



Home Office

Premises Licence Review

Mem's Meze
Halfway House
Halfway
Sheerness
Kent
ME12 3AU

Contents

Case Summary3

Licensed Premises History4

Enforcement Visit dated: 16 January 20255

Reasons for Review8

Outcome Sought.....9

Appendix – Supporting Evidence.....10

Case Summary

At 16:40 on 16 January 2025, the South East ICE Team visited Mem's Meze, Halfway House, Halfway, Sheerness, Kent, ME12 3AU following intelligence that the premises employed illegal workers. Entry was gained to the premises using Section 179 Licensing Act 2003 and officers encountered 3 immigration offenders and made 2 arrests.

A referral was made to the civil penalty compliance team in relation to the illegal working at the premises and a civil penalty was issued for £120,000 to EDT Meze Ltd on 21 March 2025.

Licensed Premises History

The premises license is held by [REDACTED] and is also listed as the designated premises supervisor (DPS). The premises licence number is SHE/SWALE/189/0165 and was issued on 21 November 2019.

Companies House records show that Mem's Meze, Halfway House, Halfway, Sheerness, Kent, ME12 3AU has been registered under the name EDT Meze Ltd since 25 January 2022. The company number is 13870270. According to Companies House, [REDACTED] was a company director until 01 January 2025.

The licensable activities permitted are sale of alcohol;

Sunday – Thursday 10:00 – 23:30,

Friday – Saturday: 10:00 – 00:30,

New Year's Eve: 10:00 – 03:00am

Late night refreshment from Friday to Saturday 23:00 – 00:30.

Enforcement Visit: 16 January 2025

Entry was gained to the premises at 16:40. Upon entering, immigration officers encountered the following individuals:

[REDACTED]

Immigration officers encountered [REDACTED] working in the kitchen in chef's uniform. [REDACTED] appeared extremely nervous to the presence of immigration officers. When questioned [REDACTED] acknowledged that he had overstayed his visa.

An illegal working interview was completed with the assistance of an interpreter. [REDACTED] confirmed that he worked as the assistant chef at the premises for approximately three months. He worked 2 - 3 days a week, maximum 4 hours a day. He received free food, accommodation and roughly £300 per week in cash in return for his work. [REDACTED] stated that the employer did not check any documents or conduct a right to work checks. When questioned if the employer was aware that he did not hold the right to work [REDACTED] replied 'No, I just told him I was allowed and he believed me'.



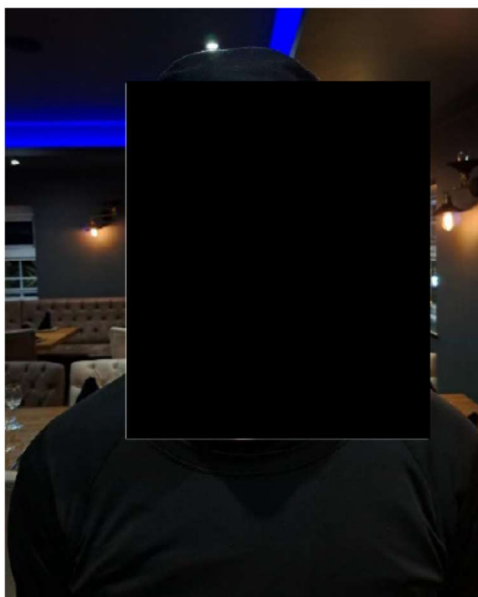
[REDACTED] when encountered in chef's uniform.

Home Office checks showed [REDACTED] last entered the UK in June 2022 using a temporary work (seasonal worker) migrant work visa which expired in December 2022. At the time of the enforcement visit, he was an overstayer with no right to work in the UK.

[REDACTED]

[REDACTED] was encountered by officers in the kitchen, dressed in chef's clothing. When questioned by immigration officers [REDACTED] stated he was preparing food and assisting his brother, who is the head chef. [REDACTED] claimed he started working at the premises on 07 January 2024 and works an average of 4 hours a day, 4 days a week. [REDACTED] stated he does not get paid for working. [REDACTED] said "[REDACTED] gives me accommodation, supports me with all my food and clothes in return for my help". [REDACTED] is the head chef at the restaurant.

