

# **Premises Licence Review**

Aroma Chef
30 Market Street
Lancaster
Lancashire
LA1 1HT

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## **Case Summary**

On 30 January 2025, North West ICE visited Aroma Chef, 30 Market Street, Lancaster, Lancashire, LA1 1HT, after intelligence was received the premises was employing illegal workers. During the enforcement visit 7 individuals were encountered, with 3 having held no legal right-to-work.

#### **Civil Penalty**

Aroma Chef Lancaster Limited was issued a civil penalty of £120,000 in March 2025, for employing three individuals who held no right-to-work within the UK. A payment plan has been arranged, with the first instalment paid on 21 May 2025.

A total of £16,666.80 has been paid so far. The current outstanding balance on 29 September 2025 is £103,333.20.

## **Licensed Premises History**

The premises licence number is LAPLWA0680 issued by Lancaster City Council and is held by Andy Wei Xia of 5 Ash Grove, Timperley, Altringham, WA15 6JX.

Ling Ling CHEN is listed as the Designated Premises Supervisor (DPS) and the Personal Licence Number is CPBC/LU/0524P issued by Castle Point.

On 24 March 2024, Aroma Chef was first incorporated on Companies House and is currently listed under the company name of Aroma Chef Lancaster Ltd. The company registration number for Aroma Chef Lancaster Ltd is 15589829. Chunjing Wang and Andy Wei Xia are both listed as active directors having both been appointed on 24 March 2024.

The premises is licensed for the provision of late-night refreshments:

Monday – Sunday 23:00 – 02:00

The premises is licensed for the supply of alcohol for consumption ON the premises:

Monday – Sunday 12:00 - 02:00

# **Enforcement Visit: 30 January 2025**

Entry was gained to the premises at approximately 16:54 under Section 179 of the Licensing Act 2003. Upon entering, immigration officers encountered the following individuals, who were identified as working illegally and arrested:

| (also known as   |
|--|
| Immigration officers encountered in the seating area of the premises, officers witnessed remove his apron and leave the premise kitchen. Upon gaining entry, attempted to leave but was detained by officers on suspicion of immigration offences. During the interaction, a search of his person revealed an envelope containing a quantity of cash, which estimated to be between £1,000 and £2,000. It is suspected that this money may have been obtained through illegal employment at the premises, although did not confirm this. |
| During interviewing stated he was at premises to hang around and cook food for himself, claiming this was an occasional activity, occurring roughly once a month. When questioned why he had removed his apron, stated it was to keep his clothes clean.   |
| reported arriving at the premises at approximately 2:00pm and intended to leave between 6:00pm and 7:00pm. When questioned about previous visits, admitted to occasionally helping out while waiting for his food to cook. claimed he had assisted on roughly ten separate occasions, primarily by carrying boxes and clothing, but denied being employed. denied receiving payment or food in exchange for being there and insisted he was only cooking for himself.  |
| stated no identification was requested prior to being allowed to cook or assist on the premises. When questioned regarding the cash found during the search, claimed £200 was earned from working at the premises, later contradicting this by stating he did not work there and that the rest of the money had come from various people.  |
| When questioned, disputed the premises owner's statement that he had worked there for two weeks and lived upstairs. acknowledged staying in the flat above the premises on two occasions but claimed the owner was unaware he had since left. admitted alternating between sleeping on the streets and staying upstairs and admitted that he sometimes helped in order to be allowed to sleep there. No rent was paid.   |
| Home Office records indicated that, prior to the date of the enforcement visit, there was no trace of in any of its databases. Upon arrest, admitted to entering the UK unlawfully by using a passport that did not belong to him. Consequently, did not possess any legal status or right to work in the UK. This could have been verified by the employer through appropriate checks, such as reviewing official documentation or requesting a share code.   |

was encountered attempting to evade officers by leaving the kitchen and was seen heading towards the rear exit. It must also be noted had visible food staining on his shoes.



Food stains on shoes.

During interviewing denied working at the business but later admitted to having worked there for over a month. stated that he works approximately 8 hours per week, spread over 2 to 3 days, typically for around 2 hours per day. His working days are not fixed, and he does not follow a set schedule.

disclosed that he has an ongoing application with the Home Office and that no checks were carried out by the employer regarding his right to work or immigration status prior to him starting work. claimed to have been given the job by a friend, whose name he could not provide. also stated that no one assigns him tasks; instead, he finds work to do on his own initiative.

When asked about payment, confirmed that he is not paid in money but receives food in exchange for his work. reiterated that no formal employment arrangements were made and that he simply comes to the premises to earn some money to buy food.

Home Office checks showed entered the UK illegally and made a claim for protection in 2003, which was refused. At the time of the visit had an outstanding application for leave in the UK. has never held any lawful right-to-work within the UK.

| was encountered within the kitchen area, an area permitted for staff only.   |
|--|
| During interviewing stated he had been employed at the premises for approximately 22 months, with his role involving assisting with food preparation, specifically cutting and washing ingredients, which he confirmed were to be served to customers.   |
| reported he works six days per week, approximately ten hours each day, and receives £490 in cash, paid weekly. Payment is made directly by a person identified as "Andy," described as the boss. No right to work checks were conducted at the time of employment, and confirmed that his immigration status had not been discussed with Andy. |
| stated a kitchen uniform and accommodation were provided, for which he pays no rent. confirmed that the accommodation was linked to his employment at the restaurant and was provided free of charge.  |
| Home Office checks showed entered the UK on a temporary work (seasonal worker) migrant visa valid June 2022 to December 2022. failed to return once his work visa had expired, as a result was an overstayer and was found working without any legal right to do so.   |

#### Andy WEI XIA – Licence Holder

During the enforcement visit WEI XIA identified himself as the owner. An illegal working employer interview was conducted with WEI XIA. During interviewing WEI XIA confirmed the business is name Aroma Chef. WEI XIA identified himself as both the director and manager. WEI XIA stated another director, Chun Jing Wang, was described as a friend and business partner. WEI XIA stated the business has been under his management for approximately four years, with staffing responsibilities divided, WEI XIA overseeing front-of-house staff and managing kitchen staff.

