

Representation Licensing Tonys Food & Wine 149 High Street, Staines-upon-Thames TW18 4PA

The Premises licence holder and DPS is Praveen Vinayagamoorthy – this has been the case since 21 November 2024.

Licensing, Trading Standards and Surrey Police visited the premises on 16 April 2025. A full licensing inspection was carried out and there were several licensing breaches. An email was sent (on 15 May 2025) to the licence holder, and this is attached at **Appendix A**. In summary:

- There was no Section 57 notice advising who the premises licence is under the control of.
- CCTV monitor was turned off. Whilst this was not a licensing breach it is reasonable to expect that it works when they have it and it shows promotion of the licensing objectives.
- No age verification policy.
- Premises floor plan had changed.
- Fire escape was blocked
- Illegal vapes and cigarettes which were seized by Trading Standards.

In response to the letter, the licence holder appointed a licensing agent to submit a minor variation application to the plan. In addition, various photographs were sent. The photos showed that:

- A challenge 25 poster was displayed at the front of the premises.
- Photo of refusal book
- Staff training – which stated ‘till work’.

The Licensing Authority visited the premises on 30 October 2025. At the visit there was various licensing issues identified at the time and a copy of our email correspondence is attached at **Appendix B**. In summary:

- Summary of premises licence was not on display
- Refusals were not comprehensive enough
- No authorisation for staff to sell alcohol in his absence.
- No staff training
- No CCTV warning signs

It was also concerning to note that the fire escape was blocked. There was also a couple of other issues in respect of the flooring was rotting and the cigarettes were not covered up. In relation to this we notified the relevant authorities.

Trading Standards have submitted a review application in respect of this premises licence. This is following multiple breaches of legislation and on the 27 August 2025 the premises sold alcohol to a child during an underage sales test purchased operation. When Trading Standards and Police inspected the same day illicit tobacco was discovered hidden within the premises.

The Section 182 Guidance states that there is ‘certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously’.

It goes on to state that ‘for the sale or storage of smuggled tobacco and alcohol’. ¹ The guidance goes on to state at 11.28 that “it is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence – even in the first instance – should be seriously considered.”

The Section 182 Guidance states at 2.29 “the Government believes that it is completely unacceptable to sell alcohol to children’.

The Licensing Authority’s Statement of Licensing Policy states²:

16.57 The Licensing Authority is committed to protecting children from harm and supports the programme of **underage** test purchases arranged by the Surrey Trading Standards Service, the Licensing Team and Police. Where **underage** sales are found, the Licensing Authority supports the appropriate and proportionate use of warnings, fixed penalty notices, reviews and prosecution as a means of promoting the licensing objectives and enforcing the Licensing Act proportionately.

16.58 In keeping with the s.182 Guidance the Licensing Sub-Committee will treat **underage** sales as serious criminal activity and will give consideration to the suspension or revocation of a licence if a review is brought in respect of **underage** sales.

All Licence Holders and Designated Premises Supervisor must promote the licensing objectives. Due to the issues detailed in this document and the review application from Trading Standards the Licensing Authority believe that the Licensing Objectives are not being adhered to- specifically, the prevention of crime and disorder and the protection of children from harm.

The Licensing Authority recommends in line with the guidance that the premises licence should be revoked.

Lucy Catlyn – Principal Licensing Officer
Stuart Bruce-Reid – Licensing Enforcement Officer

¹ Section 11.27 Section 128 - [Revised guidance issued under section 182 of the Licensing Act 2003 \(February 2025\) \(accessible version\) - GOV.UK](#)

² [Licensing Policy 2024-2029](#)

Appendix A: Letter to Premises 14 May 2025

Praveen Vinayagamoorthy
Via email
everydayzsuperstore@gmail.com

Contact: Stuart Bruce-Reid
Service: Environmental Health
Direct line: 01784 444213
Fax: 01784 446437
E-mail: s.bruce-reid@spelthorne.gov.uk
Our ref: 24/00699/LAPRE

Date: 14 May 2025

Dear Praveen Vinayagamoorthy

Licensing Act 2003

Tonys Food And Wine Tonys Food And Wine 149 High Street, Staines, TW18 4PA

I write further to a visit carried out to the above premises on 16 April 2025 with Stuart Bruce-Reid, Licensing Enforcement Officer and Jacquie Clark, Surrey Police Licensing Officer and Surrey Trading Standards officer Catriona Macbeth and Surrey Police. In attendance at the premises was Sabapathipillai Yogeswari serving.

During the visit a full premises licence inspection was carried out and there are a number of licensing breaches which I have outlined below that must be rectified:

Section 57 Notice

Under the Licensing Act 2003, you are required to display a notice advertising who the premises licence is under the control of.

This was missing.

CCTV

Your shop has CCTV fitted with cameras clearly visible and a monitor to display images was also present. Even though the monitor was turned off there was no way of checking that the CCTV was working. Any member of the public would see these and expect them to be working.

Unless you can prove otherwise, I will take it that the CCTV was operational and as such you should have CCTV warning signs clearly displayed.

Even though your licence does not stipulate that you must have CCTV, it is all part of complying with the licencing objectives and I would strongly recommend that this remains in place and working.

Age verification policy

Under the mandatory conditions you must have a proof of age policy. You must make sure that there is signage up to inform customers that you are checking the age of persons buying alcohol.

Fire exit and fire check door

Your plan shows that there should be a fire check door between the Staff Area and the shop floor, this was missing.