██████████ confirmed that the employer was aware that he did not hold the right to work and did not check any documents or conduct any right to work checks prior to being offered the job.



██████████ in chef's uniform.

Home Office checks showed ██████████ had an outstanding claim for protection which was submitted on 15 July 2024. His bail conditions did not permit him the right to work in the UK, Therefore, ██████████ was found working in breach of his bail conditions.

██████████

██████████ was seen by immigration officers attempting to leave the premises via a side exit door wearing a chef's uniform. During the illegal working interview ██████████ confirmed that he had worked at the premises roughly for a year and assists the head chef in preparing and cooking food. He worked 5 hours a day, 3 days a week. When immigration officers asked how he was remunerated for the work ██████████ replied, "The manager ██████████ pays me with food and refreshments when I help work here". When questioned if he provided the employer any documents to prove his right to work ██████████ replied, 'Yes my asylum card with no work permitted'.



An example of an ARC card stating, "NO WORK".

Home Office checks showed [REDACTED] entered the UK illegally by small boats in June 2021 and claimed for protection. At the time of the enforcement visit his claim for protection was being appealed. [REDACTED] bail conditions did not permit him the right to work in the UK. Therefore, [REDACTED] was found working in breach of his bail conditions.



[REDACTED] in full chef's uniform when encountered.

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. In this case two of the workers had outstanding claims for protection and one was an overstayer. A simple check of their ARC cards would have shown that they did not hold the right to work in the UK. During the interviews one of the worker's stated that he had shown his ARC card to gain employment. Therefore, it is considered that the license holder and its agents knowingly employed an illegal worker. The premises license holder and designated premises supervisor has failed to comply with the relevant right to work procedures. This calls in to question the license holder's ability to effectively uphold the licensing objectives and has fallen below the expected standards of a responsible licence holder.

Further concerns include the lack of wages paid to the workers. During the interviews, two of the workers confirmed that they only received food and accommodation in return for their work. Actions such as this exploits workers as well as providing an unfair competitive advantage over businesses that adhere to wage regulations.

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. Right to work checks are a process that should take place immediately on all potential employees before they undertake employment. These checks are necessary regardless of the employment contract set in place. The Home Office have published guidance which is available online - Right to work checks: an employer's guide on the GOV.UK website. 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.

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 licence.

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 considered 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.

Mem's Meze under the control of [REDACTED] (licence holder and DPS) has failed to uphold the licensing objectives. 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.

Right to work checks should be carried out on all prospective employees prior to their first day, the checks are also irrespective of the length of the engagement or employment contract. Guidance is available online and the Home Office have published "Right to work checks: an employer's guide" which can be found on the GOV.UK website.

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 subcommittee with a sound and defensible rationale as to why it should **revoke** the licence.

Appendix – Supporting Evidence

Illegal Working - Employee [REDACTED] 1
Illegal Working - Employer [REDACTED] 2

Freetext Passport [REDACTED]
Illegal Working - Employee [REDACTED]
Illegal Working - Employer [REDACTED]

Encounter [REDACTED]
Illegal Working - Employee [REDACTED]

Illegal Working - Employee	
Details	
Type of work	Visit
Visit reference	[REDACTED]
Created by	[REDACTED]
Prontold	[REDACTED] - Ethiopia
Subject CIDPID/CEPR	[REDACTED]
Subject name	[REDACTED]
Subject DOB	[REDACTED]
Subject nationality	Ethiopia
Subject gender	Male
Time	17:14
Created at geolocation	<div> <div>Easting</div> <div>593161</div> </div> <div> <div>Northing</div> <div>172890</div> </div>
Creation date	16-01-2025 17:14:36
Language of Interview	
What language is the interview carried out in?	English
Interpreter used?	No
Obligation	
How long have you been working at this business?	Ive been helping here for roughly a year now
What is your job role/ what are your duties?	I help out the main chef cook and prepare food here
What days/ hours do you work each week?	I work here 3 days a week and normaly work from 2pm till 7pm on mixed days
Do you work the same hours/ days every week?	Mixed days but normally 3 days a week
is this your only job ?	Yes
Control	
Who gave you this job (name and role in business)?	The manager [REDACTED]
Who tells you what days/ hours to work?	The manager [REDACTED]

