

# Premise Licence Holder- Additional Appendix 3 ENV 917



Audit Report for

Today's Local 10 Red Lion Square Stamford Lincolnshire PE9 2AJ

Completed on 6th Day of November 2025 at 1230 hours.

This is an audit report for the premises namely **Todays Local 10 Red Lion Square Stamford Lincolnshire PE9 2AJ. Premises licence Number 18188**

## Introduction

1.1 The audit was requested as a result of the premises being given papers to attend a Licensing Hearing with regards to failing to promote the Licensing Objectives:

### i) The prevention of crime and disorder

1.2 RJJ Consultancy were instructed to carry out the audit from the premises licence holders Mohan Retail Ltd.

1.3 RJJ Consultancy are industry experts in recognising failings and implementing solutions in licensed premises in accordance with Revised Guidance issued under Section 182 of the Licensing Act 2023 and the Licensing Act 2003.

1.4 RJJ Consultancy have gained their expertise from working as alcohol licensing officers with Lincolnshire Police and from their longevity of service within the Metropolitan and Lincolnshire Police services.

1.5 The audit is based on their findings from their initial visit to the premises carried out on Thursday 6<sup>th</sup> Day of November 2025.

1.6 RJJ Consultancy confirm they were instructed to carry out a purely independent audit for the purpose of supplying information to all the relevant parties concerned in the forthcoming licensing hearing.

1.7 RJJ Confirm that the audit report is based on their true findings and have not been fabricated in any means to show bias to any of the interested parties.

## RJJ Consultancy

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## **2.0 Purpose of Audit.**

"To assess the store's adherence to licensing conditions and operational standards in light of the deficiencies outlined in the review documentation submitted by Lincolnshire Police to South Kesteven District Council 22<sup>nd</sup> Day of August 2025."

Findings by Lincolnshire Police in respect of breaches to the **Premises Licence 23619** are recorded below and have been directly abstracted from their review paperwork.

Lincolnshire Police has refenced points from:

**Revised Guidance issued under Section 182 of the Licensing Act 2003.**

**South Kesteven District Council statement of licensing policy (2021 – 2026).**

**Crime and Disorder Act 1998 Section 17**

2.1 Within the review application Lincolnshire Police concluded that there is evidence to show the licensing objective for the prevention of crime and disorder is being undermined.

**Within the body of the review paperwork, I note and acknowledge historical evidence identifying, previous reviews against the premises, based on persons located at the premises working with no entitlement to do so, civil penalty issues being issued against the named premises of this current review, and connections to other premises that are owned by the mentioned male known as Mr Arumugam Kalamohan. It is also noted that additional conditions were placed on the licence for this premises to include more stringent relating to staff training and refresher training, checks and recording of employees right to work**

Though it has to be acknowledged that the above has occurred, this audit is purely based on findings of non-compliance to the conditions of the licence identified by Lincolnshire Police. My audit is not to identify or prove in one way or another if persons with no entitlement to work at the premises were located.

I now address the breaches to the licensing conditions alone; police have identified on their visits.

2.2 Lincolnshire Police identified that on the **2<sup>nd</sup> Day of August 2023** there was non-compliance to the conditions on the licence, relating the absence of a personal licence

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holder on the premises and a lack of signage were noted. To expand on these from a direct abstract from the statement of PC Braithwaite dated 22/08/25

**NO PERSONAL LICENCE HOLDER** - The lone worker was not a personal licence holder. The licence requires 'a personal licence holder on the premises at all times the licence is being used'.

**SIGNAGE** - No signage was present to satisfy the licence condition 'notices requesting customers leave or queue quietly'.

**It was noted that paperwork at the premises was present and completed, but it was disorganised and not found particularly up to date.**

**It was also noted that a large amount of non-priced marked alcohol was on display for sale on shelves, the fridges and positioned on the floor. This is an offence under the Price Marking Order Act 2004.**

2.3 On the same visit it was identified that a lone worker was located at the premises with no further action being taken due to the lack of information held by the National Command and Control Unit

2.4 On the **3rd day of October 2023**, Lincolnshire Police with Immigration Officers attended the premises again. On this occasion the same lone worker was present in the premises as the previous visit mentioned above. The male was arrested for Immigration offences, including they had no right to work in the shop.

