

**Application for the review of a premises licence or club premises certificate under the  
Licensing Act 2003**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

Before completing this form please read the guidance notes at the end of the form.  
If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

**I Police Licensing Officer Hannah McCully of the Metropolitan Police Service**

*(Insert name of applicant)*

**apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below (delete as applicable)**

**Part 1 – Premises or club premises details**

|   |  |
|---|--|
| <b>Postal address of premises or, if none, ordnance survey map reference or description</b> |  |
| Kingston International Market , 78-80 Tolworth Broadway, Tolworth, Surbiton, KT6 7HR        |  |
| <b>Post town</b><br>Surbiton  | <b>Post code (if known)</b><br>KT6 7HR |

|   |
|---|
| <b>Name of premises licence holder or club holding club premises certificate (if known)</b><br>Mr Erdal Tutuman |
|---|

|  |
|--|
| <b>Number of premises licence or club premises certificate (if known)</b><br>Licence Number: 23/01727/LAPREM |
|--|

**Part 2 - Applicant details**

I am

Please tick ✓ yes

1) an individual, body or business which is not a responsible authority (please read guidance note 1, and complete (A) or (B) below)

☐

2) a responsible authority (please complete (C) below)

☒

3) a member of the club to which this application relates (please complete (A) below)

☐

**(A) DETAILS OF INDIVIDUAL APPLICANT** (fill in as applicable)

Please tick ✓ yes

Mr ☐ Mrs ☐ Miss ☐ Ms ☐ Other title  
(for example, Rev)

**Surname**

**First names**

**I am 18 years old or over**

Please tick ✓ yes

☐

**Current postal  
address if  
different from  
premises  
address**

**Post town**

**Post Code**

**Daytime contact telephone number**

**E-mail address  
(optional)**

**(B) DETAILS OF OTHER APPLICANT**

Name and address

Telephone number (if any)

E-mail address (optional)

**(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT**

Name and address Police Licensing Officer Hannah McCully of the Metropolitan Police Service. SW licensing team for Kingston

Telephone number (if any) -  
Mobile: [REDACTED]

E-mail address (optional)  
[REDACTED]

**This application to review relates to the following licensing objective(s)**

- 1) the prevention of crime and disorder
- 2) public safety
- 3) the prevention of public nuisance
- 4) the protection of children from harm

Please tick one or more boxes ✓

☐  
☐  
☐  
☒

**Please state the ground(s) for review** (please read guidance note 2)

**This application is made on the grounds of a serious breach of the licensing objective:  
Protection of Children from Harm.**

**Summary of Concerns**

**This review has been brought forward following three failed test purchase operations conducted by Trading Standards and Licensing Officers and Kingston Safer Neighbourhood Team ( SNT) , in which alcohol was sold to underage cadets. These incidents occurred on:**

- **07/04/2025 – Sale of alcohol to an underage Police Cadet volunteer.**
- **31/07/2025 – Sale of alcohol to an Underage Police Cadet volunteer, second volunteer told by cashier to go and get change to make the sale.**

**Both test purchases were conducted under controlled conditions and were part of a wider initiative in the area to ensure compliance with the Licensing Act 2003, particularly the protection of children from harm.**

**The failed Test purchase operations both occurred within three months this is considered as persistently selling alcohol to children. Further breaches found at a licensing inspection.**

**I have attached a representation document to support this application.**

**Please provide as much information as possible to support the application** (please read guidance note 3)

**Please tick ✓ yes**

Have you made an application for review relating to the premises before

☐

If yes please state the date of that application

| Day                  | Month                | Year                 |
|----------------------|----------------------|----------------------|
| <input type="text"/> | <input type="text"/> | <input type="text"/> |

**If you have made representations before relating to the premises please state what they were and when you made them**

Please tick ✓

yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate ☒
- I understand that if I do not comply with the above requirements my application will be rejected ☒

**IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.**

**Part 3 – Signatures** (please read guidance note 4)

**Signature of applicant or applicant's solicitor or other duly authorised agent** (please read guidance note 5). **If signing on behalf of the applicant please state in what capacity.**

Signature

.....Hannah McCully.....

Date

.....08/10/2025.....