Who tells you what tasks/ duties to do each day?	The manager [REDACTED]
Remuneration	
How are you paid (money, accommodation, food)?	The manager [REDACTED] pays me with food and refreshments when i help work here
Do you pay income tax or have a National Insurance number?	No
Pre-employment Checks	
What name does the employer know you as?	My name
Did the employer check your right to work or immigration status before they offered you the job?	No
Did you show documents or share a code with the employer to prove your right to work before being offered the job? If so, what did you show and were they originals?	Yes my asylum card with no work permitted
Does your employer know you're not allowed to work in the UK?	Yes
did the owner do any checks with the home office to see if you are allowed to work here	No
Additional Questions	
have you understood all my questions in English	Yes i have understood all your questions in English

Photographs

subject



Exhibit Ref

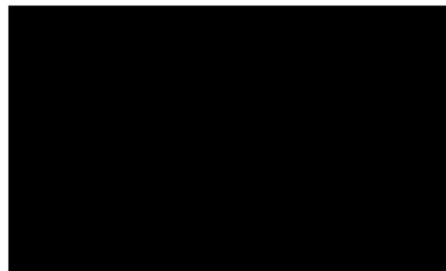
Illegal working - chefs uniform

Declaration

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

Interviewee signature

[Redacted Signature]



16-01-2025 17:38:15

Observations

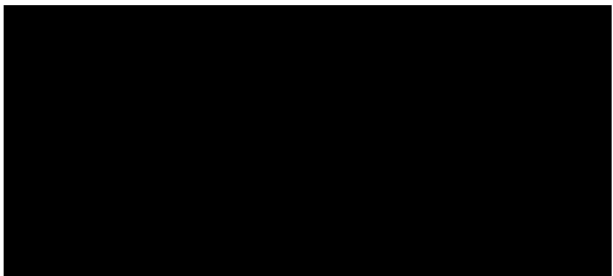
Observations

Chefs uniform and declared he works here for roughly one year

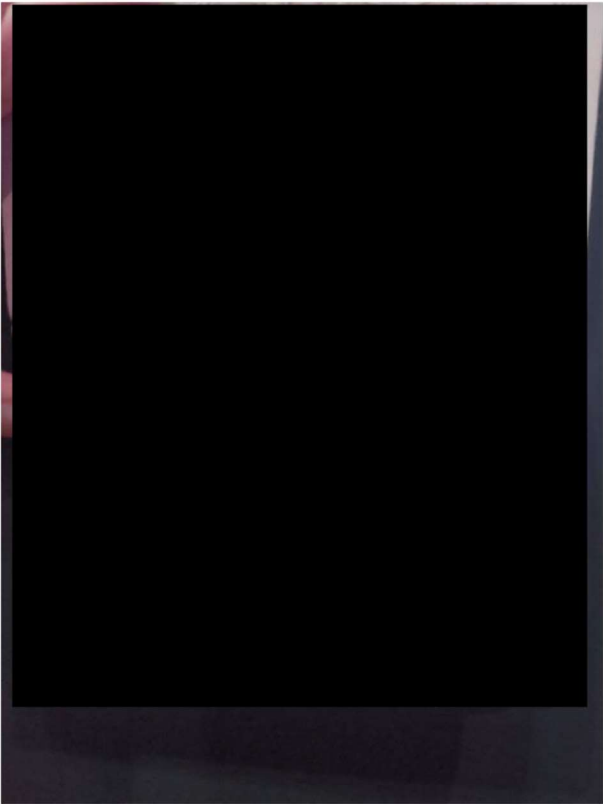
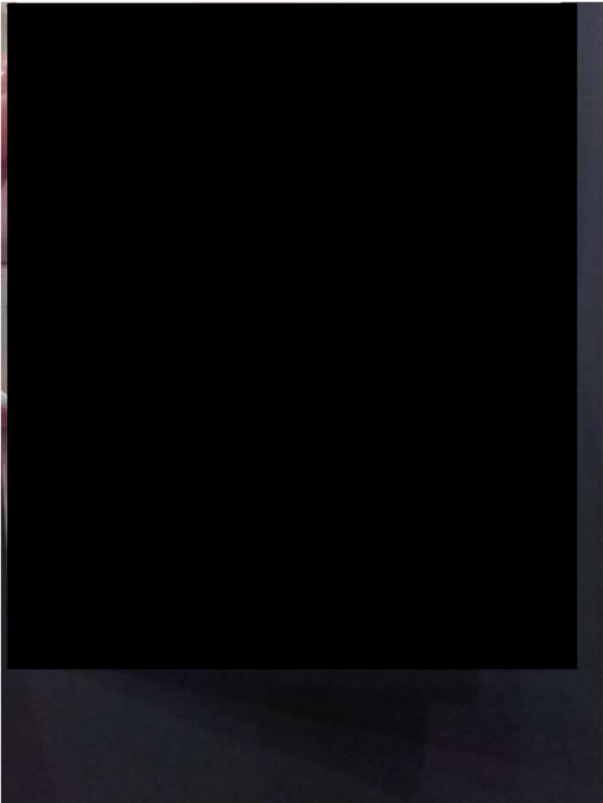
Do you suspect this person of illegal working?

