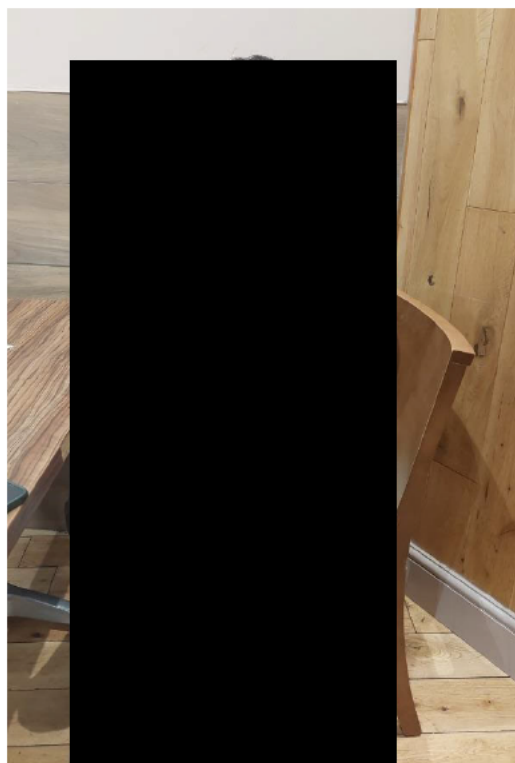
Enforcement Visit: 22 May 2024

Entry was gained to the premises at 18:53 under Section 179 of the Licensing Act 2003. The following individual was encountered:

████████████████████

██████████ was encountered in the kitchen area of the premises whilst preparing pizza and dressed in 'Flames' uniform. Home Office records show that ██████████ submitted multiple applications under the EU Settlement Scheme which were all either refused or rejected. ██████████ last entered the UK on 10 October 2023 and was allowed entry as a visitor for a period of six months. The most recent application was submitted on 14 May 2024. A Certificate of Application (CoA) was not granted for this application and therefore ██████████ did not hold the right to work in the UK at the time of the enforcement visit.

██████████ admitted to officers that he came to the UK solely for working. During the illegal working interview ██████████ stated that he had been working at the premises for two weeks, this would mean that on approximately 08 May 2024, ██████████ had no outstanding applications to remain in the UK at that time. ██████████ stated his job is to make pizzas, he works approximately 38 hours per week and is paid £300 in cash.

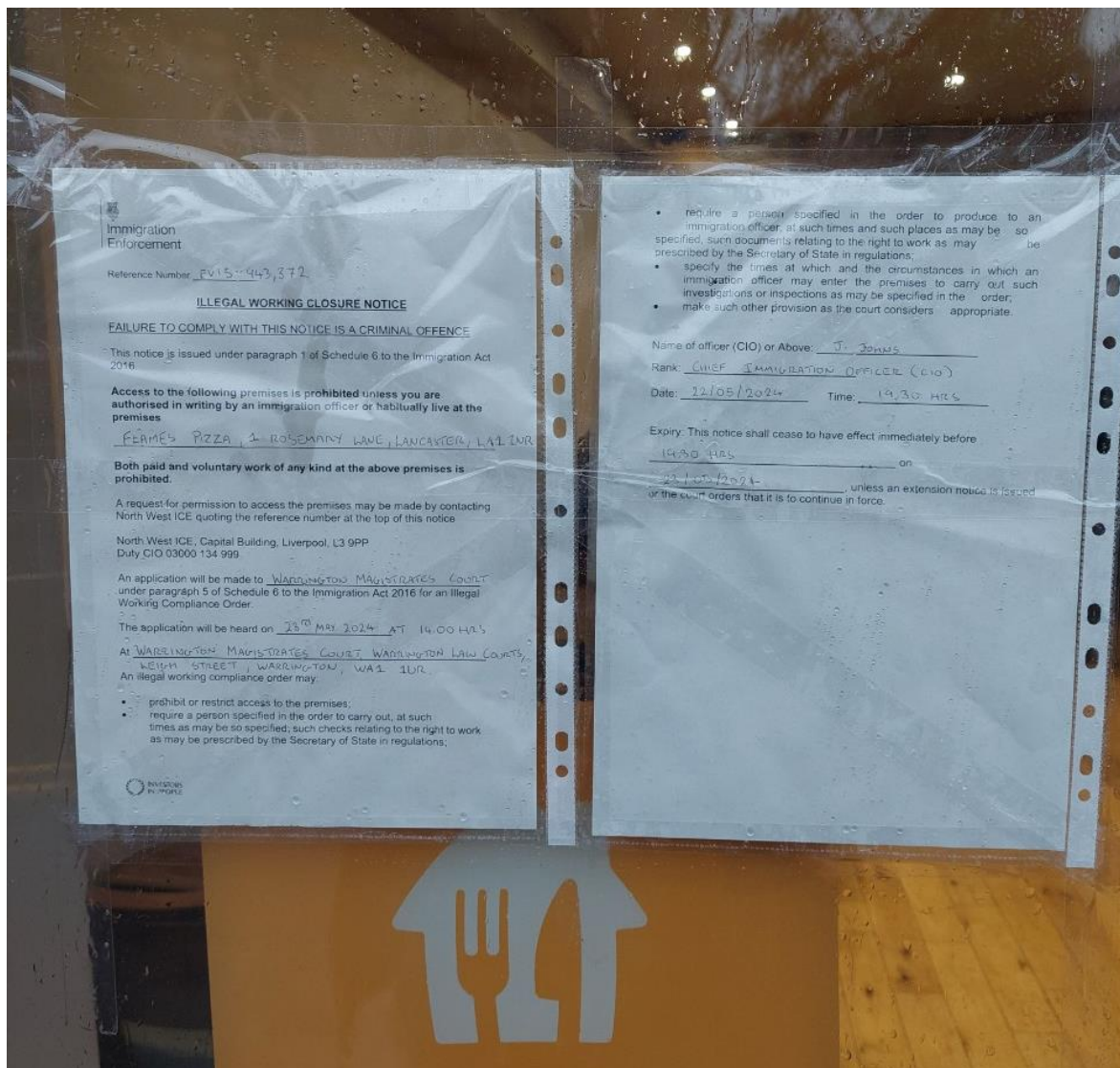


██████████ encountered in 'Flames' uniform.

██████████ stated that his cousin ██████████ who also works at the premises brought him to work at premises. ██████████ claims that he has never seen a manager or the owner for the business. He also confirmed that no right to work checks were conducted and he did not provide any documents to the employer prior to commencing work.

A referral has been made to the Civil Penalty Compliance Team in relation to the illegal working.