There were no fire exit signs to the rear of the shop and when I went out into the storeroom and then outside the rear of this area as you would to escape a fire, the end of this outside area was blocked and not usable as a fire escape.

Illegal tobacco and vapes

In the kitchen area we found numerous illegal vapes and cigarettes, these were seized by Surrey Trading Standards Officer.

This will be recorded by licensing and may be used as evidence if we have any concerns and enforcement action is to be taken.

Your licence has no other conditions apart from the mandatory ones, but what is expected of licensed premises have changed since your licence was issued. What is considered best practice and your due diligence to comply with the licencing objectives is still your responsibility and just saying 'it's not on my licence' is no defence.

Below is a list of procedures I would ask you adopt, so in the event of any incident you can prove you took all reasonable steps to prevent it.

- The adoption of Challenge 25.
- A refusal book, showing date and time and reason for refusal. You must ensure that your staff are trained on what is expected of them for refusals and that they are required to fill out this book.
- An incident log, showing date and time and what the incident was. You should be able to demonstrate that your staff have had training and this is regularly refreshed.
- A training record for yourself and staff. You should ensure both you and the member of staff sign to say they have received the training.
- CCTV recording for 31 days and downloads to be made available to any relevant authority.

Premises Plan

The area which was originally shown as staff area is now used to sell alcohol, this is out of sight of the counter, there is a camera covering this area, but is it working. Anyone could go into this area and drink from the displayed alcohol and the staff would not be aware of this. This is an area of great concern as underage or drunk person could consume alcohol here. This must be addressed before submitting the minor variation to change the plan.

I have attached the guidance for plans at the end of this document. Minor Variations can be applied for online here: [Premise Licences - Spelthorne Borough Council](#). There is a cost of £89 and the application will need to be advertised at the premises as well. You can download a notice to display using the above link.

As your plan does not reflect how the current premises is you are operating otherwise than accordance with your premises licence and this is an offence under section 136 Licensing Act 2003.

You must ensure that your minor variation is submitted by 21 May 2025 at the very latest. You may wish to consider appointing a licensing agent as we are unable to complete applications.

Yours sincerely

Stuart Bruce-Reid

CC
Surrey Police
Surrey Fire and rescue
Trading Standards

2.9 Plans

The plan of the premises should be included with the application, and copied to the responsible authorities as part of the application. The plan of the premises needs to meet the requirements set out in the act and the Licensing Act 2003 (Premises licences and club premises certificates) Regulations 2005, SI 2005/42 to show the following:

1. the extent of the boundary of the building, if relevant, and any external and internal walls of the building and, if different, the perimeter of the premises
2. the location of points of access to and egress from the premises
3. if different from (2), the location of escape routes from the premises
4. in a case where the premises is used for more than one existing licensable activity, the area within the premises used for each activity
5. fixed structures (including furniture) or similar objects temporarily in a fixed location (but not furniture) which may impact on the ability of individuals on the premises to use exits or escape routes without impediment
6. in a case where the premises includes a stage or raised area, the location and height of each stage or area relative to the floor
7. in a case where the premises includes any steps, stairs, elevators or lifts, the location of the steps, stairs, elevators or lifts
8. in a case where the premises includes any room or rooms containing public conveniences, the location of the room or rooms
9. the location and type of any fire safety and any other safety equipment, including if applicable, marine safety equipment
10. the location of a kitchen, if any, on the premises

Appendix B –

Dear Praveen Vinayagamoorthy

We visited your premises on 30 October 2025 to put on display the review posters following a review application by Trading Standards. At the time we visited the person working was Ms. Y Sabapathipilai.

We noticed that the summary of the premises licence was not on display at the time. Under the Licensing Act 2003 you are required to display the Summary of the Premises licence.

I noted that you were doing refusals, however they were not comprehensive enough. The logging of refusals helps you to show due diligence, should you or a member of your staff inadvertently make an illegal sale. It is important to record as many details about the individual you refused as possible. It also helps you to perhaps establish a pattern. The logging of refusals should include:

- Date
- Time
- Product
- Reason for refusal/description of incident
- Description of person/action taken
- Name and signature
- Date checked and signed by DPS.

We also could not see anything where you have authorised your staff to sell alcohol in your absence. It is recommended that the designated premises supervisor authorises staff in an authorisation form to sell and serve alcohol in his/her absence. We suggest that this be kept at the premises to confirm that individuals who are not personal licence holders are authorised to sell alcohol in the absence of the designated premises supervisor. I have attached a copy of a form that you can complete and keep on site.

There was no staff training available. It is recommended that you keep written records of staff training and ensure they are regularly trained.

You had no CCTV warning signs - you must display signage to advise people they are being recorded. You should also ensure your CCTV is registered with the Information Commissioners Office.

I look forward to hearing from you by Monday 24 November with:

- Photo of CCTV warning signs on display
- Photo of summary on display
- Photos of your written authorisation for your staff to sell alcohol in your absence
- Staff training records.
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We were also concerned to note other issues, which we have copied other partner agencies in for their follow up:

- There were 4 bin bags covering the fire exit at the back. It is not acceptable to cover up Fire Escapes as these are required to be clear for escape purposes.
- The cigarettes were not covered up. Cigarettes in the UK are meant to be legally covered up in all shops out of public view. The enforcing authority for this would be trading standards
- The shop floor was 'spongy' and soaking wet underneath the floor covering. This is suggestive of a leak or other issue with the flooring which appears to be rotting. Underneath the rubber mat water was coming out from underneath our feet (Photos attached). I would suggest this is a public safety issue.

Kind regards

Lucy Catlyn