



Home Office

## Premises Licence Review

The Blue Elephant

Holyhead Road

Ketley

Telford

TF1 5AN

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## Case Summary

On 13 March 2020, the West Midlands Immigration Compliance Enforcement (ICE) team visited The Blue Elephant, located at Holyhead Road, Ketley, Telford, TF1 5AN. Entry was gained to the premises under Section 179 Licensing Act 2003. Officers encountered three individuals who did not hold the right to work and were eventually arrested.

Following this event, a second visit took place at The Blue Elephant – with officers gaining entry under Section 179 Licensing Act 2003. During this enforcement visit, one illegal worker was encountered as he was working in breach of conditions and was arrested.

## Licensed Premises History

The premises licence number is **BTWPRM0140** and was issued by Telford & Wrekin Council on June 2015. This version of the premises licence was issued to Shander HERIAN as the premises licence holder. The licence also states that Shibbir MAHMOOD is the designated premises supervisor (DPS) and holds a personal licence (number: PL1936, issued by Herefordshire Council).

The Home Office obtained an updated copy of the premises licence (valid from 15 August 2025) which kept Shander HERIAN as the premises licence holder and Shibbir MAHMOOD as the DPS.

Telford & Wrekin Council confirmed that this licence was granted following a minor variation to change the wording of one of the conditions on the previously issued licence.

During the initial visit, Blue Elephant Restaurant Limited (company number **10458502**) was the liable party for the civil penalty. The company was incorporated on 02 November 2016 and shows Shibbir MAHMOOD as the appointed director since the date of incorporation. However, Companies House lists the company status as 'Dissolved' since 29 September 2020.

Currently, the company is listed as Blue Elephant Indian Cuisine Limited (company number **13132693**) on companies house and is listed as 'Active'. It was incorporated on 13 January 2021 and lists Shibbir MAHMOOD as the director, appointed on the date of incorporation.

## Civil Penalty

Following a visit by an ICE team on 13 March 2020, a No Action Notice was issued to Blue Elephant Restaurant Limited on 20 May 2021. A penalty could not be issued as the company had dissolved on 29 September 2020.

Following a visit by an ICE team on 20 June 2025, a Civil Penalty Notice for £40,000 was issued on 23 July 2025 to Blue Elephant Indian Cuisine Limited for employing one person in breach of restrictions on their right to work in the UK.

Blue Elephant Indian Cuisine Limited objected to the penalty. The case was reconsidered, and on 21 August 2025 the penalty was maintained.

Blue Elephant Indian Cuisine Limited then lodged an appeal against the penalty at the County Court. The appeal process is continuing.

## Enforcement Visit dated: 13 March 2020

Entry was gained to the premises at 17:46hrs under Section 179 of the Licensing Act 2003. Upon entering, Immigration Officers encountered the following individuals:

██████████ – Worker

██████████ was encountered wearing chef whites and was located in the kitchen.



██████████ wearing chef whites.

During the illegal working interview, ██████████ confirmed working at the premises for two to three weeks and his responsibilities consisted of cooking. In exchange for such, ██████████ admitted that he receives £20 - £35 cash in hand a night, as well as food. He claimed to have received the role from his friend, ██████████ and is under the instructions of the kitchen manager. With regards to pre – employment checks, ██████████ confirmed that they did not take place prior to commencing work at the premises as he did not show any documents. ██████████ also admitted that his employer was aware that he was not allowed to work in the country.

Home Office checks showed that ██████████ entered the country through a visit visa which was valid from October 2006 until April 2007. Prior to the enforcement visit, he submitted some applications for leave to remain which were either refused or rejected. He had no outstanding applications at the time of the enforcement visit. ██████████ also never held the right to work in the country.

██████████ – Worker

██████████ was encountered working in the kitchen and was wearing a black chef coat, upon initial encounter.



██████████ wearing a black chef coat.

During the illegal working interview, ██████████ confirmed working at the premises for a month as a chef. He specified that his working hours consisted of shifts that occurred three times per week, for six hours each day. In exchange for this, he is paid £200 cash in hand per week. Additionally, he confirmed finding the job through a FaceBook group and is allocated tasks by 'Sibbir', the boss. With regards to right to work checks, he confirmed that he did not show any documents prior to commencing work at the premises.

