Committee :	Date	Classification	Report No.	Agenda Item No.
Licensing Committee		Unclassified		

Report of:

David Tolley

Head of Environmental Health & Trading

Standards

Originating Officer:

Lavine Miller-Johnson Licensing Officer

Title:

Local Government (Miscellaneous Provisions) Act 1982 (as amended) Application for a renewal of a Sexual

Entertainment Venue Licence for the Nags Head, 17-19 Whitechapel Road, London E1

1DU

Ward affected:

Spitalfields and Banglatown

1.0 **Summary**

Applicant: NH License Ltd.

Name and The Nags Head

Address of Premises: 17-19 Whitechapel Road

London E1 1DU

Licence sought: Sexual Entertainment Venue Licence under

Local Government (Miscellaneous Provisions) Act 1982 (as amended) Application for a renewal of a Sexual

Entertainment Venue Licence for the period

from 1st June 2023-31st May 2024

Objectors: Licensing Authority & Metropolitan Police

2.0 Recommendations

2.1 That the Licensing Committee considers the application and objections then adjudicate accordingly.

LOCAL GOVERNMENT 2000 (Section 97)
LIST OF "BACKGROUND PAPERS" USED IN THE DRAFTING OF THIS REPORT

Brief description of "background paper"

Tick if copy supplied for register

If not supplied, name and telephone number of holder

Tower Hamlets S.E.V. Policy

Lavine Miller-Johnson 020 7364 2665

3.0 Background

- 3.1 This is an application made by NH License LTD for a renewal of the Sexual Entertainment Venue (SEV) licence issued by the Council under Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982and held in respect of The Nags Head, 17-19 Whitechapel Road, London, E1 1DU.
- 3.2 A licence from the Council is required for the use of any premises as a sex establishment. An SEV is any premises at which relevant entertainment is provided before a live audience for the financial gain of the organiser or the entertainer.

Relevant entertainment means:

- any live performance; or
- any live display of nudity;

which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of the audience (whether by verbal or other means).

- 3.3 The premises have benefitted from an SEV licence since 1996. A copy of the licence is attached at **Appendix 1**.
- 3.4 The licence contains the Tower Hamlets Standard SEV Conditions as well as additional conditions that are specific to these premises.
- 3.5 The licence was issued for the period from 1st June 2022 to 31st May 2023. The effect of applying to renew the licence is that it is deemed to remain in force, notwithstanding its expiry, until the application is determined by the Committee or it is withdrawn by the applicant.

The hours permitted are:

- Monday to Saturday from 11:00hrs to 03:00hrs (the following day)
- Sunday from 12:00hrs (midday) to 22:30hrs
- 3.6 The named management responsible for the premises are:
 - Manpal Clair Manager/owner
 - Bahadur Singh Binning Relief Manager
 - Alcir Orlandi Relief Manager
 - Daniel Habte- Relief Manager
- 3.7 The licence is granted subject to conditions as follows:
 - The Standard Conditions of the London Borough of Tower Hamlets made under paragraph 13 of Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (as revised on 23rd June 2015).

- 2. The following additional conditions specific to these premises:
- 42. Documents to prove compliance with the Licence pursuant to Standard Condition 3.

An incident log shall be kept at the premises, and made available on request to authorised officers immediately. It must be completed within 3 hours of the incident and shall record the following:

- a. all crimes reported to the venue by a member of the public, a performer or member of staff;
- any breach or alleged breach of either the House Rules made by a member of the public or the Code of Conduct made by a performer, and the action taken by the management;
- c. when a person is removed from the premises;
- d. any faults in the CCTV system;
- e. any visit by a relevant authority or emergency service.
- 43. In the event that a performer alleges that they have been sexually assaulted the management will immediately ensure that
 - a. the police (and, where appropriate, the London Ambulance Service) are called without delay;
 - b. all measures that are reasonably practicable are taken to apprehend a suspect pending the arrival of the police;
 - c. the crime scene is preserved so as to enable a full forensic investigation to be carried out by the police; and
 - d. such other measures are taken (as appropriate) to fully protect the safety of all persons present on the premises.
- 44. In the event that during a performance the management or security either witness a member of the public making intentional physical contact with a performer (save as permitted by Standard Conditions 35 or 36) or a performer makes a similar allegation to management or security, that member of the public shall be removed from the premises without delay. The management or security may use their discretion to allow that member of the public a supervised 10 minute drink up time prior to being removed from the premises.
- 45. Without prejudice to Standard Conditions 12 and 13, at all times the private performance areas and booths are occupied by performers and members of the public trained staff shall regularly monitor the CCTVs which cover that area.

