



Home Office

Premises Licence Review

Curry King

49 Fore Street

Heavitree

Exeter

Devon

EX1 2QN

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Case Summary

On 10 April 2025, the South Central Immigration Compliance Enforcement (ICE) team visited Curry King located at 49 Fore Street, Heavitree, Exeter, EX1 2QN. Entry was gained to the premises using Section 179 Licensing Act 2003.

Officers encountered two workers of which, one did not hold the right to work and the other was working in breach of conditions. Both workers were arrested.

Licensed Premises History

The premises licence number is **EXE – P00236** and was issued by Exeter City Council on 20 October 2020. The premises licence lists [REDACTED] and [REDACTED] as the premises licence holders. It also lists [REDACTED] as the designated premises supervisor (DPS) who holds a personal licence (licence number is EXE – 000889) which was issued by Exeter City Council.

The company registration number for Heavitree Spice Limited is **15318542**. Currently, Companies House shows that it is currently “Active – Active proposal to strike off”. It was incorporated on 30 November 2023 and listed [REDACTED] as the company director. However, [REDACTED] had resigned as director on 04 January 2025 and there is no active company director.

Civil Penalty

A £45,000 penalty was issued to Heavitree Spice Limited on 25 September 2025 in respect of 1 individual with no right to work. No objection to the penalty was received. The penalty was referred to a third-party debt collection company. The penalty is still unpaid and outstanding.

Enforcement Visit dated: 10 April 2025

Entry was gained to the premises at 21:23hrs under Section 179 of the Licensing Act 2003. Upon entering, Immigration Officers encountered the following individuals:

████████████████████ – Worker

████████████████████ was encountered in the kitchen of the premises.

During the illegal working interview, ██████ confirmed that he had been working at Curry King for two to three weeks as the head chef. He works six days a week and for six hours each day, and receives £50 cash in hand from the owner, in exchange for such. ██████ confirmed that the owner, ██████ had given him the job and oversees allocating his schedule and tasks. With regards to right to work checks, ██████ confirmed that they were not conducted prior to commencing work at the premises as he did not show any documents.

Home Office checks showed that ██████ arrived at the country clandestinely and has lived in the United Kingdom since 2011. He made an application for leave to remain in April 2011 which was refused. He also applied for further leave to remain December 2024, which was ongoing during the enforcement visit. ██████ never held the right to work in the United Kingdom.

████████████████████ – Worker

Upon arriving at the premises and after officers had made their presence known, ██████ displayed an adverse reaction by running and exiting the premises.

During the illegal working interview, ██████ denied working at the premises, stating he was only there to eat food, which he pays for. He denied cooking or carrying out any duties and said he was simply getting his bag when officers saw him moving away. When asked why his phone was found in the kitchen, ██████ said he had been talking to the chef. ██████ denied ever being asked to help by the chef or manager. When informed that the chef claimed it was ██████ first day working, ██████ denied this and said he did not know why the chef would make that statement.

Home Office checks show that ██████ entered the country through a visit visa which was valid from June 2024 until December 2024. ██████ made a claim for protection September 2024, which was refused in December 2025. However, he had no outstanding applications or appeals during the enforcement visit. ██████ was working in breach of his bail conditions which did not permit him the right to work.

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.

During the enforcement visit on 10 April 2025, officers encountered two individuals who were found working at the premises, who either did not hold the right to work or were working in breach of conditions.

The first worker, [REDACTED], confirmed he had been employed as the head chef for two to three weeks, working six days per week for six hours each day and receiving £50 cash in hand, paid directly by the owner [REDACTED]. He also confirmed that no right to work checks were carried out, and he was not asked to show any documents before starting work. Home Office checks showed that [REDACTED] arrived clandestinely, had longstanding unresolved immigration issues, and had never held the right to work in the UK.

The second individual, [REDACTED], displayed an adverse reaction to officers' presence by running and attempting to leave the premises. Although he denied working, he was observed in the kitchen area, and his phone was left in the kitchen. Officers informed [REDACTED] that the chef had said it was his first day working, but [REDACTED] denied this. Home Office checks confirmed he had entered the UK on a visit visa valid until December 2024 and that he had no outstanding claims or applications and was working in breach of his bail conditions, which did not permit employment.

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.

Furthermore, the fact that workers were paid—in cash and off the books—creates opportunities for income tax and National Insurance evasion, providing an unfair competitive advantage over compliant businesses. It is also consistent with labour exploitation indicators identified in other enforcement cases.

A civil penalty referral notice was served based on the findings of officers. This referral was considered by the Civil Penalty Compliance Team.