Capacity

.....Police Licensing Officer , SW Licensing Team

**Contact name (where not previously given) and postal address for correspondence associated with this application** (please read guidance note 6)

**Post town**

**Post Code**

**Telephone number (if any)**

**If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)**

**Notes for Guidance**

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.

**Licensing Review: Kingston International Market , 78-80 Tolworth Broadway, Tolworth, Surbiton, KT6 7HR**

**Premises Licence Holder:** Erdal TUTUMAN

**Designated Premises Supervisor (DPS):** Erdal TUTUMAN

**Licensing Authority:** Kingston

**Review Initiated By:** MPS Kingston Licensing team

**Date of Review:** TBC

### Introduction

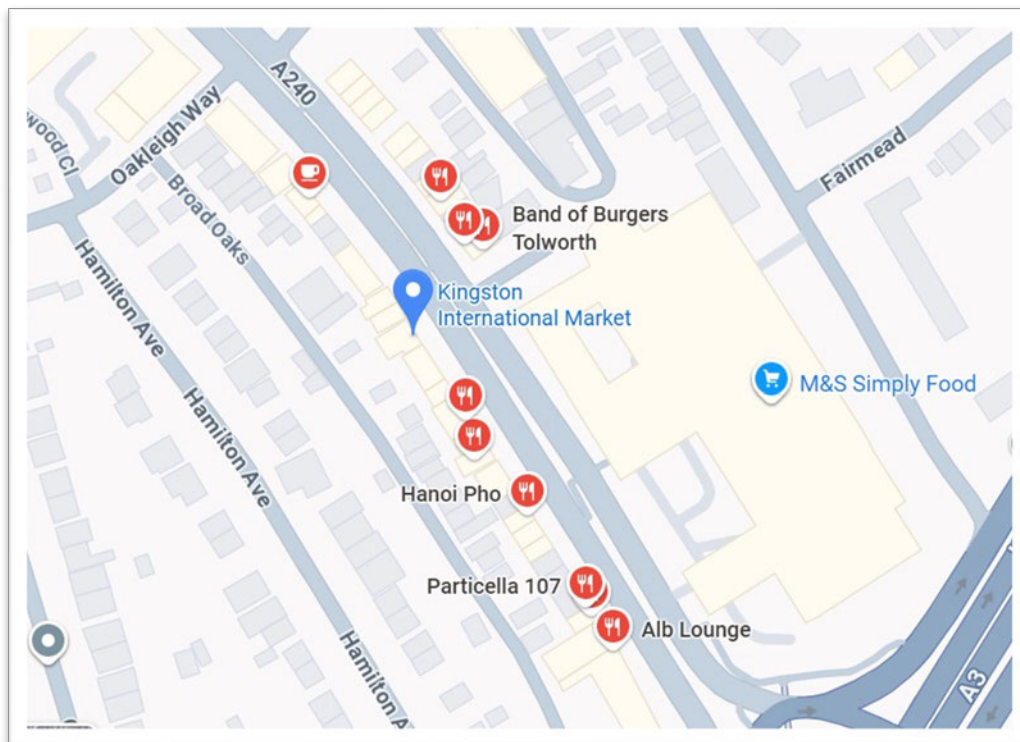
This review application is to address the concern that the Premises Licence Holder has repeatedly failed to uphold the licensing objectives, specifically 'The protection of children from harm', due to the premises repeatedly selling alcohol to children.

The records of the Metropolitan Police Service ('MPS') show that the Premises License Holder and Designated Premises Supervisor is Mr Erdal Tutuman. The MPS believe that he has sole control of the premises, which the MPS would describe as convenience store that sells a variety of alcohol.

