

To: Councillors Woodward (Chair), Tarar, Asare, Dennis, Edwards, Keane, Leng, Magon, Rowland, DP Singh, Stevens and Thompson.

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4 February 2026

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NOTICE OF MEETING - LICENSING APPLICATIONS COMMITTEE 12 FEBRUARY 2026

A meeting of the Licensing Applications Committee will be held on Thursday, 12 February 2026 at 6.30 pm in the Council Chamber, Civic Offices, Bridge Street, Reading, RG1 2LU (from Monday 26 January the public entrance to the Civic Centre will be on Bridge Street). The Agenda for the meeting is set out below.

<u>ACTION</u>	<u>WARDS AFFECTED</u>	<u>Page No</u>
1. DECLARATIONS OF INTEREST		
Councillors to declare any disclosable pecuniary interests they may have in relation to the items for consideration.		
2. MINUTES		3 - 4
To confirm the Minutes of the Licensing Applications Committee meeting held on 22 July 2025.		
3. PETITIONS		
Petitions submitted pursuant to Standing Order 36 in relation to matters falling within the Committee's powers and duties which have been received by the Assistant Director of Legal & Democratic Services by no later than 12 noon, four clear working days before the day of the meeting.		
4. QUESTIONS FROM MEMBERS OF THE PUBLIC		
Questions submitted pursuant to Standing Order 36 in relation to matters falling within the Committee's powers and duties which have been submitted in writing and have been received by the Assistant Director of Legal & Democratic Services by no later than 12 noon, four clear working days before the day of the meeting.		

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5. QUESTIONS FROM COUNCILLORS

Questions submitted pursuant to Standing Order 36 in relation to matters falling within the Committee's powers and duties which have been submitted in writing and have been received by the Assistant Director of Legal & Democratic Services by no later than 12 noon, four clear working days before the day of the meeting.

6. HACKNEY CARRIAGE & PRIVATE HIRE LICENSING POLICY BOROUGH WIDE 5 - 430

A report presenting the results of the public consultation on the proposed Hackney Carriage and Private Hire Licensing Policy and seeking Committee approval to adopt the updated Policy.

Present: Councillors Woodward (Chair), Tarar (Vice-Chair), Asare, Dennis, Edwards, Keane, Leng, Magon, Mitchell, Rowland, Stevens and Thompson.

2. MINUTES

The Minutes of the meetings held on 11 November 2024 and 21 May 2025 were confirmed as correct records and signed by the Chair.

3. HACKNEY CARRIAGE & PRIVATE HIRE LICENSING POLICY

The Committee considered a report on a proposal to introduce a consolidated Hackney Carriage and Private Hire Licensing Policy. The following documents were appended to the report:

- Draft Hackney Carriage and Private Hire Licensing Policy
- Appendix 1 - Equalities Impact Assessment
- Appendix 2 - Climate Impact Assessment

The intention of the Policy was to combine several existing policies relating to Hackney Carriage and Private Hire vehicles, drivers and private hire operators into a single, cohesive policy document. The process also provided an opportunity to review and refresh the existing component policies at the same time.

The report stated that the Council had adopted the Hackney Carriage and Private Hire Vehicle Strategy 2023-2028 on 7 November 2023 (Minute 10, 2023-24 refers). The Strategy included in its Action Plan an action to conduct a full assessment of the Council's existing policies against the Statutory Guidance issued by the Department for Transport (Statutory Taxi & Private Hire Vehicle Standards, November 2022) and to publish a consolidated policy document as was recommended by the Statutory Guidance.

The report explained that the Council currently had several separate policies covering hackney carriage and private hire licensing matters and that differing application processes, specifications and emissions policies had created an unbalanced system. The report stated that having a single, cohesive policy for Hackney Carriages and private hire vehicles, drivers and operators would ensure consistent regulations, promote public safety, and simplify operations for the industry, the public and the Council.

The report provided a summary of the draft Policy, outlined its main provisions and detailed the key changes that officers had recommended be put forward for public consultation. These included:

- The removal of 'School Transport' as a separate category of licensing.
- The withdrawal of the existing subsidy for school transport licensing.
- The introduction of a new penalty points enforcement system for Hackney Carriages, aligned with the existing Private Hire scheme, alongside updates to the latter.
- Changes to the licensing requirements of Private Hire operators.

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- Changes to the licensing requirements relating to Private Hire and Hackney Carriage drivers.
- Changes to the licensing requirements relating to Private Hire and Hackney Carriage vehicles, including the alignment and introduction of age and emissions policies for both types of vehicles.
- Updates to the Council's Hackney Carriage and Private Hire Criminal Convictions Policy which would also be incorporated into the new combined policy.

The report sought the approval of the Committee to conduct a public consultation exercise on the draft Policy. It proposed that the exercise would take place over a six-week period during which time drivers, vehicle owners and operators involved in the hackney carriage and private hire trades, as well as other relevant stakeholders and members of the public, would be invited and encouraged to submit their feedback and comments via the Council's online Consultation Hub platform. At the same time officers and trade representatives would continue to hold regular meetings that would provide a further platform discuss and develop the proposals.

A further report setting out the results of the public consultation and highlighting any changes made to the draft Policy as a result of the process would be submitted to a future meeting at which Committee approval would be sought to adopt a final version of the Policy.

Councillor Ennis was present at the meeting and, at the invitation of the Chair, spoke to the report in his capacity as the Lead Councillor for Climate Strategy and Transport.

At the invitation of the Chair, Mr Alan Parkinson, Green Metro Cars, addressed the Committee on the item. He outlined the potential impact that he believed the proposed removal of the school transport licensing category would have on school transport drivers and operators.

At the meeting the Committee discussed the proposed length of the public consultation exercise and agreed to extend its duration from the six weeks originally stated in the report to a minimum of eight weeks to ensure adequate time for engagement and response from members of public and from the trades, and to ensure that school transport drivers and operators had the opportunity to respond outside of the school summer holiday period.

Resolved –

- (1) That the draft Hackney Carriage and Private Hire Licensing Policy, as appended to the report, be approved for public consultation;**
- (2) That the public consultation period last for a minimum of eight weeks to ensure adequate time for engagement and response;**
- (3) That a report be submitted to a future meeting to adopt a final Hackney Carriage and Private Hire Licensing Policy, having taken the results of the public consultation exercise into account.**

(The meeting started at 6.30 pm and closed at 7.24 pm)

Licensing Applications Committee

12 February 2026



Reading
Borough Council
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Title	Hackney Carriage & Private Hire Licensing Policy
Purpose of the report	To make a decision
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Emma Gee, Executive Director for Economic Growth and Neighbourhood Services
Report author	Clyde Masson, Principal Licensing Enforcement Officer
Lead Councillor	Cllr John Ennis, Lead Councillor for Climate Strategy and Transport
Council priority	All
Recommendations	1. That (following a public consultation) the proposed Hackney Carriage & Private Hire Licensing Policy is now approved

1. Executive Summary

- 1.1. Under the terms of the Policing and Crime Act 2017 ('PCA') the Department for Transport (DfT) has introduced Statutory Taxi and Private Hire Vehicle Standards for hackney carriages (taxis) and private hire vehicles (PHVs). These Statutory Standards were published in July 2020 (and subsequently updated in 2022) and the Council, acting as the Licensing Authority, is required to have due regard to them when exercising its licensing functions.
- 1.2. Within the Statutory Standards it is recommended that Licensing Authorities have a publicly available Policy that brings together all their procedures for hackney carriage and private hire licensing. This should include convictions policies, licence conditions, vehicle standards and a 'fit and proper person test'.
- 1.3. The Licensing Applications Committee (LAC) meeting on 22 July 2025, resolved that the Council's proposed Hackney Carriage & Private Hire Licensing Policy, be published for public consultation with the hackney carriage and private hire vehicle trades and that a further report be submitted to a future meeting of the LAC to consider the outcome of the consultation and adoption of the final Policy. This is that report.
- 1.4. The proposed Hackney Carriage & Private Hire Licensing Policy is attached at Appendix 1.
- 1.5. The Policy includes existing procedures and licence conditions with some amendments and additions as recommended within Statutory Taxi and Private Hire Vehicle Standards. There have also been a number of changes made to the Policy document that was presented to the Committee on 22 July 2025 in response to feedback from the consultation process.

2. Policy Context

- 2.1. Until now, Reading Borough Council has not developed a single policy to incorporate both hackney carriage and private hire licensing. Differing licence conditions, enforcement, vehicle specifications and emissions policies created an unbalanced system. Our Licensing Strategy "Hackney Carriage and Private Hire Vehicle Strategy 2023-2028",

action plan contained a commitment to review existing policies and combine them to meet the statutory standards' recommendation for a single combined policy.

- 2.2. Currently, hackney carriage vehicles have an 'Age & Emissions Policy' and private hire vehicles have only an Age Policy'. Whilst driver application processes are largely the same, enforcement differs considerably. Hackney carriage drivers are subject to a 3-warning letter system, conditions and Bylaws with private hire and school transport drivers having conditions and a penalty points system. When the Local Government (Miscellaneous Provisions) Act 1976 came into effect, a new framework was established for private hire and hackney carriage licensing. In 2006 the Council decided to introduce a penalty points system as permitted within the Act for private hire drivers (reviewed and updated twice since). However, it was decided to maintain the existing conditions and bylaws from the Town Police Clauses Act 1847 for Hackney Carriage drivers as the system worked sufficiently at that time.
- 2.3. On 13 July 2023, the Licensing Applications Committee noted the Statutory Taxi and Private Hire Vehicle Standards 2022. These Standards form the basis of the draft Taxi & Private Hire Licensing Policy bringing it in line with the Department for Transport (DFT) and the policies of other Local Authorities.

<https://www.gov.uk/government/publications/statutory-taxi-and-private-hire-vehicle-standards/statutory-taxi-and-private-hire-vehicle-standards>

- 2.4. The Committee also approved the current version of the Hackney Carriage and Private Hire Criminal Convictions policy on 07 November 2023.

3. The Proposal

- 3.1. The Licensing Applications Committee at its meeting on the 22 July 2025 resolved that the draft Hackney Carriage & Private Hire Licensing Policy, be published for public consultation with the hackney carriage and private hire vehicle trades for a minimum of eight weeks.
- 3.2. The consultation was published online via the Council's Consultation Hub from 26 August 2025 to 27 October 2025. The Reading Taxi Association, Reading Private Hire Driver's Association and operators were informed of the consultation. Emails were sent to licensed drivers and details of the consultation were added to the Taxi Licensing section of the Council website and email signatures of Licensing Officers and members of Business Support.
- 3.3. The Licensing Team also held 4 drop-in meetings at the Civic Offices and All Saints church hall, Reading to engage with the taxi and private hire trades and to answer questions or help with accessing the consultation portal. Drivers were asked to spread the word within their networks.
- 3.4. There were 2,178 comments made by 137 different individuals on the proposed policy document via the consultation portal and several emails were sent directly to the Licensing Team. These included a written response from the Reading Taxi Association and a number of emails from individuals and operators and are included in Appendix 2.
- 3.5. Due to the large number of responses received, officers collated and ordered them within an excel spreadsheet according to the sections of the policy document they related to. A document summarising the responses and the main points raised is attached at Appendix 2.
- 3.6. Having considered the consultation feedback, officers have made amendments to the Policy where it was considered appropriate to do so, bearing in mind current legislation and the Statutory Taxi and Private Hire Vehicle Standards.
- 3.7. Licensing officers held meetings with the hackney carriage and private hire trades on 04 December 2025 to provide feedback on the responses received and the amendments that have been made to the proposed Policy as a result.

A summary of the amendments that have been made to the draft Policy in response to the public consultation are set out below

3.8. Section 4 – Guidance on the suitability to hold a licence

Paragraph 4.6 Changed to add ‘...where information received regarding allegations of serious criminal offences or inappropriate behaviour from Police or other responsible authorities/officers raises grave doubts...’ This clarifies that the information being acted on is from a responsible authority.

3.9. Section 6 – Enforcement

Paragraph 6.6 – the reference to ‘complaint’ changed to ‘provide feedback’ as this was deemed to be a more positive approach.

3.10. Section 7 – Hackney carriage and private hire vehicles

Paragraph 7.2.2 amended to say that a Certificate of Good Conduct is required after 3 months or more. This is to clarify the time scale required and aligns with recommendations in the Statutory Taxi and Private Hire Vehicle Standards.

3.11. Paragraph 7.4.5 changed such that category A, B and S vehicles will not be licensed if they are new to the fleet. For vehicles that are already licensed, category ‘N’ vehicles will be licensed and category ‘S’ vehicles will be permitted on a case-by-case basis. This change has been made after feedback from the trades that newer vehicles, especially hybrid/electric ones, are often written off if they are damaged in an accident due to the cost of repairs. For clarity, Category S vehicles are those which have suffered structural damage and have been written off by the insurer as they were “uneconomical to repair”. This damage could be to any part of the vehicle’s structural frame, including the chassis. After repairs, Cat S cars need to be re-registered with the DVLA before they go back on the roads. Category N vehicles have suffered non-structural damage – this could be to the brakes, steering, electrics, safety-features, or even just cosmetic damage. Cat N cars have also been written off by the insurer as they were uneconomical to repair, but the vehicle’s structural frame or chassis did not suffer any damage.

3.12. Paragraph 7.10.3 *‘Vehicle MOT and compliance tests must be conducted at alternate testing centres on a rolling basis. For example, if the annual MOT/compliance is carried out at Test Centre A the next test must be done at Test Centre B, and so on’* has been removed in its entirety. This removes the requirement to alternate between centres, this is in response to comments where there have been difficulties in obtaining bookings as required.