46. Independent Compliance Audit

- a. An independent compliance auditor, to be instructed and paid for by the Licensees, must carry out a minimum of four (4) compliance audits per year of the private performance areas and booths when sexual entertainment is offered at the premises. The compliance audits must not be pre-arranged with the Licensees or any employee or agent of the Licensees.
- A copy of the compliance audit, signed and dated by the Compliance Auditor, must be kept at the premises (The Nags Head Public House, 17-19 Whitechapel Road E1 1DU) and made available to authorised officers without delay.
- 47. The number of persons to be accommodated in the Premises at any one time shall not exceed 100 persons.

Other requirements or restrictions:

- 48. This licence must be prominently and visibly displayed inside the entrance to the Premises.
- 49. This licence together with the standard conditions must be available at the Premises at all times.

4.0 The Application

- 4.1 The current renewal application is to permit the premises to operate as a sexual entertainment venue with opening hours as follows:
 - The hours permitted are: Monday to Saturday from 11:00hrs to 03:00hrs (the following day)
 - Sunday from 12:00hrs (midday) to 22:30hrs
- 4.2 A copy of the renewal application is enclosed as **Appendix 2.**
- 4.3 The applicant has submitted additional documents in support of their application. These documents have been made available to the objectors and will also be made available to Members.
- 4.4 The premises are also licensed under the Licensing Act 2003. A copy of the existing licence is enclosed for Members' information as **Appendix 3**. The licence was originally granted on 7th October 2005

The licence authorises the following licensable activities:

The sale by retail of alcohol (on and off sales) and the provision of regulated entertainment; consisting of recorded music, performance of dance (performed by striptease artists), anything of similar nature, the provision of facilities for making music and the provision of facilities for dancing (performed by striptease artists) and the provision of facilities for entertainment of a similar nature.

- Monday to Saturday from 11:00hrs to 03:00hrs (the following day)
- Sunday from 12:00hrs (midday) to 22:30hrs

The opening hours of the premises:

- Monday to Saturday from 11:00hrs to 03:30hrs (the following day)
- Sunday from 12:00hrs (midday) to 23:00hrs
- 4.5 Maps of the premises' location are available in **Appendix 4**.
- 4.6 Members should note that the two regimes run concurrently. Therefore the premises could operate under the premises licence granted under the Licensing Act 2003 without the SEV in operation, if the sale of alcohol or the provision of regulated entertainment only was taking place.

5.0 Layout of the Premises

- 5.1 The layout plan of the premises is available in **Appendix 5**.
- 5.2 Photographs of the exterior of the premises are available in **Appendix 6**.

6.0 Adverts and Flyers

- 6.1 No adverts or flyers used to promote the premises have been included in the application; however, the Licensing Authority has been informed in the application that advertising is done outside of Tower Hamlets, the same as previous years.
- 6.2 It has been noted that there are no adverts at the exterior of the premises. The premises has a website <u>where anyone can access.</u>

7.0 Standard Conditions

- 7.1 The Council has adopted Standard Conditions and these apply as default conditions that are attached to all SEV licences. These can be seen in the licence in **Appendix 1**.
- 8.0 Codes of Conduct and Policies
- 8.1 The applicant has provided Codes of Conduct and policies as required by the Standard Conditions, see **Appendix 7**, namely:
 - Code of Conduct for Performers
 - Code of Conduct of Customers (Customer House Rules)
 - Performer Welfare Policy

9.0 Assessment and information for the vicinity

- 9.1 **Appendix 8** is a map of the Licensing Service's determination of the vicinity around the premises, set at 100 metres from the premises. It is noted that there have been no significant changes to the vicinity from the first SEV licence application in November 2014.
- 9.2 Determination of the "use" of other Premises in the "vicinity" "vicinity" is likely to be a narrower and smaller area than the "relevant locality" and much will depend upon the physical location of the premises, its appearance and upon the nature and hours of its operation.