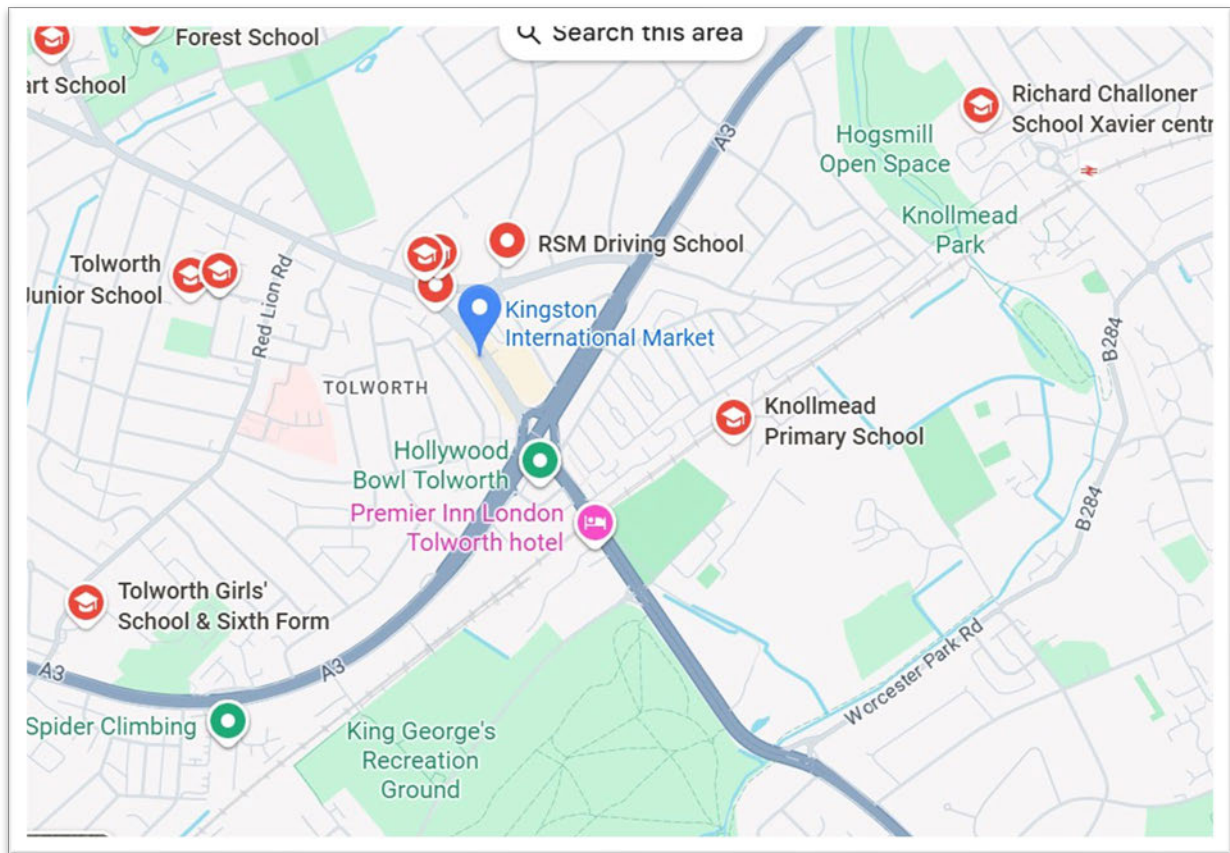
The MPS have engaged with the premises and raised the incidents of concern in the hope that Mr Tutuman would address the failings. However, this has not happened and the MPS has been left with no other option but to formally request a review of the premises licence.

### Location

The premises is located at 78-80 Tolworth Broadway, Tolworth, Surbiton, KT6 7HR. Tolworth Broadway (A240) is a busy Highstreet with many off licences, convenience store and fast food outlets.



Tolworth Broadway also had a close proximity to a large recreational area and two secondary schools within a 1 mile radius of Kingston International Market.



## Timeline

### 11 December 2023 – Licence Application Received

Applicant: Mr Erdal Tutuman (Proposed PLH and DPS) wrote on application form and as a Commitment to promoting the four licensing objectives included:

- Up-to-date training for all staff
- Challenge 25 Policy enforced at the premises
- Protection of Children from Harm:
- Age verification procedures for age-restricted sales
- Prevention of alcohol and tobacco sales to minors
- Accepted ID forms: Passport, photo card driving licence, HM Forces ID, PASS-accredited ID
- Prominent signage regarding underage sales and Challenge 25

### 19 December 2023 – Police Response

Police Licensing Officer McCully sent letter to Mr Tutuman outlining concerns including:

- Risk of increased Crime and Disorder
- Concerns regarding Protection of Children from Harm
- Recommendation to reword conditions and include additional measures
- Additional Condition: Strategic placement of notices detailing restrictions on sales to children



## 20 December 2023 – Licence agreed and granted

- Conditions agreed by applicant/agent
- Premises licence granted with agreed conditions

## 7 April 2025 – Failed Test Purchase

- Sale of one bottle of Smirnoff ICE (ABV 4%) to underage individual
- Seller: [REDACTED]
- Fixed Penalty Notice issued (PND #60622920)
- Police Licensing Officer McCully spoke with manager [REDACTED]. The premises Licence was explained and looked at with an emphasis on training, incidents and refusals. Mr [REDACTED] explained at the time he was the duty manager and that he would relay this back to the DPS/PLH.