WEI XIA stated that his role in hiring involves checking BRP cards and visas. However, admitted to not verifying the immigration status of some employees and not consistently requesting identification. Employment agreements are verbal, with no written contracts in place. ID copies are sometimes kept as photographs on a mobile phone, but not for all staff.

WEI XIA claimed has been working at Aroma Chef for approximately two weeks as a kitchen assistant. He works five days a week, typically from 11am to 10pm, totalling around 40–50 hours. He is paid £500–£600 per week, paid in cash. WEI XIA admitted he did not request ID from and is unaware of his immigration

| status. He lives upstairs at the premises, does not pay rent, and receives food and accommodation as part of his employment.  |
|---|
| WEI XIA claimed has been employed as the head chef for three years. He works six days a week, around ten hours per day, and earns £700 per week in cash. WEI XIA was unsure of his immigration status and does not hold a copy of his ID. is known personally to WEI XIA as a friend and lives upstairs under the same rent-free arrangement as other staff.  |
| WEI XIA stated has worked at the business for less than two years, performing dishwashing and cleaning duties. He works 5–6 days a week, approximately 50–60 hours, and is paid around £500 per week in cash. He was hired through a personal connection with WEI XIA stated that presented an Indonesian passport, which was photographed but not copied. has lived upstairs for about 1.5 years under the same rent-free arrangement. |
| WEI XIA stated the flat above the premises includes five single rooms and one stock room, where several staff members reside including and None of them pay rent, and food and accommodation are provided free of charge. All three have keys to the premises and freedom of movement. No tenancy agreements or formal housing contracts exist.   |

#### **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.

Three illegal workers were encountered at the premises during the enforcement visit. It is clear to see that the premises licence holder along with management has failed to conduct mandatory employment checks in line with legal obligations to prevent illegal working. It is an offence to work when a person is disqualified to do so, and such an offence can only be committed with the co-operation of a premises licence holder or its agents. The management could have eradicated any doubt concerning right-to-work by the simple task of acquiring a share-code from potential employees.

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. All employers are dutybound by law to conduct these checks, and guidance can be found on the GOV.UK website or by using a search engine.

Additional information on how to conduct these checks is available online, this includes the Home Office's official YouTube page. 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 illegal workers where there is reason to believe this is the case.

During the course of the enforcement visit, several concerning employment practices were identified at the premises. Employees admitted to receiving free food and accommodation as part of their remuneration, raising serious concerns about potential exploitation and non-compliance with employment standards.

One individual disclosed being paid £8.16 per hour, significantly below the statutory minimum wage of £11.44 at the time. Furthermore, another worker confirmed they had been employed under these conditions for a period of two years, indicating a sustained and deliberate pattern of unlawful employment practices. These findings collectively demonstrate a clear disregard for legal obligations and worker welfare, warranting serious consideration in the review of this premises licence. Such practices not only exploit workers but also provide an unfair competitive advantage over businesses that adhere to wage regulations. The payment of below-minimum wages raises serious questions about the licence holder's commitment to lawful and ethical employment practices.

The licence holder also confirmed that he conducts checks on some staff and omits others. This clearly shows that the licence holder knows the understands the legal requirements but chosen to ignore that for certain individuals.

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.

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.

Aroma Chef under the control of Andy WEI XIA has been found employing illegal workers. This business has clearly failed to meet the prevention of crime and disorder and public safety objectives. The license holder/DPS would have been aware of his responsibilities to uphold the licensing objectives as they are clearly defined as part of the premises license application.

Immigration Enforcement has submitted that the license holder and its agents repeatedly failed to conduct right to work checks prior to commencing employment and therefore Immigration Enforcement asks that the premises licence is **revoked**. Merely remedying the existing situation (for instance by the imposition of additional conditions or a different DPS), is insufficient to act as a deterrent to the licence holder and individuals involved in the management of the business from employing workers that lack the relevant permission to work in the UK.

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.

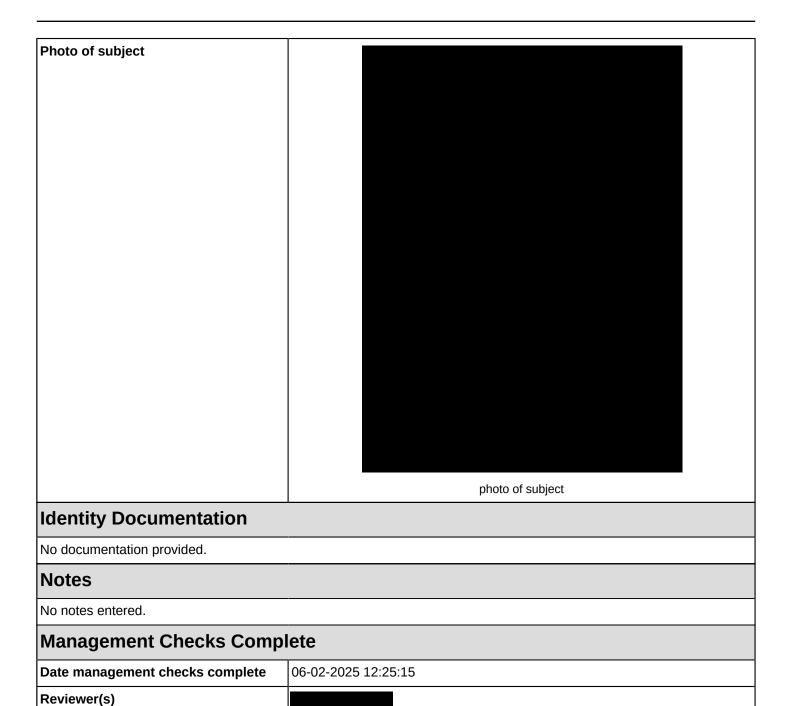
| Appendix A – Supporting Evidence |  |
|----------------------------------|--|
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|                                  |  |
|                                  |  |
|                                  |  |
|                                  |  |