A closure order was authorised for 24 hours and the relevant paperwork was served and displayed at the premises. An illegal working compliance order was approved and signed by Warrington Magistrates Court, valid until 23 May 2025.



Reasons for Review

Section 36 and Schedule 4 of the Immigration Act 2016 amended the Licensing Act 2003 to introduce immigration safeguards in respect of licensing applications made in England and Wales on or after 06 April 2017. The intention is to prevent illegal working in premises licensed for the sale of alcohol or late-night refreshment.

Section 182 guidance at point 11.27 states that certain activity should be treated particularly seriously, and this includes employing someone who is disqualified from that work by reason of their immigration status in the UK. 11.28 of the guidance states that it is expected that revocation of the licence – even in the first instance – should be seriously considered.

A total of six of illegal workers have been encountered working at the premises during the period from October 2022 to May 2024. The most recent visit led to a closure order being issued.

It is considered the license holder, Rudolf Collaku has deliberately overlooked the rules and laws in place to prevent crime and disorder.

In addition, the license holder has received three civil penalties totalling £110,000. The first civil penalty was issued on 24 March 2023 after the premises was visited three times. This financial sanction failed to modify the license holder's behaviour as further illegal workers were encountered and two additional civil penalties were issued. It must be noted that the license holder has failed to pay any of these civil penalties.

The license holder has shown complete disregard for UK immigration laws by employing illegal workers.

Whether by negligence or wilful blindness illegal workers were engaged in activity on the premises, yet it is a simple process for an employer to ascertain what documents they should check before a person can work. It is an offence to work when a person is disqualified to do so, and such an offence can only be committed with the co-operation of a premises licence holder or its agents. It is also an offence to employ an illegal worker where there is reason to believe this is the case.

Immigration Enforcement submits that for commercial reasons those engaged in the management of the premises employed illegal workers and a warning or other activity falling short of a review is inappropriate; therefore, Immigration Enforcement has proceeded to review.

Outcome Sought

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

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

The licensing objectives are:

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

Flames, under the control of Mr. Rudolf Collaku has been found employing illegal workers as outlined above. This premises has clearly failed to meet the prevention of crime and disorder objective.

The use of illegal labour provides an unfair competitive edge and deprives the UK economy of tax revenue. Illegal workers are often paid below the minimum wage (itself an offence) and National Insurance payments are not paid. The main draw for illegal immigration is the ability to work outside of the law, these illegal workers can find themselves toiling in poor working conditions for long hours and little remuneration. A firm response to this behaviour is required to ensure that the licence holder and/or its agents are not allowed to repeat the exercise and in particular, in the interests of the wider community to support responsible businesses and the jobs of both UK citizens and lawful migrants. It is also required to act as a deterrent to others who would otherwise seek to seek an unfair competitive advantage, exploit workers and deny work to the local community, evade the payment of income tax and (unlawfully) inflate their profits to the expense of others.

Immigration Enforcement asks that the premises licence is revoked. Merely remedying the existing situation (for instance by the imposition of additional conditions or a suspension) is insufficient to act as a deterrent to the licence holder and other premises' licence holders from engaging in criminal activity by employing illegal workers and facilitating disqualified immigrants to work illegally.

This submission and appended documents provide the licensing subcommittee with background arguments and information pertinent to that contention. These provide the sub-committee with a sound and defensible rationale as to why it should revoke the licence.

Appendix A – Supporting Evidence

Illegal Working-Employee [REDACTED]

Illegal Working-Employer Rudolf COLLAKU [REDACTED]

Encounter [REDACTED]

Illegal Working-Employee [REDACTED]

Illegal Working-Employee [REDACTED]

Illegal Working-Employer [REDACTED]

Illegal Working-Employee [REDACTED]

Illegal Working-Employee [REDACTED]

Illegal Working-Employer Rudolf Collaku [REDACTED]

Illegal Working-Employee [REDACTED]

Documents Served [REDACTED]

Illegal Working - Employee					
Details					
Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntoID	██████████ - AFG Afghanistan				
Subject CIDPID/CEPR	██████████				
Subject name	██████████████████				
Subject DOB	██████████				
Subject nationality	AFG Afghanistan				
Subject gender	Male				
Time	20:50				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 30%;">Easting</td> <td style="text-align: right;">347764</td> </tr> <tr> <td>Northing</td> <td style="text-align: right;">461869</td> </tr> </table>	Easting	347764	Northing	461869
Easting	347764				
Northing	461869				
Creation date	26-10-2022 20:50:51				
Language of Interview					
What language is the interview carried out in?	English				
Interpreter used?	No				
Obligation					
How long have you been working here?	Two days				
What is your job role/ what are your duties?	Make pizzas and help cleaning				
What days/ hours do you work each week?	I start at 4pm until 3am. I think I can work 20hrs after 1 year				
Control					
Who gave you this job (name and role in business)?	I don't know				
Who tells you what days/ hours to work?	The boss. He said I am on trial				
Who tells you what tasks/ duties to do each day?	The boss. I don't know his name				


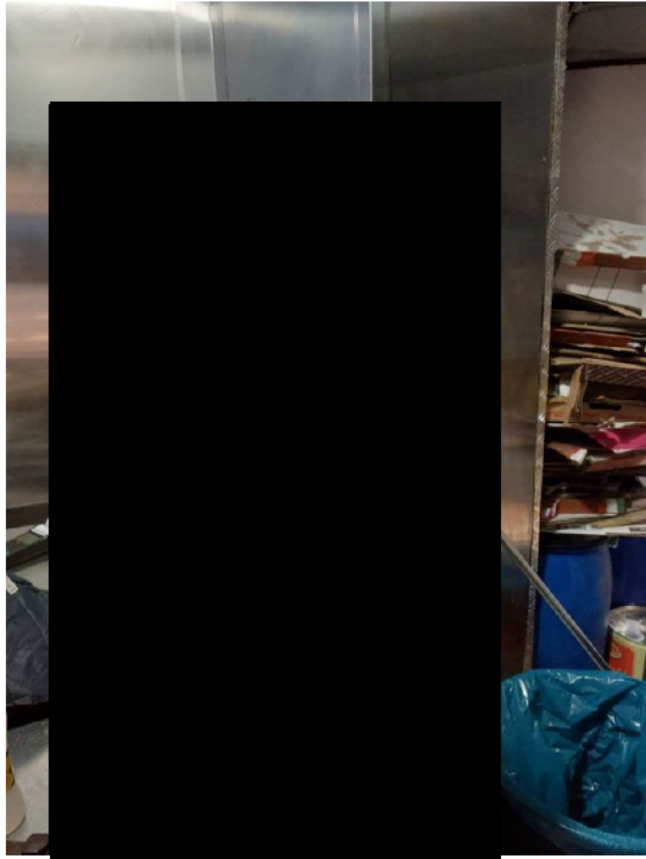
Remuneration	
How are you paid (money, accommodation, food)?	I don't know yet as not been paid
Who pays you?	The boss but we haven't agreed a fee yet as I'm training
Do you pay income tax or have a National Insurance number?	No
Pre-employment Checks	
Did you show documents before being offered the job? If so, what?	Nothing
Does your employer know you're not allowed to work in the UK?	I don't know I said I will go to immigration and get papers
Additional Questions	
do you know you are not allowed to work in the UK	Yes but I can 20 hours after 1 year
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the questions and that the details are true and correct.	
Interviewee signature [REDACTED] [REDACTED])	 26-10-2022 20:58:34
Observations	
Observations	In kitchen at time of entry. Tried to leave the rear. Wearing orange just eat t-shirt like all other workers in the kitchen
Do you suspect this person of illegal working?	Yes