3.13. 7.10.3 be further amended to *‘If a hackney carriage/private hire vehicle receives minor defects/advisories as part of an MOT, these should not appear on 3 consecutive tests. If the same minor defects/advisories appear on a second test, a letter may be sent to remind the owner to have them rectified and these must be repaired before the next test. If they appear again as part of the third MOT, the vehicle may be suspended until they are rectified. If there are serious concerns that a vehicle is not suitable, the vehicle may be revoked’*. This change is to allow for the issues to be addressed within a year and assure that minor defects/advisories do not become dangerous and ensure vehicles remain safe for passengers and other road users. Advisories are there for a reason and not to be consistently ignored.

3.14. Paragraph 7.12.9 be amended to add that a sign/sticker indicating card payments are accepted may also be displayed.

3.15. Section 7.14, the requirement to carry fire extinguishers and first aid kits, has been removed in its entirety.

3.16. Section 7.15 amended with a paragraph added to clarify the use of dashcams. *‘Permission is not required for the installation of dashcam equipment if it only covers the external front and rear-views and nothing within the vehicle. If any dashcam equipment provides internal video of the vehicle, this will be considered to be a CCTV system and must be operated in accordance with paragraph 7.15.2 above. If the dash-cam records*

audio there needs to be a sign visible to passengers notifying them of this. The equipment installed must have the ability to turn off audio recording if requested to do so by passengers.

3.17. Section 8 - Hackney carriage and private hire drivers

3.18. Paragraph 8.4.2 amended to remove requirement for a medical to be carried out by a driver's own GP and replaced with '*a GP qualified to do Group 2 medical examinations*'. It is understood that many GP surgeries do not offer this examination or that an appointment cannot be readily booked.

3.19. Paragraph 8.7.1 amended to change the time to 6 years which is the equivalent of 2 3-year licence periods.

3.20. Paragraph 8.8.1 amended to clarify the requirement would apply to new applicants and will not be retrospectively imposed unless there were concerns about the standard of a licenced driver's ability to converse in English.

3.21. Private Hire Vehicle Legislation and Conditions

3.22. Condition 15, the second bullet point amended to add the vehicle registration and the third bullet point to clarify operator advertisement to be displayed on the front doors only.

3.23. Condition 18 '*The proprietor shall keep written records of any maintenance checks of the vehicle and these shall be available for inspection by authorised officers of the Council*' has been removed in its entirety as not required.

Approval of advertising/livery on licensed vehicles

3.24. Paragraph 7.1 amended to add '*Private hire vehicles are permitted to display operator advertising and/or livery on the exterior of the vehicle subject to approval in Section 1 above*'.

3.25. Paragraph 7.2 amended to remove '*and operator*' from the paragraph as operator details are only permitted on the front door panels.

3.26. Private Hire Operator Licence Conditions

3.27. The following is removed from Condition 9 '*Operators are required to evidence that safeguarding protections are applied which are equivalent to those of Reading Borough Council by the company to which they sub-contract any bookings. If a PSV with PCV driver is used, the hirer must be informed of this and notified that the driver is not required to have an enhanced DBS check.*' Officers believe that this is not necessary as the operator/driver will have been subject to the relevant checks to obtain a licence.

3.28. Condition 10 amended from '*...the Council will require access to the system so that the Council is able to establish that records are entered sequentially and that it is able to establish the date and time at which the record was created*' to '*...officers shall be able to view the records to establish that they are entered sequentially and that it is able to establish the date and time at which the record was created*'.

3.29. Condition 11 amended to remove the reference to '*totally responsible*' and replaced with '*The operator shall be responsible for ensuring and evidencing that staff training and procedures are in place for controllers and dispatch staff in relation to the handling of personal information and conduct towards drivers, customers and members of the public.*

3.30. Condition 13 amended from 12 months to six months so as not to contradict condition 2.

3.31. Hackney Carriage Driver's Byelaws, Conditions and Penalty Points Scheme.

3.32. There were a large number of comments received on this section of the policy. The 1,198 comments received from the consultation on this section of the policy. The proposed penalty points scheme is based on the one currently being used in relation to Private Hire vehicle driver's licences. The position is that this penalty points scheme with the existing

points allocations be applied to hackney carriage driver licences with some exceptions. These changes are attached at Appendix 3.

3.33. Private Hire Driver's Conditions and Penalty Points Scheme

- 3.34. There were a large number of comments made on this section of the policy, many of which disagreed with the proposed increase in the points values for breaches of the conditions. The current position is that the existing conditions and penalty points scheme will remain in place, maintaining the points values with some exceptions. These changes are attached at Appendix 4.

3.35. General comments and feedback

- 3.36. There were comments made in general that did not fit within the scope of the policy. These related to funding incentives for cleaner/green vehicles, engagement with the trade to promote services, an increase in the number of hackney carriage ranks (especially in Craven Road and Friar Street), to collaborate more with the trade and comments regarding drivers going to other Licensing Authorities.
- 3.37. There were also a large number of comments received from school transport drivers in response to the proposal to no longer offer a restricted private hire driver's licence for school transport work only. The comments requested for the school transport driver's licences to remain as these drivers only want to do school transport work. The majority of these respondents were drivers that are parents or retired people who only wish to work a few hours a day or to fit around caring for their school-age children. These comments were reiterated by an email received from a school transport operator.
- 3.38. In response to this feedback the revised proposal is for the school transport driver's licence to remain, with applicants not required to pass a driving assessment and the location and theory tests required for a private hire driver's licence. To date, school transport drivers have a separate set of conditions to private hire drivers however, going forwards the proposed private hire driver's licence conditions and penalty points scheme will be implemented. This proposal will reduce the number of sets of conditions being enforced allowing for greater clarity to licensees and members of the public and ensure consistency across both types of private hire driver's licences.
- 3.39. There were no comments made or objections raised to the removal of separate licences for school transport vehicles and operators. The current proposal is that the school transport operator and school transport vehicle licence regime is discontinued and incorporated into that for private hire operators and private hire vehicles. It is proposed that this will be on renewal of a school transport vehicle licence and for a 1-year school transport operator's licence. For school transport operators with a 5-year licence, their licence would be re-issued as a private hire operator's licence within 1 year of the policy being approved.

Options Proposed

- 3.40. The following options are available to the committee.
1. Approve the Policy with the proposed changes as outlined above.
 2. Approve the policy subject to any further amendments proposed and agreed at committee on 12 February 2026.
- 3.44. The approval and implementation of a Hackney Carriage & Private Hire Licensing Policy will provide clear and readily available guidance to current licence holders, applicants and members of the public. Currently the information contained within the proposed policy can be found in different separate policies agreed at different times, and held in different areas of the Reading Borough Council website. The recommendation that the policy be accepted, allows this information to be accessed within a single document that allows transparency regarding Reading Borough Council's regulatory framework and enforcement of hackney carriage and private hire licensing. Furthermore, it demonstrates adherence to the recommendation in the Statutory Standards.

- 3.41. School transport licensing was considered for removal in its entirety to streamline processing and reduce administrative burden on the Council. Due to the response from consultees, it was important to keep the school transport driver category, we would recommend this option as a fair solution.
- 3.42. The removal of the school transport vehicle licence category will enable more wheelchair accessible vehicles to become available on the general private hire fleet. There are many vehicles that are currently used for school transport only that are wheelchair accessible and, in some cases, specifically designed for the transport of larger electric wheelchairs. Making these vehicles available for use by the general public would contribute towards the Council's aim for increasing the transport options available for wheelchair users, allowing them greater choice and flexibility to travel in and around Reading.

4. Contribution to Strategic Aims

4.1. Secure Reading's economic and cultural success

Taxi and private hire vehicles, drivers and operators form an important integrated part of the overall sustainable transport network. Their own economic success depends on offering a competitive, high-quality service in a highly regulated landscape. The economic and cultural success of Reading depends on a reliable and safe transport infrastructure. This policy provides more economic stability, certainty and consistency.

4.2. Deliver a sustainable and healthy environment and reduce our carbon footprint

The new policy continues our management of vehicle ages and emissions status of vehicles on the Hackney Carriage and Private Hire fleets to balance the competing demands yet follow the roadmap to net zero. Developing Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley – reducing the emissions from the Taxi and PHV fleets will contribute to a lower carbon footprint and reduce the NOx (Nitrogen Oxides) and particulate matter in the air which is associated with poor health outcomes.

4.3. Putting residents first

By conducting this comprehensive policy review, pulling it all together in one space, consulting widely, aligning with the statutory standards, modernising and improving content, we are ensuring that these transport sectors licensed by Reading Borough Council are fit for the future.

Customer safety is the principal aim for the licensing scheme. This Policy updates a number of areas to ensure improved customer safety, for instance the new QR code sticker to be displayed in vehicles for customers to leave compliments, comments and complaints, and improvements to the availability of wheelchair accessible vehicles (WAV) are proposed.

4.4. Building on strong foundations

Ensuring the Taxi and Private Hire Vehicle sector remains integrated into our sustainable transport network to continue to move passengers to destinations safely, contributing to the economy with low impact on the environment through cleaner vehicles.

Taxis and PHVs are one of the most flexible elements of the transport system operating 24/7 on a commercial basis. They are integral to supporting residents and local businesses to thrive by transporting residents and visitors around the Borough. The services are a primary mode of passenger transport for many people for whom mainstream public transport is not an option or suitable. Taxis and PHVs help support many disabled and vulnerable people to live more independent lives. They also play an important part in supporting the night-time economy, providing a safe and secure mode of transport home for many people.

5. Environmental and Climate Implications

- 5.1. The Council declared a Climate Emergency at its meeting on 26 February 2019.
- 5.2. A Climate Impact Assessment has been conducted and can be viewed alongside this report.
- 5.3. Transport is the biggest greenhouse gas emitting sector in the UK accounting for around 27% of total carbon emissions. As set out in the Reading Climate Emergency Strategy 2020-25, this figure is lower in Reading with transport accounting for around 20% of carbon emissions. However, significant investment in sustainable transport solutions is vital in order to respond to the Climate Emergency declared by the Council in February 2019 and to help achieve our target of a carbon neutral Reading by 2030.
- 5.4. The existing Hackney Carriage Vehicle Emissions and Age Policy has been incorporated into this new overarching policy document, which intends to improve both the hackney carriage vehicle fleet and the private hire fleet by removing older more polluting vehicles, and creating a safer more reliable fleet which will improve local air quality within Reading.

6. Community Engagement

- 6.1. A public consultation was carried out between 26 August 2025 and 27 October 2025. Members of the Licensing Team also engaged with drivers and operators during meetings held to discuss the consultation process and to provide feedback on the comments received on the consultation. This is all outlined in section 3 of this report.

7. Equality Implications

- 7.1 Licensing authorities are required under the [Public Sector Equality Duty](#) to pay regard to the need to eliminate conduct prohibited by the Equality Act 2010, to promote equality of opportunity and to foster understanding between people who share a protected characteristic and those who do not.
- 7.2 Disability is a protected characteristic under the Equality Act 2010, and disabled people may face particular barriers accessing taxi and private hire vehicle services if authorities fail to regulate services inclusively and to uphold the rights of affected passengers.
- 7.3 Licensing authorities should actively promote inclusivity, equality and independence for disabled people and ensure that they only issue licences to those that are fit and proper to hold one.
- 7.4 An inclusive service accessible to disabled people is one where:
 - there are sufficient vehicles meeting disabled people's access needs, to allow them to travel as easily, between the same locations and at the same times, as non-disabled people;
 - policy decisions are informed by an accurate and up-to-date understanding of the experience and needs of disabled people with a range of visible and less visible impairments;
 - action is taken proactively to improve the accessibility of the services supported;
 - disabled people have confidence that services will meet their needs and that, if things go wrong, their concerns will be understood and investigated thoroughly;
 - if operators and drivers fail in their responsibilities, that appropriate enforcement action is taken to prevent its recurrence and protect other disabled passengers.

8. Other Relevant Considerations

- 8.1 [Section 17 of the Crime and Disorder Act 1998](#) requires local authorities to consider the crime and disorder implications of all their activities and functions and do all that they reasonably can to reduce crime. Licensing authorities do this by setting licensing requirements that protect passengers, but this duty also extends to considering ways that licensing requirements and policies can reduce crime against drivers, who are subjected to robbery, verbal and physical assault, which can be racially motivated or aggravated.

9. Legal Implications

- 9.1. The Council's statutory powers to regulate the operation of taxis are contained in the [Town Police Clauses Acts 1847](#) and [Part II the Local Government \(Miscellaneous Provisions\) Act 1976](#).
- 9.2. The proposed Hackney Carriage & Private Hire Licensing Policy attached as Appendix 1 has been drafted in light of statutory guidance issued by the Department for Transport (DfT) ([Statutory Taxi and Private Hire Vehicle Standards](#)) which recommends that Licensing Authorities have a publicly available Policy that brings together all their procedures for hackney carriage and private hire licensing.
- 9.3. The Draft Policy also takes account of the [Taxi and Private Hire Vehicle Licensing Best Practice Guidance for Licensing Authorities in England](#) (as amended in November 2023).
- 9.4. As stated in the Statutory Taxi and Private Hire Vehicle Standards, the primary and overriding objective of licensing must be to protect the public.
- 9.5. In addition to ensuring that taxi and private hire vehicle services are safe, the Statutory Standards also recognise that the public have a reasonable expectation that the services available will be accessible and affordable.
- 9.6. Licensing authorities are required under [section 22\(2\) of the Legislative and Regulatory Reform Act 2006](#) to have regard to the [Regulators' Code](#), which states that:

Regulators should avoid imposing unnecessary regulatory burdens through their regulatory activities and should assess whether similar social, environmental and economic outcomes could be achieved by less burdensome means. Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity.