Yes

Illegal Working - Employer	
Details	
Type of work	Visit
Visit reference	[REDACTED]
Created by	[REDACTED]
Prontold	[REDACTED] - Ethiopia
Subject CIDPID/CEPR	[REDACTED]
Employer	[REDACTED]
Subject DOB	[REDACTED]
Subject nationality	Ethiopia
Subject gender	Male
Time	17:26
Created at geolocation	<div> <div>Eastings</div> <div>593154</div> </div> <div> <div>Northing</div> <div>172893</div> </div>
Creation date	16-01-2025 17:26:28
Language of Interview	
What language is the interview carried out in?	English
Interpreter used?	No
Employer Details	
What is the name of the business?	Mems Meze
If the business is owned by a company what is the name of the company?	Meze LTD Mems
What is your position here?	Manager of Restaurant
How much do you pay for someone to work in your shop?	I do not know
Do you have a rota for staff working at the restaurant?	No, they all know what they are doing.
How do staff know when to work?	They just know.
Do you tell people what to do?	The chef tells him what do.
How many hours does [REDACTED] work?	A couple of hours a day on Thutoday, Friday, and Saturday.
How long has [REDACTED] worked here?	A couple of weeks and goes to college.
How does he get paid?	I don't know.

Does the owner check to make sure [REDACTED] could work in the business?	I don't know if checks have been.
How does he get paid?	I don't know how he gets paid
Who is the owner?	[REDACTED], he has owned the business for 3 years.
Is there a rota for staff?	No there isn't.
Have you understood all the questions I have you today?	Yes
Do you have any questions for me?	No.
Declaration by Employer	
I confirm that I have understood all the questions and that the details are true and correct.	
Signed by [REDACTED]	 16-01-2025 17:46:31
Observations	
Observations	

Freetext	
Details	
Type of work	Visit
Visit reference	
Created by	
Address	Mem's Meze Restaurant, Halfway Rd, Minster on Sea, Sheerness , Kent, ME12 3AU (Visit Address)
Subject CIDPID/CEPR	
Subject name	
Subject DOB	
Subject nationality	Uzbekistan
Subject gender	Male
Time	17:48
Created at geolocation	Easting 593152 Northing 172906
Creation date	16-01-2025 17:48:38
Is this entry related to a Critical Incident?	No
Entry	
Title	Passport
Text	National passport and expired visa