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 Heavitree Spice Limited on 25 September 2025 for employing one individual with no right to work. No objections have been received and no appeals have been lodged. 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 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.

Curry King, under the control of [REDACTED] and [REDACTED], has been found employing two illegal workers. 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

[Redacted]

[Redacted]

[Redacted]

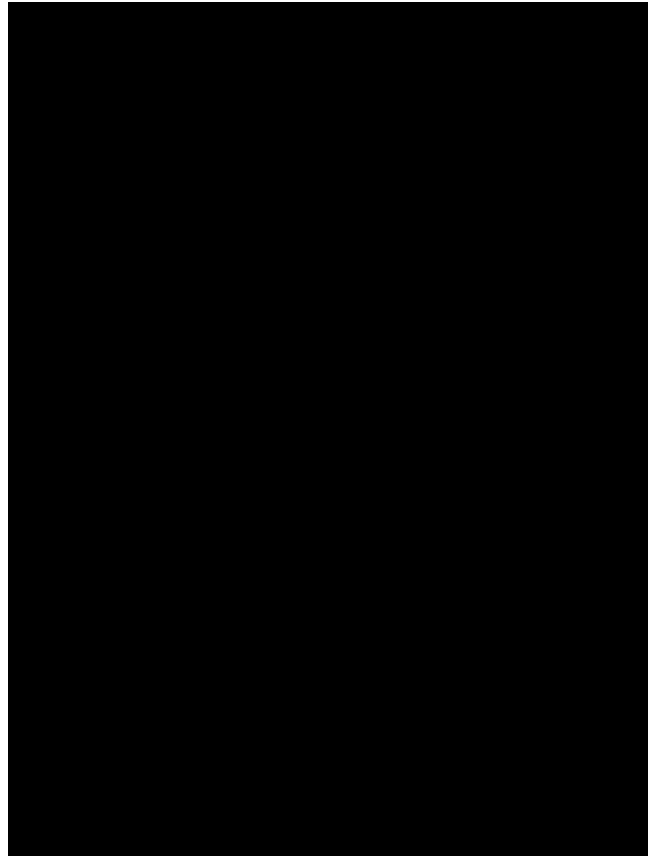
[Redacted]

[Redacted]

Encounter	
Details	
Type of work	Visit
Visit reference	██████████
Created by	██████████
ProntoID	██
Created at geolocation	Easting 293812
	Northing 92407
Time	21:32
Creation date	10-04-2025 21:41:10
Person Check Results	
Person Check Result	Given names ██
	Family name ██████
	Date of birth ██████████
	Gender Male
	Nationality BGD Bangladesh
Main Identity	
Identity source/type	Biographic
Full name	██
Date of birth	██████████
Gender	Male
Nationality	Bangladesh
Country of birth	Bangladesh
Place of birth	
Languages	
Languages spoken	English
Interpreter used?	No
Encounter	
Encountering 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?	As per Intel suggested illegal workers present at the restaurant . He as seen in the kitchen
Where was the person located?	Kitchen
Declared immigration status	ASYLUM
How and when did the subject last enter the UK?	Approximately 20 years ago from France in 2004, concealed in the back of lorry.
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	Systems checked Result of checks Does the person have an open absconder status on Atlas Person Alerts? No Status returned by system checks
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



Photo

Identity Documentation

No documentation provided.

Notes

No notes entered.

Illegal Working - Employee

Details

Type of work	Visit				
Visit reference	██████████				
Created by	██████████				
ProntoID	██				
Subject CEPR	██████████				
Subject name	██				
Subject DOB	██████████				
Subject gender	Male				
Subject nationality	Bangladesh				
Subject country of birth	Bangladesh				
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">Easting</td> <td style="text-align: right;">293807</td> </tr> <tr> <td>Northing</td> <td style="text-align: right;">92403</td> </tr> </table>	Easting	293807	Northing	92403
Easting	293807				
Northing	92403				
Time	21:54				
Creation date	10-04-2025 21:54:03				

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?	I started approximately two to three weeks.
What is your job role/ what are your duties?	I'm the Head Chef in the kitchen cooking.
What days/ hours do you work each week?	I work 6 hour per day, everyday except Tuesday.
How much do you get paid per day?	£50 cash in hand

Control

Who gave you this job (name and role in business)?	The owner, known him as ██████████ approximately 45 years old.
Who tells you what days/ hours to work?	The owner ██████████
Who tells you what tasks/ duties to do each day?	The owner.