## 19 May 2025 – Warning Letter Issued

- Recipient: Mr Erdal Tutuman (PLH & DPS)
- Delivery: Royal Mail Recorded Delivery
- Address: Kingston International Market, 78–80 Tolworth Broadway, Tolworth
- Tracking Ref: [REDACTED]

## 31 July 2025 – Second Failed Test Purchase

- Incident URN: 01/7804630/25
- Kingston SNT officers conducted test purchases with underage cadets
- Two Failures were recorded
- One cadet successfully purchased a canned alcoholic drink
- Another cadet was told to return with change in order to purchase
- Cashier: [REDACTED] admitted not checking ID due to being busy
- Cautioned by PC Billing 1227SW at 17:54
- Issued £90 PND (DA18), accepted with remorse
- All actions recorded and documented

## 26 September 2025 – Licensing Inspection

- Officer: PC Hopkins
- Findings: Multiple breaches found of premises licence, CCTV recording only 26 days, Signage missing, incident log missing.
- Other concerns: refusal log showing only 2 entries, incomplete training records showing only 1 member of staff being trained
- Manager on Duty: [REDACTED]

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### Summary of Concerns

This review has been brought forward following three failed test purchase operations conducted by Trading Standards and Licensing Officers and Kingston Safer Neighbourhood Team ( SNT) , in which alcohol was sold to underage cadets. These incidents occurred on:

- **07/04/2025** – Sale of alcohol to an underage Police Cadet volunteer.

- **31/07/2025** – Sale of alcohol to an Underage Police Cadet volunteer, second volunteer told by cashier to go and get change to make the sale.

Both test purchases were conducted under controlled conditions and were part of a wider initiative in the area to ensure compliance with the Licensing Act 2003, particularly the protection of children from harm.

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## Licensing Objectives Breached

The premises has failed to uphold the following licensing objective:

- **Protection of Children from Harm**

The sale of alcohol to minors is a serious breach of licensing conditions and demonstrates a lack of effective age verification procedures and training. Despite previous advice and guidance issued to the premises, there appears to be no robust system in place to prevent underage sales.

The Licensing Act 2003

“The offence of persistently selling alcohol is committed if, on two or more different occasions in a period of three consecutive months, alcohol is unlawfully sold on the same premises to a person aged under 18.” (Licensing Act 2003 S.147A)

The failed test purchases fall within a 3-month period. 07/04/2025 to 31/07/2025.

This is defined by the Licensing Act 2003 147A as:

### **147A 1 (a)**

“A person is guilty of an offence if—

(a) on **[F22 or more different occasions]** within a period of 3 consecutive months alcohol is unlawfully sold on the same premises to an individual aged under 18” (*Licensing Act 2003 S.147A*)

### **And 147A 7 (c)**

“In determining whether an offence under this section has been committed, the following shall be admissible as evidence that there has been an unlawful sale of alcohol to an individual aged under 18 on any premises on any occasion—

(c) the payment by a person of a fixed penalty under Part 1 of the Criminal Justice and Police Act 2001 in respect of such a sale.” (*Licensing Act 2003 S.147A*)

Both underage sales made by separate cashiers each received a FPN and fine.

Home office guidance suggests that it's not necessary to inform the DPS or PLH when the unlawful sales are detected, however there should be *engagement* to promote the licensing objectives. This was duly noted and after the initial sale on 07/04/2025, the duty manager Mr [REDACTED] was spoken to by Police Licensing Officer McCully. Mr [REDACTED] explained that he was not the DPS but was the manager on duty. A physical copy of the premises licence was shown to him and the severity of the test purchase failure explained. The need for training and refusal logs were also explained. Trading standards officers present also had a discussion regarding refusal logs. Mr [REDACTED] intimated that he would inform the DPS. It was also explained to that

a warning letter would be issued and that if breached again, it could lead to a review of the licence.