- 9.7. Licensing authorities should be focussed on mitigating safety risks for passengers and drivers and enabling fair competition within the trade by ensuring consistency of regulation and enforcement. Licensing authorities should actively promote inclusivity, equality and independence for disabled people and ensure that they only issue licences to those that are fit and proper to hold one.
- 9.8. It is for licensing authorities to ensure that their licensing policy and requirements are proportionate, so that passengers can choose from a wide range of safe services. As indicated above, the primary function of the licensing regime is public safety; however, an unduly stringent regime on other issues may restrict the supply of taxi and private hire vehicle services by putting up the cost of operation, or otherwise restricting entry to the trade. Licensing authorities should recognise that too restrictive an approach can be counter-productive, restricting the licensed trade to such an extent that the public resort to the use of unlicensed, unvetted and uninsured drivers and vehicles.
- 9.9. In formulating the attached draft Hackney Carriage & Private Hire Licensing Policy, the Council has consulted with the taxi trade and considered how the proposed requirements will affect the delivery of safe, available, affordable and accessible services.

10. Financial Implications

- 10.1. Sections 53 and 70 of the Local Government (Miscellaneous Provisions) Act 1976 allow the council to charge fees for the grant of licences in respect of hackney carriage and private hire drivers, vehicles and operators. The council cannot make a profit from licence fees and there must be a carry forward of any surplus, but there can also be recovery of any deficit. The reconciliation of any surplus or deficit will take place over a three-year cycle.
- 10.2. Any changes made to the current policy must be defensible in the court if an appeal is lodged.

11. Timetable for Implementation

- 11.1. If approved, the Policy would be implemented immediately with conditions being applied for all licences granted from the day after the Policy is approved.
- 11.2. For current licences that are due to expire within the next 6 months following the approval of the Policy, the new conditions will be applied to the relevant licences on renewal. Licences that are due to expire after 6 months from approval of the policy will be re-issued with any new conditions attached for the remainder of the licensing period. This is to retain the integrity of the current licence period.
- 11.3. The burden for compliance rests with drivers, operators and vehicle owners; it is for them to seek out and understand the rules that apply to them. Compliance with the Policy, as entered into the public domain by way of open committee meeting and the Council website is strict. There is no requirement for officers to ensure drivers, operators and vehicle owners have read and understood the Policy before it becomes incumbent on them to follow it.

12. Background Papers

- 12.1. There are none.

Appendices –

- 1. Hackney Carriage & Private Hire Licensing Policy**
- 2. Comments summary document & consultation responses**
- 3. Proposed changes to Hackney Carriage Driver's Bylaws, Conditions and Penalty Points Scheme**
- 4. Proposed changes to Private Hire Driver's Conditions and Penalty Points Scheme**

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Appendix 1

Licensing Policy

HACKNEY CARRIAGE & PRIVATE HIRE LICENSING POLICY

Licensing Policy effective from: **13 February 2026**

Reading Borough Council
Civic Offices
Bridge Street Reading
RG1 2LU

Email: licensing@reading.gov.uk

Web: www.reading.gov.uk/business/licences/taxi-and-private-hire-licensing/



www.reading.gov.uk



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1. Introduction

- 1.1. This policy statement has four main purposes, which are:
- to confirm to members of the Licensing Applications Committee and Sub Committee the boundaries and powers of the Council and the parameters within which to make decisions;
 - to inform licence applicants of the parameters within which the Council will make licensing decisions and therefore how licensed operators, drivers and vehicles can operate within the area of the Council which licenses them;
 - to inform local residents and businesses of the parameters within which the Council will make licensing decisions and therefore how their needs will be addressed; and
 - to support a case in a court of law where the Council must show how it arrived at its licensing decisions.
- 1.2. In setting out this policy, the Council seeks to promote the following objectives as set out in the Council plan.
- Healthy Environment - Developing Reading as a Green City with a sustainable environment and economy at the heart of the Thames Valley – reducing the emissions from the Taxi and PHV fleets will contribute to a lower carbon footprint and reduce the NOx (Nitrogen Oxides) and particulate matter in the air which is associated with poor health outcomes.
 - Thriving Communities – by ensuring the Taxi and PHV sector remains integrated into our sustainable transport network to continue to move passengers to destinations safely, contributing to the economy with low impact on the environment through cleaner vehicles.
 - Inclusive Economy - Taxis and PHVs are one of the most flexible elements of the transport system operating 24/7 on a commercial basis. They are integral to support local businesses to thrive by transporting residents and visitors around the Borough. The services are a primary mode of passenger transport for many people for whom mainstream public transport is not an option or suitable. Taxis and PHVs help support many disabled and vulnerable people to live more independent lives. They also play an important part in supporting the night-time economy, providing a safe and secure mode of transport for many people to get home.
- 1.3. The aim of the Council's licensing process and procedures is to protect the public and ensure that the public have access to proficient Hackney carriage and Private Hire services. It is essential the Council's licensing processes, procedures and powers produce safe, comfortable and properly insured hackney carriage vehicles, drivers and Private hire Operators, Vehicles & Drivers.
- 1.4. Hackney carriage and private hire vehicles have a specific role to play in an integrated transport system. They provide a personal bespoke service in situations where public transport may not be available (for example in rural areas, or outside 'normal' hours of operation such as in the evenings or on Sundays), and/or for those with mobility difficulties.
- 1.5. This policy also contains information about legal requirements, government guidance, Council policy, procedures and standards. It has been produced pursuant to the powers conferred by the Local Government (Miscellaneous Provisions) Act 1976, the Town Police Clauses Acts 1847 and 1889, the Public Health Act 1875 and the Local Government Act 1972 which place on councils the duty to carry out licensing functions in respect of hackney carriage and private hire vehicles, drivers and operators.

- 1.6. In exercising their discretion in carrying out their regulatory functions, the council will have regard to this policy document and the objectives set out above. Notwithstanding the existence of this policy, each application or enforcement measure will be considered on its own merits. Where it is necessary for the councils to depart substantially from this policy, clear and compelling reasons must be given for doing so.
- 1.7. This policy will remain in existence for a period of five years, during which time it shall be kept under review and revised as necessary. The Assistant Director (AD) of Planning, Transport and Public Protection in consultation with the Chair of the Licensing Applications Committee is authorised to make minor administrative amendments to the policy where necessary, and to amend the policy to reflect any changes in legislation, statutory guidance or similar.
- 1.8. The policy provides guidance for applicants, drivers and operators to assist them with the application processes and operation of their business and is set out in Sections 3 to 9 below. Also attached are Appendices A to I that are the specifications and conditions documents relevant to hackney carriage and private hire driver, vehicle and operator licences. This policy and the current fees are available on the council's website. To ensure that the most up to date version is used, applicants and licence holders should view the latest versions online when they are required.

2. Legislation and Best practice guidance

- 2.1. All licence holders must comply with the provisions relating to hackney carriage and private hire drivers and vehicles contained in legislation, including but not limited to the following:
- Town Police Clauses Act 1847;
 - Part II Local Government (Miscellaneous Provisions) Act 1976; and
 - Equality Act 2010.
- 2.2. The Department for Transport (DfT) has national responsibility for hackney carriage and private hire legislation in England and Wales and produced best practice guidance for local licensing authorities in March 2010 (amended in November 2023). The DfT guidance states local authorities will “decide for themselves the extent to which they wish to make use of it or adapt it to suit their own purposes”. The document recognises that licensing authorities may reach their own decisions both on overall policies and on individual licensing matters, in the light of their own circumstances. The Council has taken account of the DfT guidance to shape this policy. In addition, the Council has taken account of the Statutory Taxi and Private Hire Vehicle Standards published by the DfT in July 2020 (amended in November 2022).
- 2.3. In adopting this policy, the Council must strike a balance between the financial interests of the trade and the protection of the travelling public.
- 2.4. This policy also takes account of the legislative basis of the Council's taxi licensing powers, contained in the Town Police Clauses Acts 1847 and 1889, the Public Health Act 1875, the Local Government Act 1972 and the Local Government (Miscellaneous Provisions) Act 1976 as amended, which they have adopted.

3. Applications for Licenses

- 3.1. The Council requires applications for hackney carriage/private hire licences to be made on the prescribed application form which is available on the Council's website or using the relevant Council electronic procedure. The Council's website will provide guidance to assist in the completion of the application.

- 3.2. The licence fees payable to the Council are subject to annual review and will be published together with other licensing fees on the Council's website. This may include charges for appointments, knowledge tests, training sessions, etc.
- 3.3. The Council will consider all applications on their own merits once they are satisfied the application is complete. Incomplete or missing documentation or evidence may result in the application being rejected. Any application that is not completed within 6 months may be refused.
- 3.4. Where an applicant is unable to demonstrate they fulfil the requirements of this policy, applications will normally be refused. It may be that, having regard to the circumstances, it would be right to depart from the policy. Applications will be determined in accordance with the current scheme of delegation. In some cases, the Assistant Director of Planning, Transport and Public Protection may refer applications or existing licence holders to a Licensing Applications Sub Committee for determination.
- 3.5. The applicant will be given an opportunity to make representations and these will be considered by the decision maker/s.
- 3.6. If a matter is referred to a Licensing Applications Sub Committee for determination, the applicant or licence holder will be advised of the date, time and venue of the hearing. The proceedings and terms of reference of the Licensing Applications Sub Committee are set out on the Council's website.
- 3.7. Where a decision is made to refuse to grant or renew, or to suspend or revoke a licence, the applicant or licence holder will be advised in the decision notice of their rights of appeal.
- 3.8. The Council does not send reminders to licence holders before their licence expires, and the responsibility for ensuring licences do not expire remains with the licence holder. Applicants must therefore allow a minimum of 6 weeks for the processing of their renewal applications. The Council is not responsible for delays due to the actions of external bodies such as the Disclosure and Barring Service (DBS).
- 3.9. If an application to renew a licence is received late (after expiry), the licence will have expired before the new one has been issued. For operators, this will mean they are not permitted to take bookings until the new licence has been granted. For vehicles, the vehicle must not be used for the carriage of passengers for hire and reward until the new licence has been granted. For drivers, they will not be permitted to drive any vehicles licensed by the council until the new licence has been granted.
- 3.10. The Council may share information with other public bodies such as other councils, the police, Home Office Immigration Compliance Enforcement, Driver and Vehicle Licensing Agency (DVLA) and HM Revenue and Customs (HMRC). Information will only be released in response to a properly made formal request and where there is a valid reason to do so, for example an investigation of a criminal offence. The privacy notice relating to applicants for licences and licence holders can be found on the council's website. Where drivers have been licensed with other authorities, or live in other local authority areas, we will carry out checks with those authorities for any information that may be relevant to the application being considered. In addition, the council will use the National Anti-Fraud Network's national register of taxi and private hire vehicle driver licence refusals and revocations (known as 'NR3S'), to check and share information and mitigate the risk of non-disclosure of relevant information by applicants.

4. Guidance on the suitability to hold a licence

- 4.1. When considering whether a person is fit and proper to hold a licence (which includes both new

and renewal applicants, and existing licence holders), the Council shall consider the Reading Borough Council Hackney Carriage & Private Hire Criminal Convictions Policy which can be found at Appendix I. The document applies to all vehicle, driver and operator licence holders and applicants. The full document is also available on the council's website.

4.2. The DfT Statutory Taxi and Private Hire Vehicle Standards states as follows:

Licensing authorities have a duty to ensure that any person to whom they grant a taxi or private hire vehicle driver's licence is a 'fit and proper' person to be a licensee. It may be helpful when considering whether an applicant or licensee is fit and proper to pose oneself the following question:

Without any prejudice, and based on the information before you, would you allow a person for whom you care, regardless of their condition, to travel alone in a vehicle driven by this person at any time of day or night?

If, on the balance of probabilities, the answer to the question is 'no', the individual should not hold a licence. Licensing authorities have to make difficult decisions but the safeguarding of the public is paramount. All decisions on the suitability of an applicant or licensee should be made on the balance of probability. This means that an applicant or licensee should not be 'given the benefit of doubt'. If the committee or delegated officer is only "50/50" as to whether the applicant or licensee is 'fit and proper', they should not hold a licence. The threshold used here is lower than for a criminal conviction (that being beyond reasonable doubt) and can take into consideration conduct that has not resulted in a criminal conviction.

4.3. All hackney carriage and private hire/school transport licence holders (operators, vehicle proprietors and drivers) must report all new convictions, cautions, warnings, reprimands, anti-social behaviour orders, community protection notices, criminal behaviour orders, community service orders, restraining orders, fixed penalties (including traffic offences), driver education courses and any disqualifications from driving in writing within 48 hours from the date of formal notification.

4.4. All hackney carriage and private hire/school transport licence holders (operators, vehicle proprietors & drivers) are required to inform the Council in writing within 48 hours if they are arrested, formally interviewed as a suspect or charged with an offence by the police or other enforcement bodies. This is to allow the Council to be aware of any public safety concerns and to take appropriate action. Failing to notify the Council may result in additional enforcement action against the licence.

4.5. A licence may be revoked with immediate effect pending the outcome of any investigation or trial where a licensed driver has been arrested or charged with a serious offence. Serious offences can include but are not limited to:

- Driving or being in charge of a vehicle whilst under the influence of drink or drugs;
- A drug related offence
- An offence of a sexual nature;
- An offence involving violence;
- An offence involving dishonesty; and
- An offence involving exploitation.

