



**Immigration  
Enforcement**

## **Immigration representation in respect of an application for a premises licence**

On behalf of the Secretary of State, Immigration Enforcement makes representations for the following premises licence application, relating to the crime prevention objective, including the prevention of illegal working and immigration crime in licensed premises.

IE wishes to make representations on an application for a new premises licence.

<b>Licensing authority application reference number</b>	
<b>Immigration Enforcement reference number</b>	
<b>Applicant name</b>	Bando Bar Staines Limited
<b>Address of premises</b>	The Rose Bar 21B Clarence Street Staines TW18 4SU
<i>Immigration Enforcement Contact 1</i>	
<b>Name</b>	<b>Immigration Enforcement Licensing Compliance Team</b>
<b>Address</b>	
<b>Telephone no.</b>	
<b>Email address</b>	
<i>Immigration Enforcement Contact 2 (If applicable)</i>	
<b>Name</b>	
<b>Telephone no.</b>	
<b>Email address</b>	



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Representations are being made for the following reasons:

Immigration Enforcement formally object to the application for a premises licence in relation to The Rose Bar, 21B Clarence Street, Staines, TW18 4SU on the following grounds:

### **History of Non-Compliance:**

On 06 February 2025, Immigration Officers from the South Central Immigration Compliance and Enforcement (ICE) Team conducted a visit to the premises following intelligence indicating the employment of illegal workers. At the time, the premises was trading as the Bando Bar. Officers gained entry under fully informed consent. During the visit, one individual was identified as working illegally.

\_\_\_\_\_ was encountered in the kitchen area of the premises, which is restricted to staff only. During interviewing, \_\_\_\_\_ stated that he had been employed at the premises for approximately three months, working Wednesday to Saturday from 15:00 to 23:00. He explained that his duties consisted of working in the kitchen, specifically cooking wings and burgers.

\_\_\_\_\_ reported that he is remunerated through free food and by having his rent of £400 per month paid on his behalf. \_\_\_\_\_ claimed that the employer had carried out right to work and immigration checks at the time of his employment by inspecting his BRP card.

Home Office checks confirmed that \_\_\_\_\_ entered the UK on a student visa valid from September 2022 until January 2024. This visa permitted him to work up to 20 hours per week during term time. \_\_\_\_\_ did not depart the UK upon expiry of his visa, nor did he submit any further applications to regularise his immigration status. As a result, he became an overstayer, and his right to work ended on the date his visa expired.

### **Employer Interview – Bobby DHUNAY**

An illegal working employer interview was conducted with DHUNAY, during which consent was read back to him. During the interview, DHUNAY stated that he had been helping out at the premises for just under a year, primarily assisting in the kitchen. He explained that ! \_\_\_\_\_ works on an ad-hoc basis, depending on



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when he is needed, and was unable to provide specific working hours or days. He added that [redacted] is remunerated with free food.

DHUNAY confirmed that he is responsible for offering the employment and allocating [redacted] working days and hours. He also stated that he does not keep employee records "as such." DHUNAY admitted that HMRC had not been informed of [redacted] employment and that he had not checked [redacted] right to work or immigration status, nor requested a share code. He claimed he was unaware that [redacted] did not hold a legal right to work in the UK. This contradicts his later statement that employee checks are carried out approximately every six months.

There are strong grounds to object to DHUNAY applying for a licence due to his demonstrated disregard for employment and compliance obligations. During the interview, he admitted to employing an individual ([redacted]) for almost a year without conducting any right to work checks, without maintaining employee records, and without notifying HMRC. DHUNAY also accepted that he did not verify immigration status or obtain a share code, and he allowed the individual to work despite having no legal right to do so. DHUNAY's statement that he conducts employee checks every six months contradicts his earlier admissions, raising concerns about honesty and reliability. These factors collectively demonstrate poor management, a lack of due diligence, and an unwillingness to comply with legal requirements, all of which undermine his suitability to hold a licence.

### Civil Penalty

A [redacted] penalty was issued to **Bando Bar Staines Ltd** on 17 March 2025 in respect of 1 individual with no right to work. Bando Bar Staines Ltd objected to the penalty which was considered and on 24 April 2025 the penalty was maintained. The penalty was due for payment on 26 May 2025. No payments have been received; the penalty was referred to a third-party debt collection agency.

On 10 February 2021, **Bando Bar Staines Ltd** was first incorporated on Companies House with the company number 13192659. **BOBBY DHUNAY** was appointed as director on the same date and is showing as currently active.

It is also noted that Bando Bar Staines Ltd was previously registered as Vegan Pind Ltd. It is understood that a previous licence held by this company was revoked on 09 December 2022.

### Right to work checks and the prevention of crime and disorder

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.



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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 employer could have protected themselves and prevented crime and disorder by completing a straightforward right to work check. In this case the employer had not conducted the right to work checks. Should they have attempted these checks, they would have quickly and easily confirmed that [redacted] did not hold the relevant right to work.

All employers are dutybound by law to conduct these checks if they wish to avoid being penalised if found to have employed someone who is prohibited from working, 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.

The use of illegal labour provides an unfair competitive edge and deprives the UK economy of tax revenue. Illegal workers are often paid below the minimum wage (itself an offence) and National Insurance payments are not paid. A key draw for illegal immigration is work and low-skilled migrants that are increasingly vulnerable to exploitation by unlawful enterprises, finding themselves in sub-standard accommodation and toiling in poor working conditions for long hours.

Considering that an illegal worker has been found at the premises previously for which a civil penalty was issued and remains unpaid, coupled with the revocation of the licence in December 2022. The Home Office considers that allowing the application would prejudice the licensing objectives.

Date: ..... 16 March 2026.....