The same compliance concerns were identified on this visit as the ones on the 2<sup>nd</sup> august 2023.

2.5 On the 7th Day of November 2024 Sgt Adams from the Alcohol Licensing Team visited the premises and confirmed continued non-compliance at the shop. From her visit and abstracted from her statement dated 04/07/25 she identified

The summary of their licence was displayed but the full licence was not held within the premises.

-There was no personal licence holder present at the premises.

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-There was a DPS authority for the worker present, but it was not signed by the DPS. The only completed authority was for an ex-employee.

-There was no notice asking patrons to leave or queue quietly.

-There was a refusal register, but it consisted of many loose papers which were all mixed up. The last entry found was from August 2024 so not believed to be up to date.

-CCTV was present and could be seen on the screen but the shop worker could not operate it, so I was unable to check if it was recording.

-There was alcohol present in many parts of the shop that was not shown on the shop plan.

There was alcohol on sale next to children's magazines, above crisps and in a chiller unit containing chilled snacks and drinks

2.6 As part of the same visit, the shop worker was able to show compliance with some conditions. She gave me some files that contained the training package which had been completed and signed by her. There was also good challenge 25 signage.

2.7 The Home Office Immigration Enforcement officers checked the right to work of the shop worker, and she was legally entitled to work.

2.8 On our arrival at the shop there had been a male stood just outside who appeared to be from the premises. He was also detained for checks to be carried out. He was found to have no status to remain in the UK and therefore had no right to work. There was no direct evidence that he was working in the shop however he was found to have the bank card of the licence holder Arumugan Kalamohan in his phone case.

2.9 On Tuesday the 17th of June at 11:00 hours PS Adams made a further visit to the premises to carry out a follow up compliance visit. She spoke with the shop worker who was the same female she had seen on her last visit. Most of the same issues were present as detailed in the first visit.

2.10 PS Adams recognised they had put up a sign near the door asking people to leave quietly and the refusals book had improved and had up to date entries. She asked whether there were any other people working at the location since my last visit.

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2.11 PS Adams checked the documentation but could not find a DPS authority or training records for any other workers.

2.12 Lincolnshire Police shared a concern that on requesting CCTV from the premises with regards to an alleged illegal worker, Mr Kalamohan was not forthcoming with the CCTV evidence. It was thought that this may well have been a deliberate act of avoidance by Mr Kalamohan to provide CCTV, to prevent the police discovering the male had actually been working in this shop. This behaviour was associated with similar to another premises owned by Mr Kalamohan.

2.13 On the 17<sup>th</sup> Day of June 2025, A Police Licensing inspection was carried out at the premises and virtually the same various non-compliance issues discovered on the 7th of November 2024 was discovered

2.14 Lincolnshire Police feel the licence this premises operates under has become outdated, with poorly worded conditions that are not specific or measurable enough for this type of business operation. They lack detail in relation to requirements around CCTV, staff training, incident and refusals recording, and age verification policy. There is also an absence of any conditions in relation to staff right to work checks and recording.

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### **3.0 Audit Findings.**

3.1 Whilst it is clear to see from section 2, that there were failings at the premises, and they have been acknowledged it is important also to reflect evidence of good practices and procedures that are in operation that were identified on my visit. Below are my findings. My visit occurred at **1230 hours on the 06<sup>th</sup> Day of November 2025.**

3.2 On attendance at the premises I spoke to a female member of staff. The member of staff was able to answer every question put to her in relation to challenge 25, underage sales of restricted products, their immigration status and eligibility to work in the UK.

3.3 A check on their DPS authorisation sheet for members of staff to sell alcohol in their absence was current, showing the new DPS and members of staff working at the premises. This was dated and signed.

