



The Licensing Unit  
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London  
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**Metropolitan Police Service**  
**Licensing Office**  
Southwark Police Station,  
323 Borough High Street,  
LONDON,  
SE1 1JL

Tel: 020 7232 6756  
Email: SouthwarkLicensing@met.police.uk

**Our reference:** MD/21/172

**Date:** 28/09/2022

Dear Sir/Madam

**Re: Roca Café 188 Grange Road SE13AA**

Police are in possession of an application from the above for a New Premises Licence for the supply of alcohol on/off sales. The operating schedule describes it as a Bistro Cafe. The Hours requested are within the guidelines set out in the Southwark Statement of Licensing for residential area however there appears to be a discrepancy between the opening hours and supply of alcohol hours requested and this should be explained.

The applicant has provided very little in the way of an operating schedule. They have provided a seating plan for the café area and a garden area.

The applicant has offered minimal control measures within the operating schedule however the Home office guidance issued under Sec 182 of the licensing Act 2003 'General principles' state that it is important in setting the parameters within which the premises may operate. Conditions must be precise and enforceable.

I object to the granting of this licence in its current format as the applicant has not fully addressed the licensing objectives and the lack of information means I cannot make any further comment at this time.

Submitted for your consideration.  
Yours Sincerely

**PC Mark Lynch 2246AS**  
Southwark Police Licensing Unit  
Tel: 0207 232 6756/6639

**(POLICE - WITHDRAWAL OF REPRESENTATION STATEMENT)**

**From:** mark.A.Lynch@met.police.uk <mark.A.Lynch@met.police.uk>

**Sent:** Thursday, November 3, 2022 3:46 PM

**To:** Regen, Licensing <Licensing.Regen@southwark.gov.uk>

**Cc:** [REDACTED] Tear, Jayne <Jayne.Tear@SOUTHWARK.GOV.UK>; SouthwarkLicensing@met.police.uk

**Subject:** Application for a premises licence -188 Grange Road (878415)

Good afternoon

In view of the applicants acceptance to the additional conditions and amended wording as below in red ,Police would now like to withdraw our representation for the granting of the licence for Roca Café 188 Grange Road SE16

That a CCTV system shall be installed and maintained in full working order. The CCTV system will record footage of evidential quality in all lighting conditions and should be able to capture a clear facial image of all persons that enter the venue. All public areas will be covered by the CCTV system including the bar, smoking areas, and frontage of the premises. The premises shall not be open at any time when the CCTV is not operating correctly.

All CCTV footage shall be kept for a period of thirty one (31) days and shall be made immediately available for inspection to officers of the Police and the Council on request.

That at least one member of staff should be on duty at all times the premises is open that is trained in the use of the CCTV and able to view and download images to a removable device on request of Police or council officer.

That all staff shall be trained in their responsibilities under the Licensing Act 2003 and in regards to the terms and conditions of this licence. Such training should include the prevention of sales of alcohol to underage persons, and the challenge 25 scheme in operation at the premises. Records pertaining to such training shall be kept / be accessible at the premises at all times, shall be updated every 6 months and shall be made immediately available for inspection at the premises to council and / or police officers on request.

That clearly legible signs shall be prominently displayed where they can easily be seen and read by customers at all exits from the premises, requesting to the effect that customers leave the premises and area in a quiet and orderly manner. Such signs shall be maintained free from obstruction when the premises are in use in accordance with this licence.

That a dispersal policy will be implemented and maintained to assist with patrons leaving the premises in an orderly and safe manner and all relevant staff will be trained in the contents of this policy and made aware of any changes. A record of this training will be kept including the date and the trainees name and made available for inspection when requested. A copy of the dispersal policy shall be made available to the licensing officer and the police on request.

An incident log shall be kept at the premises, and made available on request to an authorised officer of the Council or the Police. It must be completed within 24 hours of the incident and will record the following: a) all crimes reported to the venue; b) all ejections of patrons; c) any complaints received concerning crime and disorder; d) any incidents of disorder; e) all seizures of drugs or offensive weapons; f) any faults in the CCTV system, searching equipment or scanning equipment; g) any refusal of the sale of alcohol including date, time and name of staff member; h) any visit by a relevant authority or emergency service.