Below is a list of notable premises within the vicinity as observed by the Licensing Officer visiting the area on foot and using GIS maps:

Residential	There is no obvious residential accommodation
accommodation	above the Nags Head.
	The floors above the Whitechapel Road premises within the vicinity are primarily used for commercial purposes.
	There are residential developments accessed from Old Montague Street: Kings Arms Court, Green Dragon Yard and Black Lion House.
	Naylor Build Yard, residential accommodation next to Altab Ali Park, is on the edge of the vicinity.
Schools	There are no schools within the vicinity.
Premises used	There is a medical centre (The Spitalfields Practice)
by children and	in Old Montague Street.
vulnerable	
persons	
Youth community	There are none in the vicinity.
and leisure	
centres	
Religious centres	There are none in the vicinity.
and public places	-
of worship	
Access routes to	The premises sits on the north side of the A11,
and from	Whitechapel Road, one of London's busiest arterial
premises listed	roads.
above	Whitechapel Road is busy 24 hours a day.

	There are a number of bus routes, as well as night buses.		
	Aldgate East Tube Station is a 5 minute walk away.		
Existing licensed	Whitechapel Road same side as applicant		
premises in the	premises		
·			
vicinity	 Restaurant: (Efes), 1 Whitechapel Road, London E1 6TY 		
	Off Licence Tesco Stores Ltd45 Whitechapel Road E1 1DU		
	Hotel Hyatt Place 45 Whitechapel Road E1 1DU		
	Whitechapel Road opposite side from applicant		
	premises		
	<u>premises</u>		
	Fast Food: (City Fried Chicken & Grill), 14 Whitechapel Road, London E1 1EW		
	Bar/night club: (The Stable), Ground Floor, 16-18 Whitechapel Road, London E1 1EW		
	Adler Street		
	Hotel The Corner London City, 42 Adler Street, E1 1EE		
	Osborn Street		
	Hotel & Bar: Hampton by Hilton, 12-20 Osborn Street, E1 6TE		
	Bar Apples and Pears, 26 Osborn Street, E1 6TD		
	• Fast Food: Chico's, 28 Osborn Street E1 6TD		
	Public House: The Buxton, 42 Osborn Street, E1 6TD		

Whitechapel High Street

- Restaurant and function space:
 Whitechapel Art Gallery, 80 Whitechapel
 High Street, E1 7QX
- Fast food Restaurant, KFC Express, 84 Whitechapel High Street, E1 7QX
- Restaurant: Carnivale, 2 White Church Lane, E1 7QR
- Public House: Bar Locks, 21 White Church Lane, E1 7QR
- Restaurant, Bari Bari, 24 Whitechurch Lane, E1 7QR

10.0 Assessment and information for the Locality

10.1 Appendix 9 contains the Ward Profile of Spitalfields and Banglatown and Whitechapel produced by the Corporate Research Unit in May 2014 to provide members with details in relation to the locality of the premise. It should be noted that although this was produced in 2014 it is the most up-to-date profile currently available.

10.2 In regards to the "relevant locality":

- The relevant locality was assessed as being within a 100 metre radius centred on the premises, 17-19 Whitechapel Road
- The premises sits on the A11, one the capital's busiest roads
- The vicinity is overwhelmingly commercial, with some residential premises.
- Opposite the premises is Altab Ali Park. The Council's maps show the area as St Mary's Gardens

10.3 The character of the locality:

 The area has been assessed to have a commercial character with about 11% of the Borough's residents living within two of the Borough's twenty wards: Spitalfields and Banglatown and Whitechapel.

- The premises are in Spitalfields and Banglatown ward, albeit on the boundary with Whitechapel ward
- The ward profiles downloaded from the council's website are appended

11.0 Other Sexual Entertainment Venues

11.1 The following premises hold SEV licences issued by the Council:

•	Metropolis	234 Cambridge Heath Road, London, E2
	-	9NN

• Whites 32-38 Leman Street, London, E1 8EW Gentleman's Club

• White Swan 556 Commercial Road, London, E14 7JD

12.0 Consultation

12.1 The application has been consulted on in accordance with the Local Government (Miscellaneous Provisions) Act 1982 and the Tower Hamlets Sexual Entertainment Policy.

