



Home Office

Premises Licence Review

Runcorn Kebab House
70 High Street
Runcorn
Cheshire
WA7 1JH

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Case Summary

On 01 February 2025, the North West ICE team visited Runcorn Kebab House, 70 High Street, Runcorn, Cheshire, WA7 1JH, after intelligence was received that the business owner was employing illegal workers.

Entry to the premises was gained at approximately 21:02 hrs under Section 179 of the Licensing Act 2003.

The officers encountered one employee of which was identified as an immigration offender.

Licensed Premises History

The premises licence has been held by Mustafa Hassan Ahmed Omar Abdalla, since 29 September 2017. The premises licence number is LPNA1004.

Licensable activities authorised by the licence are provision of late-night refreshment.

The times the licence authorises the late-night refreshment (Outdoors) is: 11:00pm to 3:00am Monday to Sunday.

The company is registered on Companies House as Four Seasons Runcorn Limited and the registration number is 15656416. Companies House show that it was incorporated on 17 April 2024 and is currently active proposal to strike off. Rami Hassan SHAWQI is registered as the company director and secretary and was appointed on 17 April 2024.

Civil Penalty

A civil penalty of £45,000 was issued to Four Seasons Runcorn Limited on 10 March 2025 in relation to the illegal working. No objections were received, and appeal rights were exhausted on 08 April 2025. The penalty remains outstanding in full and has been referred to a third-party debt collection agency.

Enforcement Visit: 01 February 2025

Entry was gained to the premises at 21:02. Upon entering, immigration officers encountered the following individual,

██████████

██████████ was encountered by officers behind the counter and was the only person in the shop, upon officers' arrival.

An illegal working interview was conducted with the assistance of an interpreter. ██████████ stated he started work at 3pm and was unsure what time he will finish. ██████████ claimed he was only working that day as his friend had gone to London and Rami SHAWQI (company director) asked him to cover. He stated SHAWQI had helped him in the past, so he is helping him in return. ██████████ stated he hadn't worked at the premises before as he is not allowed to work. ██████████ confirmed that SHAWQI would provide him with food and cigarettes in return for his work. He also stated SHAWQI was aware that he did not hold the right to work. When officers asked if SHAWQI had conducted any right to work checks before asking him to work at the premises he replied 'No he didn't he was in a hurry'.



██████████ encountered at the premises wearing an apron.

Home Office checks showed ██████████ entered the UK clandestinely in January 2015. ██████████ claim for protection was refused in May 2015. He submitted multiple further submissions and appeals since, all of which have been dismissed or rejected. At the time of the enforcement visit ██████████ had an ongoing further submission in relation to his protection claim. His bail conditions did not permit him the right to work in the UK

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 was one illegal worker encountered at the premises, and he has an outstanding claim for protection. Claimants are 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 did not hold the right to work.



Example of ARC card

■ was the only person working at the premises and was in charge of the shop whilst SHAWQI was away. His claim that he was asked to cover at short notice lacks credibility as he would have done so without any training, knowledge or experience of running the kitchen and front of house. It is considered that SHAWQI was aware that ■ is unable to work in the UK but still employed him and left him in the premises to run the business alone.

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 £45,000 civil penalty to Four Seasons Runcorn Limited on 10 March 2025 for employing one individual with no right to work. No objection or appeal has been received as yet. 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 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 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 licence 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. However, this has not been done as the Licensing Act 2003 prohibits the employment of illegal workers as immigration compliance is a condition of the licence.

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.

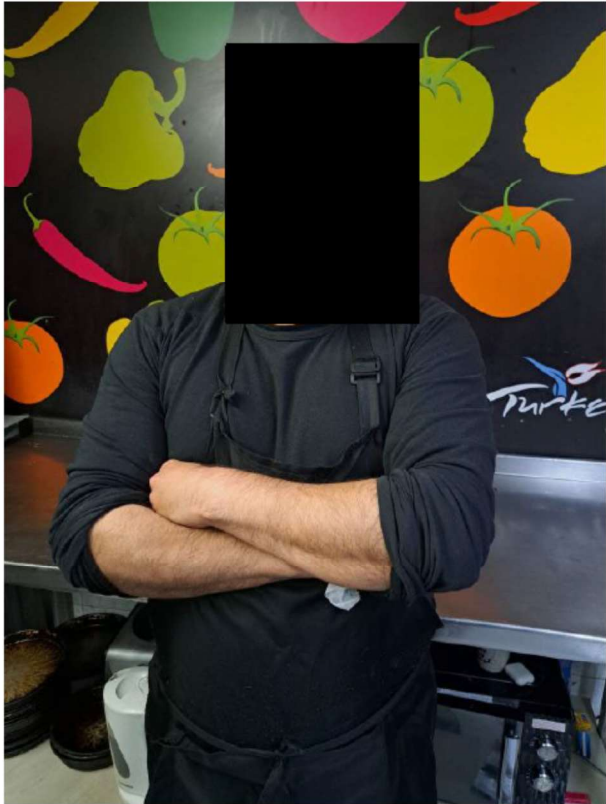
This submission and appended documents provide the licensing subcommittee with background arguments and information pertinent to that contention. These provide the sub-committee with a sound and defensible rationale as to why it should **revoke** the licence.