That all staff are trained in their responsibilities under the Licensing Act 2003 and the signs of drunkenness and training records to be kept and updated every six months and shall be made immediately available to officers of the police and the council upon request.

That customers shall use no outside area after 20.00 other than those who temporarily leave the premises to smoke a cigarette at the front of the premises with no more than five people permitted to smoke at one any time.

That the supply of alcohol on the premises shall only be to a person seated taking a table meal there and for consumption by such a person as ancillary to their meal

That all licensable activities shall cease 30 mins before the terminal hour

There shall be no vertical drinking in the premises

That staff shall monitor the internal and external areas of the premises and ensure the orderly conduct of patrons at the premises

All off Sales of alcohol shall be sold in sealed containers

All off sales shall only be made to persons purchasing substantial takeaway meal and shall be for consumption away from the premises.

That alcohol shall not be sold or supplied on the premises otherwise than to persons taking a substantial table meal, and by consumption by such persons as an ancillary to their meal

The accommodation limit shall be set at 28 patrons as per the seating plan

The licensee shall ensure that no noise shall emanate from the premises by its patrons which causes nuisance to their neighbours rise to a nuisance;  
Proposed Conditions

Kind Regards  
Mark Lynch Pc2246AS  
Southwark Police Licensing

**From:** Roca Cafe [REDACTED]  
**Sent:** 03 November 2022 10:03  
**To:** Lynch Mark A - AS-CU <[mark.A.Lynch@met.police.uk](mailto:mark.A.Lynch@met.police.uk)>  
**Cc:** [Jayne.Tear@SOUTHWARK.GOV.UK](mailto:Jayne.Tear@SOUTHWARK.GOV.UK); MD Mailbox - Southwark Licensing <[SouthwarkLicensing@met.police.uk](mailto:SouthwarkLicensing@met.police.uk)>; [Ray.Moore@southwark.gov.uk](mailto:Ray.Moore@southwark.gov.uk)  
**Subject:** Re: Application for a premises licence -188 Grange Road (878415)

Dear Mark Lynch,

I accept all the above conditions.

Kind regards

Turker Akcil

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**From:** Moore, Ray <Ray.Moore@southwark.gov.uk>

**Sent:** Thursday, October 20, 2022 8:46 AM

**To:** Regen, Licensing <Licensing.Regen@southwark.gov.uk> [REDACTED]

**Cc:** Forrest, Yemisi <Yemisi.Forrest@Southwark.gov.uk>

**Subject:** RE: Application for a new premises license, Turker Akcil T/A "Roca Cafe", 188 Grange Road, London SE1 3AA Ref: 878415

Trading Standards as a responsible authority are in receipt of a new premises license application from Turker Akcil in respect of a premises at 188 Grange Road, London, SE1 3AA. Trading Standards as a responsible authority are making representation in respect of this application under all the licensing objectives, but primarily the protection of children from harm.

In the general description this is:-

“Bistro Cafe intending to expand business by providing alcohol with the current food menu. The premises has a capacity of 28 seats. We also like to deliver alcohol via delivery applications such as deliveroo and uber.”

The hours for alcohol sales are to be:-

Monday to Sunday 12:00hrs to 22:30hrs

...these are not the same as the opening hours as the premises opens earlier in the day. The application is for on and off sales as well as online sales via platforms such as Deliveroo or Unbereats.

It is noted that the application states the following in relation to the protection of children from harm....

CHILDREN WILL BE OUR TOP PRIORITY TO ENSURE THEIR SAFETY.

It is also noted that it states under General All four licensing objectives...

THE LICENCE WILL BE USED IN GOOD SPIRIT AT ALL TIMES.

This is not sufficient and Trading Standards asks that the following conditions be put forward to cover all these matters.

4AA - The premises shall operate an age check 'Challenge 25' policy whereby customers purchasing alcohol who look or appear to be under 25 years of age will be asked for an approved form of proof of age to verify their age. Approved forms shall include a driving licence, passport or a PASS approved proof of age card such as the Southwark Proof of Age (SPA) card.