| Arrest                                   |   |  |
|--|---|--|
| Details                                  |   |  |
| Type of work                             | Visit   |  |
| Visit reference                          |   |  |
| Created by                               |   |  |
| Address                                  | Aroma Chef, 30 Market Street, Lancaster, LA1 1HT (Visit Address)  |  |
| ProntolD                                 |   |  |
| Subject CIDPID/CEPR                      |   |  |
| Subject name                             |   |  |
| Subject DOB                              |   |  |
| Subject gender                           | Male  |  |
| Subject nationality                      | China   |  |
| Created at geolocation                   | Easting 347645  |  |
|  | Northing 461735   |  |
| Creation date                            | 30-01-2025 18:42:20   |  |
| Arrest Details                           |   |  |
| Time of arrest                           | 17:21   |  |
| Power of arrest                          | Paragraph 17(1) Schedule 2 Immigration Act 1971   |  |
| Arresting officer                        |   |  |
| Reason for arrest                        | Illegal entrant (EWOL)  |  |
| Grounds for arrest explained to subject? |   |  |
| Caution administered                     | Administrative caution  |  |
| Confirm subject understood caution?      | Yes   |  |
| Notes                                    |   |  |
| Search of Person                         |   |  |
| Subject searched                         | Yes   |  |
| Did you search the subject?              | Yes   |  |
| Power used for search                    | Paragraph 25B Schedule 2 Immigration Act 1971   |  |
| Justification                            | Individual stated he had no ID and no picture of ID on his phone therefore search done to try and find a form of ID. He had also been in the kitchen area and viewed coming out therefore search done for my own safety |  |
| Items found                              | Yes   |  |
| Item 1                                   | Power of seizure Paragraph 25B Schedule 2 Immigration Act 1971  |  |

|   | Туре  | Cash   |
|---|---|--|
|   | Description   | 3 separate envelopes with cash. Male stated it is roughly two thousand pound. Envelopes taken out of his pocket by myself infront of and Envelopes were put onto the table infront of me and I did not take the money out of any envelope. On person opinion I believed there was over £1000 present |
|   | Where found   | Left pants pocket  |
|   | Time seized   | 17:59  |
|   | Exhibit reference number                                  | SEE CASH SIEZURE FORM  |
|   | Evidence bag seal number                                  | SEE CASH SIEZURE FORM  |
|   | Comments (including questions and answers about the item) | conducted the cash seizeure and has completed cash seizure form on Pronto.   |
| Item 1 Photos                                   |   |  |
| Outcome After Arrest                            |   |  |
| Outcome   | Bail  |  |
| Details of bail restrictions, including address | Bail 201 to report to ROM Liverpool 06.02.2025            |  |
| Bail authorised by                              |   |  |
| Notes   |   |  |
| No notes entered.                               |   |  |
| Management Checks Complete                      |   |  |
| Date management checks complete                 | 06-02-2025 12:25:12                                       |  |
| Reviewer(s)                                     |   |  |

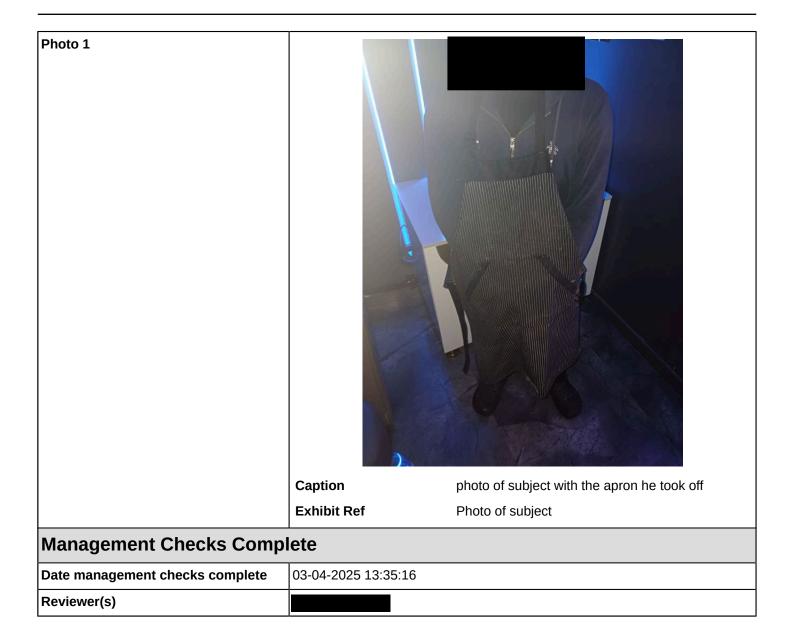
| Encounter  |                            |  |
|--|----------------------------|--|
| Details  |                            |  |
| Type of work   | Visit                      |  |
| Visit reference  |                            |  |
| Created by   |                            |  |
| ProntoID   |                            |  |
| Time   | 17:16                      |  |
| Created at geolocation   | Easting                    | 347645   |
|  | Northing                   | 461734   |
| Creation date  | 30-01-2025 17:16:38        |  |
| Main Identity  |                            |  |
| Identity source/type   | Declared                   |  |
| Full name  |                            |  |
| Date of birth  |                            |  |
| Gender   | Male                       |  |
| Nationality  | China                      |  |
| Country of birth   |                            |  |
| Place of birth   |                            |  |
| Languages  |                            |  |
| Languages spoken   | Mandarin                   |  |
| Interpreter used?  | Yes                        |  |
| Interpreter details  |                            |  |
| Does the individual understand the interpreter?                          | Yes                        |  |
| Encounter  |                            |  |
| Encountering officer   |                            |  |
| Is this encounter related to a Small Boats event?                        | No                         |  |
| Is this person the subject of the visit?                                 | No                         |  |
| Prior to Schedule 2 examination, did you suspect an Immigration Offence? | Yes                        |  |
| Why do you suspect the person of an immigration offence?                 |                            | not specify age or nationality. male tried to leave nitted to entering illegally using a passport that was |
| Where was the person located?  | Eating area of the premise | es   |