Home Office checks showed that ██████████ entered the country through a student visa which was valid from December 2010 until April 2014. Due to non – compliance with conditions his leave was curtailed and set to expire in December 2013. When the enforcement visit took place, ██████████ was an overstayer and therefore did not hold the right to work.

██████████ - Worker

██████████ was encountered in the kitchen and was wearing chef whites.

During the illegal working interview, he confirmed that he had been working at the premises for two weeks as a cook. His hours consisted of working six days a week receiving £270 cash in hand on a weekly basis, as well as on site accommodation – both provided by his boss. Although he was unable to name his boss, he confirmed that he was the person responsible for giving him the job. ██████████ confirmed that

right to work checks were not conducted prior to commencing work at the premises as he did not show any documentation.

Home Office checks showed that ██████ entered the country through a working holiday visa – valid from August 2009 until August 2011. He made multiple applications for leave and claims for protection which were all refused. As an overstayer, ██████ no longer held the right to work.

## Enforcement Visit dated: 20 June 2025

Entry was gained to the premises at 19:30hrs. Upon entering, Immigration Officers encountered the following individual:

██████████ – Worker

██████████ was encountered at the front of house, wearing standard waiter attire.



██████████ wearing waiter attire.

During the illegal working interview, ██████████ stated that he has been working at the premises for two weeks as a waiter. He works Fridays from 5pm until late and Saturdays from 5pm until 11pm, and confirmed that these hours remain the same each week. ██████████ confirmed that he was brought to the restaurant by his friend ██████████ but was employed by the boss, 'Shippir MAHMOOD', who also tells him what days and hours to work and assigns his tasks. He confirmed that he is paid £40 per day in cash by Shippir. Regarding pre-employment checks, he showed his ARC card, but no right to work checks were carried out on it. He did not provide any documents or share a digital code to prove his status. ██████████ further stated that Shippir knows he is not allowed to work but did not discuss his working restrictions with him despite seeing his details.

Home Office checks showed that ██████████ entered the country through a student visa which was valid from January 2021 until October 2021. In May 2024, he made a claim for protection which was refused. He had no outstanding claims for protection or applications for leave, at the time of the enforcement visit. His bail conditions

clearly allowed him to work in roles listed on the Immigration Salary List; the role of a waiter not being included on it. Therefore, [REDACTED] was working in breach of conditions.

## 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.

Across two enforcement visits to The Blue Elephant, officers encountered four individuals who either did not hold the right to work or were working in breach of their visa conditions. During the first visit on 13 March 2020, three individuals—■■■■, ■■■■, ■■■■, and ■■■■—were found working in the kitchen. All three confirmed that no right to work checks were carried out, and Home Office checks showed that each individual either had overstayed previous visa routes or never held permission to work in the UK.

A subsequent visit on 20 June 2025 identified a further illegal worker, ■■■■, who admitted to working as a waiter in breach of his bail conditions. He confirmed that although he showed his ARC card, no right to work checks were carried out, and the employer was aware he was not permitted to work in the UK. Home Office checks confirmed that his role did not fall within the Immigration Salary List, and therefore he was working illegally.

During interviews, individuals identified as managers or owners—including Shibbir MAHMOOD—were repeatedly named as the persons allocating tasks, setting hours, and providing payment. Workers confirmed that MAHMOOD and others were aware of their lack of permission to work.

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

In all cases, the individuals confirmed that they were paid in cash, received accommodation, or were otherwise compensated informally. These methods of payment strongly indicate that wages were not recorded for tax purposes, thereby depriving the UK economy of tax revenue and creating an unfair competitive advantage over fully compliant businesses.

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 straight 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.

The Blue Elephant, under the control of Shander HERIAN, has been found employing four illegal workers across two visits - which were five years apart. The license holder 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 asks that the premises licence is **revoked**.