Photo 1



Caption

[Redacted]

Illegal Working - Employer

Details

Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntoID	Rudolf Collaku - [REDACTED] - ALB Albania	
Subject CIDPID/CEPR	Unknown	
Employer	Rudolf Collaku	
Subject DOB	[REDACTED]	
Subject nationality	ALB Albania	
Subject gender	Male	
Time	21:01	
Created at geolocation	Easting	347848
	Northing	461823
Creation date	26-10-2022 21:01:22	

Language of Interview

What language is the interview carried out in?	English
Interpreter used?	No

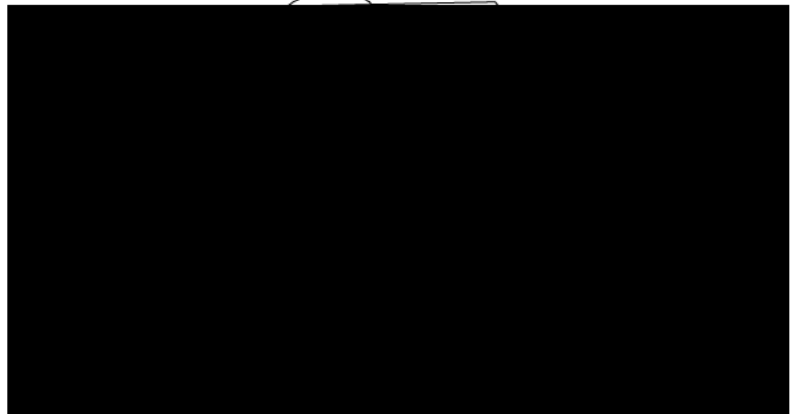
Employer Details

What is your role at Flames?	I am the manager
How long had [REDACTED] worked at Flames?	Since yesterday 25/10
Have you asked for [REDACTED] for any ID?	Yes I have asked him for ID multiple times but hasn't provided any
How did [REDACTED] get the job?	He came into the shop on Monday 24/10 and asked for a job. He told me that he was allowed to work.
How many hours does [REDACTED] work a day?	From 16:30 until 03:30 yesterday and today
How were you going to pay [REDACTED] for the work he has done?	In cash at the end of the week £10 an hour
How many days was [REDACTED] due to work?	3/4 days a week agreed.
Who tells [REDACTED] what to do every day?	I do, he comes to the shop every day at 4pm and I give him duties.

Declaration by Employer

I confirm that I have understood all the questions and that the details are true and correct.

Signed by Rudolf Collaku



26-10-2022 21:08:34

Observations

Observations

Encounter	
Details	
Type of work	Visit
Visit reference	██████████
Created by	██████████
ProntolD	██████████ - ALB Albania
Time	18:45
Created at geolocation	No geolocation available
Creation date	15-12-2022 18:46:34
Chosen Identity	
Identity source/type	Biographic
Name	██████████
DOB	██████████
Gender	Male
Nationality	ALB Albania
Languages	
Languages spoken	English
Interpreter used?	No
Encounter	
Encountering officer	██████████
Is this encounter related to a Small Boats event?	No
Is this person the subject of the visit?	No
Do you suspect an immigration offence?	Yes
Why do you suspect the person of an immigration offence?	Sat in rear of takeaway and moved out of sight upon our arrival
Declared immigration status	Illegal entrant
How and when did the subject last enter the UK?	6 months ago via small boat
CIDPID/CEPR	██████████
Are there any vulnerabilities/trafficking/safeguarding issues?	No
Is the subject considered a 'rough sleeper'?	No

Where in the premises was the subject located?	Kitchen
Are you taking enforcement action?	No
References (Person ID, HO Ref, Port Ref, BRP)	
Biographic search results	Systems checked Person Check Result of checks Does the person have an open absconder status on Atlas Person Alerts? Status returned by system checks
Identity Documentation	
Document 1	Document type Name in document (if different from above) Document reference Document expiry date Country of issue (if different from nationality above) Suspected fraudulent Notes Photos
Notes	
No notes entered.	

Illegal Working - Employee

Details

Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntoID	██████████ - ALB Albania				
Subject CIDPID/CEPR	██████████				
Subject name	██████████				
Subject DOB	██████████				
Subject nationality	ALB Albania				
Subject gender	Male				
Time	19:36				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 30%;">Easting</td> <td style="text-align: right;">347784</td> </tr> <tr> <td>Northing</td> <td style="text-align: right;">461874</td> </tr> </table>	Easting	347784	Northing	461874
Easting	347784				
Northing	461874				
Creation date	12-01-2023 19:36:00				

Language of Interview

What language is the interview carried out in?	Albanian
Interpreter used?	Yes
Details of interpreter	See encounter
Does the individual understand the interpreter?	Yes

Obligation

Are you working here?	No I am not working the owner of this fast food is my cousin he is Albanian he said I can come here and help myself
Do you help out?	It depends of course I am help him sometimes
the last time immigration here you were advised not to be on the staff side, why did you not listen to this?	Immigration told me I can be here just not in the kitchen area
What were you helping out with other day when the police officers observed you moving boxes?	It was some boxes from the shop or its contents
Why are you here now?	Today I just came to eat I was hungry
Had you ordered your food?	No I just order but there was some other orders before me
Have you got a receipt?	No because it belongs to my cousin