The warning letter including details of the sale and the possible consequences of a recurrence was sent to the DPS and PLH , Mr Erdal Tutuman was sent royal mail recorded delivery on 19/05/2025. ( *Reference list : Warning letter* )

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### **Additional Observations**

A licensing inspection was carried out on 26/09/2025 by Licensing Officer PC Hopkins and several breaches of the premises licence were found including:

#### **1. Breach of Condition 19 – Security, Incidents**

Under the conditions of the premises licence, the venue is required to maintain a log. There was no logbook available for inspection, breaching condition 19. An incident logbook shall be kept and maintained on the premises and made available to the Police or the Licensing Authority upon immediate request, which will record the following:

- All crime reported to the venue;
- All ejections of patrons;
- Any complaints received;
- Any incidents of disorder;
- Any refusals to the sale of alcohol

#### **2. Breach of Licence Condition 24 – The Protection of Children from Harm**

Condition 24 of the premises licence requires that notices be strategically and prominently placed at points of sale, advising customers that they may be asked to provide evidence of age.

During the inspection, no such notices were visible at or around the point of sale. This constitutes a breach of the licence condition.

#### **3. Breach of Condition 5 - Closed-Circuit Television**

Condition 5 states that the premises shall install and maintain a comprehensive closed-circuit television system (CCTV). All recordings shall be stored for a minimum of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31-day period.

During the inspection, it was established that the recordings lasted 26 days.

#### **4. Refusals Log**

During the visit, it was noted that the logbook recorded had no records since operating in the beginning of 2024. The first record was that of a failed test purchase on 7 April 2025. Since that date, only two further refusals have been recorded:

- 1 August 2025 – Refusal of alcohol sale

- 8 August 2025 – Refusal of the sale of RIZLA Paper

Both incidents were recorded just after the second failed test purchase. No other refusals have been documented since this date, which is unusual for a supermarket of this size and footfall on the Tolworth Broadway. (*Reference list : Photo 1, refusal log showing lack of entries*)

Training records viewed at the inspection showed that the cashier who sold the alcohol had been trained two months previously on 01/06/2025 by Mr [REDACTED]. Also, one would have believed that someone receiving training so recently would have had a better understanding of Challenge 25 and underage alcohol sales.

Whilst a training record was present, it was only completed two months previously and was for the one female cashier only. This is considered highly unusual for a venue of this size that operates 17 hours a day (14 hours a day on Sunday). It would be extremely unlikely that the one member of staff and the person that trained her would be on duty for the opening hours stipulated. (*Reference list : Photo 2 and 3 , Training record showing 1 entry*)

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## **Conclusion**

The Licensing Authority takes the protection of children extremely seriously. The repeated sale of alcohol to minors at this premises is unacceptable and warrants formal intervention which is why we have applied for this review.

MPS Licensing team for Kingston seek full revocation of the licence. It is not believed that any further conditions could be imposed. The MPS has considered standing Mr Tutuman down as the DPS would promote the licensing objectives, however as Mr Tutuman is the PLH, he would still have overall control of the premises, which means that it is unlikely that the required changes will be implemented.

At the first failed test purchase, Police licensing officer spoke with manager on duty and explained the breach and the importance of training. The refusal logs and incident logs were also discussed. It was explained that the DPS would receive a warning letter and that any further breaches could have severe consequences e.g. revocation. The warning letter was then sent recorded delivery to the DPS/PLH , ensuring that without doubt it could be viewed and the advice followed to look at the failing processes already in place or re-offer training to those who needed it. The second test purchase was within 3 months of the first and a second and third failure was recorded leading the MPS licensing team to believe that the advice and guidance had not been followed.

The Police Licensing Team are therefore left with no other options other than to request that the Licensing Sub-Committee consider revoking this premises licence to safeguard the protection of children from harm. The proposed actions aim to ensure future compliance and safeguard the community.

