
TO **Licensing and Safety Team**

FROM **Kamal Miah**

REFERENCE: **Natural Treatment**

DATE **20th June 2022**

Re: Ms Yani Wang

T/A Natural Treatment, 35 Artillery Lane, London E1 7LP (the Premises)

Reference is made to the Special Treatment License for the above premises. Currently the business holds a premises special treatments licence to carry out Massage which expires on the 22nd March 2023.

A request is being made to revoke the special treatments licence for the following reasons;

1. The business has been investigated and found to be offering services of a sexual nature to customers. Mr Gary Finnigan, an operative from a surveillance company, was hired by the Council to carry out a test purchase at this premises on the 15th of October 2021. Mr Finnigan wrote that during the massage, a female therapist removed his boxers and shortly thereafter, offered him a 'hand job or topless hand job' whilst making hand gestures. He declined the offer. The therapist then moved behind his head and leaned forward over him to massage his hips so that her breasts were rubbing on his face and she asked "are you sure you don't want an extra massage". He again declined (see witness statement of test purchaser in appendix **KM1**). This was a clear offering of a sexual service in addition to the massage.
2. On the 29th October 2021, another test purchase was carried out by Mr Finnigan who reported that he was again offered a 'hand job or topless hand job' by a female massage therapist and declined. She asked him again if he was sure whilst leaning over him so that her breasts rubbed his face. He again declined (see witness statement of test purchaser in appendix **KM2**). This was another clear offering of a sexual service in addition to the massage.

3. On the 22nd March 2022, Principal Environmental Health Officer, Ms Geraldine O'Grady of the Licensing and Safety team at Tower Hamlets Council contacted Mr Finnigan by video conference. When Ms O'Grady showed Mr Finnigan photographs of the therapists including Ms Wang, he only recognised Ms Wang as the receptionist he had met on both of his test purchases. He did not recognise any of the other therapists, which indicates that he was treated both times by a person not declared to the Local Authority by Ms Wang. It is a condition of the licence that any therapists employed during the licensing period, must be notified to the Licensing and Safety Team first for approval (see conditions in appendix **KM3**).
4. Ms Wang has been the applicant of the special treatment licence applications and identified herself as the person responsible for the management of the premises (see Appendices **KM4** and **KM5** for the two applications made by Ms Wang to this Authority). Ms Wang also listed herself as one of the therapists at the business premises. Therefore, as she has a close sight in the operation of the business and is a person concerned in the conduct and management of the premises used for special treatments, she could be reasonably regarded as not being fit and proper to hold such a license (London Local Authorities Act 1991, Section 8c).
5. The continual offering of sexual services also suggests a business culture and a trading norm rather than a problem with a rogue therapist. The evidence suggests that the business is conducting regular services similar to a brothel but masquerading as a massage parlour. Therefore, Ms Wang has demonstrated her inability to be considered as a 'fit and proper' person to hold a special treatments license.
6. Under Section 9(2) of the London Local Authorities Act 1991 the Borough Council may revoke a licence held by a person for grounds mentioned in Section 8 which includes premises being improperly conducted and the licence holder not being a fit and proper person to hold a licence.

Kamal Miah

Environmental Health Officer

List of Appendices

KM1 = Witness statement of first test purchase conducted on the 15/10/2021

.

KM2 = Witness statement of second test purchase conducted on the 29/10/2021

KM3 = Standard licence conditions

KM4 First application form for special treatment licence for Natural Treatment, 35 Artillery Lane, London, E1 4LP

KM5 = Second application form for special treatment licence for Natural Treatment, 35 Artillery Lane, London, E1 4LP