Photographs	
passport	
expired visa	

Illegal Working - Employee	
Details	
Type of work	Visit
Visit reference	██████████
Created by	██████████
Prontold	████████████████████ - Uzbekistan
Subject CIDPID/CEPR	██████████
Subject name	██████████████
Subject DOB	██████████
Subject nationality	Uzbekistan
Subject gender	Male
Time	17:25
Created at geolocation	<div> <div>Easting</div> <div>593159</div> </div> <div> <div>Northing</div> <div>172896</div> </div>
Creation date	16-01-2025 17:24:59
Language of Interview	
What language is the interview carried out in?	Uzbek
Interpreter used?	Yes
Details of interpreter	Same as encounter
Does the individual understand the interpreter?	Yes
Obligation	
How long have you been working at this business?	Not long, around 3 months, i help in the evenings
What days/ hours do you work each week?	2 or 3 days a week for 3 or 4 hours from 6-10pm
What is your job role/ what are your duties?	Im the assistant chef
Do you work the same hours/ days every week?	Yes
Control	
Who gave you this job (name and role in business)?	I asked for the job, i just turned up and asked if there were any jobs. The owner gave me the job. ██████████ is his name.

Who tells you what days/ hours to work?	The owner
Who tells you what tasks/ duties to do each day?	The owner
Remuneration	
How are you paid (money, accommodation, food)?	Only a little Cash in hand, i get to eat the restaurant food for free and i live upstairs for free, i dont pay rent
who provided your uniform	The owner
If money, how much and how do you receive it?	£250-300 per week
Who pays you?	The owner
Do you pay income tax or have a National Insurance number?	No
Pre-employment Checks	
What name does the employer know you as?	██████
does the owner know you are not allowed to work in the uk	No, i just told him i was allowed and he believed me
Did the employer check your right to work or immigration status before they offered you the job?	No
Did you show documents or share a code with the employer to prove your right to work before being offered the job? If so, what did you show and were they originals?	No

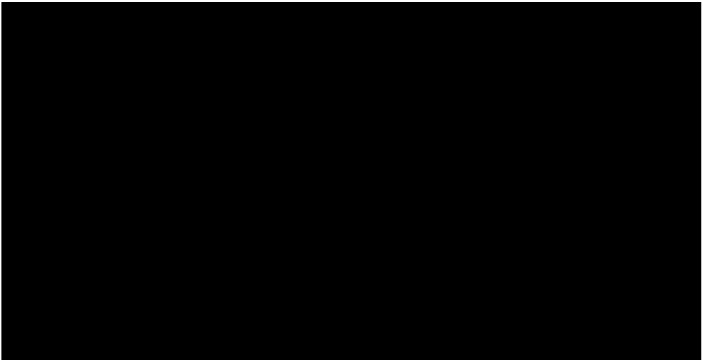
Additional Questions	
No details provided.	
Photographs	
No photographs.	
Declaration	
I confirm that I have understood all the questions and that the details are true and correct.	
Interviewee signature ([REDACTED]) [REDACTED]	 16-01-2025 17:39:51
Observations	
Observations	Individual was working in the kitchen on immigration arrival and is wearing a chefs uniform. Individual has admitted to illegal working
Do you suspect this person of illegal working?	Yes


