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Bridgend County Borough Council



Swyddfeydd Dinesig, Stryd yr Angel, Pen-y-bont, CF31 4WB / Civic Offices, Angel Street, Bridgend, CF31 4WB

*Rydym yn croesawu gohebiaeth yn Gymraeg. Rhowch wybod i ni os mai Cymraeg yw eich dewis iaith.*

*We welcome correspondence in Welsh. Please let us know if your language choice is Welsh.*



**Cyfarwyddiaeth y Prif Weithredwr / Chief Executive's Directorate**  
Deialu uniongyrchol / Direct line /: 01656 643148 / 643694 / 643513  
Gofynnwch am / Ask for:

Ein cyf / Our ref:  
Eich cyf / Your ref:

**Dyddiad/Date:** Dydd Iau, 16 Ebrill 2026

Annwyl Cyngorydd,

**IS-BWYLLGOR DEDDF TRWYDDEDU 2003 (B)**

Cynhelir cyfarfod ailgynnull o Is-bwyllgor Deddf Trwyddedu 2003 (B) o bell drwy Microsoft Teams ddydd Iau, 23 Ebrill 2026 am 10:00.

**AGENDA**

1 Ymddiheuriadau am absenoldeb

Derbyn ymddiheuriadau am absenoldeb gan Aelodau.

2 Datganiadau o fuddiant

Derbyn datganiadau o ddiddordeb personol a rhagfarnol (os o gwbl) gan Aelodau / Swyddogion yn unol â darpariaethau'r Cod Ymddygiad Aelodau a fabwysiadwyd gan y Cyngor o 1 Medi 2014.

3 Adolygiad o Drwydded Safle ar gyfer USA Chicken, Pizza & Kebabs, 25 Stryd Talbot, Maesteg, Pen-y-bont ar Ogwr, CF34 9DW

3 - 44

**Nodyn:** Cynhelir y cyfarfod hwn o bell drwy Microsoft Teams. Bydd y cyfarfod yn cael ei recordio i'w ddarlledu wedyn drwy wefan rhyngwyd y Cyngor a fydd ar gael cyn gynted â phosibl ar ôl y cyfarfod. Os hoffech wylio'r cyfarfod hwn yn fyw, cysylltwch â [cabinet\\_committee@bridgend.gov.uk](mailto:cabinet_committee@bridgend.gov.uk) neu ffoniwch 01656 643148 / 643694 / 643513 / 643159.

Yn ddiffuant

**K Watson**

Prif Swyddog - Gwasanaethau Cyfreithiol, Rheoliadol ac Etholiadol

**Dosbarthiad:**

Cynghorwr:

H T Bennett  
S Easterbrook  
R Williams

# Agenda Item 3

<b>Meeting of:</b>	<b>LICENSING ACT 2003 SUB COMMITTEE (B)</b>
<b>Date of Meeting:</b>	<b>23 APRIL 2026</b>
<b>Report Title:</b>	<b>REVIEW OF A PREMISES LICENCE FOR USA CHICKEN, PIZZA &amp; KEBABS, 25 TALBOT STREET, MAESTEG, BRIDGEND CF34 9DW</b>
<b>Report Owner / Responsible Chief Officer / Cabinet Member</b>	<b>CHIEF OFFICER – LEGAL &amp; REGULATORY SERVICES &amp; HR &amp; ELECTORAL</b>
<b>Responsible Officer:</b>	<b>KIRSTY EVANS LICENSING TEAM MANAGER</b>
<b>Policy Framework and Procedure Rules:</b>	<b>There is no effect upon the policy framework or procedure rules.</b>
<b>Executive Summary:</b>	<b>For the Sub-Committee to consider and determine an application submitted by Home Office Immigration to review the premises licence at USA Chicken, Pizza &amp; Kebabs, 25 Talbot Street, Maesteg CF34 9DW under Section 51 of the Licensing Act 2003.</b>

## 1. Purpose of Report

- 1.1 The purpose of this report is to determine an application for a review of a premises licence for USA Chicken, Pizza & Kebabs, 25 Talbot Street, Maesteg CF34 9DW.

## 2. Background

- 2.1 The Licensing Authority has received an application for the review of premises licence BCBCLP493, pertaining to USA Chicken, Pizza & Kebabs, 25 Talbot Street, Maesteg, Bridgend CF34 9DW.

The review application was submitted by Home Office Immigration Enforcement.

A copy of the application is detailed in **Appendix A**.

- 2.2 The licence holder of premises licence BCBCLP493 is Suleyman Yavuz.

- 2.3 The following licensable activities are authorised by the premises licence:

Provision of Late-Night Refreshment

Monday to Wednesday:

2300 - 0100 hours

Thursday:

2300 - 0000 hours

Friday & Saturday:

2300 - 0200 hours

Sunday:

2300 - 0130 hours

Christmas Eve:

2300 - 0200 hours

Boxing Day:	2300 - 0000 hours
New Year's Eve:	2300 - 0200 hours

2.4 There is no designated premises supervisor nominated on the premises licence, as the sale of alcohol isn't authorised.

2.5 A copy of the premises licence is detailed in **Appendix B**.

### **3. Current situation / proposal**

3.1 In accordance with the requirements of the Licensing Act 2003, copies of the application were forwarded to the Responsible Authorities.