4.6. A licence may also be revoked with immediate effect where information received regarding allegations of serious criminal offences or inappropriate behaviour from Police or other responsible authorities raises grave doubts as to the fitness and propriety of a driver, regardless of whether criminal charges are brought. In all cases the licence holder will be given an

opportunity to make representations and these will be taken into account by the decision maker/s.

5. Changes to details

- 5.1. All licence holders must notify the council in writing within 7 days of any change of name, postal address, email address or telephone number during the period of the licence.
- 5.2. It is recommended that all licence holders notify the Council if they are likely to be unable to be contacted for more than 28 days. This may help to prevent unnecessary suspension or revocation of licences.

6. Enforcement

- 6.1. Enforcement is part of the overall licensing control process exercised by the Council and is taken to:
- ensure public safety;
 - maintain standards within the trade;
 - support the policies of the Council;
 - respond to complaints; and
 - support partnerships with neighbouring local authorities, and other agencies such as the police and Driver and Vehicle Standards Agency (DVSA).
- 6.2. All enforcement will be proportionate, transparent and in accordance with our enforcement policy. While the ultimate authority is the court, the expectation is that enforcement will be carried out by licensing officers overseen by the Licensing Applications Committee and Sub Committee. The Council will ensure that the policy and its enforcement system meet the objectives set out in the policy whilst avoiding undue burden and costs upon licence holders.
- 6.3. Any enforcement system needs to deal with persistent, low-level breaches up to serious, possibly criminal, behaviour. There are grades of sanctions from informal advice and warnings, through to the suspension and revocation of licences. The majority of enforcement will be for relatively minor offences or breaches and will be undertaken by the licensing officers through a penalty points-based enforcement scheme as detailed in Appendices G and H.
- 6.4. Authorised officers are empowered to take the following measures:
- verbal warning;
 - written warning;
 - penalty points;
 - final written warning;
 - suspension of licences;
 - appearance before the Licensing Applications Sub Committee;
 - revocation (by the AD of Planning, Transport and Public Protection); and
 - prosecution.
- 6.5. Licence holders have a clear legal duty to offer assistance and information to any authorised officer. Any person who willfully obstructs an officer, fails to comply with any reasonable requirement of an officer, fails to provide assistance or information reasonably required by an officer, or makes a false statement, may be prosecuted under the relevant sections of the Local Government (Miscellaneous Provisions) Act 1976. Licence holders may be requested to attend the council offices, for example to produce current insurance documents or their vehicle for inspection, upon reasonable request by an officer.
- 6.6. All licensed vehicles are required to display information for passengers on how to provide

feedback directly to the licensing authority. For renewals, this requirement will take effect from the next licence renewal after the date of publication of this policy. The licensing authority will provide the information card to be displayed.

7. Hackney carriage and private hire vehicles

7.1. Applications for vehicle licenses

- 7.1.1. A hackney carriage or private hire vehicle proprietor is an owner or part owner of a vehicle, or where a vehicle is subject to leasing contract, hiring agreement or hire purchase, a proprietor is the person in possession of the vehicle under the agreement. In both cases the proprietor requires a hackney carriage or private hire vehicle licence from the Council before they are legally entitled to use the vehicle to carry passengers for hire and reward. Hackney carriages are permitted to be used to ply for hire and carry out pre-booked work, and private hire vehicles may only be used to carry out pre-booked work through a licensed private hire vehicle operator.
- 7.1.2. This policy outlines the minimum requirements for vehicles licensed by the council. These requirements set out what is acceptable under delegated powers. Prospective applicants should have regard to these requirements before a vehicle is purchased. Any vehicle presented for licensing which does not comply with these requirements may not be accepted after consideration of its own merits by officers or via any Licensing Applications Sub -Committee hearing.
- 7.1.3. Legislation limits hackney carriage or private hire vehicle licenses to a maximum period of 12 months. A licence may be granted for a shorter period, should this be justified on a case-by-case basis.
- 7.1.4. Vehicles will only be considered for licensing if they are not already licensed by another licensing authority.
- 7.1.5. Applications for the renewal of a licence must be made a minimum of 6 weeks before the expiry of the current licence. This is to ensure the renewal application can be processed before the licence expires. It is the responsibility of the owner to ensure applications are made in time. Applications are processed on a 'first come, first-served basis,' and priority will not be given to applications that are submitted outside of the prescribed timeframe, even if this means the licence will expire.

7.2. Criminal record checks

- 7.2.1. All applicants must also provide a current (dated within the last year) Basic DBS disclosure (although if the vehicle proprietor is also a licensed driver or operator with the council the requirement for the DBS disclosure is waived as the driver will have been subject to an Enhanced Disclosure and the operator will already have provided a Basic DBS disclosure - should the individual cease to hold a driver or operator licence, a basic DBS will be required to be provided within a month of that licence expiring). The Council will then decide whether the applicant is a 'fit and proper person' to hold such a licence. Where the proprietor is trading as a limited company (or partnership) the Council will also require the directors and company secretary (or partners) to provide a Basic DBS disclosure and the company (or partnership) must advise the licensing authority within seven days of any change in directors (or partners) throughout the period of the licence.
- 7.2.2. Currently the DBS only has details of offences committed in England, Scotland, Wales, Northern Ireland, Jersey, Guernsey, the Isle of Man and Gibraltar, therefore if an applicant has lived in countries other than these at any point beyond the age of criminal responsibility for three months

or more, an authenticated certificate of good conduct from the relevant embassy will be required. All certificates of good conduct must be submitted in English or accompanied by a translation by a certified translator.

7.2.3. Where the Council has reasonable cause for concern relating to a particular vehicle proprietor, a DBS check may be carried out. If a proprietor is given notice to undertake a DBS check by the Council, they must do so within 14 days of the request. Failure to do so may result in the suspension or revocation of the licence.

7.2.4. Both prospective and current licence holders are required to sign up to the DBS Update Service. This service reduces the costs of DBS checks to the licence holder and provides a mechanism for the Council to carry out DBS checks on a 6 monthly basis as required. Licence holders are required to ensure their direct debit account is always active. Failure to maintain their direct debit account may result in removal from the update service which will result in suspension of the licence.

7.3. **Limitation of Hackney Carriage numbers**

7.3.1. The Council currently limits the number of hackney carriage vehicle licences. To maintain a limit on the number of licences, the Council is required by law to carry out a survey to test if sufficient demand is delivered within the number of vehicles licensed. An 'Unmet Demand Survey' is required to be carried out every 5 years to determine if the limit on numbers of vehicle licences should remain.

7.3.2. DfT guidance advises the default option should not be to restrict vehicle numbers, any restrictions imposed on hackney carriage vehicle numbers should be justified through a survey. The costs associated with the carrying out of an unmet demand survey are borne by the hackney carriage trade.

7.3.3. No powers exist for the Council to limit the number of private hire vehicles that they licence.

7.4. **Specifications and conditions**

7.4.1. The Council has adopted minimum standards that will apply to all licensed vehicles. These are set out in Appendix A for hackney carriages and Appendix C for private hire vehicles.

7.4.2. The Council is empowered to impose such conditions as they consider reasonably necessary, in relation to the grant of hackney carriage or private hire vehicle licences. Hackney carriages and private hire vehicles provide a service to the public; the Council will only licence vehicles suitable for this purpose. It is important to set criteria for the external and internal condition of the vehicle, provided that these are not unreasonably onerous, to maintain high standards within the trade.

7.4.3. The Council will not licence purpose built hackney carriage vehicles as private hire vehicles as this would be likely to confuse members of the public.

7.4.4. Any vehicle with a 'Q' plate registration will not be licensed as 'Q' plates are issued for vehicles which are either not originally registered in the UK and proof of age was unavailable at registration or for vehicles that have been built using a significant proportion of used parts. 'Q' plates may be used to disguise stolen or accident damaged vehicles.

7.4.5. The Council will NOT licence vehicles that have been classified as the following 'write off' categories:

- 'A' (whole vehicle to be crushed),
- 'B' (body shell to be crushed).

Vehicles categorized as 'S' (structural damage) will only be considered if they are currently licensed by the Council and on a case-by-case basis. Category 'S' vehicles that are coming new to the fleet will NOT be licensed.

Category 'N' vehicles (non-structural damage) will be considered for a licence if they meet the specifications in Appendices A and C. This is to ensure all vehicles are of a high quality and meet the original, statutory safety standards.

7.5. Condition of the vehicle

- 7.5.1. The interior and exterior of the vehicle shall always be kept clean. The exterior of the vehicle shall be free of large dents, rust or un-repaired accident damage and shall always have uniform paintwork equivalent to that applied by the manufacturer. The interior shall be free of stains, spills, tears and the seats must function in accordance with the original manufacturer's specification. All handles and internal trims must be present, safely attached and in working order. The vehicle will comply with all relevant statutory requirements applicable to the class of vehicles to which it belongs including, but without prejudice to, the generality of the current Motor Vehicle (Construction and Use) Regulations.

7.6. Insurance and other documentation

- 7.6.1. The proprietor shall not use the vehicle, nor permit it to be used, as a private hire or hackney carriage vehicle if it does not have a policy of insurance, or such security as complies with the requirements of Part VI of the Road Traffic Act 1988, covering the use of the vehicle for these purposes. The proprietor must produce when requested a valid certificate of insurance. On renewal of the insurance a copy of the new certificate (paper or electronic) must be provided to the Council. The Council will only accept insurance from bodies that are registered with the Motor Insurance Bureau. Failure to do so may result in the licence being suspended/revoked or prosecution.
- 7.6.2. When requested, the proprietor must produce the vehicle registration document, insurance or evidence that the vehicle has a valid MOT/compliance certificate. Only original documents are acceptable.

7.7. Reporting to the Council

- 7.7.1. All licence holders must report to the Licensing section of the Council all new convictions, cautions, warnings, reprimands, anti-social behaviour orders, community protection notices, criminal behaviour orders, community service orders, restraining orders, fixed penalties (including traffic offences), driver education courses and any disqualifications from driving in writing within 48 hours.
- 7.7.2. All licence holders are required to inform the Licensing Section of the Council in writing within 48 hours if they are arrested, formally interviewed as a suspect or charged with an offence by the police.
- 7.7.3. All licence holders must notify the Licensing Section of the Council in writing of any change of name, postal address, email address or telephone number during the period of the licence within seven days of the change taking place.
- 7.7.4. Where damage that requires repair arises from an accident the proprietor is required to report the accident to the Council within three days.

7.8. Transfers

- 7.8.1. A 'transfer' is the sale of a currently licensed vehicle from one owner to another within the fleet.

The Council must be notified of any such transfer within 14 days of it taking place.

- 7.8.2. Applications to transfer the licence must be made on the prescribed application form. The licence fee payable for a transfer is subject to annual review and will be published together with other council licensing fees.

7.9. **Vehicle emissions**

- 7.9.1. The Council has declared a Climate Emergency and aspires to work towards a carbon neutral borough. Considering this, the aim is for all vehicles licensed by the council to be zero carbon by 2030 at the latest. Over the life of this policy, we will work with other sections of the Council and other partners to improve the infrastructure for electric vehicle charging on the council's property and land and will investigate options for installing additional infrastructure on other sites.
- 7.9.2. The Council encourages drivers and operators to adopt more efficient vehicles, which reduce the levels of CO₂ and NO_x emitted. The use of alternative fuels and different technologies, such as fully electric vehicles, will further reduce emissions.
- 7.9.3. The Council offers reduced licence fees for new to fleet Hackney Carriage vehicles that produce lower carbon dioxide or nitrous oxide emissions, or that are solely electric/hydrogen powered (i.e. zero- emissions). These incentives are reviewed annually.
- 7.9.4. There are no such incentives for low emission and electric vehicles within private hire vehicle licensing, because these types of vehicles are readily available to private hire proprietors.
- 7.9.5. The emissions and age policies for hackney carriage and private hire vehicles can be found in Appendix A and Appendix C respectively.

7.10. **Vehicle testing**

- 7.10.1. The DfT guidance recognises that an annual inspection for licensed vehicles of whatever age is necessary. More frequent tests are recommended for older vehicles. The DfT guidance also suggests that it is good practice for councils to consider having more than one testing station and argues that there could be advantages in contracting out the testing work to different garages. The Council will not licence vehicles unless they have a current certificate of compliance from one of the approved compliance testing centres.
- 7.10.2. The Council has approved 2 MOT/RBC compliance testing centres to which all hackney carriages and private hire vehicles must be taken when tested in connection with licensing requirements. The location and contact information for approved compliance testing centres is available on the Council's website.
- 7.10.3. If a hackney carriage/private hire vehicle receives minor defects/advisories as part of an MOT, these should not appear on 3 consecutive tests. If the same minor defects/advisories appear on a second test, a letter may be sent to remind the owner to have them rectified and these must be repaired before the next test. If they appear again as part of the third MOT, the vehicle licence may be suspended until they are rectified. If there are serious concerns that a vehicle is not suitable, the vehicle licence may be revoked.
- 7.10.4. Anyone who wishes to complain about or is in dispute with any of the approved testing stations may contact the Licensing Team who will investigate the complaint. Complaints concerning the part of the test that checks the Council's conditions will be dealt with by the Licensing Team.
- 7.10.5. Officers are trained to carry out vehicle inspections to ascertain their fitness to be on the road through City & Guilds, Level 3, Basic Vehicle Inspections Course. Reference may be sought from

DVSA. Complaints about the mechanical part of the test may be referred to the DVSA if appropriate.