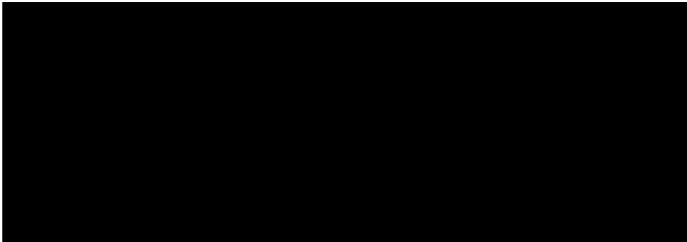

Photo 1



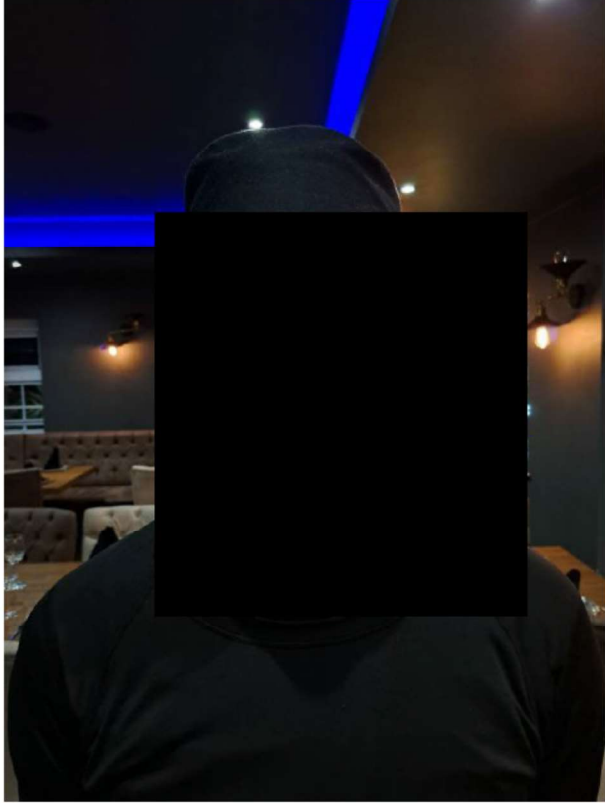

Caption

photo

Illegal Working - Employer		
Details		
Type of work	Visit	
Visit reference	[REDACTED]	
Created by	[REDACTED]	
Prontold	[REDACTED] Uzbekistan	
Subject CIDPID/CEPR	[REDACTED]	
Employer	[REDACTED]	
Subject DOB	[REDACTED]	
Subject nationality	Uzbekistan	
Subject gender	Male	
Time	17:47	
Created at geolocation	<div> Easting 593154 </div> <div> Northing 172893 </div>	
Creation date	16-01-2025 17:47:09	
Language of Interview		
What language is the interview carried out in?	English	
Interpreter used?	No	
Employer Details		
What is the name of the business?	EDT Meze Ltd	
What is your position here?	I am the restaurant manager	
Do you have a rota for staff working at the restaurant?	No	
How do you know [REDACTED] ?	He has worked he a couple of work?	
How do staff know when to work?	They just get told to work and know	
Do you tell people what to do?	No, the kitchen manager tells them.	
Do you tell people what to do?	No, I don't	
Who is the owner?	[REDACTED]	
How does [REDACTED] get paid?	I don't know.	
Does the owner complete right to work checks?	I don't know.	
How many days does [REDACTED] work?	He works a couple of days a week, Thursday, Friday, and Saturday.	
How does he get paid?	I don't know	

Declaration by Employer	
I confirm that I have understood all the questions and that the details are true and correct.	
Signed by 	 16-01-2025 17:57:21
Observations	
Observations	
Management Checks Complete	
Date management checks complete	03-02-2025 10:37:34
Reviewer(s)	

Encounter	
Details	
Type of work	Visit
Visit reference	[REDACTED]
Created by	[REDACTED]
Prontold	[REDACTED] - Uzbekistan
Time	17:02
Created at geolocation	<div>Easting 593152</div> <div>Northing 172904</div>
Creation date	16-01-2025 17:02:14
Chosen Identity	
Identity source/type	Declared
Name	[REDACTED]
DOB	[REDACTED]
Gender	Male
Nationality	Uzbekistan
Languages	
Languages spoken	English
Interpreter used?	No
Encounter	
Encountering officer	[REDACTED] - Officer
Is this encounter related to a Small Boats event?	No
Is this person the subject of the visit?	No
Do you suspect an immigration offence?	Yes
Why do you suspect the person of an immigration offence?	subject encountered working dressed in chefs clothing. encountered in kitchen.
Where was the person located?	Kitchen
Declared immigration status	Asylum
How and when did the subject last enter the UK?	
CIDPID/CEPR	[REDACTED]
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 Atlas</p> <p>Result of checks Asylum applicant. No right to work.</p> <p>Does the person have an open absconder status on Atlas Person Alerts? No</p> <p>Status returned by system checks</p>
Photo of Subject	
Do you want to take a photograph of the subject?	Yes
Powers used	Paragraph 18(2) Schedule 2 Immigration Act 1971
Photo of subject	 

Identity Documentation
No documentation provided.
Notes
No notes entered.