| [  | 1   |
|--|---|
| Declared immigration status                      | Illegal entrant                                 |
| How and when did the subject last                | 8 or 10 years ago                               |
| enter the UK?                                    |   |
| CIDPID/CEPR                                      |   |
| Are there any vulnerabilities/                   | No  |
| trafficking/safeguarding issues?                 |   |
| Are you taking enforcement action?               | Yes   |
| References (Person ID, HO Ref, Port              |   |
| Ref, BRP)  |   |
| Biographic search results                        | Systems checked                                 |
|  | Result of checks                                |
|  | Does the person have No                         |
|  | an open absconder                               |
|  | status on Atlas Person                          |
|  | Alerts?   |
|  | Status returned by                              |
|  | system checks                                   |
| Photo of Subject                                 |   |
| Do you want to take a photograph of the subject? | Yes   |
| Powers used                                      | Paragraph 18(2) Schedule 2 Immigration Act 1971 |
| •  | Į.  |



| Illegal Working - Employee  |   |  |
|---|---|--|
| Details   |   |  |
| Type of work  | Visit   |  |
| Visit reference   |   |  |
| Created by  |   |  |
| ProntoID  |   |  |
| Subject CIDPID/CEPR   |   |  |
| Subject name  |   |  |
| Subject DOB   |   |  |
| Subject gender  | Male  |  |
| Subject nationality   | China   |  |
| Time  | 17:41   |  |
| Created at geolocation  | <b>Easting</b> 347644   |  |
|   | Northing 461735   |  |
| Creation date   | 30-01-2025 17:40:56   |  |
| Language of Interview   |   |  |
| What language is the interview carried out in?                                  | Mandarin  |  |
| Interpreter used?   | Yes   |  |
| Details of interpreter  |   |  |
| Does the individual understand the interpreter?                                 | Yes   |  |
| Obligation  |   |  |
| what are you doing here today?  | I come here to hang around and cook food for myself                 |  |
| how often do you cook here?   | Not often maybe once a month  |  |
| why did you take the coomkng apron<br>off when you saw immigration<br>officers? | I just try my clothes clean   |  |
| Control   |   |  |
| Who allows you to be here?  | A China man allows me to come but I do not if he is the boss or not |  |
| How do you know him?  | Someone introduced us I know him as he saw me on the street         |  |
| What name do you know him by?   | I do not know   |  |
| Does he pay you or give you food when you are here?                             | No  |  |

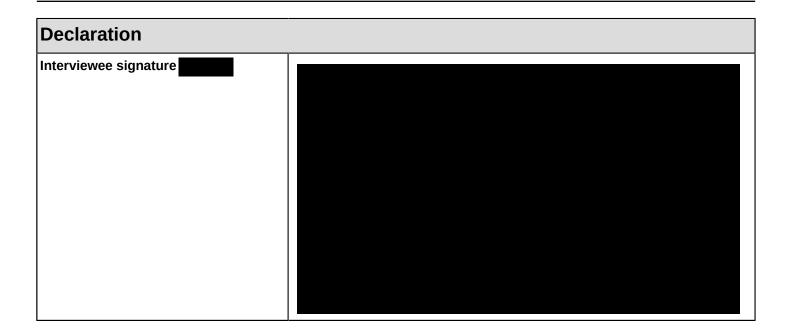
| Do you cook food for anyone else apart from yourself?   | No   |  |  |
|---|--|--|--|
| What time did you arrive today?   | 2pm  |  |  |
| What time was you planning on leaving?  | 6 or 7pm   |  |  |
| If we was to check the cctv would we see you working here on other occasions?                 | Sometimes I help out when I am waiting for my food to cook they say I can cook so I think I should help then out |  |  |
| How often do you help out here?   | About ten days all together I think  |  |  |
| What do you do when you help out?   | Just to carry things anything that needs carrying  |  |  |
| What do you carry?  | Just boxes and clothing but I do not work  |  |  |
| Remuneration  |  |  |  |
| Who pays you?   | No one pays me   |  |  |
| Pre-employment Checks   |  |  |  |
| did anyone ask to see ID before they allowed you to come here to cook and help out?           | No   |  |  |
| Additional Questions  | 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. |  |  |  |
| Subject has refused to provide a signature  | ).   |  |  |
| Employee read the contents of the interview themselves  | No   |  |  |
| Contents read back to the employee in the language used during the interview                  | No   |  |  |
| Observations  |  |  |  |
| Observations  | Male took apron off when he seen immigration   |  |  |
| Do you suspect this person of illegal working?  | Yes  |  |  |