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

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

## Appendix – Supporting Evidence

13 March 2020

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 June 2025

[REDACTED]

[REDACTED]

<b>Encounter</b>					
<b>Details</b>					
Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntoID	██				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 30%;"><b>Easting</b></td> <td style="text-align: right;">367642</td> </tr> <tr> <td><b>Northing</b></td> <td style="text-align: right;">311065</td> </tr> </table>	<b>Easting</b>	367642	<b>Northing</b>	311065
<b>Easting</b>	367642				
<b>Northing</b>	311065				
Time	17:54				
Creation date	13-03-2020 17:54:11				
<b>Main Identity</b>					
Identity source/type	Biometric				
Full name	██████████				
Date of birth	██████████				
Gender	Male				
Nationality	BGD Bangladesh				
Country of birth					
Place of birth					
<b>Languages</b>					
Languages spoken	None specified				
Interpreter used?	No				
<b>Encounter</b>					
Encountering officer	██				
Where was the person located?	Kitchen				
Declared immigration status	Asylum in progress				
How and when did the subject last enter the UK?	2006 by air				
Is this person the subject of the visit?	Yes				
CEPR	██████████				
Details of vulnerabilities/ safeguarding issues	None				
Duty to Notify/MS1 referral made?					
References (Person ID, HO Ref, Port Ref, BRP)	██████████				

<b>Biographic search results</b>	<b>Systems checked</b>	CID, CRS
	<b>Result of checks</b>	Last app refused 2013 no further apps or leave since. Overstayer not served
	<b>Does the person have an open absconder status on Atlas Person Alerts?</b>	
	<b>Status returned by system checks</b>	Section 10: Overstayer

**Identity Documentation**

<b>Document 1</b>	<b>Identity</b>
	<b>Document type</b>
	<b>Document reference</b>
	<b>Issuing authority</b>
	<b>Document issue date</b>
	<b>Document expiry date</b>
	<b>Country of issue (if different from nationality above)</b>
	<b>Is the person the rightful holder of the document?</b>
	<b>Is the document falsified?</b>
	<b>Is the document in the possession of the Home Office?</b>
	<b>Suspected fraudulent In transit details</b>
<b>Photos</b>	

**Biometric Search Results**

<b>Given name</b>	██████
<b>Surname</b>	██████
<b>Alias</b>	
<b>Date of birth</b>	██████████
<b>Gender</b>	M
<b>Nationality</b>	BGD
<b>IABS Person Identifier</b>	██████████████████

Search confidence	HIGH
Important notes	
Additional information	██████████
Search confidence	HIGH
Image capture date	06-03-2013
Image reference ID	01
<b>Notes</b>	
No notes entered.	
<b>Management Checks Complete</b>	
Date management checks complete	30-03-2020 13:35:00
Reviewer(s)	██████████

**Illegal Working - Employee**

**Details**

Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntoID	[REDACTED]	
Subject CEPR	[REDACTED]	
Subject name	[REDACTED]	
Subject DOB	[REDACTED]	
Subject gender	Male	
Subject nationality	BGD Bangladesh	
Created at geolocation	<b>Easting</b>	367639
	<b>Northing</b>	311058
Time	18:04	
Creation date	13-03-2020 18:04:22	

**Language of Interview**

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

**Obligation**

How long have you been working here?	2-3 weeks
What is your job role/ what are your duties?	Cooking

**Control**

Who gave you this job (name and role in business)?	My friend [REDACTED]
Who tells you what days/ hours to work?	The kitchen manager

**Remuneration**

How are you paid (money, accommodation, food)?	In cash, food
If money, how much and how do you receive it?	£20-35 a night, depends