3.4 The new DPS had put in place all new authorisation sheets to give authorisation to sell alcohol. These were dated and signed to an acceptable level.

3.5 All staff were competent in operating the CCTV system and were able to demonstrate to me playback, time, date, camera locations..

3.6 RTW checks are stored on a computer behind the counter and are accessible on request.

3.7 Staff present were knowledgeable in their understanding of the necessity of filling in the refusals register and incident books.

3.8 Records of refusals documented in the logbooks were cross referenced against CCTV footage and showed the exact incident as it occurred to what was documented.

3.9 Staff were able to locate all the training, refusal and incident logs upon request.

3.10 There was a noticeable gap in recording refusals between the dates of 11/11/24 and 17/10/25. From here on the refusals has been completed with consistency.

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3.11 There was alcohol stored on shelves with no pricing on toward the rear right-hand side of the shop. These were clearly there for storage and not for sale, as the exact same bottles were in the fridge next to them with pricing on.

3.12 Alcohol pricing on the boxes of beer stood on the floor were not attached to them. But a full list of prices was displayed on the side of the fridge next to where they were stored. Although not ideal, pricing was present

3.13 There were bottles of alcohol on the top shelf above the crisps. These were clearly out of reach of young children and were almost adjacent to the main till area. They are not easily accessible to average height of a person.

3.14 Alcoholic drinks were in fridges next to snack food, but they are clearly displayed as alcoholic drinks, and if persons were to take them to the till for payment then they would show up as a Challenge 25 product.

3.15 All signs were displayed to members of the public at all the exit points to the premises.

3.16 All staff were confident in explaining the Challenge 25 policy with regards to selling age restricted products. They knew their responsibilities to challenge appropriately without showing confrontation. And to record their actions.

3.17 From the incident log it was recorded that on the 17<sup>th</sup> of October 2025 at 1624 hours a male entered the premises and was argumentative towards the lone female worker over a payment that had gone through on his card despite the refusal of a sale. The female recorded this correctly and stood her ground, thus promoting the licensing objective of the prevention of crime and disorder to its full degree. The male left the premises still without the item he had attempted to purchase even though he believed the item had been purchased.

3.18 Incident retrieved from refusals register identified 2 males refused service for purchase of alcohol on the basis they presented a college id card as proof of age. On review of CCTV neither of them was granted purchase of alcohol due to the belief it was going to be a proxy sale.

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3.19 Lincolnshire Police highlight the lack of information supplied on the DPS authorisation sheets. It is good practice to have a list of persons who are entitled to sell alcohol in the absence of the DPS or personal licence holder only. But the absence of these do not constitute a SEC136 Offence of the Licensing Act 2003.

3.20 The act states under SEC19 of the Licensing Act 2003

*Mandatory conditions where licence authorises supply of alcohol*

*(1) Where a premises licence authorises the supply of alcohol, the licence must include the following conditions.*

*(2) The first condition is that no supply of alcohol may be made under the premises licence—*

*(a) at a time when there is no designated premises supervisor in respect of the premises licence, or*

*(b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended.*

*(3) The second condition is that every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.*

There is no evidence to state the DPS has not authorised a person without a personal licence not to sell alcohol. On this basis it could be acknowledged that there has been a verbal authorisation.

#### **4.0 Conclusion**

4.1 Despite the shortcomings identified in the police review, the premises have demonstrated a commendable commitment to addressing and rectifying these issues. Management has acknowledged that greater accuracy was required and that minor clerical errors had occurred.

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4.2 It is a premises situated in the middle of Stamford and footfall is consistent throughout the day. The customers are from all demographic groups but each showing respect and courtesy to the staff member.

4.3 The premises showed that it was a community shop where people valued and respected, and not a premises which would attract or purposely criminality.

4.4 It has to be identified there is some requirement to have some training input in the premises and for everyone to hold a personal licence. With discussions already had with the owner of the premises Mr Kalamohan, training has been booked in for the 19<sup>th</sup> of November 2025. This training will be completed by RJJ Consultancy who are accredited by Highfield Qualifications to deliver the highest level of training. Their Training Reference number 40988

The training will consist of each allocated person completing them.