What did you order?	I ordered a pizza as soon as I came here
We have been here for 30 minutes and there still isn't a pizza being cooked would you like to change your answer?	I really don't know why the pizza is not ready I usually do like this
Why is your coat taken off behind the counter?	How am I going to go the toilet with a jacket on
How long have you been helping out here for?	When I arrived in the UK I was sent to a camp, so this cousin that owns this premises took me up and there was a guarantee when I was released that I live with him so whenever we come here, I do help him sometimes only during the day
How often would you say you help out a week?	I can't say sir how many times per week just sometimes I get bored and go out on the way here, its not a day in particular
Control	
Is it your cousin who tells you to help out here?	My cousin has his own employees it's not that he asks me to help him
Remuneration	
How are you paid (money, accommodation, food)?	Well even if I help my cousin out I don't get any help as I live with him, it's a tradition. Whenever I wake up at the same time time he goes to work sometimes in join him and have a coffee
Pre-employment Checks	
No details provided.	
Additional Questions	
you have been observed working here 4 times now, do you have anything to say to this?	I probably came even more here but its my cousin who owns this place. We stay here for 30 min drink a bit and go home
Are you aware you don't have permission to work in the UK?	I am well aware

Photographs

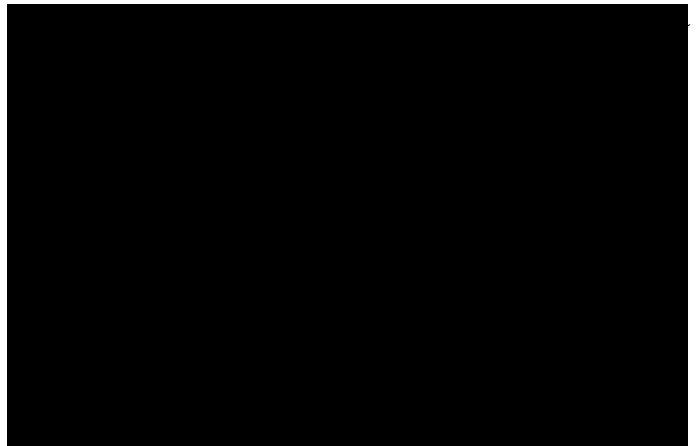
individuals coat



Declaration

I confirm that I have understood all the questions and that the details are true and correct.

Interviewee signature ([REDACTED])



12-01-2023 19:56:39

Observations

Observations

Individual has been observed behind counter in staff only area on 4 occasions. Twice by immigration and once by police officer [REDACTED] and once by other police officers.
He was again in staff area tonight with his coat behind staff counter.

OFFICIAL SENSITIVE

	He claimed to be coming for food which still wasn't cooked by the time officers left. He admitted to helping out. He lives with his cousin the owner
Do you suspect this person of illegal working?	Yes

Illegal Working - Employee

Details

Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntoID	[REDACTED] - IRQ Iraq	
Subject CIDPID/CEPR	[REDACTED]	
Subject name	[REDACTED]	
Subject DOB	[REDACTED]	
Subject nationality	IRQ Iraq	
Subject gender	Male	
Time	20:31	
Created at geolocation	Easting	347786
	Northing	461872
Creation date	12-01-2023 20:31:39	

Language of Interview

What language is the interview carried out in?	Kurdish
Interpreter used?	Yes
Details of interpreter	See encounter
Does the individual understand the interpreter?	Yes

Obligation

How long have you been working here?	1 day
What is your job role/ what are your duties?	Cutting the pizza
What time did you start today?	3pm
What time were you expecting to stay until?	3am
During that time, were you expecting to be cutting pizzas for the whole shift?	Cutting tomatoes and cucumbers and salad as well and cleaning
Have you ever been here before today?	No

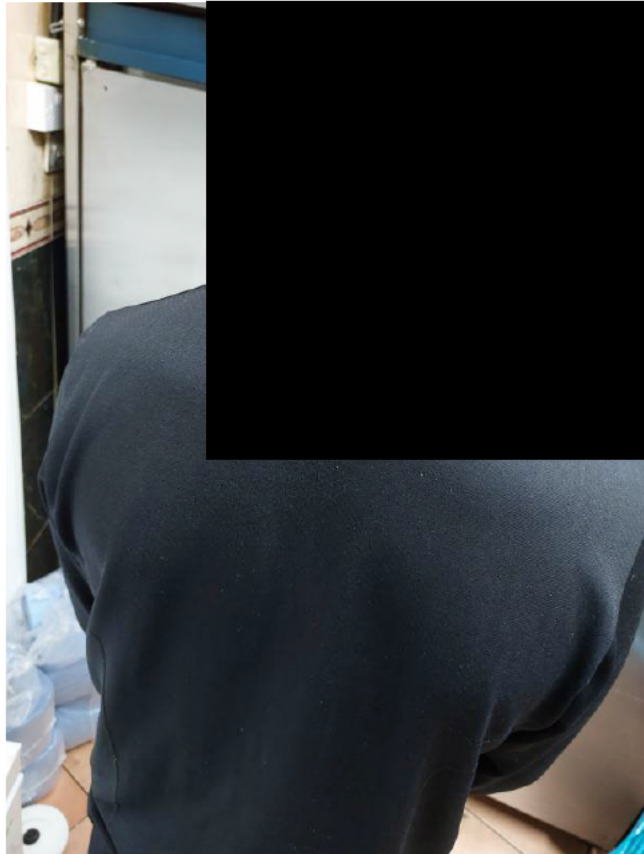
Control	
Who told you you could have this job?	Owner of the shop
What is that persons name?	Rudy
Have you ever met Rudy or only spoken to him on the phone?	The pizza chef spoke with the owner and the owner accepted it.
Were these conversations today?	Yes today
Who is the manager here tonight?	The other pizza chef is the manager
Do you know his name?	████
Is he here right now?	Yes - pointed to █████
Remuneration	
How much money were you expecting to receive for your shift?	Rudy will pay me and I don't know how much.
Are you just expecting to receive money, or do you get accommodation or receiving food whilst on shift?	Just money
Pre-employment Checks	
Before you got this job, did the chef or Rudy ask to see any ID documents?	No
Did they ask if you have permission to work in the UK?	The chef asked if I had a permit to be allowed to work and I said no
Additional Questions	
Are you happy to sign my phone to confirm the answers you have provided are true and correct, or would you like me to read them back to you?	I want to read my answers
Can you read in English?	No Arabic
I will read the question and answer to the interpreter.	*read answers back*
Are you now happy to sign my phone to confirm the answers you have provided are true and correct?	Yes

Photographs

1



2



3



top he took off



Declaration

I confirm that I have understood all the questions and that the details are true and correct.

Interviewee signature ([REDACTED]
[REDACTED])



12-01-2023 20:50:51

Observations

Observations

Upon entry he was behind the counter wearing a just eat top which he took off before he was arrested.