3.2 During the statutory 28-day consultation period the application has been advertised in accordance with the regulations at the premises, in a local newspaper and on the Council's website.

3.3 Section 51 of the Licensing Act 2003 provides that where a premises licence has effect, a responsible authority or any other person may apply to the relevant licensing authority for a review of the licence. This must relate to a concern arising at the premises in connection with any of the four licensing objectives.

The application states that the licence holder has undermined the licensing objective, prevention of crime and disorder as illegal working has been identified at the premises.

Further details are provided within the application which is detailed in **Appendix A**.

3.4 Before determining the application, the authority must hold a hearing to consider it and any relevant representations received.

3.5 The authority must, having regard to the application and any relevant representations, take such of the steps mentioned in subsection (4) (if any) as it considers appropriate for the promotion of the licensing objectives.

3.6 The steps in subsection (4) of Section 51 are:

- (a) to modify the conditions of the licence;
- (b) to exclude a licensable activity from the scope of the licence;
- (c) to remove the designated premises supervisor;
- (d) to suspend the licence for a period not exceeding three months;
- (e) to revoke the licence; and for this purpose the conditions of the licence are modified if any of them is altered or omitted or any new condition is added.

3.7 Equally, the licensing authority may decide that the review does not require it to take any further steps appropriate to promoting the licensing objectives.

3.8 The Licensing Act 2003 (Section 4) states that it is the duty of all Licensing Authorities to carry out their functions under the Act with a view to promoting the licensing objectives. The licensing objectives are:

- a) The prevention of crime and disorder
- b) Public safety
- c) The prevention of public nuisance
- d) Protection of children from harm

Each objective is of equal importance and should be of paramount consideration at all times.

3.9 Section 4(3) Licensing Act 2003 states that the Licensing Authority should also have regard to the Council's Statement of Licensing Policy, the Statutory guidance issued under Section 182 of the Licensing Act 2003 and the Licensing Act itself, in this case in particular to:

- a) Paragraphs 2, 3, 4, 5, 9, 11 and 12 of the 2025-2029 Statement of Licensing Policy
- b) Chapters 2, 11, 13 and 14 of the Statutory guidance issued by the Home Office
- c) Sections 51 to 53, 182 and 183 of the Licensing Act 2003.

3.10 It is likely that the parties involved will be providing additional evidence as permitted under the Licensing Act 2003 (Hearings) Regulations 2005. Regulation 18 permits that in considering any representations or notice made by a party the authority may take into account documentary or other information produced by a party in support of their application, representations or notice (as applicable) either before the hearing or, with the consent of all the other parties, at the hearing. This will be confirmed at the start of the meeting.

#### **4. Equality implications (including Socio-economic Duty and Welsh Language)**

4.1 The protected characteristics identified within the Equality Act, Socio-economic Duty and the impact on the use of the Welsh Language have been considered in the preparation of this report. As a public body in Wales the Council must consider the impact of strategic decisions, such as the development or the review of policies, strategies, services and functions. It is considered that there will be no significant or unacceptable equality impacts as a result of this report.

#### **5. Well-being of Future Generations implications and connection to Corporate Well-being Objectives**

5.1 The well-being goals identified in the Act were considered in the preparation of this report. It is considered that there will be no significant or unacceptable impacts upon the achievement of well-being goals/objectives as a result of this report.

#### **6. Climate Change and Nature Implications**

6.1 There are no Climate Change or Nature implications arising from this report.

#### **7. Safeguarding and Corporate Parent Implications**

7.1 There are no Safeguarding and Corporate Parent implications arising from this report.

#### **8. Financial Implications**

8.1 There are no financial implications arising from the report.

## **9. Recommendations**

9.1 The Sub-Committee is asked to determine the application having regard to the Council's Statement of Licensing Policy, the Guidance issued by the Home Office under Section 182 of the Licensing Act 2003, the application, and any submissions.

The options open to the Sub-Committee are to take no action or if it considers it appropriate for the promotion of the licensing objectives to determine:

- (a) to modify the conditions of the licence;
- (b) to exclude a licensable activity from the scope of the licence;
- (c) to remove the designated premises supervisor;
- (d) to suspend the licence for a period not exceeding three months;
- (e) to revoke the licence and for this purpose the conditions of the licence are modified if any of them is altered or omitted, or any new condition is added.

**Background documents:** None

Licensing Authority: Bridgend County Borough Council  
 Address: [licensing@bridgend.gov.uk](mailto:licensing@bridgend.gov.uk)  
 Reference: PI

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

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

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

**I Home Office Immigration Enforcement**

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**apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below**

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

Postal address of premises or, if none, ordnance survey map reference or description	
USA Chicken, Pizza & Kebabs 25 Talbot Street Maesteg	
Post town Bridgend	Post code (if known) CF34 9DW

<b>Name of premises licence holder or club holding club premises certificate (if known)</b>
Suleyman Yavuz

<b>Number of premises licence or club premises certificate (if known)</b>
BCBCLP493