- 7.10.6. Tests must take place in accordance with the Council's testing procedures. A compliance test covers all the elements of the MOT and the Council's standards as laid out in Appendices A to D. In addition, the accuracy of a meter will be checked over a measured mile by officers.
- 7.10.7. The table below sets out how many MOT and Compliance tests vehicles are required to take according to the age of the vehicle.

MOT AND RBC COMPLIANCE TESTING REQUIREMENTS		
Age of Vehicle	Frequency of MOT	Frequency of Compliance test
Under 3 years	Not required	Once a year
3 to 5 years	Once a year on grant or renewal	Once a year
5 years and over	Twice a year on yearly renewal and every 6 months thereafter	Twice a year on renewal and every 6 months there after

7.11. **Tariff**

- 7.11.1. The tariff is the maximum figure that hackney carriage drivers can charge based on a range of factors including time of day or night and special occasions such as bank holidays. For journeys outside the Council boundary, unless there is a fare agreed before the hiring, the fare should not exceed the tariff. If a hackney carriage is used for a private hire booking, the fare shall be calculated from the point in the Borough at which the hirer commences their journey.
- 7.11.2. The tariff card must be fixed in such a position that it is always visible to all passengers within the vehicle. The information on the tariff card shall be clearly legible and if it becomes damaged or defaced it must be replaced.
- 7.11.3. The tariff does not apply to private hire vehicles as these are set by individual private hire operators.

7.12. **Signage and advertising**

- 7.12.1. Members of the public sometimes confuse private hire vehicles with hackney carriages; without realising that private hire vehicles are not available for immediate hire or allowed to be hailed in the street. It is therefore important that the public can easily distinguish each type of vehicle.
- 7.12.2. For this reason, private hire vehicles must NOT display any roof signs and must not display any wording that includes the words 'taxi' or 'cab'.
- 7.12.3. Hackney carriage vehicles must have a roof sign that is built into the design of the hackney carriage vehicle. No aftermarket roof signs are permitted.
- 7.12.4. Both hackney carriages and private hire vehicles must display a licence plate on the rear of the vehicle. The plates are a different colour for hackney carriages and private hire vehicles. The external licence plate supplied by the Council shall be securely fixed to the outside and rear of the vehicle either by direct fixing, e.g. screw, bolt or rivet, or on a secure bracket. No temporary fixing such as magnets, double sided tape, cable ties or Velcro® are allowed. The licence plate

always remains the property of the council. If required to do so at any time, the licence holder must return the plate to the Council within seven days of any such request.

- 7.12.5. Private Hire Vehicle licence holders shall display their licence details on side panels located on the rear passenger doors. The side identification panels must include the words "Private Hire, Advanced Bookings Only" and the licence plate number, printed in letters and numbers not less than 2.5cm (1") in height. This wording must NOT be handwritten. They may also display a sticker with their operator details on the front doors of the vehicle.
- 7.12.6. Advertising is permitted on the exterior of licensed hackney carriage and private hire vehicles, subject to approval in accordance with the process set out in Appendix E. Complaints about unsuitable or offensive advertisements may be referred to the Licensing Applications Sub-Committee. This does not include advertising for the taxi or private hire firm that the vehicle works for.
- 7.12.7. Advertisements are permitted on the interior of purpose-built hackney carriages subject to approval in accordance with the process set out in Appendix E. These may be on the underside of the tip up seats and across the bulkhead above the dividing glass partition only. No advertisement may be placed on the dividing glass partition other than notices approved by the Council.
- 7.12.8. Hackney carriage and private hire vehicles must display the feedback information card provided by the Council inside the vehicle so that it may be clearly read by passengers.
- 7.12.9. Licensed vehicles may also display:
- a sign indicating membership of the AA, RAC or similar motoring organisation;
 - card payment details; and
 - any other material supplied by the Council.

7.13. **Plate exemption for private hire vehicles**

- 7.13.1. Private hire vehicles which are used for contract work may be exempted from displaying a plate. The operator's records for these vehicles must prove that the required amount of contract work is being carried out and the council will require written evidence as to why plate exemption is required. Where an exemption is granted, the internal exemption card/disc issued by the Council must be placed in the bottom corner of the front windscreen on the passenger side and must be clearly visible from both inside and outside of the vehicle. The rear licence plate must be always carried in the vehicle.
- 7.13.2. Exemption certificates will only be granted to executive type vehicles. The Council will determine applications for exemption on a case-by-case basis. The plate exemption must be applied for by the operator of the vehicle with evidence of contract work to support the exemption. An exemption will expire on expiry of the vehicle licence. Operators are required to provide up to date evidence of the requirement for the exemption on request from officers. Operators should not automatically assume that when applying for a new vehicle exemption to replace an existing one that the plate exemption will continue. The fee for this process is subject to annual review and will be published together with other Council licensing fees.
- 7.13.3. Executive private hire vehicles shall not be used to carry out home-to-school contract journeys due to safeguarding and public safety concerns.

7.14. **Smoke free vehicles**

- 7.14.1. Smoking/vaping is NOT permitted in the vehicle at any time, either by the driver or any passengers. The use of vapes, electronic cigarettes and any other vapor inhaling equipment is

prohibited by drivers and passengers. At least one legible no-smoking sign must be displayed in the vehicle.

7.15. CCTV and security measures

- 7.15.1. The DfT recommends councils to look sympathetically on the installation of security features, such as a screen between driver and passengers or CCTV systems as a means of providing some protection for vehicle drivers. The Council fully supports such measures.
- 7.15.2. The Council does not require enhanced security or CCTV measures in vehicles. Where a proprietor installs a CCTV system, signage must be clearly displayed in the vehicle including contact details for the system manager/operator. All such equipment and images must be operated in accordance with any relevant data protection legislation or regulations. It is the responsibility of the driver/operator to ensure compliance.
- 7.15.3. No audio, video or recording systems (CCTV) shall be installed or operated in the vehicle without prior written notification being supplied by the vehicle proprietor to the Licensing Section of the Council.
- 7.15.4. Permission is not required for the installation of dash-cam equipment, if it only covers the external front and rear views of the vehicle. If any dashcam equipment provides internal video of the vehicle, this will be considered to be a CCTV system and must be operated in accordance with paragraph 7.15.2 above. If the dash-cam records audio there needs to be a sign visible to passengers notifying them of this. The equipment installed must have the ability to turn off audio recording if requested to do so by passengers.

7.16. Meters and payment machines

- 7.16.1. Hackney carriage vehicles must always be fitted with a taximeter (a private hire vehicle may also be fitted with a meter, subject to approval from the Licensing Section of the Council).
- 7.16.2. All taximeters must be compliant with the Measuring Instruments (Taximeters) Regulations 2006 (S.I. 2006/2304) or UKCA (UK Conformity Assessed) marked. The taximeter shall be maintained in a sound working condition at all times. All meters must be of the 'calendar' type to automatically adjust for bank holidays. All meters must be sealed with a tamper evident seal. The taximeter shall be set at the tariff displayed in the vehicle which must be visible to passengers.
- 7.16.3. The taximeter must:
 - be of the clock calendar type and change according to the wording of the displayed fare tariff.
 - show the fare recorded on the taxi meter in plainly legible figures and the word 'FARE' shall be clearly displayed so as to apply to such figures.
 - be kept securely fixed in such a position so that the fare recorded is always visible to all passengers within the vehicle and the figures shall be illuminated for this purpose whenever necessary.
 - not be altered or tampered with except with the approval of the Council and must be retested by officers or one of the Council's approved testing stations if it is altered.
 - All openings shall be sealed with a 'tamper evident' seal supplied by the Council.
- 7.16.4. Hackney carriage vehicles must always have a working card payment machine available for use by passengers and there must be signs on display to show that payment by card is available.

7.17. Accidents

- 7.17.1. Where damage that requires repair arises from an accident, the proprietor is required to report the accident to the Council within three days. The proprietor may be required to produce the vehicle at the Council offices, or to undertake a compliance test. The Council's primary concern is to ensure that the vehicle is in a safe and suitable condition to be used as a licensed vehicle.
- 7.17.2. A Licensing Officer or an approved testing station may examine the extent of the damage and determine whether the vehicle must be repaired to allow it to continue as a licensed vehicle.
- 7.17.3. Where a temporary vehicle licence has been granted due to the original vehicle being subject to accident damage or mechanical breakdown, a new compliance certificate may be required for the original vehicle to prove it is mechanically fit to be re-licensed.
- 7.18. **Lost property**
- 7.18.1. The proprietor or driver of a hackney carriage or private hire vehicle must report any lost property found in the vehicle to Thames Valley Police in accordance with current procedures, if they are unable to contact the passenger directly.
- 7.19. **Accessible vehicles**
- 7.19.1. The Council is committed to social inclusion and ensuring that disabled residents have a variety of opportunities to enjoy a high quality of life. For this reason, the Council consider it important that disabled residents have access to all forms of public transportation.
- 7.19.2. All hackney carriage vehicles are required to be purpose-built wheelchair accessible vehicles.
- 7.19.3. All private hire operators with fleets of 10 or more vehicles are required to have a minimum of 1x wheelchair accessible vehicle per 10 vehicles (1x vehicle in 10, 2x vehicles in 20, 3x vehicles in 30 etc.).
- 7.20. **Hackney carriage vehicles – accessibility requirements, equipment and anchorage.**
- 7.20.1. The Council follows the London Carriage Office specifications for licensing hackney carriage vehicles which includes the turning circle (see Appendix A).
- 7.20.2. Any electronic doors, steps and the turning circle mechanism is required to always be in working order.
- 7.20.3. Vehicles will have a maximum seating capacity of up to eight passenger seats and only forward or rear-facing seats shall be fitted. When carrying a wheelchair this must be included in, and not in addition to, the maximum number of seats. When the wheelchair facility is not required the vehicle may operate as a standard hackney carriage with seating for the number of passengers the vehicle is licensed to carry.
- 7.20.4. All wheelchair accessible vehicles must be able to load a wheelchair using the access equipment by the side access doors. The side access door must be the door situated on the nearside of the vehicle i.e. the kerbside when stopped in a normal road.
- 7.20.5. Hackney carriage vehicles shall be fitted with the manufacturer's access equipment.
- 7.20.6. The ramp must be nonslip, integrated and shall have visible reference to a safe working load of 250kg and certified to the relevant British Standards.
- 7.20.7. The wheelchair must always be carried in a secure and stable position as recommended by the vehicle manufacturer. Please note this will always be either facing the front or rear of the vehicle.

Wheelchairs must never be carried facing sideways in a vehicle.

- 7.20.8. A system for the effective anchoring and securing of wheelchairs shall be provided within the vehicle in all spaces designated as wheelchair spaces. The system and the devices used to secure a wheelchair to the vehicle shall comply with the relevant standards laid down in European Directive 76/115 EEC (as amended by 90/629 EEC) or the UK equivalent standard.
- 7.20.9. Each wheelchair user shall be provided with a disabled-person seatbelt, which fastens to the structure of the vehicle either permanently or temporarily by use of approved fixings to the position of the wheelchair. This is required by (European Directive 76/115 EEC or the UK equivalent standard and Regulations 46 and 47 Road Vehicles (Construction and Use) Regulations 1986).
- 7.21. **Private hire accessible vehicles – Specification, equipment and anchorage**
 - 7.21.1. Any vehicle that has been purpose built, or any vehicle that has been modified or converted to carry a disabled person confined to a wheelchair, will be considered for licensing provided the vehicle complies with the requirements and guidelines laid down by the Council. This specification can be found in Appendix C for private hire vehicles.
 - 7.21.2. The Council are aware of the different demands for private hire vehicles, particularly those involved in providing transport through school contracts for disabled children. Operators also need to be aware of their liabilities under health and safety legislation in respect of the staff that they employ to ensure that they provide a safe system of work for the driver.
 - 7.21.3. Vehicles will have a maximum seating capacity of up to eight passenger seats and only forward or rear-facing seats shall be fitted. When carrying a wheelchair this must be included in, and not in addition to, the maximum number of seats. When the wheelchair facility is not required the vehicle may operate as a standard private hire vehicle with seating for the number of passengers the vehicle is licensed to carry.
 - 7.21.4. Prior to licensing, the applicant must provide the Licensing Section of the Council with written confirmation from the manufacturer or modifier that the vehicle meets the required standard. When a vehicle has been modified post manufacture to provide access or special facilities for disabled passengers, the vehicle must have all modifications and adaptations, including all seats, seat belts and anchorages, retested or approved to meet either the European Whole Vehicle Type Approval or the UK Low Volume Type Approval standard. A Licensing Officer may require the vehicle to be referred to a testing centre approved by officers of the Council. This inspection will be carried out at the owner's cost. It is recommended that prior to purchasing any new vehicle, advice be sought from the Licensing Team.
 - 7.21.5. All wheelchair accessible vehicles must be able to load a wheelchair using the access equipment by the side or rear access doors where available. The side access door must be the door situated on the nearside of the vehicle, i.e. the kerbside when stopped in a normal road.
 - 7.21.6. The aperture of the door into which the access equipment is fitted shall have a minimum clear headroom in its central third of 1220mm (48 inches). The measurement shall be taken from the upper centre of the aperture to a point directly below on either the upper face of the fully raised platform or the upper face of the ramp fully deployed on level ground.
 - 7.21.7. A locking mechanism shall be fitted that holds the access door in the open position whilst in use.
 - 7.21.8. A wheelchair accessible vehicle shall be fitted with either of the following forms of wheelchair access equipment:

Ramps

Any purpose designed access ramp that is carried must be lightweight and easy to deploy. The installed ramp shall have visible reference to a safe working load of 250kg and certified to the relevant British Standards.