Do you suspect this person of illegal working?

Yes

Illegal Working - Employer

Details


Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntoID	[REDACTED] - BGR Bulgaria	
Subject CIDPID/CEPR	Unknown	
Employer	[REDACTED]	
Subject DOB	[REDACTED]	
Subject nationality	BGR Bulgaria	
Subject gender	Male	
Time	20:30	
Created at geolocation	Easting	347786
	Northing	461874
Creation date	12-01-2023 20:29:54	

Language of Interview

What language is the interview carried out in?	Turkish	
Interpreter used?	Yes	
Details of interpreter	[REDACTED]	
Does the individual understand the interpreter?	Yes	

Employer Details

Who is the manager?	Me	
Who is the owner?	Rudolph is in hospital	
Who is in charge of employment?	Rudolph Klaku	
How long have you worked here?	5 years	
How long has [REDACTED] worked here?	Not too long a little bit	
what does he do when he's here?	When we are busy he helps me	
When you are busy here he helps out yes?	Just for a few hours he only helps out here he's not working	
How long has [REDACTED] been helping here?	Maybe one week	
Does he help out most days?	Only Friday and Saturday	

Does he receive any payment or cash do this?	We are not giving him any money for a few hours he helps us and I give him some food
████ helps out for a few hours and you give him some food is that right?	Yes
Were you aware that the two individuals cannot work?	No
What food does █████ usually get after he helps out?	Whatever they want to eat I give them
How long has █████ been working here?	A few days 1 or 2 days
Does he receive any payment or food?	Only for a few hours or 2 days so of course we give him food or when we go to barbers
How does █████ know when he needs to come in?	I WhatsApp him to come to help out
Is that the same for █████?	Yes
Declaration by Employer	
I confirm that I have understood all the questions and that the details are true and correct.	
Signed by █████	 12-01-2023 20:55:04
Observations	
Observations	

Illegal Working - Employee

Details

Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntoID	████████████████████ - India				
Subject CIDPID/CEPR	██████████				
Subject name	██████████████████				
Subject DOB	██████████				
Subject nationality	India				
Subject gender	Male				
Time	17:20				
Created at geolocation	<table border="0"> <tr> <td>Easting</td> <td>347788</td> </tr> <tr> <td>Northing</td> <td>461872</td> </tr> </table>	Easting	347788	Northing	461872
Easting	347788				
Northing	461872				
Creation date	23-11-2023 17:20:00				

Language of Interview

What language is the interview carried out in?	English
Interpreter used?	No

Obligation

What are you doing here today?	I came here to work
What is your role here?	Folding pizzas boxes
How long have you been doing that?	2 days
When did you start your shift?	Yesterday it was 4 o'clock until 2am. Today it was 4 o'clock again but I don't know what time I finished.
Who said you could work here?	The boss (Confirmed to be Rudolf Collaku - subject pointed)
Did Rudolf ask you for any permission to work in the UK?	No he said bring it in tomorrow
Have you showed him today?	No
How much did you get paid for your work yesterday?	He said he would pay me once I showed my passport
Have you received anything else for your work?	Yea I got a free pizza
How did you know about the job here?	My friend ██████████ who I am staying with in Morecambe (address unknown) told me about it.

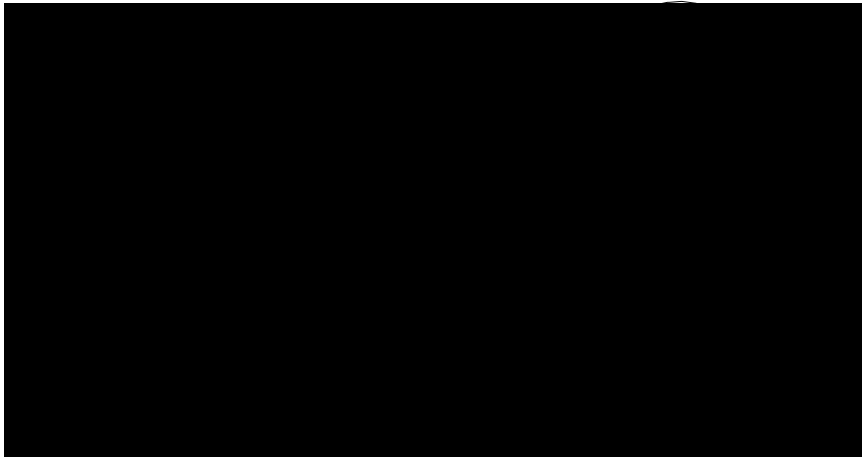
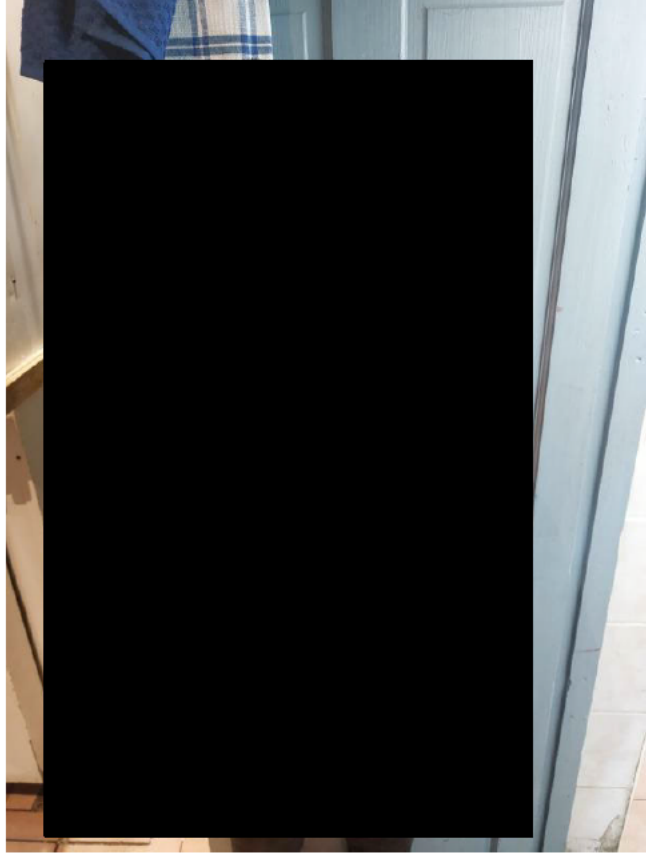
Is there are written contractual agreement between yourself and this business?	No
Who told you to come into work today and what time to start?	The boss Rudolf
Who gave you the JustEat t-shirt you are wearing?	It was in the cloakroom, my top was dirty so I wore I went and wore it
Control	
No details provided.	
Remuneration	
No details provided.	
Pre-employment Checks	
No details provided.	
Additional Questions	
No details provided.	
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the questions and that the details are true and correct.	
Interviewee signature ([REDACTED])	 23-11-2023 17:43:48
Observations	
Observations	Male was in the staff area upon arrival and walked away from me immediately, subsequently arrested and admitted he has worked here on 2 occasions. Male is also wearing a JustEat t-shirt
Do you suspect this person of illegal working?	Yes