| Q&A   |  |  |  |
|---|--|--|--|
| Details   | Details  |  |  |
| Type of work  | Visit  |  |  |
| Visit reference   |  |  |  |
| Created by  |  |  |  |
| ProntolD  |  |  |  |
| Subject CIDPID/CEPR   | Unknown  |  |  |
| Subject name  |  |  |  |
| Subject DOB   |  |  |  |
| Subject gender  | Male   |  |  |
| Subject nationality   | China  |  |  |
| Time  | 17:59  |  |  |
| Created at geolocation  | Easting 347645   |  |  |
|   | Northing 461735  |  |  |
| Creation date   | 30-01-2025 17:59:23  |  |  |
| Language of Interview   |  |  |  |
| What language is the interview carried out in?  | Mandarin   |  |  |
| Interpreter used?   | Yes  |  |  |
| Details of interpreter  |  |  |  |
| Does the individual understand the interpreter?   | Yes  |  |  |
| Q&A   |  |  |  |
| the money we have found on you what is it?  | I got it from some other place, 200 from me working here £1000 is from a person that give me the money |  |  |
| why did someone give you £1000?   | It is not from one person it is from many people   |  |  |
| you have stated that £200 is from working at the premises however you stated before that you do not work here and do not get any money. so what is correct? | I do not work here I just come to cook.  |  |  |
| where is this money from?   | Many different people  |  |  |
| how much money do you believe you on your possession?   | Around £1000-£2000   |  |  |

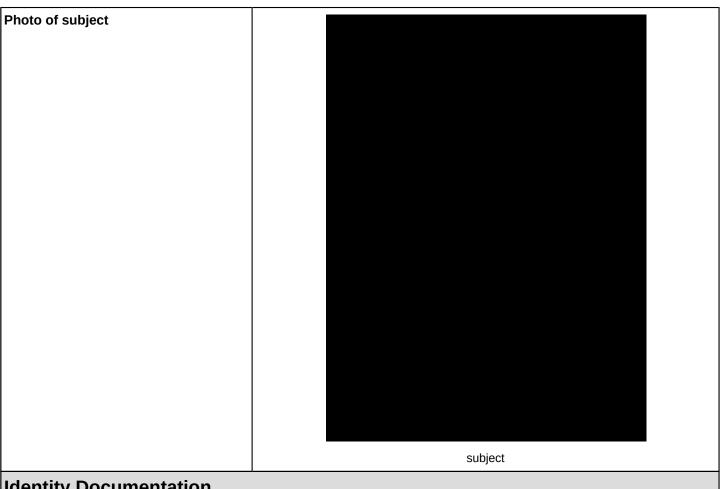
| you have stated you are homeless, why would someone who is homeless have this money on them?   | I can be homeless and still have money why can I not be homeless and have money      |
|--|--|
| the boss of the premises has stated<br>you have worked here for 2 weeks and<br>live upstairs above the premises. what<br>do you have to say to that? | I do not know why he says that I have been here about 10 days                        |
| what do you have to say about the boss saying you live upstairs?   | I have stayed upstairs only 2 nights but the boss does not know that I have left not |
| So you are saying that you left the premises upstairs to live on the streets and be homeless?  | Sometimes I sleep upstairs sometimes i sleep on the streets                          |
| what was you planning on doing with the money you have on you?   | I save it for food, clothing, shoes and skincare                                     |
| To confirm, you are stating that many different people have given you this money?  | Yes that is correct.   |
| Declaration  |  |
| Interviewee signature  |  |

| Q&A  |  |  |
|--|--|--|
| Details  |  |  |
| Type of work   | Visit                                    |  |
| Visit reference  |  |  |
| Created by   |  |  |
| ProntolD   |  |  |
| Subject CIDPID/CEPR  |  |  |
| Subject name   |  |  |
| Subject DOB  |  |  |
| Subject gender   | Male                                     |  |
| Subject nationality  | China                                    |  |
| Time   | 18:17                                    |  |
| Created at geolocation   | <b>Easting</b> 347645                    |  |
|  | Northing 461735                          |  |
| Creation date  | 30-01-2025 18:17:37                      |  |
| Language of Interview  |  |  |
| What language is the interview carried out in?   | Mandarin                                 |  |
| Interpreter used?  | Yes                                      |  |
| Details of interpreter   |  |  |
| Does the individual understand the interpreter?  | Yes                                      |  |
| Q&A  |  |  |
| when you do stay upstairs do you pay any rent?   | No sometimes i just carry things         |  |
| do you work here in order to sleep here?   | Correct                                  |  |
| to confirm, you are saying you<br>entered the UK illegally 8 years ago is<br>that correct? | I am not sure if I came illegally or not |  |



| Encounter  |  |
|--|--|
| Details  |  |
| Type of work   | Visit  |
| Visit reference  |  |
| Created by   |  |
| ProntolD   |  |
| Time   | 17:20  |
| Created at geolocation   | Easting 347645   |
|  | Northing 461735  |
| Creation date  | 30-01-2025 17:20:16  |
| Main Identity  |  |
| Identity source/type   | Declared   |
| Full name  |  |
| Date of birth  |  |
| Gender   | Male   |
| Nationality  | China  |
| Country of birth   |  |
| Place of birth   |  |
| Languages  |  |
| Languages spoken   | Mandarin   |
| Interpreter used?  | Yes  |
| Interpreter details  |  |
| Does the individual understand the interpreter?                          | Yes  |
| Encounter  |  |
| Encountering officer   |  |
| Is this encounter related to a Small Boats event?                        | No   |
| Is this person the subject of the visit?                                 | No   |
| Prior to Schedule 2 examination, did you suspect an Immigration Offence? | Yes  |
| Why do you suspect the person of an immigration offence?                 | Intel of illegal working subject seen by io wright attempting to flee the kitchen area towards the back exit |
| Where was the person located?  | Kitchen  |

| Declared immigration status  |   |
|--|---|
| How and when did the subject last enter the UK?                    | 2003 when claimed asylum at port                |
| CIDPID/CEPR  |   |
| Are there any vulnerabilities/<br>trafficking/safeguarding issues? | No  |
| Are you taking enforcement action?                                 | Yes   |
| References (Person ID, HO Ref, Port<br>Ref, BRP)                   |   |
| Biographic search results  | Systems checked                                 |
|  | Result of checks                                |
|  | Does the person have No                         |
|  | an open absconder                               |
|  | status on Atlas Person Alerts?                  |
|  |   |
|  | Status returned by system checks                |
| Photo of Subject   |   |
| Do you want to take a photograph of the subject?                   | Yes   |
| Powers used  | Paragraph 18(2) Schedule 2 Immigration Act 1971 |



# **Identity Documentation**

**Document 1** Identity **Document type Document reference Issuing authority Document issue date Document expiry date** Country of issue (if different from nationality above) Is the person the rightful holder of the document? Is the document falsified? Is the document in the possession of the Home Office?