Wheelchair lift

A purpose designed wheelchair lift shall conform to the relevant British Standards and the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). Vehicles presented for inspection with a wheelchair lift will require a valid LOLER certificate. All equipment used to lift people requires inspection every six months. The LOLER regulations require that records of inspection must be kept for two years or until the next inspection as a minimum. Any such equipment must always be maintained in good working order and be available for use.

- 7.21.9. The wheelchair access equipment shall be fitted such that it terminates at the interior floor level to allow smooth entry/exit of the wheelchair.
- 7.21.10. The wheelchair must always be carried in a secure and stable position as recommended by the vehicle manufacturer or conversion company. In the case of purpose-built vehicles e.g. London style taxis, this position will be facing the rear of the vehicle. In the case of vehicles which have been specially converted for the purpose of conveying wheelchairs, the converter's recommendations shall be followed. Please note this will always be either facing the front or rear of the vehicle. Wheelchairs must never be carried facing sideways in a vehicle.
- 7.21.11. A system for the effective anchoring and securing of wheelchairs shall be provided within the vehicle in all spaces designated as wheelchair spaces. The system and the devices used to secure a wheelchair to the vehicle shall comply with the relevant standards laid down in European Directive 76/115 EEC (as amended by 90/629 EEC) or the UK equivalent standard.
- 7.21.12. All wheelchair tracking must comply with European Standard UNECE Regulation 14 (EC Directive 76/115 EEC) or the UK equivalent standard.
- 7.21.13. Each wheelchair user shall be provided with a disabled-person seatbelt, which fastens to the structure of the vehicle either permanently or temporarily by use of approved fixings to the position of the wheelchair. This is required by (European Directive 76/115 EEC or the UK equivalent standard and Regulations 46 and 47 Road Vehicles (Construction and Use) Regulations 1986).
- 7.21.14. If the vehicle is designed or adapted to carry a wheelchair, the proprietor must ensure that any driver of the vehicle has received sufficient training to load and convey wheelchair bound passengers.

7.22. Stretched limousines and special vehicles

- 7.22.1. For the purposes of this policy, a special vehicle shall mean a vehicle that is used for a particular occasion or occasions of a restricted nature and is not a conventional vehicle used for standard private hire work. Examples of vehicles that may fall within the 'special' category are stretch limousines, classic cars or a vehicle that has fewer than four seats.
- 7.22.2. Councils are sometimes asked to license stretched limousines as private hire vehicles. The Council will assess licence applications for these vehicles in accordance with the private hire vehicle specifications set out in Appendix C.
- 7.22.3. Where a vehicle has been imported from another country, the Council may require DVSA approved certification prior to licensing approval. The Council will take into consideration any

relevant guidance from the DfT, DVSA or similar when determining whether to include special conditions on any licence.

- 7.22.4. This element of the policy only applies to private hire vehicles and sets out the general considerations the Council will take into account when considering an application for the licensing of a special vehicle. This policy does not apply in relation to vehicles used solely in connection with weddings and funerals, as these are exempt from private hire licensing.
- 7.22.5. The general licence conditions for private hire vehicles would not normally allow for special vehicles to be licensed for a number of reasons including the style and design of the vehicle.
- 7.22.6. A proprietor may apply for a licence for any special vehicle which would not meet the standard private hire vehicle conditions by seeking variation or exemption from some of the standard conditions. All other requirements in respect of standard private hire vehicles shall apply to any special vehicles unless the vehicle is exempted from said requirement in writing by the Council.
- 7.22.7. Each vehicle will be considered and assessed on merit taking account of:
- the overall condition of the vehicle;
 - the number of passengers for which it is required to be licensed (vehicles may only be licensed for up to and including 8 passengers);
 - the specific criteria for which exemption is sought.
- 7.22.8. The individual nature of a special vehicle means it may not conform to conventional private hire vehicles standards so it may be necessary to consider additional conditions to be included on any licence. The primary consideration will always be the safety and comfort of the travelling public.
- 7.22.9. Vehicles may be right- or left-hand drive provided that left-hand drive vehicles have the relevant vehicle type approval from DVSA (written proof to be submitted with the application). In addition, the following applies:
- the vehicle must not have fewer than four road wheels;
 - the number of doors must be sufficient to allow safe access and egress for the number of passengers for which approval is sought; and
 - the vehicle must comply with Construction and Use Regulations.

7.23. **Funeral and wedding vehicles**

- 7.23.1. There is currently no requirement for a vehicle to be licensed where it is being used in connection with a funeral or is being wholly or mainly used by a person carrying on the business of a funeral director for the purpose of funerals.
- 7.23.2. A vehicle does not need to be licensed to be used in connection with a wedding. Written certification from the council of the relevant exemption claimed is not currently required and it is not proposed to change this arrangement. However, if a licensed hackney carriage vehicle is used for a wedding the licence plate and roof sign must be displayed; for licensed private hire vehicles the licence plate must be displayed unless a valid exemption notice is held.

7.24. **Trailers**

- 7.24.1. Trailers may only be used with prior written approval of the Licensing Section of the Council and subject to the following requirements:
- trailers can only be used in connection with private hire bookings;
 - the trailer must at all times comply with all requirements of Road Traffic legislation in particular those laid down in the Road Vehicles (Construction and Use) Regulations

- 1986 (S.I. 1986/1078);
- the vehicle insurance must include cover for towing a trailer; and
- a suitable lid or other approved means of enclosure shall be fitted to secure and cover the contents of the trailer whenever in use.

8. Hackney carriage and private hire drivers

8.1. Grant and renewal of licences

- 8.1.1. The licensing of hackney carriage and private hire/school transport drivers is governed by Section 53 of the Local Government (Miscellaneous Provisions) Act 1976. This provides that these licences shall remain in force for up to three years or for such lesser period as appropriate in the circumstances of the case.

8.2. Age and experience

- 8.2.1. The DfT guidance recommends against setting a maximum age limit for drivers provided that regular medical checks are made on them. It also considers that minimum age limits, beyond the statutory requirement of holding a full driver's licence for 12 months are unnecessary, advising that applicants should be assessed on their merits.

8.3. Right to work in the UK

- 8.3.1. All driver licence applicants must prove that they have a right to work in the UK in accordance with the Immigration Act 2016. The Council will follow any relevant guidance such as that published by the Home Office in respect of establishing proof of the right to work.
- 8.3.2. If an applicant is unable to provide satisfactory proof of their right to work in the UK, their application will be refused. Should a driver's right to remain in the UK lapse, the licence automatically lapses with no right of appeal.
- 8.3.3. Applicants who cannot provide evidence of indefinite right to work will only have their licence granted for the period of their right to work. If the right-to-work period is extended by the Home Office, a new application to renew the licence will be required. The existing licence cannot be extended to take into account an extension to the right to work.

8.4. Medical examination

- 8.4.1. The DfT recognises that it is good practice for medical checks to be made on each driver as a condition for the initial grant of a licence and for each renewal. Use of the 'Group 2' medical standards (as applied by DVLA to the licensing of lorry and bus drivers) to hackney carriage and private hire drivers is best practice and shall be applied by the Council. Please see below for requirements for drivers with diabetes managed by insulin, a sulphonyl urea or a glinide.
- 8.4.2. A medical examination report must be downloaded from the Council's website and given to the GP conducting the examination. If the driver/applicant is not using their own registered GP, they must use a GP who has access to their medical records who will be required to certify that they have checked the driver's/applicant's personal medical records before completing the medical examination. The GP conducting the examination must use the Group 2 criteria within the DVLA '*Assessing fitness to drive – a guide for medical professionals*' document, a link to which can be found on the Council's website. The applicant will be responsible for paying the fee for the examination to the GP. On completion of the examination, the driver/applicant should check through the report before submitting this to the Council, to ensure all questions have been answered and they are satisfied that the information is accurate.

- 8.4.3. During the application process, applicants must advise the Licensing Team in writing within seven days of any change in their medical condition that may affect their driving capabilities. If there is any doubt as to the medical fitness of the applicant, the Council may require the applicant to produce a medical certificate, letter or report from their own GP or consultant confirming their fitness to drive. This will be done at the expense of the applicant. Where there remains any doubt about the fitness of any applicant, the AD of Planning, Transport & Public Protection will review the medical evidence and make the final decision.
- 8.4.4. The DVLA Group 2 medical standard stipulates that over the age of 45 drivers will require a medical every five years. Drivers aged 65 and over, or those with relevant medical conditions, will require an annual examination. More frequent checks will be required if the medical practitioner thinks it is necessary. For drivers with diabetes managed by insulin or a sulphonyl urea or a glinide, a full medical is required at the usual intervals determined by the driver's age and/or any other medical conditions, and in addition a specialist medical will be required before the licence is issued and annually thereafter.
- 8.4.5. Licence holders must advise the Licensing Team in writing within seven days of any change in their medical condition that may affect their driving capabilities or that has required them to speak to their GP or another medical practitioner. If there is any doubt as to the medical fitness of the licence holder, the Council may require the licence holder to produce a medical certificate, letter or report from their own GP or consultant confirming their fitness to drive. This will be done at the expense of the licence holder. Where there remains any doubt about the medical fitness of any licence holder, the AD of Planning, Transport & Public Protection will review the medical evidence and make the final decision on whether to suspend or revoke the licence. The licence may be suspended with immediate effect on the grounds of public safety if there is any doubt as to their medical fitness.
- 8.5. **Criminal record checks**
- 8.5.1. Criminal record checks on drivers are an important safety measure. The DfT considers that such checks should be at the level of enhanced disclosure through the Disclosure and Barring Service as these disclosures include details of spent convictions and police cautions. The Council will manage information arising from disclosures in accordance with the [DBS Code of Practice](#).
- 8.5.2. The Rehabilitation of Offenders Act 1974 ("1974 Act") and associated amendments sets out the period after which a conviction/caution/warning would be regarded as 'spent' and not normally require details of that conviction to be provided on any relevant application form. However, in 2002 the Rehabilitation of Offenders Act 1974 was amended to exclude hackney carriage and private hire drivers from the 1974 Act. This was because the driving of hackney carriages and private hire vehicles was listed as a 'Regulated Occupation' in relation to which questions may be asked as to the suitability of individuals to be granted a licence.
- 8.5.3. Applicants for such licenses must therefore provide details of all disclosable convictions, warnings, reprimands, criminal behaviour orders, injunctions, cautions, community service orders, restraining orders, traffic offences, driver education courses, disqualifications and fixed penalty notices, including any that would previously have been regarded as spent under the 1974 Act or may not currently show on any replacement DVLA driver's licence. In addition, any pending court cases or hearings must be declared, and details of any licences previously held, suspended or revoked. Failure to disclose any information and the making of false declarations will be considered an act of dishonesty and may result in the application being refused or the licence revoked. Applicants should seek advice of officers if they cannot remember full details that they are required to declare or have any uncertainty about what details they are required to provide.
- 8.5.4. Currently the DBS only has details of offences committed in England, Scotland, Wales, Northern

Ireland, Jersey, Guernsey, the Isle of Man and Gibraltar, therefore if an applicant has lived in countries other than these for three months or more at any point from the age of ten, an authenticated certificate of good conduct from the relevant embassy will be required. All certificates of good conduct must be submitted in English or accompanied by a translation by a certified translator. This includes any licence holder who has lived in other countries for three months or more since the licence was granted.

- 8.5.5. No driver's licenses will be issued or renewed without a current enhanced DBS disclosure or one checked through the Update service.
- 8.5.6. Applicants must obtain their DBS disclosure through the Council.
- 8.5.7. All drivers must sign up for the DBS Update service and maintain their annual payments to the DBS. Applicants whose Update check reveals new information will have to complete a new, full DBS application that may take several weeks to be returned. Where a driver fails to maintain their payments to the DBS Update service, their licence may be suspended with immediate effect on the grounds of public safety pending the return of a new DBS disclosure.
- 8.5.8. Where the Council has reasonable cause for concern relating to a particular driver, enhanced DBS checks may be carried out. If a driver is given notice to undertake a DBS check by the Council, they must provide all relevant documentation within 14 days of the request. Failure to do so may result in the suspension or revocation of the licence.

8.6. **DVLA Licence and Checks**

- 8.6.1. All applicants must have held a full DVLA/EU/EEA driving licence for at least 12 months prior to application. Before the grant or renewal of a driver's licence, all applicants are required to submit a DVLA licence check code so a check can be carried out to confirm the status of the DVLA licence. Any photocard must be current and valid. The authority may undertake further checks of licensed driver's DVLA licenses to identify undisclosed offences. If a driver is given notice to undertake a DVLA check by the Council, they must provide a DVLA check code within 14 days.
- 8.6.2. Applicants who have held a full driving licence issued by a European Economic Area (EEA) country for at least 12 months can apply for a hackney carriage or private hire vehicle driver's licence.
- 8.6.3. Applicants from EEA Accession States are eligible to acquire a hackney carriage/private hire driver's licence if they have held an ordinary driving licence for 12 months, which was issued by an Accession State.
- 8.6.4. Those applicants whose driving licenses were not issued by an EEA state, an Accession State or Northern Ireland will be required to hold a full DVLA licence for 12 months prior to being issued with a hackney carriage/private hire vehicle driver's licence.
- 8.6.5. If an applicant has been disqualified from driving due to motoring offences and they have not held a full, clean licence for a minimum of 12 months, the application will be refused.

8.7. **Practical Driving Assessment**

- 8.7.1. All new applicants must take and pass, at their own cost, the appropriate practical driving assessment(s) from the Council's list of approved providers which can be found on the Council's website. Drivers who have previously been granted a licence by the Council and who have not held one for 6 or more years, must re-take and pass the practical driving assessment. The assessment certificate will only be valid for the application process for a period of 12 months from the date of issue.