Photo 1



Caption

IW Evidence

Management Checks Complete

Date management checks complete 13-03-2024 10:35:05

Reviewer(s)

[Redacted]

Illegal Working - Employee

Details

Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntoID	[REDACTED] - India	
Subject CIDPID/CEPR	[REDACTED]	
Subject name	[REDACTED]	
Subject DOB	[REDACTED]	
Subject nationality	India	
Subject gender	Male	
Time	17:44	
Created at geolocation	Easting	347788
	Northing	461860
Creation date	23-11-2023 17:44:21	

Language of Interview

What language is the interview carried out in?	Tamil
Interpreter used?	Yes
Details of interpreter	See encounter
Does the individual understand the interpreter?	Yes

Obligation

How long have you been working at this business?	For the past 3 days
What is your job role/ what are your duties?	Make pizza
What time did you arrive today?	4pm
What time do you intend to leave tonight?	4:30am or 05:30am if busy
Have you been working the same hours every day?	Different timings. Whatever time they tell me. Been here the past 3 days, 04:00am or 03:30am.

Control

Who gave you this job (name and role in business)?	The owner Rudy
--	----------------

Who tells you what days/ hours to work?	The owner Rudi the one who tells me I will be coming here. I've only been coming for the past 3 days.
Who tells you what tasks/ duties to do each day?	The owner Rudy.
Remuneration	
How are you paid (money, accommodation, food)?	I just joined. I came here because I don't have any food. That's why I came here. From next week I will get a salary.
How much do you expect to get paid?	£70 a day
Do you free food here?	Yes because I am working here so I get free food. It is not hourly paid, just a day £70. I said he can only pay me £70 and if I do better it will be £80 per day.
Pre-employment Checks	
Did Rudy check your permission to work before you started this job?	He hasn't checked. I asked him because I haven't got any food. He said he hasn't got any food and he said he will start to give me £70
Did Rudy check your passport?	No
Are you aware you are not allowed to work in the UK?	Yes I do
Additional Questions	
I am going to ask you to sign my phone to confirm the answers you have provided are true and correct. Would you like to read the answers back, or I can read them to you, or are you willing to sign?	Okay
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the questions and that the details are true and correct.	
Interviewee signature ([REDACTED])	[REDACTED]

23-11-2023 17:57:15

Observations

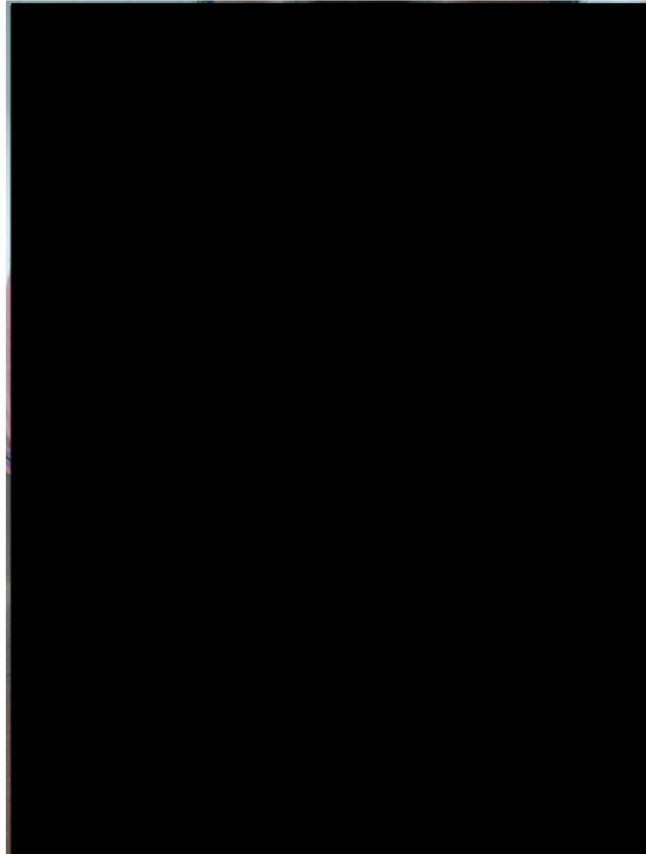
Observations

Male was in the kitchen when we entered. He looked nervous and tried to move away from officers. There is only a staff entrance to the kitchen. It is a separate door therefore no customers would have access.

Do you suspect this person of illegal working?

Yes

Photo 1



Caption

food stains

Photo 2



Caption

shoes

Illegal Working - Employer	
Details	
Type of work	Visit
Visit reference	██████████
Created by	██████████
ProntoID	Other
Subject CIDPID/CEPR	Unknown
Employer	Rudolf Collaku
Time	17:32
Created at geolocation	No geolocation available
Creation date	23-11-2023 17:31:45
Language of Interview	
What language is the interview carried out in?	English
Interpreter used?	No
Employer Details	
What is the name of the business?	Flames, no other details
If the business is owned by a company what is the name of the company?	No
What are the Companies House and VAT numbers of the business?	States not on Companies House or reg'd for VAT
What is your position here?	Manager
Who is or who are the owner/s	I'm the owner/manager
Declaration by Employer	
I confirm that I have understood all the questions and that the details are true and correct.	
Subject has refused to provide a signature.	
Employer read the contents of the interview themselves	Yes
Contents read back to the employer in the language used during the interview	Yes
Employee - ██████████	
Known to employer as	██████████

Obligation	
How long has the employee been working at this business?	About 3 months
What is their job role/ duties?	He makes pizzas and cleans at the end of the night
What days/ hours do they work each week?	18 to 20 hours per week
Is there a reason why he works that amount of hours?	He's on a student visa
Are their days/ hours the same every week?	His hours/days vary
Control	
Who gave the employee this job?	I did
Who tells them what days and hours to work?	I do
Who tells them what tasks or duties to perform each day?	I do
Where are the employee records?	No, no copies of anything here
If [REDACTED] cannot work, do you find a replacement for him?	Yes
Remuneration	
What is the employee given in return for their tasks and duties?	He gets paid, £11p/h
Who pays this employee?	I do
How is this employee paid – cash, bank transfer?	Cash
Does HMRC know that this employee works at your business?	Yes, they do
Pre-employment Checks	
Did you check the right to work or immigration status before you offered the employee the job?	Yes, he told me he is a student
Did the employee share a digital code with you to enable you to check their right to work in the UK?	No, I don't remember that
Did you ask to see any documents from the employee to demonstrate their right to work in the UK?	I think I did, I don't remember