4AB - All staff involved in the sale of alcohol shall be trained in the age check 'Challenge 25' policy. A record of their training, including the dates that each member of staff is trained, shall be available for inspection at the premises on request by the Council's authorised officers or the Police.

4AC - Age check or 'Challenge 25' signage shall be displayed at entrances to the premises, areas where alcohol is displayed for sale and at points of sale to inform customers that an age check 'Challenge 25' policy applies and proof of age may be required.

4AI - A register of refused sales of alcohol shall be maintained in order to demonstrate effective operation of the policy. The register shall be available for inspection at the premises on request by Council authorised officers or the Police.

350 - No beers, lagers or ciders in single cans, bottles or multi packs with an ABV of more than 6.5% will be displayed, sold or offered for sale from the premises unless written permission has been given by Metropolitan Police Licensing, Southwark Council Trading Standards or Southwark Council Licensing. A copy of that permission must be retained with the premises licence and be immediately available for inspection by any Responsible Authority.

It is not specified how age will be verified for online sales.

If the license were to be granted then Trading Standards as a responsible authority would ask that the applicant suggest some form of conditions to ensure that alcohol is not delivered to minors and what online age verification scheme is to be used.

Trading Standards would welcome a dialogue on these matters to discuss what conditions could be put in place to ensure that the licensing objective “the protection of children from harm” is met. An initial suggestion might be as follows:-

That all online sales of alcohol are subject to a real time age verification check via an external third party.

- That drivers (whether employed directly, as self-employed or via third parties) have to undertake training on age restricted policies to ensure that the following checks are conducted at the point of delivery when the person appears to be under the age of 25...???

- All online age verification checks should only be made by a company which is a member of the following organisation <https://avpassociation.com/>

It maybe that these matters are dealt with in any contract with deliveroo etc. If so Trading Standards would welcome details of how they intend to deal with these matters.

Draft guidance published by the Government on these matters for primary authority relationships with businesses suggest the following:-

#### “Online Age Assessment for Remote Sales

Online transactions present a challenge that the customer is not directly visible to the company to assess their age. Broadly, online transactions should verify age by securing that:

- The customer is a real person
- The customer is able to demonstrate that they are over the relevant age restriction
- That this is anchored in a process that can be relied upon
- That the process is tested, independently certified and monitored

Primary authorities should seek evidence from partner businesses or their systems suppliers that the approach to age verification meets the above criteria and any other relevant criteria to the specific circumstances of the transactions.

Primary authorities should consider whether systems are resilient to presentation attack (this is more commonly known as 'spoofing'). There should be means in place to test for both liveness presentation attack (is it a real living person) and documentary presentation attack (is it a genuine ID document).

Systems should be clear, through their age check practice statement, of the methodologies utilized to provide age assurance and the authoritativeness category of originating identity documentation. Primary authorities may want to consider the application of relevant standards (such as the Governments Good Practice Guide (GPG45) on identity proofing, the PASS 2:2020 – Proof of Age Standards Scheme – Requirements for e-ID Validation Technology or BS 8626:2020 – Design and operation of online user identification systems – Code of practice.

Typically, authoritativeness categories of identity documents should secure that they are from:

- A governmental or public authority
- The Proof of Age Standards Scheme (PASS) or international equivalent
- An authorized or regulated industry (such as finance or utility)

It is worth noting that identity is a construct of an asserted status noted and recorded by the individual citizen and their home state. A person's identity attributes can evolve over time, although their date of birth remains a constant (name, address, gender, financial footprint and other identify attributes can change through the lifetime of an individual). Processes based on gaining age assurance associated with identity are, therefore, prone to error. Primary authorities should consider whether or not the validity of an age assurance check based on identity verification should diminish over time, perhaps associated with the risk assessment of the age restricted item concerned. Generally, primary authorities should not accept age assurance that are perpetual indefinitely.