Suspected fraudulent

|                                 | In transit details Photos |
|---------------------------------|---------------------------|
| Notes                           |                           |
| No notes entered.               |                           |
| Management Checks Complete      |                           |
| Date management checks complete | 04-02-2025 11:48:19       |
| Reviewer(s)                     |                           |

| Q&A  |   |  |  |
|--|---|--|--|
| Details  |   |  |  |
| Type of work   | Visit   |  |  |
| Visit reference  |   |  |  |
| Created by   |   |  |  |
| ProntolD   |   |  |  |
| Subject CIDPID/CEPR  |   |  |  |
| Subject name   |   |  |  |
| Subject DOB  |   |  |  |
| Subject gender   | Male  |  |  |
| Subject nationality  | China   |  |  |
| Time   | 17:29   |  |  |
| Created at geolocation   | Easting 347645  |  |  |
|  | Northing 461735   |  |  |
| Creation date  | 30-01-2025 17:29:43   |  |  |
| Language of Interview  |   |  |  |
| What language is the interview carried out in?   | Mandarin  |  |  |
| Interpreter used?  | Yes   |  |  |
| Details of interpreter   |   |  |  |
| Does the individual understand the interpreter?  | No  |  |  |
| Q&A  | Q&A   |  |  |
| how long have you been working at this business for  | I don't work here   |  |  |
| you have food all over your shoes and<br>wete encountered cooking in thr<br>kitchen area by an immigration<br>officers it's important you tell the truth | More than a month   |  |  |
| what is your immigration status  | I have an application in with the home office for article 8 |  |  |
| Declaration  |   |  |  |
| Subject has refused to provide a signature.  |   |  |  |
| Interviewee read the contents of the interview themselves  | No  |  |  |

|                                    | ·   |
|------------------------------------|-----|
| Contents read back in the language | Yes |
| used during the interview          |     |

| Illegal Working - Employee                             |  |  |
|--|--|--|
| Details  |  |  |
| Type of work   | Visit  |  |
| Visit reference  |  |  |
| Created by   |  |  |
| ProntolD   |  |  |
| Subject CIDPID/CEPR                                    |  |  |
| Subject name   |  |  |
| Subject DOB  |  |  |
| Subject gender   | Male   |  |
| Subject nationality                                    | China  |  |
| Time   | 17:34  |  |
| Created at geolocation                                 | <b>Easting</b> 347644                                  |  |
|  | Northing 461735  |  |
| Creation date  | 30-01-2025 17:34:40                                    |  |
| Language of Interview                                  |  |  |
| What language is the interview carried out in?         | Mandarin   |  |
| Interpreter used?                                      | Yes  |  |
| Details of interpreter                                 | See q and a  |  |
| Does the individual understand the interpreter?        | Yes  |  |
| Obligation   |  |  |
| How long have you been working at this business?       | More than a month                                      |  |
| how many hours do you work a week                      | 8 hours per week                                       |  |
| how many days per week                                 | Only 2 - 3 days per week each day I work mahne 2 hours |  |
| do you work set days                                   | Sometimes it not here                                  |  |
| í en               | I only work here for like 2 months                     |  |
| where else do you work                                 |  |  |
| where else do you work what days do you work each week | It's not fixed   |  |
|  | It's not fixed   |  |
| what days do you work each week                        | It's not fixed  My friend                              |  |
| what days do you work each week  Control               |  |  |

| Who tells you what tasks/ duties to do each day?   | No one tells me I find it by myself                                       |
|--|---|
| Did no one tell you to start cooking<br>today when you were encountered by<br>immigration in the kitchen cooking | No I just came here and I earn some money to buy some food no one told me |
| Remuneration   |   |
| Who pays you?  | I get paid in food  |
| How are you paid (money, accommodation, food)?   | Food  |
| Pre-employment Checks  |   |
| Did the employer check your right to<br>work or immigration status before<br>they offered you the job?           | No they checked nothing   |

# **Additional Questions**

No details provided.