**Part 2 - Applicant details**

I am

Please tick ✓ yes

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

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

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

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

Please tick ✓ yes

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

**Surname**

**First names**

**I am 18 years old or over**

Please tick ✓ yes

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

**Post town**

**Post Code**

**Daytime contact telephone number**

**E-mail address  
(optional)**

**(B) DETAILS OF OTHER APPLICANT**

Name and address

Telephone number (if any)

E-mail address (optional)

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

Home Office

**Immigration Enforcement Licensing Compliance Team (IELCT)**

6<sup>th</sup> Floor, 2 Ruskin Square

Dingwall Road

Croydon

CR0 2WF

Telephone number (if any)

E-mail address (optional)

[ie.licensing.reviews@homeoffice.gov.uk](mailto:ie.licensing.reviews@homeoffice.gov.uk)

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

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

**Please state the ground(s) for review** (please read guidance note 2)

Grounds for review:

We have grounds to believe the license holder has failed to meet the licensing objectives of prevention of crime and disorder, as illegal working has been identified at this premises.

Section 36 and Schedule 4 of the Immigration Act 2016 (the 2016 Act) amended the Licensing Act 2003 (the 2003 Act) to introduce immigration safeguards in respect of licensing applications made in England and Wales on or after 6 April 2017. The intention is to prevent illegal working in premises licensed for the sale of alcohol or late-night refreshment.

The Home Secretary (in practice Home Office (Immigration Enforcement)) was added to the list of Responsible Authorities (RA) in the licensing regime, which requires Home Office (Immigration Enforcement) to receive premises licence applications (except regulated entertainment only licences and applications to vary a Designated Premises Supervisor (DPS)), and in some limited circumstances personal licence applications. In carrying out the role of responsible authority, Home Office (Immigration Enforcement) is permitted to make relevant representations and objections to the grant of a licence or request a review of an existing licence as a responsible authority where there is concern that a licence and related licensable activity is prejudicial to the prevention of immigration crime including illegal working.

**Please provide as much information as possible to support the application (please read guidance note 3)**

Please refer to accompanied review pack for detailed information

**Please tick ✓ yes**

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

If yes, please state the date of that application

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

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

**Please tick ✓ yes**

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

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

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

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

Signature **C. Samuels**  
 .....

Date **03 February 2026**  
 .....

Capacity **Responsible Authority**.....

<b>Contact name (where not previously given) and postal address for correspondence associated with this application</b> (please read guidance note 6)	
<b>Immigration Enforcement Licensing Compliance Team 6<sup>th</sup> Floor, 2 Ruskin Square Dingwall Road</b>	
<b>Post town</b> <b>Croydon</b>	<b>Post Code</b> <b>CR0 2WF</b>
<b>Telephone number (if any)</b>	
<b>If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)</b> <a href="mailto:ie.licensing.reviews@homeoffice.gov.uk">ie.licensing.reviews@homeoffice.gov.uk</a>	

**Notes for Guidance**

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant’s agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.



Home Office

## Premises Licence Review

USA Chicken, Pizza & Kebabs  
25 Talbot Street  
Maesteg  
Bridgend  
CF34 9DW

## Contents

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## Case Summary

On Saturday 24 May 2025, the Swansea ICE team visited USA Chicken, Pizza & Kebabs, 25 Talbot Street, Maesteg, Bridgend, CF34 9BW, after intelligence was received that the business' owner was employing illegal workers.

Entry to the premises was gained at approximately 14:27 hrs under Section 179 of the Licensing Act 2003.

The officers encountered a total of 5 employees of which 2 were identified as immigration offenders.

## Licensed Premises History

The premises licence number is BCBCLP493 held by Suleyman YAVUZ. The licence allows the provision of late-night refreshment.

The company registration number for TALBOT KEBAB LTD is 14695648. Companies House shows that it was incorporated on 28 February 2023 and is currently active. Suleyman TURHAN is the company director and was appointed on 28 February 2023.

## Civil Penalty

A civil penalty of £80,000 was issued to Talbot Kebab Ltd on 16 June 2025. An in-time objection was received on 09 July 2025. The penalty was maintained at £80,000 on 16 July 2025. The liable party had until 17 August 2025 to make payment or lodge an appeal. The penalty remains unpaid in full and no appeals have been made.

## Enforcement Visit: 24 May 2025

Entry was gained to the premises at 14:27. Upon entering, immigration officers encountered the following individuals:

██████████

██████████ was encountered behind the counter when officers arrived. ██████████ was wearing a red USA Fried Chicken t-shirt.



Photo of ██████████ in a USA Fried Chicken t-shirt.

An illegal working interview was conducted with the assistance of an interpreter. ██████████ stated he had worked for USA Fried Chicken for one week and cooks the kebabs. He works 3 or 4 days a week from 4pm till 11pm. ██████████ stated that ██████████ gave him the job and delegates the duties. ██████████ stated that, presently, he gets free food and ██████████ gives him £20 pocket money, until they know he can do a good job. ██████████ stated that he showed “his card” to the employer to prove his right to work.

Home Office checks showed that ██████████ had an outstanding claim for protection at the time of the enforcement visit. ██████████ bail conditions permitted him to work on occupations listed on the Immigration Salary List (ISL)<sup>1</sup>. Working as an

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<sup>1</sup> [Skilled Worker visa: immigration salary list - GOV.UK](https://www.gov.uk/skilled-worker-visa-immigration-salary-list)

assistant in a chicken shop does not fall within the ISL. Therefore, [REDACTED] was working in breach of his work restrictions.