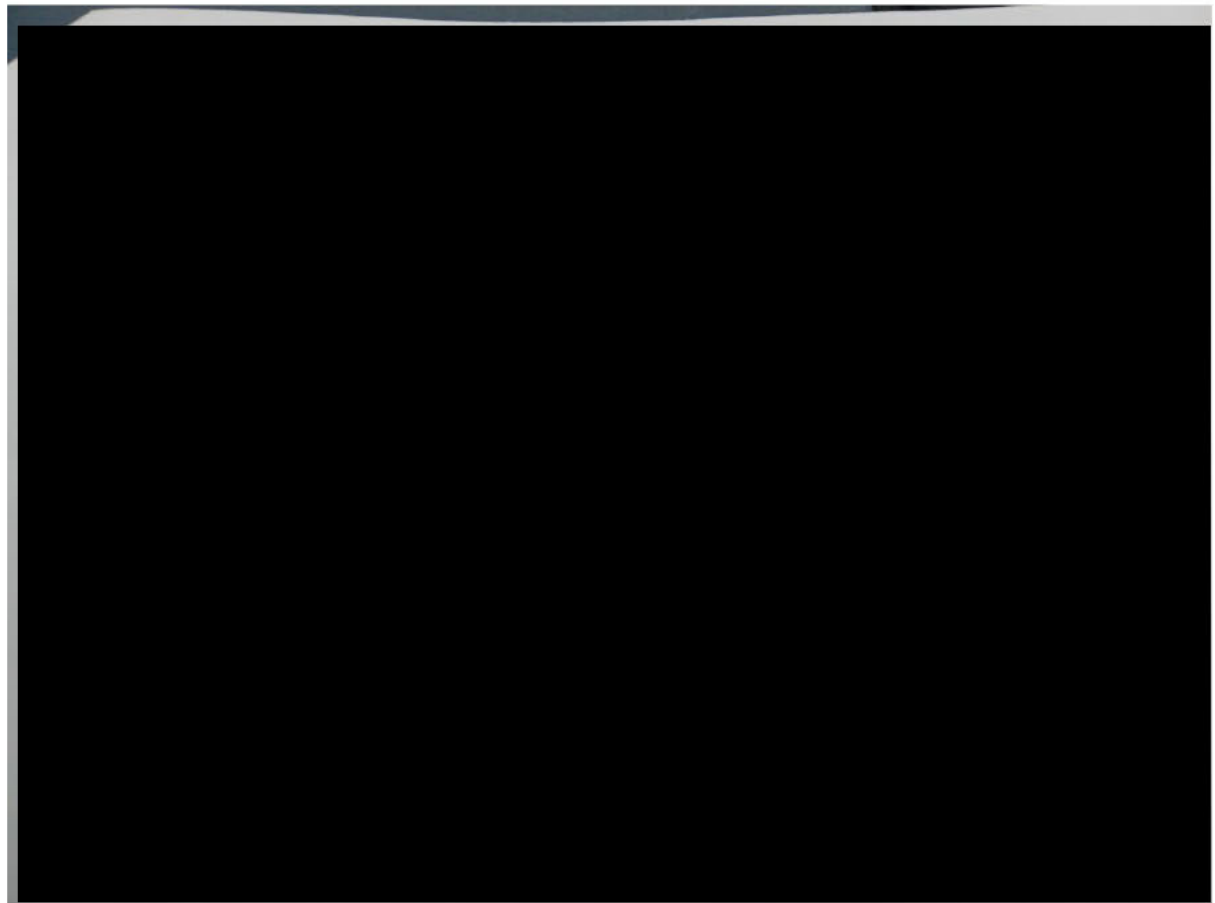
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Photo 1 Refusal log