This has included:

- a) A site notice at the premises displayed by the applicant during the required period. A copy of the notice is appended as **Appendix 10**.
- b) A press advert was placed in the Docklands and East London Advertiser on the Thursday 1st June 2023, by the applicant, which is appended as **Appendix 11**.
- 12.2 The following is a list of those also consulted with respect to the application:
 - The Police
 - The Fire Brigade
 - Building Control
 - Health and Safety
 - Ward Councillors

13.0 Objections/Responses to the Consultation

- 13.1 The Licensing Authority and the Police have objected to the renewal application. The objections have already been made available to the licence holder's legal representatives and will also be made available to Members. The objections are due to the following reasons:
 - Evidence gained from a Test Purchase visits on the 18th August 2022 This shows a number of alleged breaches of the Standard Conditions attached to the SEV licence.
 - The Licensing Authority has already made a request for the Authority to consider revoking the SEV licence. This is on the basis that the licence holder is unsuitable to hold a licence for other reasons as detailed in the representation.
 - Breaches have been found at a venue (Vanity) that held an SEV licence in Westminster, which was managed by this licence holder.

13.2 The Licensing Authority's representation evidence is as follows:

Representation Letter dated 21st June 2023	Appendix 12
Request for Revocation letter dated 3 rd March 2023	Appendix 13
Witness Statement and notes – Officer A	Appendix 14
Witness Statement and notes – Officer B	Appendix 15
Witness statement Mohshin Ali (15th May 2023)	Appendix 16
Exhibit MA/01: Witness Statement PC Morgan	Appendix 17
Witness Statement PC Guerra (2/1/23)	Appendix 18
PC Guerra – CCTV Transcript	Appendix 19
PC Guerra – CCTV Photo Evidence	Appendix 20
PC Guerra – Communication with Sols	Appendix 21
Exhibit MA/02: Companies House	Appendix 22
Table of Breaches CCTV 18 th August 2022	Appendix 23
Witness Statement Mohshin Ali (24th August 2023)	Appendix 24
Exhibit MA/03: Westminster Committee Decision 25/5/2023	Appendix 25
Exhibit MA/04: LBTH Committee Decision 17/10/2017	Appendix 26

13.3 The Metropolitan Police have made a representation. Some of their evidence duplicates that submitted by the Licensing Authority and therefore the below only sets out their additional evidence:

Police Representation	Appendix 27
Witness Statement – PC Guerra (14/5/23)	Appendix 28
PC Guerra Exhibit RGG 0021-0031	Appendix 29

Witness Statement PC Muldoon (15/5/23)	Appendix 30
PC Muldoon Exhibits SM/1-18	Appendix 31

- 14.0 No representations were received from the other consultees.
- 14.1 The application received two supporting representations from customers of the venue of which they describe the venue as safe, well managed and a community asset. See **Appendix 32**

15.0 Summary of Premises and Licence History

- 15.1 A copy of the existing premises licence is available in **Appendix 1.**
- 15.2 The current licence holders are NH License Ltd.
- 15.3 The current Designated Premises Supervisor is Bahadur Singh Binning.

16.0 Complaints and Enforcement History

- 16.1 The Licensing Authority has received no complaints about the premises in the last 24 months.
- 16.2 The premises have been visited by or on behalf of Local Authority on the following occasions in the last 24 months:

Date	Authority (TS/Lic)	Nature of visit
18/08/2022	Licensing	Covert visit found breaches of conditions which lead to revocation application
13/09/2022	Licensing	Licensing Officer hand delivered letter for CCTV request for breaches found on 18/08/2022

16.3 The premises have been subject to the following enforcement actions in the last 12 months:

Date	Authority (TS/Lic)	Nature of
		Enforcement
18/08/2022	Licensing	Breach of conditions
		review licence

17.0 Policy - Appropriate Number of Sexual Entertainment Venues

17.1 The Council has determined that there are a sufficient number of sex shops, sex cinemas and sexual entertainment venues currently operating

- in the borough and it does not want to see an increase in the numbers of premises that are currently providing these activities.
- 17.2 The Council has adopted a policy to limit the number of sexual entertainment venues in the borough to nil. However it recognises that there are a number of businesses that have been providing sexual entertainment in Tower Hamlets for several years. The Council will not apply this limitation when considering applications for premises that were already trading with express permission for the type of entertainment which is now defined as sexual entertainment on the date that the licensing provisions were adopted by the authority if they can demonstrate in their application:
 - High standards of management;
 - A management structure and capacity to operate the venue;
 - The ability to adhere to the standard conditions for sex establishments.
- 17.3 The Council will consider each application on its merits although new applicants will have to demonstrate why the Council should depart from its policy. Furthermore if any of the existing premises cease trading there is no presumption that the Council will consider any new applications more favourably.
- 17.4 A copy of the Policy can be found in **Appendix 33**