[REDACTED] [REDACTED]

[REDACTED] was encountered by officers at the side entrance to the premises. When sighted officers, he attempted to walk away. He had food residue on his t-shirt and shoes.



Photo of [REDACTED] in the kitchen of the premises.

An illegal working interview was conducted with the assistance of an interpreter. [REDACTED] stated he has been helping at the USA Fried Chicken for a week in return for accommodation. He stated he is not working but has been washing up things to help out. [REDACTED] stated that he does not receive money for helping.

Home Office checks showed [REDACTED] entered the UK illegally by small boats in May 2024 and claimed for protection. This was refused on 15 April 2025. [REDACTED] has never held the right to work in the UK.

## ██████████ – Employer Interview

██████████ was seen by immigration officers behind the counter, wearing an apron.

██████████ identified himself as the brother-in-law of ██████████ ██████████ who he believed is the company director of Talbot Kebab Ltd t/a USA Fried Chicken. ██████████ was looking after the business, whilst ██████████ ██████████ was away.

██████████ stated ██████████ ██████████ is solely responsible for recruitment. ██████████ ██████████ was employed by ██████████ and commenced work approximately one week ago, with his first day being Sunday. Since then, ██████████ has worked six days, completing eight-hour shifts each day. No agreement has yet been reached regarding his rate of pay, as ██████████ instructed that his performance will be assessed before deciding on remuneration.

██████████ consumes meals on the premises and resides in a room located in an upstairs flat. This flat is separate from the business premises but falls under ██████████ responsibility. ██████████ understands that ██████████ holds a valid work permit based on ██████████ assurance; however, no documentation has been sighted by ██████████ but he believes ██████████ would have reviewed it.

██████████ stated ██████████ ██████████ is not employed by the business, and this was the first time he had seen ██████████ on the day in question. He recalled ██████████ arriving around 12:00hrs and sat at the back of the takeaway, talking to his friend. ██████████ stated that ██████████ was not involved in serving customers or cooking food.

When asked by officers ██████████ stated that the CCTV system was not working, but provided officers with the password to the system.

When officers checked the CCTV footage it showed ██████████ in the kitchen wearing an apron, cooking food, which contradicts ██████████ account. When confronted with the footage, ██████████ stated that ██████████ was probably “helping his friends” and the previous day’s footage might show ██████████ assisting in the kitchen.

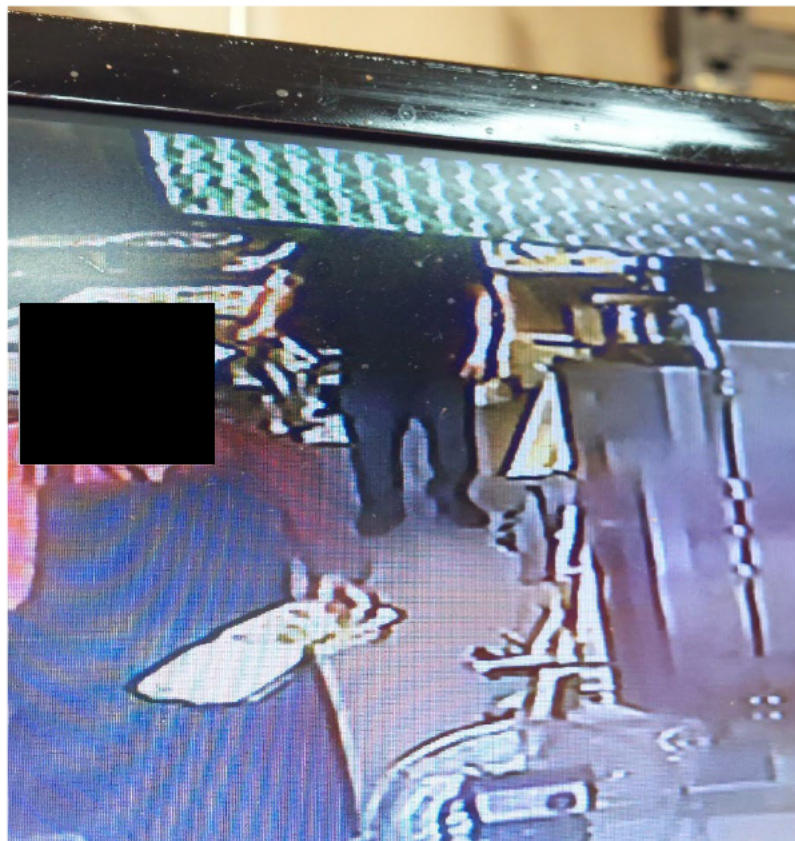
Regarding ██████████ assistance in the kitchen, ██████████ stated that he first saw ██████████ at the premises on Sunday. ██████████ has helped Wednesday to Friday, and the on the day of encounter. ██████████ stated that ██████████ helps on the fryer and washes dishes. ██████████ admitted that ██████████ is not paid money but receives free food and accommodation above the premises in return for his assistance. No right to work checks were completed by ██████████ prior to ██████████ helping at the business but ██████████ handles such matters.