Personal Licence Training to APLH2 level

Right to work checks and procedures

Section 136 offences and knowing their licence

Completion of refusal and incident logs to a competent level.

Price Marking Order Act 2004

4.5 This shows commitment and responsibility to show the determination to make the premises operate in accordance with the requirements of the Licensing Act and beyond.

4.6 It has been identified and acknowledged by the police already that the conditions on the current licence are not suited to the operation schedule of the premises. These conditions now have to be reflective of the premises today and not yesteryear.

4.7 The premises and I have had previous involvement when I was the police licensing officer for South Kesteven. It would be remiss of me not to detail these interactions with the premises especially as the emails are contained as part of the review.

4.8 During my time of dealing with the premises, I found them nothing but accommodating in listening to our concerns and offering voluntary conditions to help prevent the number of incidents that were occurring that were allegedly attached to the

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premises. Not only did they work with me but also alongside the neighbourhood policing team. In the offering of their conditions the premises contributed to the drop in incidents within the area of the reported ASB. They acknowledged the operating schedule was not brilliant at the time but did everything that was asked of them and more to assist the police.

4.9 Unfortunately, though as a result of them doing everything, they still felt as though they were let down by the police in the way they were supported, in that they felt targeted by them. I liaised with the officers and ask them them to support and not target. After many meetings I made them they realise the stem of the issues were not coming from the premises but a pub from around the corner who were serving underage people. This premises was investigated by myself, and I was successful in getting the DPS removed from the premises with immediate effect. Thus, the issues stopped.

4.10 It is essential from my experience that any punishment or action taken by any licensing committee should be tied in with and how are the licensing objectives being compromised to the harm and deterrent of others. This shop is in the centre of the town with a community feel that serves a local community and offers everything they require. It has a high and continuous foot fall, with a single member of staff working within it at any one time. If the premises is a source of continuous current issues in the town with behaviour that compromises the licensing objectives to the town then yes I can respect the polices decision to review. But they are not, everyone in every day work can let the clerical aspect of the daily duties slip, and this is what the breaches are identified as, a slip in clerical duties. Nothing that cannot be put right by training and education.

4.11 As an independent auditor and using my experience, Revocation in my opinion is not a suitable course of action and would not serve any purpose. Continuous training and support with a revamp of the conditions to make them more applicable for today's operating schedule.

4.12 Lincolnshire police already acknowledge the licence is not suitable for today's operation schedule and I quote from their summary.

*"Lincolnshire Police feel the licence this premises operates under has become outdated, with poorly worded conditions that are not specific or measurable enough for this type of business operation. They lack detail in relation to requirements around*

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*CCTV, staff training, incident and refusals recording, and age verification policy. There is also an absence of any conditions in relation to staff right to work checks and recording.”*

4.13 I have already identified the training package that will be delivered to the staff at the premises and would be happy to provide details of attendees and their certificates upon completion of training.

4.14 The training is a full day's event led by real people with scenario and question-based knowledge checks to insure complete and utter respect is shown to the licence they will gain. Normal procedures for training would be to sit in front of a computer and do online training which is neither human led nor gives the opportunity to ask questions on the legislation.

4.15 Mr Kalamohan has chosen the human led training as he sees the value and importance of this over pre-loaded material.

4.16 I welcome PC Braithwaite as the licensing officer for SKDC to attend the training as well to ensure that the level of depth of the training is not shallow but attends to the issues she has raised in this review.

4.17 In short the premises operates to a good standard without no obvious recent signs of causing or being a negative impact on the local community. Breaches to the licence have been identified, but no more than other premises may do, they are not damaging for which the purpose they were implemented under the Licensing Act 2003.

4.18 At no time throughout the review has reference been made to recent (within the last 5 years) of alcohol related crime and disorder. It is purely clerical errors. If there were alcohol/drug related issues attached to the premises then yes I would agree totally with the police and apply for revocation of the licence.