18.0 Licence Conditions

- 18.1 Where the Council decides to produce standard conditions under paragraph 13 they will apply to every licence granted, renewed or transferred by the authority unless they have been expressly excluded or varied.
- 18.2 If the Council decides to grant a licence they are able to impose specific terms, conditions and restrictions on that licence. These are additional to any standard conditions taking effect by virtue of paragraph 13 of Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982.
- 18.3 Most sexual entertainment venues will require a licence under the Licensing Act 2003 as well as an SEV licence. Where this is the case, local authorities should avoid duplicating licence conditions and should ensure that conditions imposed on each licence are relevant to the activities authorised by that licence. For example, conditions relating to the sale of alcohol should only appear on a premises licences and should not be imposed on sexual entertainment venue licence. Likewise, conditions relating the provisions of relevant entertainment should appear on the sexual entertainment venue licence and not a premises licence..

- Local authorities should also avoid imposing conditions on either licence that are contradictory.
- 18.4 In many cases licences granted under the 2003 Act to existing operators will contain conditions that relate expressly and exclusively to the provision of relevant entertainment. In these cases, in order to avoid duplication, where conditions on premises licences or club premises certificates relate only to the provision of relevant entertainment, they shall be read as if they were deleted from the premises licence from the third appointed day onwards (1st June 2015).
- 18.5 In cases where conditions on a premises licence or clubs premises certificate are inconsistent with, and less onerous than, the conditions in the licence granted under the 1982 Act they shall likewise be read as though they have been deleted.

19.0 Sexual Entertainment Venues and Determination

- 19.1 The Council can refuse applications on grounds related to an assessment of the relevant locality. A licence can be refused if either, at the time the application is determined the number of SEVs, or SEVs of a particular kind, in the relevant locality is equal to or exceeds the number that the authority considers appropriate for that locality; or that an SEV would be inappropriate having regard to the character of the relevant locality, the use to which any premises in the vicinity are put or the layout, character or condition of the premises. Nil may be the appropriate number.
- 19.2 The decision regarding what constitutes the 'relevant locality' is a matter for the Council. However, such questions must be decided on the facts of the individual application.
- 19.3 Once the Council has determined the relevant locality, it should seek to make an assessment of the 'character' of the relevant locality and how many, if any, SEVs, or SEVs of a particular kind, it considers appropriate for that relevant locality.
- 19.4 Members should consider the relevant legislation, Home Office guidance; the Council's SEV Policy and Standard Conditions (see **Appendix 33** and **Appendix 1** respectively).

20.0 Legal Comments

20.1 On an application for the grant or renewal of an SEV licence the Committee may grant the licence for a period of not more than one year and may be shorter if the Committee thinks fit. The licence will take effect subject to any standard conditions that have been made by the Council under Paragraph 13 of Schedule 3 (unless expressly excluded or varied)

- and subject to any specific conditions or restrictions that the Committee determines ought to be imposed on the licence.
- 20.0 Paragraph 11(1) provides that the licence is deemed to continue where an application to renew has been made before the expiry date of the licence.
- 20.3 The Committee can only refuse an application for the grant or renewal of a licence on one or more of the grounds specified in the Act. Paragraph 12(1) of Schedule 3 makes refusal mandatory if any of the following grounds apply. These are that the licence, if granted or renewed, would be:
 - a) to a person under the age of 18;
 - b) to a person who is for the time being disqualified under paragraph 17(3) (if the authority has revoked a sex establishment licence held by the applicant, the holder is disqualified from holding or obtaining a licence from that authority during the period of twelve months beginning with the date of revocation);
 - to a person, other than a body corporate, who is not resident in an EEA state or was not so resident throughout the period of six months immediately preceding the date when the application was made;
 - d) to a body corporate which is not incorporated in an EEA state;
 - e) to a person who has, within a period of 12 months immediately preceding the date when the application was made, been refused the grant or renewal of a licence for the premises, vehicle, vessel or stall in respect of which the application is made, unless the refusal has been reversed on appeal.
- 20.4 The discretionary grounds for refusal are set out in paragraph 12(3) of Schedule 3. These are:
 - a) That the applicant is unsuitable to hold a licence by reason of having been convicted of an offence or for any other reason;
 - that if the licence were to be granted, renewed or transferred, the business to which it relates would be managed by or carried on for the benefit of a person other than the applicant who would have been refused a licence if they had applied themselves;
 - that the number of sex establishments, or of sex establishments of a particular kind, in the relevant locality at the time the application is determined is equal to or exceeds the number which the authority consider is appropriate for that locality;
 - d) the grant or renewal of licence would be inappropriate because of:
 - i. the character of the relevant locality;
 - ii. the use to which the premises in the vicinity are put; or
 - iii. the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.
- 20.5 The Committee should only take into account comments within the objections or made orally at the hearing which are relevant to the