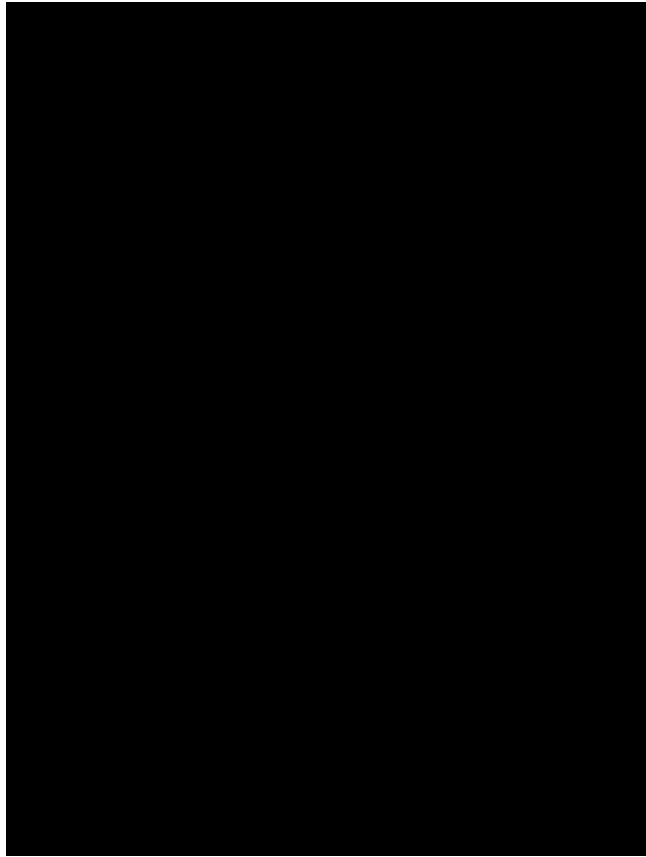
Do you pay income tax or have a National Insurance number?	No
<b>Pre-employment Checks</b>	
What name does the employer know you as?	████
Did you show documents before being offered the job? If so, what?	No
Does your employer know you're not allowed to work in the UK?	Yeah he knows
<b>Additional Questions</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.	
Interviewee signature █████	
<b>Observations</b>	
Observations	Admission & encountered in kitchen wearing chef whites
Do you suspect this person of illegal working?	Yes

Photo 1



Caption

Subject

**Management Checks Complete**

Date management checks complete 30-03-2020 13:35:06

Reviewer(s)

[Redacted]

<b>Encounter</b>					
<b>Details</b>					
Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntoID	██				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 150px;"><b>Easting</b></td> <td style="text-align: right;">367642</td> </tr> <tr> <td><b>Northing</b></td> <td style="text-align: right;">311072</td> </tr> </table>	<b>Easting</b>	367642	<b>Northing</b>	311072
<b>Easting</b>	367642				
<b>Northing</b>	311072				
Time	17:49				
Creation date	13-03-2020 17:48:31				
<b>Main Identity</b>					
Identity source/type	Declared				
Full name	██				
Date of birth	██████████				
Gender	Male				
Nationality	BGD Bangladesh				
Country of birth					
Place of birth					
<b>Languages</b>					
Languages spoken	None specified				
Interpreter used?					
<b>Encounter</b>					
Encountering officer	██				
Where was the person located?	Working in the kitchen				
Declared immigration status	Student Visa				
How and when did the subject last enter the UK?	2010				
Is this person the subject of the visit?	No				
Justification for questioning someone who is not the subject of the visit	Working in the kitchen				
CEPR	██████████				
Details of vulnerabilities/ safeguarding issues					
Duty to Notify/MS1 referral made?					

References (Person ID, HO Ref, Port Ref, BRP)	[REDACTED]
Biographic search results	<p>Systems checked CRS</p> <p>Result of checks Tier 4 student visa expired until 30.4.14 Leave curtailed on 15.12.13</p> <p>Does the person have an open absconder status on Atlas Person Alerts?</p> <p>Status returned by system checks Section 10: Overstay</p>
<b>Identity Documentation</b>	
Document 1	<p>Identity</p> <p>Document type</p> <p>Document reference</p> <p>Issuing authority</p> <p>Document issue date</p> <p>Document expiry date</p> <p>Country of issue (if different from nationality above)</p> <p>Is the person the rightful holder of the document?</p> <p>Is the document falsified?</p> <p>Is the document in the possession of the Home Office?</p> <p>Suspected fraudulent</p> <p>In transit details</p> <p>Photos</p>
<b>Notes</b>	
Claims Passport is being held - [REDACTED]	
<b>Management Checks Complete</b>	
Date management checks complete	26-04-2020 17:34:15
Reviewer(s)	[REDACTED]