- 8.7.2. Existing drivers may also be required to pass a practical driving assessment, at their own cost, if there are concerns about their standard of driving, and the licence may be suspended until the assessment is passed.

8.8. English language proficiency

- 8.8.1. A lack of language proficiency could impact on a driver's ability to understand written documents, such as policies, guidance and licence conditions. This could have a direct impact on the protection of children and vulnerable adults and being able to identify and act on signs of exploitation. Sitting the knowledge test is a reasonable test of English language proficiency. If concerns are identified during the application process, the Principal Licensing Officer may decide to refer an applicant to an independent organisation who will undertake testing of the applicant's spoken English. Applicants who are referred will be required to demonstrate their ability to converse in English in an independently administered test. Current drivers may be referred for an English proficiency test if there are concerns that their ability to converse in English means that they may not be 'fit and proper' to hold a driver's licence. Candidates will be responsible for all the costs associated with this additional testing.

8.9. Knowledge test

- 8.9.1. Hackney carriage and private hire/school transport drivers need a good working knowledge of the area for which they are licensed. The law requires that members of the public are transported by the most direct and therefore cheapest route. Hackney carriages can be hired immediately, directly with the driver, at hackney carriage stands or hailed on the street, whereas private hire vehicle drivers will normally have time to check the shortest or quickest route on a map and discuss the options with the hirer prior to the hire commencing. The ability to find destinations and read maps is seen as a fundamental skill in providing a quality service for passengers.
- 8.9.2. To maintain the high standards expected of drivers, the council will not grant a licence to drive a hackney carriage or private hire vehicle until the applicant has passed their knowledge test. This includes previously licensed drivers who have not held one for 6 years or more. The knowledge test will be in a form and structure determined by the council and may be administered by Council officers. Applicants will be given their results as soon as possible and the aim is to provide the results within one week.
- 8.9.3. To determine their fitness, applicants will be required to undertake a test as to their knowledge of:
- local geography (e.g. location of public buildings and recreation destinations, and the shortest route between locations in the area or primary destinations such as airports);
 - the Highway Code;
 - hackney carriage and private hire licensing law and council conditions;
 - Transportation of disabled passengers; and
 - Safeguarding.
- 8.9.4. There is a fee to sit the test and this is published together with the other Council licensing fees. No applicant may sit the test more than three times in any 12-month period commencing on the date of their first test. Any cancellations must be made at least 48 hours before the test date and time. The fee for tests cancelled with less than 48 hours' notice will not be refunded.
- 8.9.5. Candidates with a disability that may affect their ability to undertake a written test, such as dyslexia, must provide written confirmation from a suitably qualified professional such as a doctor or consultant. Based on the recommendation of the professional, the applicant will be given appropriate support such as additional time or a spoken test. Applicants must contact the

licensing team prior to booking the knowledge test if they require additional support.

8.10. Disability Awareness Training

- 8.10.1. All applicants for a hackney carriage driver's licence are required to pass wheelchair assessment training before a licence is granted. The applicant shall meet the cost of the training.

8.11. Safeguarding Training

- 8.11.1. We recognise that all licensed drivers who transport children, young people and vulnerable adults play a very important role in safeguarding, and this is why mandatory training is provided. Licensed drivers are the eyes and ears of their communities through the work they do and the contacts they have. The ability to spot the signs and have the knowledge of how to report concerns can be a major help in preventing this crime. The key message is that safeguarding is everyone's responsibility.
- 8.11.2. All applicants for a hackney carriage, private hire or school transport driver's licence will be required to pass approved safeguarding training before a licence is granted. The applicant shall meet the cost of the training.
- 8.11.3. Once passed, the training must be retaken by all licensed drivers every three years in line with the renewal of their licence. Failure to re-take the training will result in the driver's licence being suspended until such time as they have attended and passed the training.

9. Private hire operators

9.1. Requirements and obligations

- 9.1.1. A private hire vehicle may only be dispatched to a booking by a licensed private hire operator. Such a licence permits the operator to invite or accept bookings for a vehicle with a driver. Private hire operators must ensure that every private hire vehicle that they operate is licensed by the same council who issued them with the operator's licence and that it is driven by a person who holds a private hire driver's licence issued by the same council.

9.2. Grant and renewal of licences

- 9.2.1. All private hire operator licences will be issued for five years. Licences of a shorter duration may be issued in exceptional circumstances.

9.3. Criminal record checks

- 9.3.1. Applicants must also provide a current (less than one month old) Basic DBS disclosure (although if the operator is also a licensed driver with the Council the requirement for the DBS disclosure is waived as the driver will have been subject to an Enhanced Disclosure, should the individual cease to hold a driver licence, a Basic DBS will be required to be provided within a month of that licence expiring and annually thereafter). The Council will then decide whether the applicant is a 'fit and proper person' to hold such a licence.
- 9.3.2. Where the private hire operator is trading as a limited company (or partnership) the Council will also require the directors and company secretary (or partners) to provide a Basic DBS disclosure every year and the company (or partnership) must advise the licensing authority within seven days of any change in directors (or partners) throughout the period of the licence.
- 9.3.3. Currently, the DBS only has details of offences committed in England, Scotland, Wales, Northern

Ireland, Jersey, Guernsey, the Isle of Man and Gibraltar, therefore if an applicant has lived in countries other than these for three months or more at any point from the age of ten, an authenticated certificate of good conduct from the relevant embassy will be required. All certificates of good conduct must be submitted in English or accompanied by a translation by a certified translator. This includes any licence holder who has lived in other countries for three months or more since the licence was granted.

- 9.3.4. Where the council has reasonable cause for concern relating to an operator, a DBS check may be carried out. If an operator is given notice to undertake a DBS check by the Council, they must do so within 14 days of the request. Failure to do so may result in the suspension or revocation of the licence.
- 9.3.5. Operators must keep a register of all staff involved in booking and dispatching work and they must obtain basic DBS checks for all such staff prior to them commencing work for the operator and annually thereafter. Evidence of the most recent check must be retained while the staff member works for the firm and for a period of 6 months after they leave the firm and provided on request. The staff member must be required as part of their contract to advise the operator of any cautions or convictions while they are employed in this role.
- 9.3.6. Operators must keep a written policy on employing ex-offenders in roles that would be on the register as above, and this must be provided to any person on request.

9.4. **Right to work in the UK**

- 9.4.1. All operator licence applicants must prove that they have the right to work in the UK in accordance with the Immigration Act 2016. The Council will follow any relevant guidance such as that published by the Home Office in respect of establishing proof of the right to work. If an applicant is unable to provide satisfactory proof of their right to work in the UK, their application will be refused.
- 9.4.2. Applicants who cannot provide evidence of indefinite right to work will only have their licence granted for the period of their right to work. There is no discounted fee for a licence of less than five years.
- 9.4.3. If the right-to-work period is extended by the Home Office, a new application to renew the licence will be required. The existing licence cannot be extended to take into account an extension to the right to work.

9.5. **Safeguarding Training**

- 9.5.1. The operator shall ensure that all staff involved in bookings and dispatching work are given appropriate safeguarding training prior to commencing work for the operator. The training must be refreshed every three years and documented by the operator. Staff training records should be kept for the duration of the licence and be available for inspection by any authorised officers.

9.6. **Conditions**

- 9.6.1. The Council has the power to impose such conditions on an operator's licence as it considers reasonably necessary. These conditions can be found at Appendix F.

9.7. **Operator Base**

- 9.7.1. The Council will not grant a private hire operator's licence for an operator with an operating base that is outside the Council's boundary. This is to ensure that proper regulation and enforcement measures may be taken by the Council.

- 9.7.2. The address used on the operator's application must be the one where the invitation and acceptance of bookings take place. This will be the premises where the records referred to below are kept and at which they may be inspected by licensing officers without notice. It will be the responsibility of the operator to ensure that necessary planning consent exists for the operational address to be used for that purpose before any licence is granted.
- 9.7.3. If premises are open to the public, applicants must produce evidence that they have taken out a minimum of £5 million of public liability insurance for the premises to be licensed, before the relevant council will approve an application for a private hire operator's licence.
- 9.7.4. Operators who propose to change their operating base must obtain a licence to operate from the new address prior to commencement of operating from the new base.
- 9.8. **Sub-contracting**
- 9.8.1. A private hire operator may sub-contract a booking to another licensed operator or hackney carriage driver. A record of whom the booking was sub-contracted to and when must be kept..
- 9.8.2. Passenger Carrying Vehicle (PCV) licensed drivers are subject to different checks from hackney carriage and private hire vehicle licensed drivers as the work normally undertaken, e.g. driving a bus, does not present the same risk to passengers. Members of the public are entitled to expect when making a booking with a private hire vehicle operator that they will receive a private hire vehicle licensed vehicle and driver. The use of a driver who holds a PCV licence and the use of a public service vehicle (PSV) such as a minibus to undertake a private hire vehicle booking must not be permitted without the informed consent of the hirer. The hirer must be informed that a PSV will be used, with a PCV driver who is subject to different checks and not required to have an enhanced DBS check.
- 9.9. **Trading names**
- 9.9.1. An operator shall only use company or trading names that are included on the operator's licence. Additional trading names may be added during the period of the licence on approval by the Council in writing.
- 9.10. **Data protection**
- 9.10.1. Private hire vehicle operators have a duty under data protection legislation to protect the information they record. The Information Commissioner's Office provides comprehensive online guidance on registering as a data controller and how to meet their obligations.
- 9.11. **Record keeping**
- 9.11.1. The conditions at Appendix F outline the requirements in respect of records to be kept by operators, including booking records, and records in respect of the drivers and vehicles operated. All records kept by the operator shall be kept at the operator base for a minimum of 6 months following the date of the booking (for booking records) or the date the vehicle or driver ceases to take bookings from the operator (for driver and vehicle records).

Appendix A - Hackney Carriage Vehicle Specifications

Vehicle emissions and age policy

<i>Hackney Carriage Emissions & Age Policy 14th Nov 2024 to 1st Oct 2035</i> <i>*unless reviewed earlier</i>	
Dates	Policy
23 October 2023	All replacement vehicles must be less than 8 years old and minimum of Euro 5b. This rule applies regardless of whether the vehicle is new to fleet or an existing vehicle. The maximum age limit is 12 years.
01 October 2028	All replacement vehicles are minimum ULEV and less than 7 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle. Age limit for ULEV vehicles to be set at a maximum 15yrs and then removed from fleet. *Each vehicle shall be assessed on its own merit and an extension of a year to a maximum of 3 additional years might be granted on renewal of the licence after a successful RBC compliance test. That the revised Hackney Carriage Vehicle Emissions and Age Policy run until 2035 at which point it would be reviewed again unless changes prompt a review sooner.

Specifications

In addition to those in the table above, the vehicle must meet the following specifications:

1. Complies with the Public Carriage Office, Hackney Carriage Specification “Conditions of fitness”, as amended appropriate to Reading Borough Council;
2. Has means to facilitate the carriage of chair bound disabled persons;
3. Is of the manufacturer’s colours or Council approved advertising livery;
4. All hackney carriages must be purpose built to the London standards of fitness specifications in respect of roof signs including the turning circle.
5. All roof signs shall be built into the design of the hackney carriage vehicle. No aftermarket roof signs are permitted.
6. All Mercedes Vito Taxis be fitted with the Mercedes Taxi Graphic Pack (must be light reflective) prior to being licensed as hackney carriages in Reading;
7. the vehicle must be capable of carrying no fewer than four passengers and no more than eight;
8. each passenger seat shall be fitted with a seat belt;
9. the vehicle will be right hand drive;
10. the vehicle will have four wheels;
11. the vehicle must have sufficient space to carry a reasonable amount of luggage.
12. Windows must meet the following standards:
 - Windscreens: must let in at least 75% of the light
 - Front, side windows: must let in at least 70% of the light

- Rear, side windows: must let in at least 65% of the light
- Rear screen windows: must let in at least 65% of the light

Where currently licensed vehicles have factory tinted/privacy glass fitted and can provide documentary evidence of this, they will remain licensed for as long as required assuming they meet the rest of this policy. Where currently licensed vehicles have had a tinted film fitted to the vehicle (i.e. not factory fitted at time of manufacture), they will be required to have the film removed. Failure to do so will result in the vehicle licence being suspended until rectified.