Illegal Working - Employee	
Details	
Type of work	Visit
Visit reference	[REDACTED]
Created by	[REDACTED]
Prontold	[REDACTED] - Uzbekistan
Subject CIDPID/CEPR	[REDACTED]
Subject name	[REDACTED]
Subject DOB	[REDACTED]
Subject nationality	Uzbekistan
Subject gender	Male
Time	17:16
Created at geolocation	<div> <div>Easting</div> <div>593152</div> </div> <div> <div>Northing</div> <div>172905</div> </div>
Creation date	16-01-2025 17:16:38
Language of Interview	
What language is the interview carried out in?	English
Interpreter used?	No
Obligation	
How long have you been working at this business?	Since January 7th 2024
What is your job role/ what are your duties?	I help my brother by preparing the restaurant food. Im just learning.
What days/ hours do you work each week?	Average of 4 hours per day 4 days per week
Do you work the same hours/ days every week?	Yes
what is the name business you worked at	Mems restaurant
Control	
Who gave you this job (name and role in business)?	[REDACTED]
What does [REDACTED] do here	Head chef.

Who tells you what days/ hours to work?	██████
Who tells you what tasks/ duties to do each day?	██████
Remuneration	
how do you support yourself here in the UK	██████
If money, how much and how do you receive it?	I dont get paid money. ██████ gives me accommodation, supports me with all my food and clothes in return for my help.
do you receive asylum support money also	No
Pre-employment Checks	
What name does the employer know you as?	██████
Did the employer check your right to work or immigration status before they offered you the job?	No
Did you show documents or share a code with the employer to prove your right to work before being offered the job? If so, what did you show and were they originals?	No
Does your employer know you're not allowed to work in the UK?	Yes
Additional Questions	
do you understand that by being here and helping prepare food in the kitchen and by doing activities under the instruction of ██████ in return for accommodation, clothing and all living expenses that you are effectively working at Mems Meze restaurant	Yes but i am learning here. If you say so.

Photographs

No photographs.

Declaration

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

Interviewee signature

[REDACTED]

[REDACTED]



16-01-2025 17:34:43

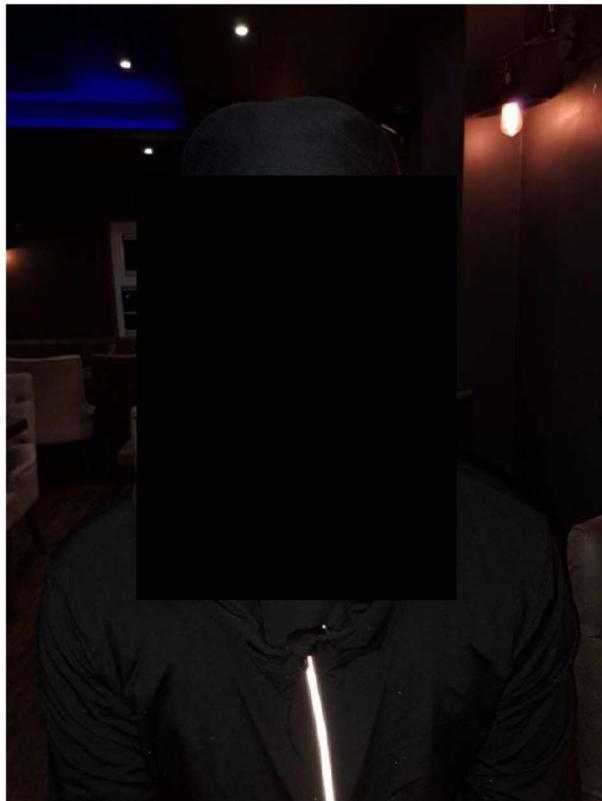
Observations

Observations

Do you suspect this person of illegal working?

Yes

Photo 1



	Caption	
--	---------	--