4.19 All previous historical events of alcohol related offences have already been addressed to the satisfaction of Lincolnshire Police at the time. These were addressed by the volunteering of conditions by the premises themselves in consultation with PC Jones at the time of their upheaval.

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Thus ends my report.

Jon Jones

Co-Owner of RJJ Consultancy

07/11/2025.

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Please record all refusals on the register below

**Refusals Register**

No.	Date	Product	Time	Name of person or description	Observations	Staff member
09	17/10/25	Alcohol	14:40	2 Boys looking young	They have Only One ID - ROXY - REFUSED	
10	17/10/25	Alcohol	20:30	A kid with white jacket blonde Hair	HAVE ID - ROXY - REFUSED	
11	17/10/25	Beer	20:34	A guy with Black Hoodie with cap	DRANK & NOT STEADY (REFUSED)	
12	18/10/25	Vape	20:46	A guy with Blue shirt with Black jacket shirt	No ID - REFUSED	
13	20/10/25	Budweiser 330 ml bottle	216:33	A guy with black shirt & trouser with bag	No ID - REFUSED	
14	21/10/25	Vape	14:35	A Girl with Old man (Pink long hair)	NO ID - REFUSED (ROXY)	
15	24/10/25	Vape	8:20	A lady with young girl (Rude) (Several times)	NO ID - REFUSED (ROXY)	
16	24/10/25	Aurora	19:57	A kid with Black Hair with yellow jacket	ROXY SAE - REFUSED	

Manager's Signature:

Date: 24/10/25

Additional pages can be downloaded from [noidnosale.com](http://noidnosale.com)



Please record all refusals on the register below

Refusals Register

No.	Date	Product	Time	Name of person or description	Observations
09	05/11/25	Nico - Poppers	10:37	2 Boys wearing 2 Boys wearing looking strong (Short and Black hair)	NO ID Refused
10	06/11/25	Alcohol	11:58	2 Boys Young	NO ID Refused
11	06/11/25	Vape	12:47	Boy wearing a Black hoodie	NO ID Refused
12	07/11/25	Alcohol	18:55	Boy with Black Pant and Tshirt (Boys old).	Proxy Sale - Refused
13	07/11/25	Alcohol	19:03	Guy with Black Pant with Black hair	Proxy Sale - Refused
14	07/11/25	Alcohol	20:11	Guy with yellow Jacket and Black Pant	Proxy Sale - Refused
15	08/11/25	Alcohol	21:30	Guy wearing hairy Socks and Boring Alcohol.	2 of them dont have ID Refused
16	08/11/25	Vape	21:55	Boy wearing Black Tshirt.	NO ID Refused

Manager's Signature:

Date:

Additional pages can be downloaded from [noidnosale.com](http://noidnosale.com)



Please record all refusals on the register below

Refusals Register

NO.	Date	Product	Time	Name of person or description	Observations
09	31/10/25	Alcohol	19.45	A guy with Black Hoodie with Harley Davidson logo	No ID - Refused
10	31/10/25	LIGHTER	19.47	A tall guy with Green Seatbelt	No ID - Refused
11	31/10/25	VAPE	20.15	A man with Black Hoodie	No ID - Refused
12	31/10/25	Alcohol	20.22	I know that guy Tan Driver with Hat	Proxy Sale - Refused
13	31/10/25	Alcohol / VAPE	22.30	A guy with Red Shirt in Black jacket	Using SOMEONE ID Refused - Took ID from him
14	01/11/25	Alcohol	01.25	A guy with Black Tshirt & hat with Black Skirt	GUY HAVE ID - HIR DONT PROXY SALE - REFUSED
15	01/11/25	Alcohol	22.05	A short guy with long Beard	No ID - REFUSED
16	04/11/25	Vape	13:49	A Girl looking young wearing with Black Skirt & Tshirt	No ID - Refused

Manager's Signature:

Date:

NO ID  
NO  
SALE!

Additional pages can be downloaded from noithnosale.com