## Photo 2 Training log

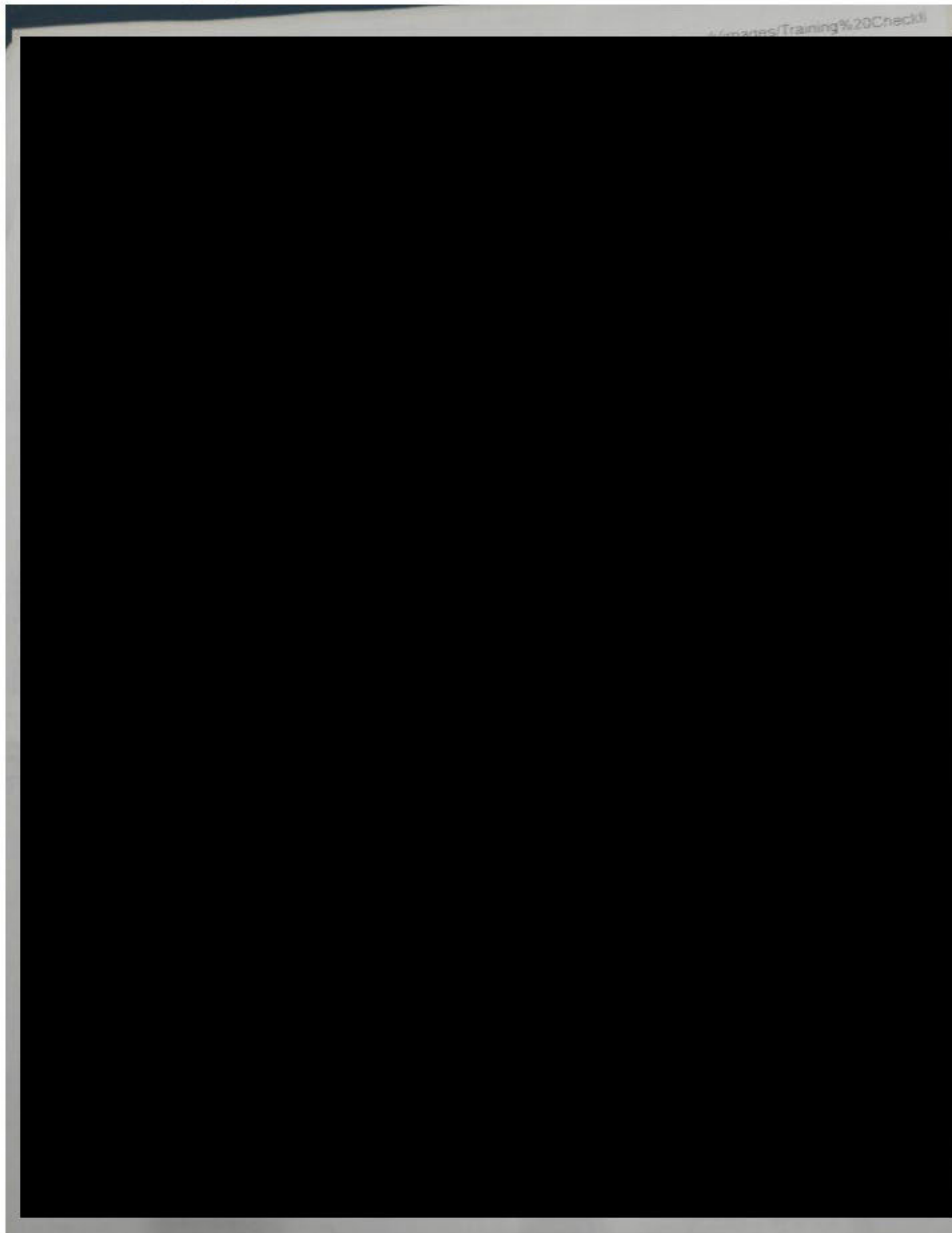


Photo 3 Training log



## LICENSING ACT 2003

### PREMISES LICENCE SUMMARY

Licence Number: 24/00347/LAPREM

**Postal address of premises, or if none, ordnance survey map reference or description**  
Kingston International Market, 78 - 80 Tolworth Broadway, Tolworth, KT6 7HR

**Where the licence is time limited the dates** - Not applicable

**Licensable activities authorised by the licence** - Supply Alcohol - retail

**The times the licence authorises the carrying out of licensable activities**

**Supply Alcohol - retail**

|                     |               |
|---------------------|---------------|
| Sunday              | 09:00 - 23:00 |
| Monday to Saturdays | 08:00 - 23:00 |

**Seasonal variations / Non-standard timings**

Good Friday 9:00 A.M to 21:00 P.M.  
Christmas Day 10:00 A.M to 19:00 P.M.

**The opening hours of the premises**

|           |       |    |       |
|-----------|-------|----|-------|
| Monday    | 06:00 | to | 23:00 |
| Tuesday   | 06:00 | to | 23:00 |
| Wednesday | 06:00 | to | 23:00 |
| Thursday  | 06:00 | to | 23:00 |
| Friday    | 06:00 | to | 23:00 |
| Saturday  | 06:00 | to | 23:00 |
| Sunday    | 06:00 | to | 23:00 |

**Where the licence authorises supplies of alcohol whether these are on and / or off**  
**Supplies** - Alcohol is supplied for consumption **OFF** the Premises

**Name and (registered) address of holder(s) of Premises licence**

Mr Erdal Tutuman  
9 Northview Road, Hornsey, N8 7LN

**Registered number of holder, for example company number, charity number (where applicable)** - Not applicable

**Name of designated premises supervisor where the premises licence authorises the supply of alcohol** - Mr Erdal Tutuman

**State whether access to the premises by children is restricted or prohibited** - None



## **Annex 1 – Mandatory Conditions**

### **Where licence authorises supply of alcohol [Licensing Act 2003 s.19]**

- b. 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.
- c. Every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.