**Illegal Working - Employee**

**Details**

Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
ProntolD	[REDACTED]	
Subject CEPR	[REDACTED]	
Subject name	[REDACTED]	
Subject DOB	[REDACTED]	
Subject gender	Male	
Subject nationality	BGD Bangladesh	
Created at geolocation	<b>Easting</b>	367643
	<b>Northing</b>	311070
Time	18:22	
Creation date	13-03-2020 18:22:48	

**Language of Interview**

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

**Obligation**

How long have you been working here?	1 month
What is your job role/ what are your duties?	Chef
What days/ hours do you work each week?	3 days 6 hours each day

**Control**

Who gave you this job (name and role in business)?	Facebook Group
Who tells you what days/ hours to work?	The boss - sibbir

**Remuneration**

How are you paid (money, accommodation, food)?	Cash
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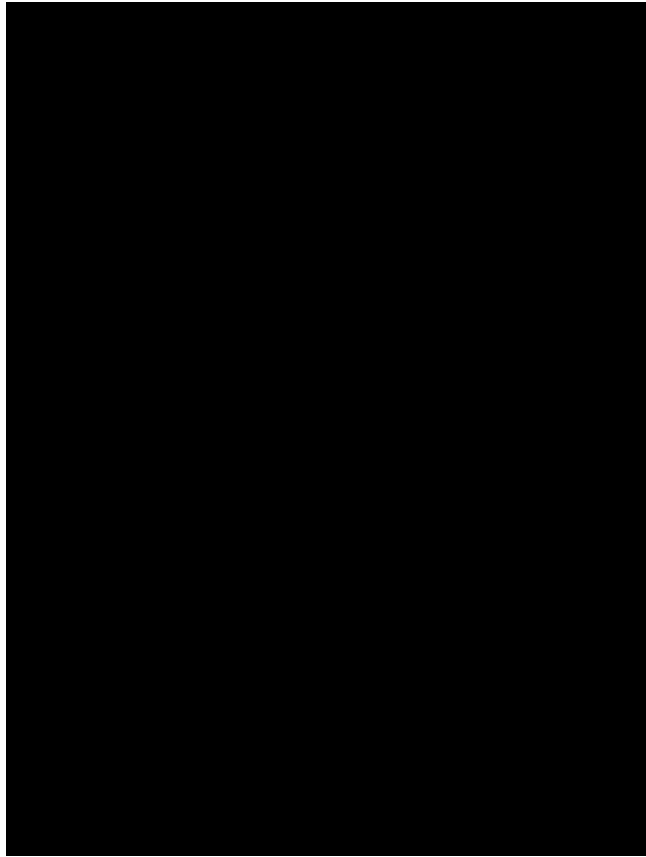
If money, how much and how do you receive it?	£200 per week
<b>Pre-employment Checks</b>	
What name does the employer know you as?	██████████
Did you show documents before being offered the job? If so, what?	No
<b>Additional Questions</b>	
No details provided.	
<b>Photographs</b>	
No photographs.	
<b>Declaration</b>	
I confirm that I have understood all the questions and that the details are true and correct.	
Interviewee signature ██████████ ██████████	
<b>Observations</b>	
Observations	Seen in the kitchen
Do you suspect this person of illegal working?	Yes

Photo 1



Caption working clothes wearing

**Management Checks Complete**

Date management checks complete 26-04-2020 17:34:24

Reviewer(s)