Remuneration

Who pays you?	The owner
Do you pay income tax or have a National Insurance number?	No

Pre-employment Checks

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?	I don't know

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  	
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Observations

Observations	He was seen in the kitchen cooking with two more person.
Do you suspect this person of illegal working?	Yes

Freetext	
Details	
Type of work	Visit
Visit reference	██████████
Created by	██████████
Is this entry related to a Critical Incident?	No
Subject CEPR	██████████
Subject name	██████████
Subject DOB	██████████
Subject gender	████
Subject nationality	██████████
Subject country of birth	██████████
Address	Other
Details, if other	Conversation
Created at geolocation	Easting 258725 Northing 73865
Time	
Creation date	11-04-2025 15:19:56
Entry	
Title	Conversation
Text	In the takeaway part of the building, there were a couple waiting for their order. They had been there since we entered the property. I went to the kitchen where ██████████ was tidying and cleaning. I asked him if the couples' food would be much longer. He replied that he was not allowed to cook as he was not the chef. I asked him who the chef was, and he said it was gentleman sat being interviewed by my colleague. At this time, there was only the manager and one other still in the restaurant with my colleagues.
Photographs	
No photographs.	

Encounter											
Details											
Type of work	Visit										
Visit reference	██████████										
Created by	██████████										
ProntoID	████████████████████										
Created at geolocation	<table style="width: 100%; border: none;"> <tr> <td style="width: 150px;">Easting</td> <td style="text-align: right;">293805</td> </tr> <tr> <td>Northing</td> <td style="text-align: right;">92402</td> </tr> </table>	Easting	293805	Northing	92402						
Easting	293805										
Northing	92402										
Time	21:36										
Creation date	10-04-2025 21:33:18										
Person Check Results											
Person Check Result	<table style="width: 100%; border: none;"> <tr> <td style="width: 150px;">Given names</td> <td></td> </tr> <tr> <td>Family name</td> <td></td> </tr> <tr> <td>Date of birth</td> <td style="text-align: right;">██████████</td> </tr> <tr> <td>Gender</td> <td style="text-align: right;">Male</td> </tr> <tr> <td>Nationality</td> <td style="text-align: right;">IND India</td> </tr> </table>	Given names		Family name		Date of birth	██████████	Gender	Male	Nationality	IND India
Given names											
Family name											
Date of birth	██████████										
Gender	Male										
Nationality	IND India										
Main Identity											
Identity source/type	Declared										
Full name	██████████										
Date of birth	██████████										
Gender	Male										
Nationality	India										
Country of birth	India										
Place of birth	Haryana										
Languages											
Languages spoken	English, Hindi										
Interpreter used?	No										
Encounter											
Encountering 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?	Suspect encountered running from the property by me, I arrested him as I suspected he may be an immigration offender. Questioned in line with Singh v Hammond.
Where was the person located?	Rear court yard
Declared immigration status	Asylum seeker
How and when did the subject last enter the UK?	
CEPR	██████████
Are there any vulnerabilities/trafficking/safeguarding issues?	No
Are you taking enforcement action?	No
References (Person ID, HO Ref, Port Ref, BRP)	
Biographic search results	Systems checked Result of checks Does the person have an open absconder status on Atlas Person Alerts? No Status returned by system checks
Photo of Subject	
Do you want to take a photograph of the subject?	No
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]	
Subject CEPR	[REDACTED]	
Subject name	[REDACTED]	
Subject DOB	[REDACTED]	
Subject gender	Male	
Subject nationality	India	
Subject country of birth	India	
Subject place of birth	Haryana	
Created at geolocation	Easting	293801
	Northing	92405
Time	21:48	
Creation date	10-04-2025 21:48:49	

Language of Interview

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

Obligation

Do you work here?	No.
Why are here today?	Here just food.
Are you cooking food here?	No.
Do you pay for the food?	They give me food after I pay.
Do you have a wallet?	Yes. In my bag.
Why does the manager say you work here?	I don't know.
Why were you running away?	I was just going for my bag.
I think you were working, why is you phone in the kitchen?	I was talking to the chef.
Does the chef or manager ever ask you to help?	No.

My colleague has just spoken to the chef who has said today is your first day working here. Why would he say that?	I don't know.
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Control

No details provided.

Remuneration

No details provided.

Pre-employment Checks

No details provided.

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 	
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Observations

Observations	Subject encountered running from the rear of the premises after uniformed IO's had entered the business and clearly announced themselves. Two other members of staff, the manager and the chef both said that Mr.  worked at the business. His phone was found in the kitchen and his bag was in the rear court yard both are clearly staff only areas.
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Do you suspect this person of illegal working?	Yes
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