### **Proof of age [Licensing Act 2003 s.19A]**

- d. The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.
  - a) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.
  - b) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either
    - i) a holographic mark, or
    - ii) An ultraviolet feature.

### **Cost of alcohol - permitted price [Licensing Act 2003 s.19A]**

- e. The relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

The definition of the permitted price can be found in The Licensing Act 2003 (Mandatory Licensing Conditions) Order 2014 (SI 2014/1252)

## **Annex 2 – Conditions consistent with the Operating Schedule**

### **The prevention of crime and disorder**

#### **Closed-circuit television**

5. The premises shall install and maintain a comprehensive closed-circuit television system (CCTV). All recordings shall be stored for a minimum of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31 day period.
6. The digital CCTV will cover all areas to where public have access, as well as the outside areas at the front and rear of the premises, and will be capable of taking a head & shoulders shot of persons entering the premises.
7. CCTV will be recording at all times when premises is open, and the recordings will be of evidential quality in all lighting conditions and be of a sufficient quality to produce in court of hearing.
8. All images downloaded from the CCTV must be provided in a format which can be viewed on regularly available equipment without the need for specialist software.
9. At all times the premises is open to the public a minimum of one member of staff on duty will be able to operate the CCTV.
10. The CCTV system shall be maintained in effective working order.
11. Suitable signage shall be displayed at the premises in a prominent position as customers enter the premises stating that CCTV is in operation.

#### **Staff training**

12. All staff shall be trained before they are allowed to sell any alcohol to the public.
13. Records of staff training along with any training material used must be kept by the Designated Premises Supervisor or Premises Licence Holder.
14. Training will include children safety/safeguarding principles and information on how to report any concerns to the appropriate authorities.
15. All training records shall be signed by the trainer and trainee in respect of training received.
16. The premises licence holder shall implement a training manual and all members of staff shall be suitably trained in underage sales prevention before making any sales of alcohol.
17. Refresher training shall be carried out every 6 months for all staff and documented within the training records.
18. The training records shall be available for inspection by the police or authorised local authority officers.

#### **Security, incidents**

19. An incident logbook shall be kept and maintained on the premises and made available to the Police or the Licensing Authority upon immediate request, which will record the following:
  - b. All crime reported to the venue;
  - c. All ejections of patrons;
  - d. Any complaints received;
  - e. Any incidents of disorder;
  - f. Any refusals to the sale of alcohol.

**Display/Storage of alcohol**

20. At all times the premises is open to the public outside the hours for which they are licensed, the alcohol displayed within the shop shall be kept behind lockable shutters or stored within a lockable fridge.

**The prevention of crime and disorder****Litter**

21. A waste bin will be provided near the entrance/exit of the premises to enable the disposal of waste.

**The protection of children from harm****Age verification - challenge 25**

22. Evidence of age in the form of photographic identification (ID) shall be requested from any person appearing to those selling or supplying alcohol to be under the age of 25 and who is attempting to buy alcohol.
23. Acceptable identification for the purpose of this condition is that issued by a government agency bearing a holographic mark with a photograph and date of birth, or the Proof of Age Standards Scheme (PASS) approved age cards.
24. Notices shall be strategically and prominently placed at points of sale advising customers that they may be asked to provide evidence of age.
25. A refusals book to record every instance that sales of alcohol are refused shall be maintained.
26. The refusals book shall document the date and time a refusal of sale is made and the member of staff refusing the sale.
27. The refusals book shall be available for inspection by the police or authorised local authority officers.

**Notice, sales/admission to children**

28. Notices shall be strategically and prominently placed on the premises detailing the restrictions on sales to children.

**Annex 3 – Conditions attached after a hearing by the Licensing Authority**

None

## Annex 4 – Plans