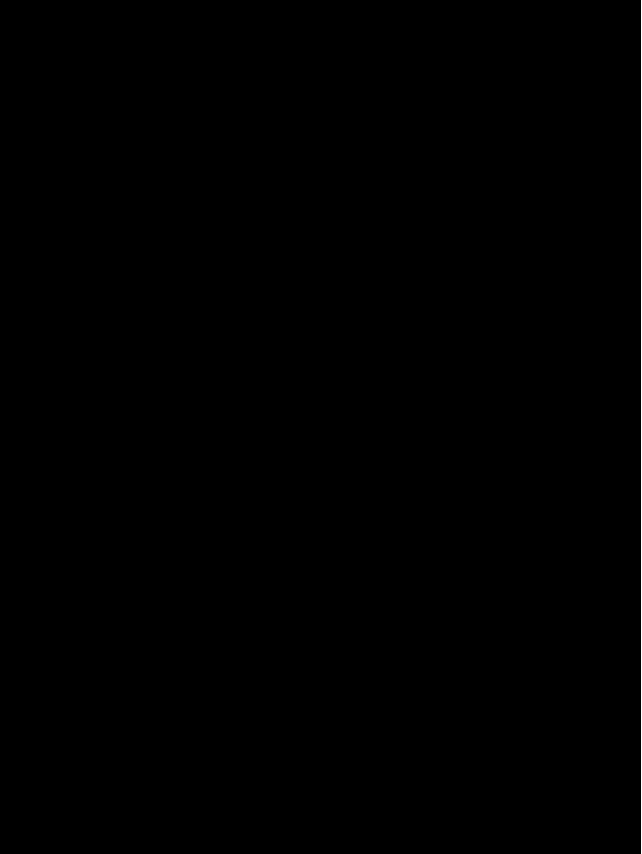
<b>Encounter</b>					
<b>Details</b>					
Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntoID	██				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 150px;"><b>Easting</b></td> <td style="text-align: right;">367654</td> </tr> <tr> <td><b>Northing</b></td> <td style="text-align: right;">311088</td> </tr> </table>	<b>Easting</b>	367654	<b>Northing</b>	311088
<b>Easting</b>	367654				
<b>Northing</b>	311088				
Time	17:49				
Creation date	13-03-2020 17:48:22				
<b>Main Identity</b>					
Identity source/type	Declared				
Full name	██████████				
Date of birth	██████████				
Gender	Male				
Nationality	BGD Bangladesh				
Country of birth					
Place of birth					
<b>Languages</b>					
Languages spoken	None specified				
Interpreter used?					
<b>Encounter</b>					
Encountering officer	██				
Where was the person located?	In the kitchen				
Declared immigration status	Overstayer, leave expired 2011				
How and when did the subject last enter the UK?	2009 working holiday				
Is this person the subject of the visit?	No				
Justification for questioning someone who is not the subject of the visit	No named targets				
CEPR	██████████				
Details of vulnerabilities/ safeguarding issues	None				
Duty to Notify/MS1 referral made?	No				

<b>References (Person ID, HO Ref, Port Ref, BRP)</b>	
<b>Biographic search results</b>	<b>Systems checked</b> CID <b>Result of checks</b> Served as overstayer in 2017. FAS April 2018 <b>Does the person have an open absconder status on Atlas Person Alerts?</b> <b>Status returned by system checks</b> Section 10: Overstayer
<b>Identity Documentation</b>	
<b>Document 1</b>	<b>Identity</b> <b>Document type</b> <b>Document reference</b> <b>Issuing authority</b> <b>Document issue date</b> <b>Document expiry date</b> <b>Country of issue (if different from nationality above)</b> <b>Is the person the rightful holder of the document?</b> <b>Is the document falsified?</b> <b>Is the document in the possession of the Home Office?</b> <b>Suspected fraudulent</b> <b>In transit details</b> <b>Photos</b>
<b>Notes</b>	
No notes entered.	
<b>Management Checks Complete</b>	
<b>Date management checks complete</b>	17-03-2020 11:28:37
<b>Reviewer(s)</b>	██████████