There are numerous methods of age assurance, which are growing and developing in accuracy and efficacy all of the time. At present the following are some of the methods that businesses may be seeking to implement:

- e-IDVT (ID verification technology) – scanning a passport/Driving Licence/PASS Card – with or without NFC capabilities (near field communication).
- Apps and Attribute Identity and Verification Services
- Age Estimation and Artificial Intelligence Systems
- Database look up – links to primary data sources (like credit reference agencies). Government records, records from sources regulated by government agencies (such as FCA, OFCOM, etc), PASS Card Issuers
- Age Exchanges – distributed ledgers

Primary authorities should consider how businesses and age assurance systems deal with contra indicators, that is information or behaviours that cast doubt on the age assurance gained.”

AS CAN BE SEEN FROM THE ABOVE THERE ARE AS YET NO AGREED PROTOCOLS FOR MOVING FORWARD ON THESE MATTERS AND THE TECHNOLOGY IS RAPIDLY EVOLVING.

**Trading Standards as a responsible authority would welcome a dialogue with the company to try and agree a way forward that is appropriate for your business.**

Ray MOORE

Principal Trading Standards Enforcement Officer

Southwark Council | Environment & Leisure| Regulatory Services

Post: 3rd Floor Hub 2, PO Box 64529 | London SE1P 5LX

Direct line 020 7525 0816 | Fax 020 7525 5735 | Call Centre 020 7525 2000

[www.southwark.gov.uk/TradingStandards](http://www.southwark.gov.uk/TradingStandards)

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<http://www.southwark.gov.uk/business/trading-standards-and-food-safety/illegal-tobacco-e-cigarettes-and-shisha>

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**(TRADING STANDARDS - WITHDRAWAL OF REPRESENTATION STATEMENT)**

**From:** Moore, Ray <Ray.Moore@southwark.gov.uk>

**Sent:** Monday, October 24, 2022 1:04 PM

**To:** Roca Cafe [REDACTED] Regen, Licensing <Licensing.Regen@southwark.gov.uk>

**Cc:** Tear, Jayne <Jayne.Tear@SOUTHWARK.GOV.UK>; Forrest, Yemisi <Yemisi.Forrest@Southwark.gov.uk>

**Subject:** RE: Application for a new premises license, Turker Akcil T/A "Roca Cafe", 188 Grange Road, London SE1 3AA Ref: 878415

As the applicant has now accepted the following condition TS as a responsible authority now withdraw the representations.

4AA - The premises shall operate an age check 'Challenge 25' policy whereby customers purchasing alcohol who look or appear to be under 25 years of age will be asked for an approved form of proof of age to verify their age. Approved forms shall include a driving licence, passport or a PASS approved proof of age card such as the Southwark Proof of Age (SPA) card.

4AB - All staff involved in the sale of alcohol shall be trained in the age check 'Challenge 25' policy. A record of their training, including the dates that each member of staff is trained, shall be available for inspection at the premises on request by the Council's authorised officers or the Police.

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"Online sales will be done by "Ubereats" and "Deliveroo" and age verification is covered by their respective policies on these matters."

Ray MOORE

Principal Trading Standards Enforcement Officer

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<http://www.southwark.gov.uk/business/trading-standards-and-food-safety/illegal-tobacco-e-cigarettes-and-shisha>

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**From:** Roca Cafe [REDACTED]  
**Sent:** Monday, October 24, 2022 1:02 PM  
**To:** Moore, Ray <[Ray.Moore@southwark.gov.uk](mailto:Ray.Moore@southwark.gov.uk)>  
**Cc:** Tear, Jayne <[Jayne.Tear@SOUTHWARK.GOV.UK](mailto:Jayne.Tear@SOUTHWARK.GOV.UK)>; Forrest, Yemisi <[Yemisi.Forrest@Southwark.gov.uk](mailto:Yemisi.Forrest@Southwark.gov.uk)>  
**Subject:** Re: Application for a new premises license, Turker Akcil T/A "Roca Cafe", 188 Grange Road, London SE1 3AA Ref: 878415

Dear Ray Moore,

I confirm these conditions are acceptable.

Kind regards

Turker Akcil

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