mandatory or discretionary grounds for refusal. The Committee should note also that late objections may be considered in the Committee's discretion, subject to the principles of natural justice and procedural fairness.

- 20.6 The Act provides limited grounds for appealing a decision of the Committee to the Magistrates' Court. Where the Committee refuses the application on the basis of suitability of the applicant (Para. 12(1)(a)) or on the basis that the business would be managed or carried on for the benefit of a person who would be refused a licence in their own right (Para. 12(1)(b)) the applicant may appeal to the Magistrates' Court within 21 days beginning with the date of the decision. There is a similar right of appeal if the Committee decides to impose a term, restriction or condition.
- 20.7 There is no right of appeal against any of the mandatory grounds unless the applicant seeks to show that the ground(s) did not apply to him or her. There is no right to appeal in respect of the discretionary grounds set out at Paragraph 12(3)(c) and (d). Any appeal against such a decision would be by way of an application for judicial review to the High Court.
- 20.8 Where a decision is appealed to the Magistrates' Court, there is a further right of appeal to the Crown Court. There is no further right of appeal from the Crown Court.
- 20.9 Where a licence has been revoked or an application for renewal has been refused, the licence is deemed to remain in force until the time limit for appealing has passed or, if an appeal has been made, when the appeal is finally determined or abandoned and, in the case of a successful appeal against a refusal to renew, when there is no further right of appeal and the authority renews the licence.

21.0 Finance Comments

21.1 The Chief Finance Officer has been consulted on this report and has no additional comments to make.

22.0 Appendices

Appendix 1	A copy of the existing SEV Licence (including the LBTH Standard Conditions)
Appendix 2	A copy of the renewal application
Appendix 3	A copy of the existing Premises Licence
Appendix 4	Maps of the premises showing the site location

Appendix 5	layout plans of the premises
Appendix 6	Photographs of the premises
Appendix 7	Code of Conduct for Performers, Code of Conduct for Customers (House Rules) and Dancers Welfare Policy
Appendix 8	Vicinity Map
Appendix 9	Ward profile for Spitalfields and Banglatown and Whitechapel
Appendix 10	Copy of Site Notice
Appendix 11	Copy of Press Advert
Appendix 12	Representation from Licensing Authority
Appendix 13	Request for Revocation letter dated 3 rd March 2023
Appendix 14	Witness Statement and notes – Officer A
Appendix 15	Witness Statement and notes – Officer B
Appendix 16	Witness statement Mohshin Ali (15th May 2023)
Appendix 17	Exhibit MA/01: Witness Statement PC Morgan (3/1/23) Sensitive Photos RESTRICTED DJM/1 to DJM/9
Appendix 18	Witness Statement PC Guerra (2/1/23)
Appendix 19	PC Guerra – CCTV Transcript (RGG/001/ RGG/002)
Appendix 20	PC Guerra – CCTV Photo Evidence (RGG/004-020) Sensitive Photos RESTRICTED
Appendix 21	PC Guerra – Communication with Sols (RGG/003)
Appendix 22	Exhibit MA/02: Companies House
Appendix 23	Table of Breaches CCTV 18 th August 2022
Appendix 24	Witness Statement Mohshin Ali (24th August 2023)
Appendix 25	Exhibit MA/03: Westminster Committee Decision 25/5/2023
Appendix 26	Exhibit MA/04: LBTH Committee Decision 17/10/2017
Appendix 27	Police Representation
Appendix 28	Witness Statement – PC Guerra (14/5/23)

Appendix 29	PC Guerra Exhibit RGG 0021-0031
	Sensitive Photos RESTRICTED
Appendix 30	Witness Statement PC Muldoon (15/5/23)
Appendix 31	PC Muldoon Exhibits SM/1-18
	Sensitive Photos RESTRICTED
Appendix 32	Supporting representations
Appendix 33	SEV Policy