In summary, ██████████ told officers since Sunday, ██████████ is helping at the premises and believed the business was simply trying to provide hospitality to ██████████

It should be noted that Suleyman TURHAN, the director on companies house, was encountered at the premises behind the counter and did not identify his position in the business to immigration officers.



CCTV footage showing [REDACTED] in the kitchen



CCTV footage of [REDACTED] preparing food in the kitchen

## 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.

There were 2 illegal workers encountered at the premises. Right to work checks were not conducted for [REDACTED]. Should they have been carried out, the employer would have quickly and easily established that [REDACTED] did not hold the right to work. The right to work checking system on GOV.UK would have provided this information.

In [REDACTED] case, he had an outstanding claim so would be issued with an ARC card. The licence holder could've done a simple check of this card which would've clearly and easily shown that the individual had restrictions on the right to work.



Example of an ARC card

[REDACTED] tried to obstruct officers by declaring the CCTV was not functioning. With the persistence of immigration officers, they accessed the system and clearly saw both [REDACTED] and [REDACTED] in the kitchen, working. Contrary to what [REDACTED] declared.

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.

Under Section 15 of the Immigration, Asylum and Nationality (IAN) Act 2006, employers can face a civil penalty if they employ someone who does not have the legal right to work in the UK. The civil penalty process is administered by an independent separate team.

CPCT issued a £80,000 civil penalty to Talbot Kebab Ltd on 16 June 2025 for employing two individuals with no right to work. An in-time objection was received on 09 July 2025. The objection was considered and maintained at £80,000 on 16 July 2025. They exhausted their appeal rights on 17 August 2025. The Penalty remains outstanding in full. The noncompliance with the civil penalty was taken into account when considering action against the licence.

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 the premises.

## 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.

USA Chicken, Pizza & Kebabs under the control of Suleyman YAVUZ was found employing illegal workers. The business has failed to uphold the prevention of crime and disorder licensing objective. The licence holder would have been aware of his responsibilities to uphold the licensing objectives as they are clearly defined as part of the premises licence application.

The outstanding £80,000 civil penalty issued to Talbot Kebab Ltd further demonstrates a disregard for legal obligations and undermines confidence in the licence holder's ability to operate responsibly.

The seriousness of employing an illegal worker has also been recognised in case law. In *East Lindsey District Council v Hanif* [2016], the High Court upheld the revocation of a premises licence following the employment of an illegal worker, even in the absence of criminal prosecution. The court confirmed that the crime prevention objective can be engaged based on evidence of unlawful conduct alone, and that revocation is a proportionate response where illegal working is identified.

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 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 – Supporting Evidence

Illegal Working - Employee [REDACTED] ( [REDACTED] )

Illegal Working - Employee [REDACTED] ( [REDACTED] )

Illegal Working - Employer [REDACTED] ( [REDACTED] )

Encounter - Suleymen TURHAN ( [REDACTED] )

Freetext - Illegal Working CCTV ( [REDACTED] )

**Illegal Working - Employee**

**Details**

Type of work	Visit				
Visit reference	[REDACTED]				
Created by	[REDACTED]				
ProntoID	[REDACTED] - Turkey				
Subject CEPR	[REDACTED]				
Subject name	[REDACTED]				
Subject DOB	[REDACTED]				
Subject gender	Male				
Subject nationality	Turkey				
Subject country of birth	Turkey				
Subject place of birth	Turkey				
Created at geolocation	<table border="0"> <tr> <td><b>Easting</b></td> <td>285291</td> </tr> <tr> <td><b>Northing</b></td> <td>191392</td> </tr> </table>	<b>Easting</b>	285291	<b>Northing</b>	191392
<b>Easting</b>	285291				
<b>Northing</b>	191392				
Time	19:52				
Creation date	24-05-2025 19:42:07				

**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

**Obligation**

how long have you been working here at this premises?	1 week
What is your job role/ what are your duties?	I cook kebabs
What days/ hours do you work each week?	3 or 4 days 4pm till 11 this week
Do you work the same hours/ days every week?	Yes
what time did you start here today	4pm
what time were you due to finish	11pm

<b>Control</b>	
Who gave you this job (name and role in business)?	██████████
Who tells you what days/ hours to work?	██████████
Who tells you what tasks/ duties to do each day?	██████████
<b>Remuneration</b>	
do you get paid	Like pocket money a bit until they know I can do job good
do you get free food	Yes
do you get free accomodation	No
Who pays you?	██████████ gives me a bit of pocket money 20
Do you pay income tax or have a National Insurance number?	Yes national insurance
<b>Pre-employment Checks</b>	
Did the employer check your right to work or immigration status before they offered you the job?	I should my card
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?	My card
<b>Additional Questions</b>	
No details provided.	
<b>Photographs</b>	
No photographs.	
<b>Declaration</b>	
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	Yes
Contents read back to the employee in the language used during the interview	Yes