What documents did you ask to see and what were you shown before offering employment?	I think so, I can't remember
Employee - [REDACTED]	
Known to employer as	[REDACTED]
Obligation	
How long has the employee been working at this business?	A few months, 2 or 3
What is their job role/ duties?	Makes pizzas
What days/ hours do they work each week?	Same as the other guy, 18-20
Is there a reason why he works those hours?	He's on a student visa as well
Are their days/ hours the same every week?	His hours vary
Control	
Who gave the employee this job?	I did
Who tells them what days and hours to work?	I do
Who tells them what tasks or duties to perform each day?	I do
Where are the employee records?	No, none
Remuneration	
What is the employee given in return for their tasks and duties?	He gets paid
If the payment includes money, how much is paid?	Same as the other one, £11, some food but no accommodation, same for the other one too
Who pays this employee?	I do
How is this employee paid – cash, bank transfer?	By cash
Does HMRC know that this employee works at your business?	Yes
Does HMRC know that this employee works at your business?	Yes
Pre-employment Checks	
Did you check the right to work or immigration status before you offered the employee the job?	Yes, I think I did

Did the employee share a digital code with you to enable you to check their right to work in the UK?	No
Did you ask to see any documents from the employee to demonstrate their right to work in the UK?	I think i saw his ID
What kind of ID was it?	Just an ID card, I don't recall
Were you shown any originals?	I don't know, I can't tell
Observations	
Observations	

Illegal Working - Employee

Details

Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntoID	[REDACTED] - Bulgaria	
Subject CIDPID/CEPR	Unknown	
Subject name	[REDACTED]	
Subject DOB	[REDACTED]	
Subject nationality	Bulgaria	
Subject gender	Male	
Time	19:38	
Created at geolocation	Easting	347788
	Northing	461874
Creation date	22-05-2024 19:38:44	

Language of Interview

What language is the interview carried out in?	Bulgarian
Interpreter used?	Yes
Details of interpreter	See encounter
Does the individual understand the interpreter?	Yes

Obligation

How long have you been working at this business?	2 weeks
What is your job role/ what are your duties?	I prepare food and help out with other things
What days/ hours do you work each week?	I work 37-38 hours per week
Do you work the same hours/ days every week?	I work different hours
What is your job role/ what are your duties?	I only make pizzas here
do you complete any other tasks? do you serve any cusotmers	No. I don't serve customers because I don't speak english

how much are you paid per hour?	I do not get paid per hour. I get £300. I work 2-3 days. I do not work Mondays or Tuesdays
what days do you work each week?	I don't work here all the Time. I worked one week and didn't work the next.
what time do you start your shift a d what time do you end?	Start at 4pm and work until 9 or 10pm. So times I work 4 hours sometimes 3 hours.
Control	
Who gave you this job (name and role in business)?	My cousin brought me here. My cousin is called [REDACTED]. He is here now (points to other worker encountered)
Who tells you what days/ hours to work?	My cousin. He tell me everything
Who tells you what tasks/ duties to do each day?	My cousin [REDACTED]
Who is the manager here?	I don't know. Never seen manager here. I Work 5 hours per day and leave.
You said you were paid by [REDACTED] paid you before.	No there is no [REDACTED]
What is your home address?	I live in Lancaster. I only came here two weeks ago. I live in number 14.
Does your cousin know?	I don't know. I only know it is number 40
Is it number 40 Slaidburn Drive LA1 4 QX?	Yes that is correct. I have stayed there for the last two weeks.
Remuneration	
How are you paid (money, accommodation, food)?	Paid cash in hand. My cousin gives the mmoney to me
If money, how much and how do you receive it?	Once per week or when I need it
Who pays you?	[REDACTED] my cousin.
Do you pay income tax or have a National Insurance number?	No
who lives with you at the address you are currently living at.	Just my cousin Who else lives there? My cousin his wife and his daughter
who do you believe to be the owner or manager of this business	I don't know I have never seen them. I just work 5 hours and leave
your cousin must have mentioned the owners name or details.	No never
Pre-employment Checks	
Did the employer check your right to work or immigration status before they offered you the job?	No

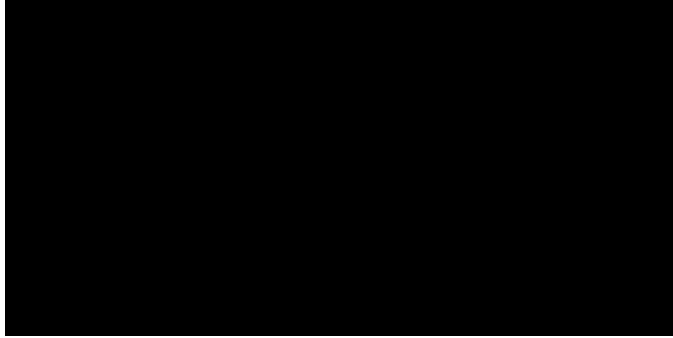
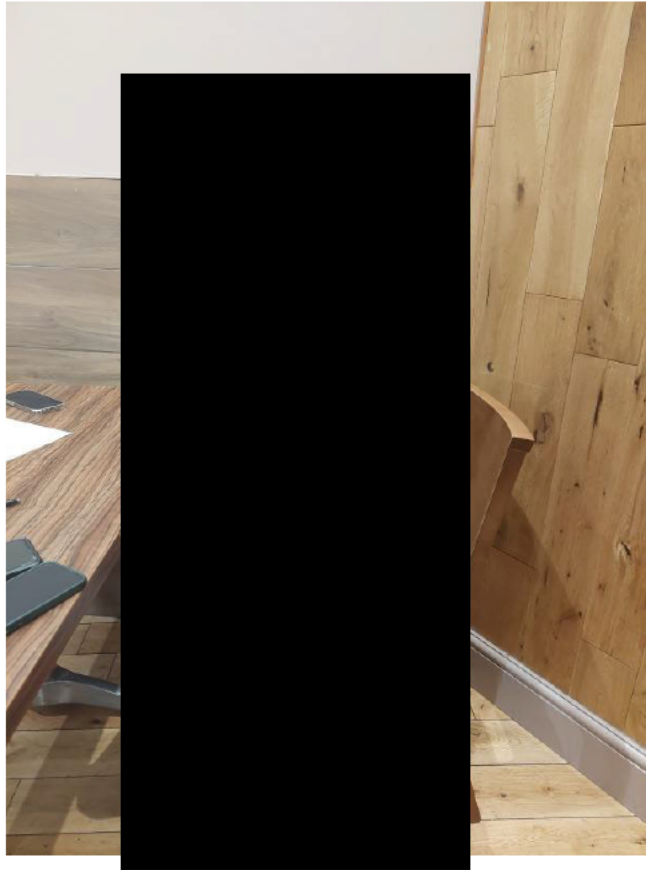
Did you show documents or share a code with the employer to prove your right to work before being offered the job? If so, what did you show and were they originals?	No I didn't show anything
Does your employer know you're not allowed to work in the UK?	I don't know..I have even seen any employer.
Additional Questions	
I am going to ask you to sign my phone to show the answers are a true reflection of our conversation. would you like me to read questions and answers back	Yes I am.happy to sign
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the questions and that the details are true and correct.	
Interviewee signature ([REDACTED])	 <p>22-05-2024 20:10:30</p>
Observations	
Observations	Male was encountered in kitchen area of 'Flames'. He was wearing a 'Flames' t-shirt and was preparing a pizza when we arrived. His Flames t-shirt was dirty and stained with food, particularly flour from making pizza dough. He has openly admitted to working here for cash in hand for the last couple.of weeks (please see q&a). He also stated that he came to the UK simply to work (please see q&a)
Do you suspect this person of illegal working?	Yes