<b>Illegal Working - Employee</b>					
<b>Details</b>					
Type of work	Visit				
Visit reference	[REDACTED]				
Created by	[REDACTED]				
ProntolD	[REDACTED]				
Subject CEPR	[REDACTED]				
Subject name	[REDACTED]				
Subject DOB	[REDACTED]				
Subject gender	Male				
Subject nationality	BGD Bangladesh				
Created at geolocation	<table border="0"> <tr> <td><b>Easting</b></td> <td>367655</td> </tr> <tr> <td><b>Northing</b></td> <td>311069</td> </tr> </table>	<b>Easting</b>	367655	<b>Northing</b>	311069
<b>Easting</b>	367655				
<b>Northing</b>	311069				
Time	18:02				
Creation date	13-03-2020 18:02:15				
<b>Language of Interview</b>					
What language is the interview carried out in?					
Interpreter used?	No				
<b>Obligation</b>					
How long have you been working here?	2 weeks				
What is your job role/ what are your duties?	Cook				
What days/ hours do you work each week?	Work 6 days a week, normally have Sunday off				
<b>Control</b>					
Who gave you this job (name and role in business)?	The boss				
What is the bosses name?	He is just the boss				
How did you get the job?	I made a phone call				
<b>Remuneration</b>					
How are you paid (money, accommodation, food)?	Cash				
how often do you get paid?	Weekly				

how much do you get paid	£270
is your accommodation included as well as you live on site?	Yes
who pays your wages	The boss
<b>Pre-employment Checks</b>	
before starting your job did you show any docs to show you could work in UK	No
<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	
Contents read back to the employee in the language used during the interview	
<b>Observations</b>	
Observations	Encountered in kitchen with chef whites on
Do you suspect this person of illegal working?	Yes
<b>Management Checks Complete</b>	
Date management checks complete	17-03-2020 11:28:38
Reviewer(s)	██████████

<b>Encounter</b>					
<b>Details</b>					
Type of work	Visit				
Visit reference	[REDACTED]				
Created by	[REDACTED]				
ProntoID	[REDACTED]				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 150px;"><b>Easting</b></td> <td style="text-align: right;">367646</td> </tr> <tr> <td><b>Northing</b></td> <td style="text-align: right;">311056</td> </tr> </table>	<b>Easting</b>	367646	<b>Northing</b>	311056
<b>Easting</b>	367646				
<b>Northing</b>	311056				
Time	19:33				
Creation date	20-06-2025 19:33:11				
<b>Main Identity</b>					
Identity source/type	Declared				
Full name	[REDACTED]				
Date of birth	[REDACTED]				
Gender	Male				
Nationality	Bangladesh				
Country of birth	Bangladesh				
Place of birth					
<b>Languages</b>					
Languages spoken	English				
Interpreter used?	No				
<b>Encounter</b>					
Encountering officer	[REDACTED]				
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 stated illegal workers at the premises on entry the individual was wearing waiter clothing and standing at the front of house.				
Where was the person located?	Front of restaurant				
Declared immigration status	Overstayer wib				
How and when did the subject last enter the UK?	10 February 2021				

CEPR	██████████
Are there any vulnerabilities/trafficking/safeguarding issues?	No
Are you taking enforcement action?	Yes
References (Person ID, HO Ref, Port Ref, BRP)	
Biographic search results	<p>Systems checked</p> <p>Result of checks</p> <p>Does the person have an open absconder status on Atlas Person Alerts? No</p> <p>Status returned by system checks</p>
<b>Photo of Subject</b>	
Do you want to take a photograph of the subject?	Yes
Powers used	Paragraph 18(2) Schedule 2 Immigration Act 1971
Photo of subject	 <p>individual</p>

<b>Identity Documentation</b>	
No documentation provided.	
<b>Notes</b>	
No notes entered.	
<b>Management Checks Complete</b>	
Date management checks complete	25-06-2025 17:06:30
Reviewer(s)	[REDACTED]

**Illegal Working - Employee**

**Details**

Type of work	Visit				
Visit reference	[REDACTED]				
Created by	[REDACTED]				
ProntoID	[REDACTED]				
Subject CEPR	Unknown				
Subject name	[REDACTED]				
Subject DOB	21-09-2001				
Subject gender	Male				
Subject nationality	Bangladesh				
Subject country of birth	Bangladesh				
Created at geolocation	<table border="0"> <tr> <td><b>Easting</b></td> <td>367647</td> </tr> <tr> <td><b>Northing</b></td> <td>311056</td> </tr> </table>	<b>Easting</b>	367647	<b>Northing</b>	311056
<b>Easting</b>	367647				
<b>Northing</b>	311056				
Time	19:47				
Creation date	20-06-2025 19:47:00				