**Observations**

**Observations** Male is wearing red USA fried chicken t shirt aand was behind the counter when officers entered

**Do you suspect this person of illegal working?** Yes

**Photo 1**





**Caption** photo

**Management Checks Complete**

**Date management checks complete** 07-07-2025 13:03:19

**Reviewer(s)** [REDACTED]

<b>Illegal Working - Employee</b>					
<b>Details</b>					
Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntolD	██████████ - Turkey				
Subject CEPR	██████████				
Subject name	██████████				
Subject DOB	██████████				
Subject gender	Male				
Subject nationality	Turkey				
Subject country of birth	Turkey				
Subject place of birth	Turkey				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 30%;"><b>Easting</b></td> <td style="text-align: right;">285257</td> </tr> <tr> <td><b>Northing</b></td> <td style="text-align: right;">191367</td> </tr> </table>	<b>Easting</b>	285257	<b>Northing</b>	191367
<b>Easting</b>	285257				
<b>Northing</b>	191367				
Time	19:42				
Creation date	24-05-2025 19:42:14				
<b>Language of Interview</b>					
What language is the interview carried out in?	Turkish				
Interpreter used?	Yes				
Details of interpreter	As per encounter				
Does the individual understand the interpreter?	Yes				
<b>Obligation</b>					
why are you here today	I am visiting friend				
who are you visiting today	I am visiting my fiend				
when did you travel here from your house in london	1 week ago				
you have food residue on your clothing how long have you been working here.	I have not been working here only helping for the week				
what have you been doing to help	I have been washing things to help				
<b>Control</b>					
Who said you could help here	The chef				

Who tells you what days/ hours to work?	The chef and the boss
What hours have you been working	I'm not sure just when I want just to help out. My friend.
So how many hours have you been spending here at te takeaway helping.	1 hour today. I have been helping today because bank holiday
<b>Remuneration</b>	
have you been paid for helping	No
does the boss give you somewhere to live for helping.	I have been sleeping upstairs
does the boss you give you food for helping	Yes pizza
<b>Pre-employment Checks</b>	
Did the employer check your right to work or immigration status before they offered you the job?	No
<b>Additional Questions</b>	
when are you returning to to London	In about 1 or 2 days
how will you travel	By bus
<b>Photographs</b>	
No photographs.	
<b>Declaration</b>	
I confirm that I have understood all the questions and that the details are true and correct.	
Interviewee signature ( [REDACTED] )	  24-05-2025 20:14:44
<b>Observations</b>	
Observations	Male as stated he as been helping at the takeaway for a week. He as food residue on his t shirt and shoes

Do you suspect this person of illegal working?	Yes
--	-----

Photo 1



Caption male

**Management Checks Complete**

Date management checks complete	07-07-2025 13:55:27
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Reviewer(s)	[REDACTED]
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## Illegal Working - Employer

### Details

Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntoID	[REDACTED] - Turkey	
Subject CEPR	[REDACTED]	
Employer	[REDACTED]	
Subject DOB	[REDACTED]	
Subject gender	Male	
Subject nationality	Turkey	
Subject country of birth	Turkey	
Created at geolocation	Easting	285285
	Northing	191366
Time	19:55	
Creation date	24-05-2025 19:54:59	

### Language of Interview

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

### Employer Details

What is the name of the business?	Talbot Kebab Ltd T/A USA Fried Chicken. Director's name is [REDACTED].
What is your position here?	Temporarily looking after the business for [REDACTED], he has had a family problem and had to go to London. He is my brother in law.
How long have you been managing this business?	I've been working here with [REDACTED] a long time, [REDACTED] is the full manager and when he's not here I'm the manager.
Who is responsible for employing people?	The company director, [REDACTED].
Who employed [REDACTED]?	[REDACTED]
How long has [REDACTED] worked here?	Just one week, the first time I saw him was on Sunday.
How many days has [REDACTED] worked here since Sunday?	Every day. 6 days
What hours has he worked on each of those days?	Eight hours

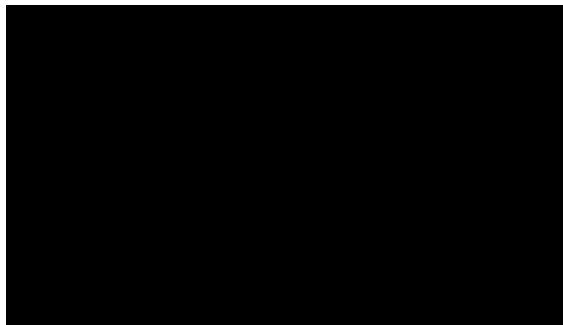
How much is he getting paid?	We didn't talk about it. [REDACTED] told me to see how he's working and then we will decide.
Are you providing him with free food and accommodation?	I don't know. He's eating here, but I don't know anything about his working conditions.
Does he live with you?	He's living upstairs. There's a room
Does that room belong to the business?	It's a separate flat but [REDACTED] is responsible for it.
What is your understanding of [REDACTED]' immigration status?	[REDACTED] told me he's got a working permit that's why I gave him permission to work here.
Have you seen any documentation from [REDACTED] in relation to his permission to work?	No I think [REDACTED] has seen it.
How long has [REDACTED] [REDACTED] worked here?	[REDACTED] is not working here.
What is he doing at the premises this evening?	It's the first time I've seen him today.
Why is he here?	I think he's got friends he is just visiting here.
What time did he arrive here today?	This afternoon about 12 o clock.
What has he been doing here since 12 o clock?	Doing nothing, just sitting at the back talking to his friend.
Do you have CCTV?	We do but it's not working.
Do you know the password for the CCTV?	[REDACTED]
Has [REDACTED] been behind the counter at all today?	I don't know
Has he cooked any food today?	No
Has he served any customers?	I didn't see
We have accessed the CCTV and it shows [REDACTED] in the kitchen and it looks like he's cooking food. Earlier on you said he had only been sat at the back of the takeaway talking to his friends. What is he doing on the CCTV in the kitchen?	He's probably helping his friends
If we look at the CCTV from yesterday is it going to show [REDACTED] helping in the kitchen?	I don't know it might do
How long has [REDACTED] been helping out in the kitchen?	When I came here on Sunday I saw him here.