Photo 1



Caption

photo of subject wearing Flames t-shirt stained with food

Exhibit Ref

[REDACTED]

Documents Served

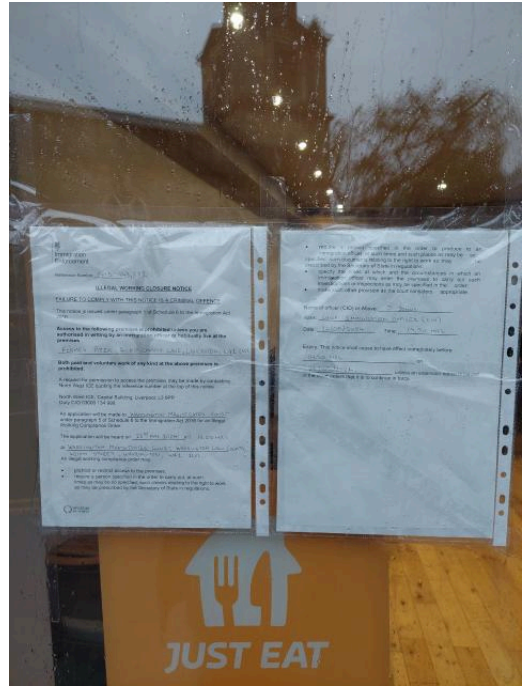
Details

Type of work	Visit
Visit reference	[REDACTED]
Created by	[REDACTED]
Address	Flames , 1 -2 Rosemary Ln, Lancaster, LA1 1NR (Visit Address)
ProntoID	[REDACTED] - Bulgaria
Subject CIDPID/CEPR	Unknown
Subject name	[REDACTED]
Subject DOB	[REDACTED]
Subject nationality	Bulgaria
Subject gender	Male
Created at geolocation	Easting 347786 Northing 461873
Creation date	22-05-2024 20:02:27

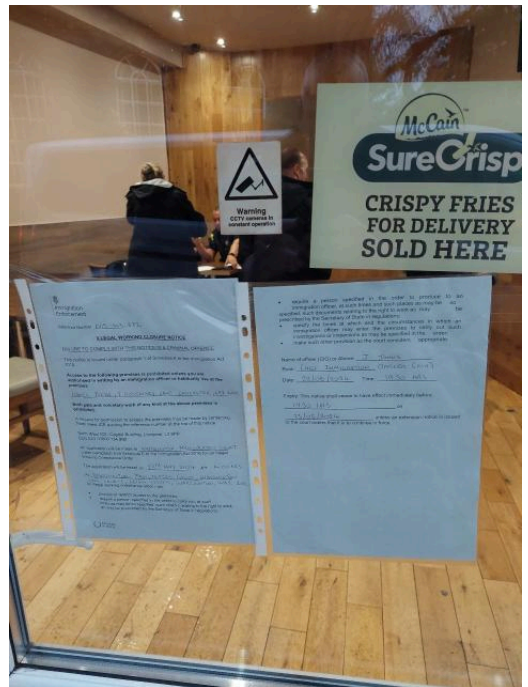
Documents Served

Document Served	Document category CPRN
	Document served IW Closure Notice
	Document served to Other
	Specify Employee
	Language spoken Turkish
	Interpreter used? Yes
	Interpreter details [REDACTED]
	Does the individual understand the interpreter? Yes
	What date/time was the document served? 22-05-2024 19:30:00
	Document issued by [REDACTED]

Photos



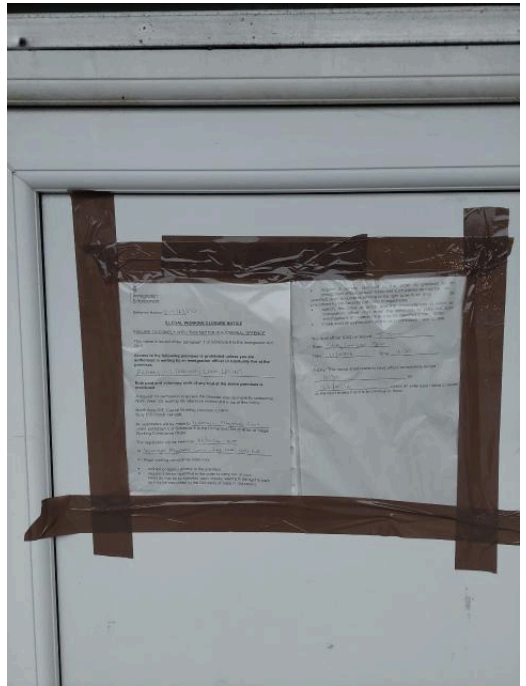
Closure Notice Exterior Window Dining Area.



Closure Notice interior door Dining Area.



Closure Notice Window Interior Dining area.



Closure Notice Door exterior kitchen area.

Comments

Closure Notice fully explained to employee [REDACTED] who stated that he understands the Closure Notice and subsequent requirements via Turkish interpreter [REDACTED].

Management Checks Complete

Date management checks complete 27-05-2024 16:22:40

Reviewer(s)

[REDACTED]