# **Photographs**

food on shoes



Exhibit Ref

Food on footwear

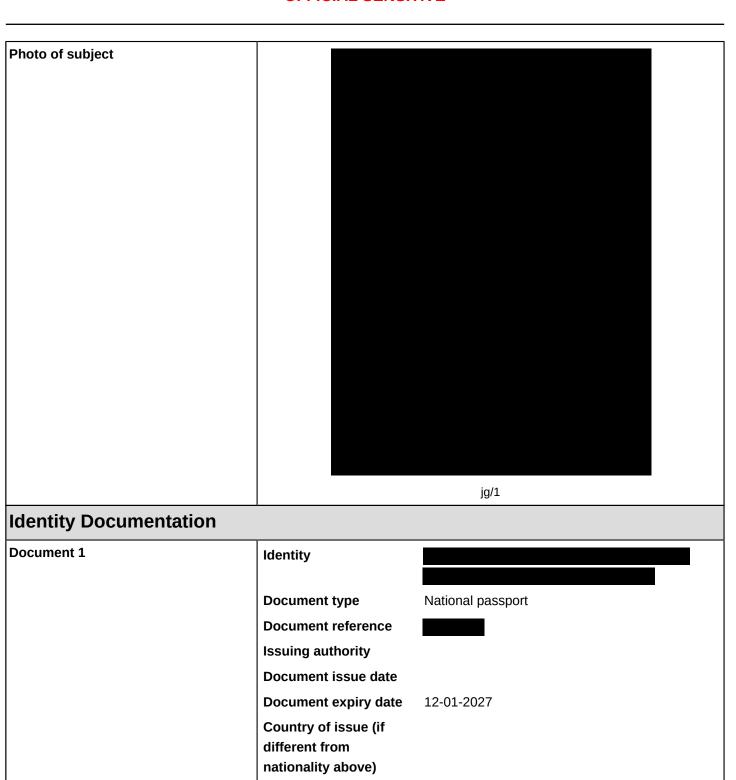
Common name

See above

# Declaration I confirm that I have understood all the questions and that the details are true and correct. Interviewee signature Observations Observations When ios entered the subject was seen fleeing the kitchen to the rear exit of the business Do you suspect this person of illegal working? Management Checks Complete Date management checks complete Reviewer(s)

| Encounter  |  |
|--|--|
| Details  |  |
| Type of work   | Visit  |
| Visit reference  |  |
| Created by   |  |
| ProntoID   |  |
| Time   | 17:02  |
| Created at geolocation   | <b>Easting</b> 347645  |
|  | Northing 461735  |
| Creation date  | 30-01-2025 17:02:10  |
| Main Identity  |  |
| Identity source/type   | Declared   |
| Full name  |  |
| Date of birth  |  |
| Gender   | Male   |
| Nationality  | Indonesia  |
| Country of birth   |  |
| Place of birth   |  |
| 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   |
| Prior to Schedule 2 examination, did you suspect an Immigration Offence? | Yes  |
| Why do you suspect the person of an immigration offence?                 | intel states there are illigal workers on the premises.  male was evasive when officers entered and quickly tried to walk away |
|  | after multiple requests to ask the person to stop he would not listen and continued to walk away.                              |

|  | therfore person arrested as suspected immigration offender |
|--|--|
| Where was the person located?                                      | In the staff area (kitchen)                                |
| Declared immigration status  | Overstayer   |
| How and when did the subject last enter the UK?                    | I last entered the UK June 2022                            |
| CIDPID/CEPR  |  |
| Are there any vulnerabilities/<br>trafficking/safeguarding issues? | No   |
| Are you taking enforcement action?                                 | Yes  |
| References (Person ID, HO Ref, Port<br>Ref, BRP)                   |  |
| Biographic search results  | Systems checked  |
|  | Result of checks   |
|  | Does the person have No                                    |
|  | an open absconder<br>status on Atlas Person                |
|  | Alerts?  |
|  | Status returned by   |
|  | system checks  |
| Photo of Subject   |  |
| Do you want to take a photograph of the subject?                   | Yes  |
| Powers used  | Paragraph 18(2) Schedule 2 Immigration Act 1971            |



No

Is the person the rightful holder of the

Is the document

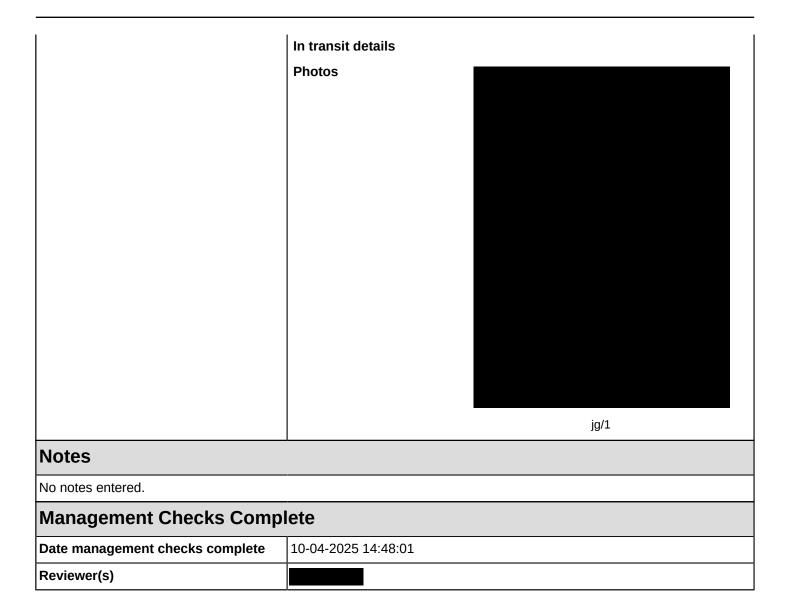
Is the document in the possession of the Home

Suspected fraudulent

document?

falsified?

Office?



| Illegal Working - Employee                            |   |  |
|---|---|--|
| Details   | Details   |  |
| Type of work  | Visit   |  |
| Visit reference                                       |   |  |
| Created by  |   |  |
| ProntolD  |   |  |
| Subject CIDPID/CEPR                                   |   |  |
| Subject name  |   |  |
| Subject DOB   |   |  |
| Subject gender  | Male  |  |
| Subject nationality                                   | Indonesia   |  |
| Time  | 17:34   |  |
| Created at geolocation                                | Easting 347644  |  |
|   | Northing 461735   |  |
| Creation date   | 30-01-2025 17:34:01   |  |
| Language of Interview                                 |   |  |
| What language is the interview carried out in?        | Indonesian  |  |
| Interpreter used?                                     | Yes   |  |
| Details of interpreter                                |   |  |
| Does the individual understand the interpreter?       | Yes   |  |
| Obligation  |   |  |
| How long have you been working at this business?      | 22 months   |  |
| What is your job role/ what are your duties?          | I am a helper in the kitchen I help with the cutting and the washing. |  |
| and is the food that you cut served to the customers? | Yes there is somebody else who works as a waitress at the front       |  |
| What days/ hours do you work each week?               | Six days  |  |
| and how many hours each day?                          | Only 10 hours   |  |
| how often do they pay you and how much?               | They pay me £490 per week   |  |