How many days has he been helping here since Sunday?	Not Monday or Tuesday but every other day.
So he's helped here on Wednesday, Thursday, Friday and today?	Yes
What jobs has he been doing?	Just helping his colleagues
Helping them do what?	Frying chips, sometimes washing dishes. He is just having meals not having money.
Is he being paid?	No he's just having food.
Is that food in return for him helping out?	Yes
Is he also being provided with accommodation?	Yes he has been living upstairs since he's been here
Did you ask him for any documentation before he started helping here?	No I haven't because I'm not the director
Do you know what his permission to work is?	I don't know
Is there anything you wish to add or clarify?	Since Sunday I saw [REDACTED] here, I thought he's helping us and he hasn't got any accommodation. We were just trying to provide hospitality for him.

**Declaration by Employer**

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

Signed by [REDACTED] [REDACTED]



24-05-2025 20:31:35

**Observations**

Observations

Q&A read back to Imam in the presence of IO [REDACTED]. [REDACTED] confirms it is an accurate reflection of Q&A.

IO [REDACTED] interrogates CCTV and photographs of suspected illegal workers

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Management Checks Complete	
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Date management checks complete	25-05-2025 15:56:48
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Reviewer(s)	[REDACTED]
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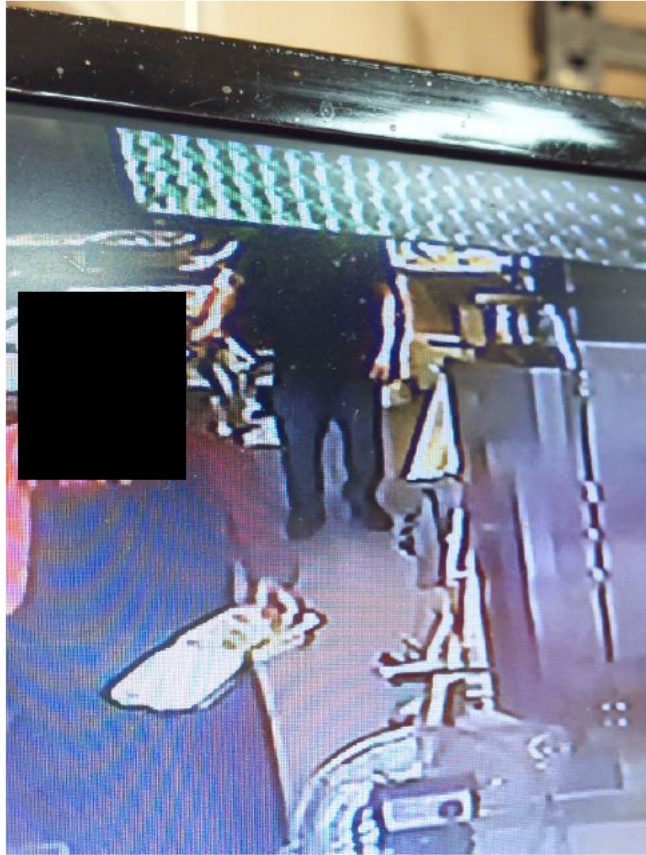
<b>Encounter</b>	
<b>Details</b>	
Type of work	Visit
Visit reference	██████████
Created by	██████████
ProntoID	SULEYMAN TURHAN - ██████████ - Turkey
Created at geolocation	<b>Easting</b> 285276 <b>Northing</b> 191367
Time	19:26
Creation date	24-05-2025 19:30:46
<b>Main Identity</b>	
Identity source/type	Biographic
Full name	SULEYMAN TURHAN
Date of birth	██████████
Gender	Male
Nationality	Turkey
Country of birth	
Place of birth	
<b>Languages</b>	
Languages spoken	English
Interpreter used?	No
<b>Encounter</b>	
Encountering officer	██████████ - Officer_Admin
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?	Allegation relates to un named immistation offenders and this male was working upon entry.
Where was the person located?	Behind counter
Declared immigration status	British
How and when did the subject last enter the UK?	