Appendix – Supporting Evidence


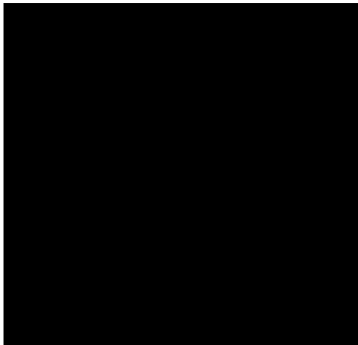
Encounter - [REDACTED])
Illegal Working - Employee [REDACTED])

Encounter	
Details	
Type of work	Visit
Visit reference	██████████
Created by	██████████
Prontold	██████████ - ██████████ - Egypt
Time	21:11
Created at geolocation	<div>Easting 351100</div> <div>Northing 382942</div>
Creation date	01-02-2025 21:11:29
Chosen Identity	
Identity source/type	Declared
Name	██████████
DOB	██████████
Gender	Male
Nationality	Egypt
Country of birth	
Place of birth	
Languages	
Languages spoken	Egyptian Arabic
Interpreter used?	Yes
Interpreter details	██████████
Does the individual understand the interpreter?	Yes
Encounter	
Encountering officer	██████████ - Officer
Is this encounter related to a Small Boats event?	No
Is this person the subject of the visit?	No
Prior to Schedule 2 examination, did you suspect an Immigration Offence?	Yes
Why do you suspect the person of an immigration offence?	Intelligence suggests illegal workers are present at this business. Therefore individual checked to establish identity and immigration status.
Where was the person located?	Behind the counter

Declared immigration status	
How and when did the subject last enter the UK?	
CIDPID/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 Outstanding asylum. Further subs</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

<p>Photo of subject</p>	 <p>Egypt</p>
<p>Identity Documentation</p>	
<p>No documentation provided.</p>	
<p>Notes</p>	
<p>No notes entered.</p>	
<p>Management Checks Complete</p>	
<p>Date management checks complete</p>	<p>05-03-2025 14:39:49</p>
<p>Reviewer(s)</p>	<p>[REDACTED];</p>

Illegal Working - Employee	
Details	
Type of work	Visit
Visit reference	[REDACTED]
Created by	[REDACTED]
Prontold	[REDACTED] - Egypt
Subject CIDPID/CEPR	[REDACTED]
Subject name	[REDACTED]
Subject DOB	[REDACTED]
Subject gender	Male
Subject nationality	Egypt
Time	21:16
Created at geolocation	<div> <div>Easting</div> <div>351100</div> </div> <div> <div>Northing</div> <div>382943</div> </div>
Creation date	01-02-2025 21:16:24
Language of Interview	
What language is the interview carried out in?	Egyptian Arabic
Interpreter used?	Yes
Details of interpreter	See encounter
Does the individual understand the interpreter?	Yes
Obligation	
How long have you been working at this business?	I only work today because my friend has gone to London
What is your job role/ what are your duties?	I work doing pizza but I'm not very good
Are you taking money from customers?	Yes just for today
Have you worked here before today?	No because I have no papers to work
How do you know how to do the job?	I used to help some people
Who is the owner of the shop?	Ramy
What time did you arrive at this business today?	15.00
What time will you be leaving today?	Not sure

Does the shop have a closing time?	I don't know I don't work here.
Control	
Who gave you this job?	Ramy
Who tells you what days/ hours to work?	Ramy asked me to cover today
So you expect to be paid for today?	He has helped me in the past, so I will help him.
Remuneration	
How are you paid (money, accommodation, food)?	Food and anything like cigarettes
Pre-employment Checks	
Does Ramy know you have no right to work in the UK?	Yes he knows that's why I'm not working.
When is Ramy expected back to run his business?	I expect him back tomorrow
Are you responsible for locking the shop tonight?	Yes I have the key
Did Ramy do any right to work checks on you before asking you to cover the shop?	No he didn't he was in a hurry
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 )	 01-02-2025 21:38:54

Observations	
Observations	Male is the only subject in the shop on our arrival.
Do you suspect this person of illegal working?	Yes
Management Checks Complete	
Date management checks complete	05-03-2025 14:39:52
Reviewer(s)	