**Language of Interview**

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

**Obligation**

Are you fit and well	Yes
Do you have a solicitor	No
How long have you been working at this business?	2 weeks
What is your job role/ what are your duties?	I am a waiter here
What days/ hours do you work each week?	Friday 5pm till and Saturday 5pm till 11pm
Do you work the same hours/ days every week?	Yes
do you any other work here apart from waitering	No

<b>Control</b>	
Who gave you this job (name and role in business)?	█ my friend brought me here but the boss shippir mahmood employed me
Who tells you what days/ hours to work?	Shippir the boss tells me
Who tells you what tasks/ duties to do each day?	Shippir tells me
<b>Remuneration</b>	
How are you paid (money, accommodation, food)?	I am paid with cash
If money, how much and how do you receive it?	40 pound per day
Who pays you?	Shippir the boss pays me
Do you pay income tax or have a National Insurance number?	No
Did shippir tell you what he is going to pay you	Yes
how do you know the boss	Through █
do you know know £40 per day is well below minimum wage	Yes
<b>Pre-employment Checks</b>	
What name does the employer know you as?	He calls █
Did the employer check your right to work or immigration status before they offered you the job?	I showed him my arc card
Did he do any checks on your arc card	No
Did you show documents or share a code with the employer to prove your right to work before being offered the job? If so, what did you show and were they originals?	No
Does your employer know you're not allowed to work in the UK?	Yes he knows my asylum was refused
did he not tell you about your working if you showed him your details.	No

**Additional Questions**

No details provided.

**Photographs**

No photographs.

**Declaration**

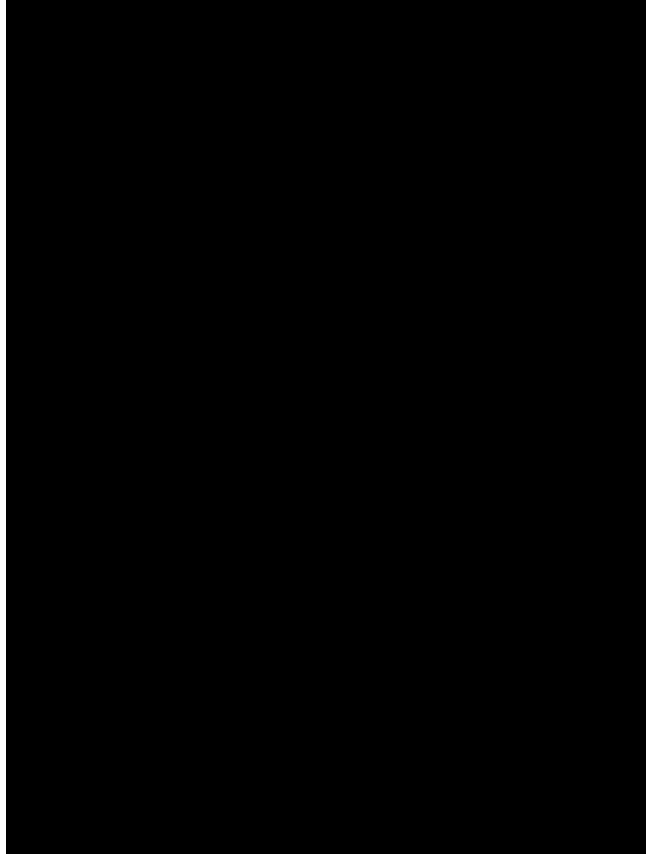
I confirm that I have understood all the questions and that the details are true and correct.

<p>Interviewee signature [REDACTED]</p>	
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**Observations**

<b>Observations</b>	Individual wearing waiter clothing and cofirmed he is working
<b>Do you suspect this person of illegal working?</b>	Yes

Photo 1



Caption Individual in waiter clothing

**Management Checks Complete**

Date management checks complete 25-06-2025 17:06:33

Reviewer(s) [REDACTED]