Are there any vulnerabilities/trafficking/safeguarding issues?	No
Are you taking enforcement action?	No
References (Person ID, HO Ref, Port Ref, BRP)	[REDACTED]
Biographic search results	<b>Systems checked</b> <b>Result of checks</b> Naturalised 2024 <b>Does the person have an open absconder status on Atlas Person Alerts?</b> No <b>Status returned by system checks</b>
<b>Photo of Subject</b>	
Do you want to take a photograph of the subject?	No
<b>Identity Documentation</b>	
No documentation provided.	
<b>Notes</b>	
No notes entered.	
<b>Management Checks Complete</b>	
Date management checks complete	07-07-2025 12:32:38
Reviewer(s)	[REDACTED]

Freetext					
Details					
Type of work	Visit				
Visit reference	[REDACTED]				
Created by	[REDACTED]				
Is this entry related to a Critical Incident?	No				
Subject CEPR	[REDACTED]				
Subject name	[REDACTED]				
Subject DOB	[REDACTED]				
Subject gender	Male				
Subject nationality	Turkey				
Subject country of birth	Turkey				
Subject place of birth	Turkey				
Address	USA Fried Chicken Takeaway, 25 Talbot Street, Maesteg, CF34 9BW (Visit Address)				
Created at geolocation	<table border="0"> <tr> <td><b>Easting</b></td> <td>285304</td> </tr> <tr> <td><b>Northing</b></td> <td>191340</td> </tr> </table>	<b>Easting</b>	285304	<b>Northing</b>	191340
<b>Easting</b>	285304				
<b>Northing</b>	191340				
Time	20:35				
Creation date	24-05-2025 20:23:00				
Entry					
Title	Illegal working cctv				
Text	<p>24/5 18:08</p> <p>23/5. 17:05</p> <p>23/5 17:30</p>				

Photographs

preparing



wrapping food



second male 23



second male 24



**BRIDGEND COUNTY BOROUGH COUNCIL****THE LICENSING ACT 2003 (PREMISES LICENCES) REGULATIONS 2005****PREMISES LICENCE****PART A****PREMISES LICENCE**

**Premises Licence Number :** BCBCLP493

**Premises Details:** USA Chicken, Pizza & Kebabs  
25 Talbot Street  
Maesteg  
Bridgend  
CF34 9DW

**Telephone Number:** 01656 731811

**Where the licence is time limited the dates:**

N/A

**Licensable activities authorised by the licence:**

Provision of late night refreshment

**Times the licence authorises the carrying out of licensable activities:**

Provision of late night refreshment:-

Monday to Wednesday: 2300 - 0100 hours

Thursday: 1600 - 0000 hours

Friday & Saturday: 1600 - 0200 hours

Sunday: 2300 - 0130 hours

Christmas Eve: 1600 - 0200 hours

Boxing Day: 1600 - 0000 hours

New Year's Eve: 1600 - 0200 hours

**Opening hours of the premises:**

Monday to Wednesday: 1600 - 0100 hours  
Thursday: 1600 - 0000 hours  
Friday & Saturday: 1600 - 0200 hours  
Sunday: 1600 - 0130 hours  
Christmas Eve: 1600 - 0200 hours  
Boxing Day: 1600 - 0000 hours  
New Year's Eve: 1600 - 0200 hours

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

N/A

**PART 2**

**Name (registered) address, telephone number and e-mail (where relevant) of holder of premises licence:**

Suleyman Yavuz  
USA Chicken, Pizza & Kebabs  
25 Talbot Street  
Maesteg  
Bridgend  
CF34 9DW

**Registered number of holder, for example company number, charity number (where applicable):**

N/A

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

N/A

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

N/A

**Annex 1 - Mandatory Conditions:**

N/A

**Annex 2 - Conditions Consistent with the Operating Schedule**

General – All four licensing objectives:-

Well established, no problems of violence, incidents of premises.  
Maintains good working relationship with the local Police.

The prevention of crime and disorder:-

1. We intend to contact the Police if any crime takes place.
2. There is also a camera that records the service area.

Public safety:-

1. Fire fighting equipment are fully checked and the fire exit areas are always kept clean.

The prevention of public nuisance:-

1. There is a rubbish bin in the service area for the customers.
2. The staff collect the rubbish outside the premises.
3. The waste collectors collect the waste during the week regularly.

The protection of children from harm:-

1. No alcohol is being sold on the premises.
2. The staff do not let the under 16 years play the gambling machines on the premises.

**Annex 3 - Conditions attached after a hearing by the licensing authority:**

1. The licensee shall arrange for the South Wales Police Crime Reduction Officer to inspect the CCTV system currently installed at the premises.
2. Any CCTV system installed at the premises must be approved by the South Wales Police Crime Reduction Officer and maintained to the standard set out in Appendix 'A' attached.

3. The CCTV system shall be maintained at all times the premises remain open to the public.
4. The CCTV system will cover all areas to which the public has access including entrances/exits.
5. There will be a storage facility of images of up to 31 days.
6. Images shall be produced on request of the Police as soon as is practicable and therefore adequate training will have to be provided to duty staff in order to comply with the condition.
7. A Security Industry Authority (SIA) Registered Door Supervisor will be employed at the premises from 2300 hours to 0200 hours on Friday and Saturday and on Sundays preceding Bank Holiday Mondays.
8. Door staff must be clearly identifiable by clothing as well as a visible SIA registration badge as per the terms and conditions of the SIA Licence.
9. Such staff will be employed by the licence holder directly and not be engaged to work at other premises.
10. The applicant shall arrange for the regular clearance of litter within 2 metres either side of the curtilage of the premises and always at the close of business.

#### **Annex 4 - Plans**

Attached



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