| Control  |   |
|--|---|
| Who gave you this job (name and role in business)?                                     | My boss who gave me the job is called andy                                |
| When andy employed you, did he conduct any right to work checks?                       | He didnt check my ID.   |
| Does andy know that you have no right to work in the UK?                               | I never talked about it with him  |
| When you started working here did you receive any training to help out in the kitchen? | I only received an order that's it (doesn't seem to understand questions) |
| Does the buisness provide you with a uniform?  | Yes they have me uniform for the kitchen                                  |
| Remuneration   |   |
| Who pays you?  | It is andy who pays me  |
| How are you paid (money, accommodation, food)?   | Cash in hand weekly   |
| do you pay rent for your accommodation?  | I don't pay anything  |
| so is the accommodation provided to you for the work you do as the restaurant?         | Yes I don't pay anything for working here.                                |

# **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.





#### **Observations**

| Observations                                   | I observed the person In the staff area (kitchen) and subject admits to working. |
|--|--|
| Do you suspect this person of illegal working? | Yes  |

## **Management Checks Complete**

| Date management checks complete | 10-04-2025 14:46:37 |
|---------------------------------|---------------------|
| Reviewer(s)                     |                     |

| Illegal Working - Employer                       |   |
|--|---|
| Details  |   |
| Type of work                                     | Visit   |
| Visit reference                                  |   |
| Created by                                       |   |
| ProntolD   | Other   |
| Subject CIDPID/CEPR                              | Unknown   |
| Employer   |   |
| Time   | 17:22   |
| Created at geolocation                           | Easting 347644  |
|  | Northing 461733   |
| Creation date                                    | 30-01-2025 17:21:46   |
| Language of Interview                            |   |
| What language is the interview carried out in?   | English   |
| Interpreter used?                                | No  |
| Employer Details                                 |   |
| What is the name of the business?                | Aroma Chef  |
| What is your position here?                      | Director of the business  |
| What is your position here?                      | Manager and owner   |
| Do you have another directors working here       | Chun jing Wang  |
| who is he to you                                 | Friend and business partner   |
| who's the person employees people                | Andy is charge front of house waiters and waitresses. Wang in charge of kitchen staff |
| what do you do for employing people              | I just chech BRP cards and visas  |
| How long have you been in charge if the business | 4 years   |
| How long has worked here                         | About 2 weeks   |
| what does he do here                             | Kitchen assistant   |
| How many days a week does he work                | 5 days a week   |
| What hours would he work on a normal day         | 11am to 10pm  |
| Are you aware of his immigration status          | No  |

| Did you ask gir any ID from him         | No                                       |
|---|--|
| How many hours a week                   | 40-50 hours                              |
| How muchbis he paid a week              | I don't no                               |
| How do pay him                          | CASH                                     |
| How did he get the job                  | I don't no                               |
| does he have a contract of              | No aural agreement                       |
| employment                              |  |
| How much does he earn                   | £500-£600 per week                       |
| How long has he worked here             | 3 years                                  |
| what does he do                         | Head chef                                |
| how many hours a week                   | 6 days a week at 10 hours                |
| How much does he earn                   | £700                                     |
| are you aware of his immigration status | I'm not sure                             |
| Do you keep copies if ID                | Yes I keep copies on the phone. Pictures |
| How does he get paid                    | Cash                                     |
| How did he get the job here             | Friends known him for years              |
| Do you have copies of his ID            | No                                       |
| what do you know as                     | As a friend                              |
| do you know him                         | No got hired 2 weeks ago                 |
| how has he worked here                  | Less than 2 years                        |
| Whatvis his role                        | Dishes and cleaning jobs                 |
| How many days a week                    | 5-6 days a week                          |
| What hours                              | 50-60 hours a week                       |
| How much does he get paid               | About £500                               |
| How                                     | CASH                                     |
| Would Mr Wang deal with that            | Yes because he's kitchen staff           |
| How did get the job                     | He is a friend d of                      |
| Are you aware of his status             | No                                       |
| Did he show any ID                      | Indonesia passport I took a photo        |
| Would you have taken a copy             | No                                       |
| Do you no him as any other names        | No                                       |
| How many staff work here in whole       | 7-8 full time staff                      |
| Any living accommodation for staff      | Yes some of the staff stay there         |

|  | 7  |
|--|--|
| Any staff spoken about live here   | They all live stairs                               |
| How long has He Bao lived upstairs   | 2 weeks  |
| Does he pay rent   | No   |
| Do you pay him with food and accommodation   | Yes  |
| Is that included with the cash   | Food and accommodation is free                     |
| Do you have any contracts  | No contracts                                       |
| Do you know who the landlord is  |  |
| How long has lived upstairs  | 3 years he's lived up there                        |
| Does he pay any rent   | All the same conditions as everyone else           |
| live here  | 1 year and a half                                  |
| Does he pay rent   | Same as before                                     |
| Any contracts  | No   |
| How many rooms upstairs  | 5 single rooms and stock rooms x 1                 |
| Do the 3 members of staff have keys  | Yes  |
| Have they got freedom of movement  | Yes  |
| Do you understand all the questions that have been asked?                            | Yes  |
| Would you like to sign my phone to say you have answered all the questions correctly | I will sign  |
| Declaration by Employer  |  |
| I confirm that I have understood all the qu  | estions and that the details are true and correct. |
| Signed by Andy Wei Xia   |  |
|  | 30-01-2025 17:58:28                                |

| Observations                    |                     |
|---------------------------------|---------------------|
| Observations                    |                     |
| Management Checks Complete      |                     |
| Date management checks complete | 10-02-2025 09:43:08 |
| Reviewer(s)                     |                     |