Appendix B – Hackney Carriage Vehicle Legislation and Conditions

Legislation relevant to the PROPRIETORS of Hackney carriage vehicles in the Borough of Reading

TOWN POLICE CLAUSES ACT 1847

Licence plate to be displayed on the vehicle. **(Section 38)**

The proprietor must inform the Council within seven days of any change of address. **(Section 44)**

The proprietor must retain the hackney carriage driver's licence of any person he permits or employs to drive a hackney carriage and shall return it when he ceases to drive such vehicle. **(Section 48)**

LOCAL GOVERNMENT (MISC. PROVISIONS) ACT 1976

If you transfer your interest in your vehicle you must inform the Council of this person's name and address within 14 days. **(Section 49)**

You must present the vehicle for inspection and testing and produce a certificate of insurance when required by the Council. **(Section 50)**

If the vehicle is involved in an accident which causes damage which materially affects the safety, performance or appearance of the vehicle or comfort or convenience of passengers you must report the damage to the Council as soon as reasonably practicable or in any case within 72 hours of the accident. **(Section 50)**

You must return the licence plate issued to the vehicle within seven days of the request of the Council when it has expired or been revoked or suspended. **(Section 58)**

The Council may suspend, revoke or refuse to renew a vehicle licence on any of the following grounds:

That the vehicle is unfit for use as a hackney carriage;
any offence or non-compliance with the laws and conditions controlling the hackney carriage trade;
any other reasonable cause. **(Section 60)**

An authorised officer of the Council or police constable may inspect your vehicle at all reasonable times to ascertain its fitness for use and if he/she is not satisfied with its condition may by notice in writing require it to be made available for a further test at a date and time shown in the notice. The vehicle licence is suspended until this examination is carried out. Should you fail to present the vehicle for such a test within two months the licence is deemed to have been revoked. **(Section 68)**

You must not willfully obstruct a council officer or police constable acting under the above Act, or without reasonable excuse fail to comply with any requirement made to you by such a person, or without reasonable cause fail to give any such person any other assistance or information he may reasonably require in the performance of his duties under the above Act. **(Section 73)**

BYELAWS MADE BY THE COUNCIL UNDER SECTION 68 TOWN POLICE CLAUSES ACT 1847
AND SECTION 171 PUBLIC HEALTH ACT 1875

BYELAW 2

- (a). The proprietor of a hackney carriage shall cause the number of the licence granted to him in respect of the carriage to be legibly painted or marked on the outside of the carriage, or on a plate affixed thereto.
- (b). A proprietor or driver of a hackney carriage shall:
 - (i) not willfully or negligently cause or suffer any such number to be concealed from public view while the carriage is standing or playing for hire;
 - (ii) Not cause or permit the carriage to stand or ply for hire with any such painting, marking or plate so defaced that any figure or material is illegible.

BYELAW 3

The Proprietor of a hackney carriage shall:

- (a) provide sufficient means by which any person in the carriage may communicate with the driver;
- (b) Cause the roof or covering to be kept watertight;
- (c) Provide any necessary windows and a means of opening and closing not less than one window on each side;
- (d) Cause the seats to be properly cushioned or covered;
- (e) Cause the floor to be provided with a proper carpet, mat or other suitable covering;
- (f) Cause the fittings and furniture generally to be kept in a clean condition, well maintained and in every way fit for public service;
- (g) Provide means for securing luggage if the carriage is so constructed as to carry luggage;
- (h) Provide an efficient fire extinguisher, which shall be carried in such a position as to be readily available for use by the driver; and
- (i) Provide at least two doors for the use of persons conveyed in such carriage and a separate means of ingress and egress of the driver.

BYELAW 4

The proprietor of a hackney carriage shall cause the same to be provided with a taximeter so constructed, attached and maintained as to comply with the following requirements:

- (a) The taximeter shall be fitted with a key, flag or other device, the turning of which will bring the machinery of the taximeter into action and cause the word "HIRED" to appear on the face of the taximeter or for the taximeter to indicate that the carriage is hired or that a fare is being charged;
- (b) Such key, flag or other device shall be capable of being locked in such a position that the machinery of the taximeter is not in action and that no fare is recorded on the face of the taximeter;
- (c) When the machinery of the taximeter is in action there shall be recorded on the face of the taximeter in clearly legible figures a fare not exceeding the rate or fare which the proprietor

or driver is entitled to demand and take for the hire of the carriage by distance in pursuance of the Table of Fares;

- (d) The word "FARE" shall be printed on the face of the taximeter in plain letters so as to clearly apply to the fare recorded thereon;
- (e) The taximeter shall be so placed that all letters and figures on the face thereof are at all times plainly visible to any person being conveyed in the carriage, and for that purpose the letters and figures shall be capable of being suitably illuminated during any period of hiring; and
- (f) The taximeter and all the fittings thereof shall be so affixed to the carriage with seals or other appliances that it shall not be practicable for any person to tamper with them except by breaking, damaging or permanently displacing the seals or other appliances.

CONDITIONS ATTACHED TO HACKNEY CARRIAGE VEHICLE LICENCES

These conditions shall apply to all proprietors of hackney carriage vehicles that operate within the Borough of Reading.

In these conditions, unless the subject or context otherwise requires:

- (i) "The Act" means the Local Government (Miscellaneous Provisions) Act 1976, Town Police Clauses Act 1847 or Public Health Act 1875;
 - (ii) "Authorised Officer" means any officer of Reading Borough Council authorised to deal with private hire vehicles;
 - (iii) "The Borough" means the district controlled by Reading Borough Council;
 - (iv) "The Council" means Reading Borough Council;
 - (v) "Licence" means a Hackney Carriage Vehicle Licence issued by the Council;
 - (vi) "Proprietor" includes a part-proprietor and means the owner of the vehicle, or in relation to any vehicle which is the subject of a hiring agreement, means the person in possession of the vehicle under that agreement.
 - (vii) "Passengers" means members of the public carried in a hackney carriage vehicle; and
 - (viii) "Home-to-School transport contract" means a written contract between a local authority and a licensed private hire operator or hackney carriage driver for the purpose of transporting children from their usual abode to school.
1. The proprietor shall report the loss of any plate or the licence to the Council as soon as the loss becomes known and in the event of ceasing to use his vehicle as a hackney carriage, shall return the plate and licence to the Council within seven days.
 2. In the event of a licence plate being stolen, lost, damaged, or destroyed, the full cost of replacement shall be payable by the proprietor.
 3. The proprietor shall ensure that the internal identification plate issued by the council is displayed on the driver's side of the glass partition, so as to be clearly visible to passengers, without obscuring their view of the taximeter. In the event of the proprietor ceasing to use the vehicle as a hackney carriage, he shall return the plate to the Council within seven days.

4. The proprietor shall ensure that the exterior sign approved by the council clearly displays to the front of the vehicle the word "TAXI" in normal daylight and shall be kept illuminated during the hours of darkness, as defined in the Road Traffic Acts, when plying for hire. "TAXI" shall be shown on the said side on plain letters not less than 50mm high, such lettering to be dark in colour, on a light background.
5. The proprietor shall ensure that no advertisement is displayed, on or within the vehicle, unless prior approval has been received from the Council.
6. All hackney carriage vehicles must have council approved, electronic payment device facilities available for use by customers, at all times and must display council approved signage to show this facility is available.
7. The proprietor shall not attach or affix or cause to be attached or affixed to the vehicle any sign or mark other than those allowed under conditions 3, 4,5 and 6 above and section 38 Town Police Clauses Act 1847.
8. A Hackney carriage vehicle shall comply with Part II of the Public Carriage Office Specification "Conditions of Fitness" as amended appropriate to, the Borough of Reading at all times.
9. No alteration to the manufacturer's specification for the vehicle, including a change of or additional fuel type, shall be carried out except with the prior written approval of the Council.
10. The proprietor shall provide a copy of these conditions and a valid vehicle insurance certificate to any licensed driver of this vehicle.

CONDITIONS APPLICABLE TO HACKNEY CARRIAGE VEHICLES CARRYING OUT 'HOME-TO-SCHOOL' TRANSPORT CONTRACTS

When any hackney carriage vehicle is fulfilling/undertaking a 'Home to School Transport' Contract journey the following conditions shall apply, notwithstanding that they may conflict with the conditions stated above.

11. No child under the age of 8 shall sit in the front passenger seat of any vehicle used for home-to-school transport contracts.
12. The proprietor shall use booster cushions conforming to British Standard BS AU 185 or European Standard ECE44 for use by small children where provided by STS, unless the seat belts installed in the vehicle are designed to be adjusted to the shoulder height of young children.
13. Where a vehicle is fitted with childproof locks on the rear doors, these must be used at all times when the vehicle is carrying children under the age of 18.
14. The vehicle shall display the school transport sign, to a type and standard normally applicable to PCV operators, prescribed in the Road Vehicles Lighting Regulations 1989 and amended in Statutory Instrument 1519 The Vehicles Lighting (Amendment) Regulation 1994, in such position as required by the Council, but only while the vehicle is actively involved in transporting pupils and at no other time.
15. The vehicle shall display, any signs as specified in the contract, such as the school number and contract route number.

APPEAL PROCEDURE

16. Any person aggrieved by any condition specified in this licence may appeal to a Magistrates' Court.
17. The procedure shall be by way of complaint for an order, and the Magistrates' Courts Act 1980 (or any re-enactment thereof) shall apply to the proceedings.
18. The time within which any such appeal may be brought shall be 21 days from the date on which notice of the requirement, or other decision was served upon the person desiring to appeal, and for this purpose the making of the complaint shall be deemed to be the bringing of the appeal.

Appendix C - Private Hire Vehicle Specifications

Vehicle emissions and age policy

<i>Private Hire Emissions & Age Policy 13 February 2026 to 1 October 2035</i> <i>*Unless reviewed earlier</i>	
<i>Dates</i>	<i>Policy</i>
13 February 2026	All new to fleet vehicles are minimum ULEV and less than 5 years old. Age limit for all vehicles to be set at a maximum of 15 years and then removed from the fleet.
13 February 2027	All replacement vehicles are minimum ULEV and less than 5 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle. Age limit for all vehicles to be set at a maximum of 12 years and then removed from the fleet.
13 February 2028	All replacement vehicles are minimum ULEV and less than 5 years old. This rule will apply regardless of whether the vehicle is new to fleet or an existing vehicle. Age limit for ULEV vehicles to be set at a maximum 10 years and then removed from the fleet* Each vehicle shall be assessed on its own merits and an extension of a year to a maximum of 2 additional years might be granted on renewal after a successful RBC compliance test. That the revised Private Hire Vehicle Emissions and Age Policy run until 2035 at which point it would be reviewed again unless changes prompt a review sooner.

Specifications

In addition to those in the table above, the vehicle must meet the following specifications:

1. New vehicles will only be licensed which fall within the following Euro NCAP or European classification groups as set below:
 - Large Family
 - Executive
 - Small MPV (will only be licensed to carry a maximum of 4 passengers)
 - Large MPV
2. Further to the above, vehicles which do not fall within Euro NCAP classification groups criteria may be considered for Private Hire vehicle licensing on a case-by-case application basis.
3. The vehicle must be capable of carrying no fewer than four and no more than eight passengers;
4. Three-point type seat belts must be fitted to all passenger seats. Lap belts may only be used for the middle rear passenger seat of saloon vehicles.

5. No seats may be side facing;
6. Each passenger shall have direct access to a door without the need to remove or completely fold flat any other seating in order that passengers may access their seat easily and escape without delay in case of emergency. The Council will consider vehicles that have seats that 'tilt' forward by a single operation. If this type of seat is fitted the driver must inform the passengers of the operation of the seats before a journey commences;
7. Access to the vehicle shall not be more than 15" (38cm) from ground level.
8. In addition to the driver's door, the vehicle will have three doors, each of which must be fitted with an efficient handle, lock and window operation to allow access and egress for passengers;
 - the vehicle will be right hand drive;
 - the vehicle will have four road wheels;
 - the vehicle body must be fixed head type. (A sunroof may be fitted);
 - the vehicle must have a boot or luggage compartment which provides sufficient space to carry a reasonable amount of luggage for the total capacity of the vehicle;
9. Vehicles that do not have a separate luggage compartment (boot) must be fitted with a grill behind the rear seat to prevent luggage entering the passenger area;
10. No alteration to the manufacturer's specification for the vehicle, including a change of or additional fuel type, shall be carried out except with the prior written approval of the Licensing Section of the Council;
11. Windows must meet the following standards:
 - Windscreens: must let in at least 75% of the light.
 - Front, side windows: must let in at least 70% of the light.
 - Rear, side windows: must let in at least 65% of the light.
 - Rear screen windows: must let in at least 65% of the light.
12. Where currently licensed vehicles have factory tinted/privacy glass fitted and can provide documentary evidence of this, they will remain licensed for as long as required assuming they meet the rest of this policy. Where currently licensed vehicles have had a tinted film fitted to the vehicle (i.e. not factory fitted at time of manufacture), they will be required to have the film removed. Failure to do so will result in the vehicle licence being suspended until rectified.
13. A private hire vehicle must not be of such design or appearance as to lead any person to believe it is a hackney carriage.
14. Vehicles which are adapted to carry passengers seated in wheelchairs must meet the following specifications:
 - Suitable independent restraint systems must be fitted for both wheelchair and passenger. The restraint system must be installed and operated in accordance with the manufacturer's instructions. At no time should wheelchair passengers be transported in vehicles that do not have floor restraints fitted.
 - Passengers must not be fitted in wheelchairs facing sideways or rearward.
 - Vehicles may be fitted with ramps or power operated lifts to facilitate entry and exit for passengers in wheelchairs. Vehicles with a floor height of more than 330mm must be fitted with a power operated lift and not a ramp. All such equipment must be installed, operated and maintained in accordance with the manufacturer's instructions.

- If a powered lift is used, an emergency manual method of lowering the lift must be provided.
- Ramps or lifts must not prevent service and emergency doors from being operated from both outside and inside the vehicle.
- The ramp surface must be of non-slip material and raised edges should be provided on each side of the ramp.
- Doorways for use by passengers in wheelchairs must be at least 800mm wide up to a height of 800mm, and 600mm wide (between the handrails) above that height.
- The height of the doorway must be a minimum of 1300mm.
- There should be a minimum floor to ceiling height of 1350mm in any part of the vehicle to be occupied by passengers in wheelchairs.
- Power-operated passenger lifts must have a load-bearing capacity of at least 300kg and have a platform size of at least 750mm wide and 1200 mm long with raised rear rollback plate when deployed and with grip handles fitted to both side edges.
- Vehicles using power-operated passenger lifts must ensure that they have;
 - fluorescent yellow grip handles and strips on the edges of the lift;
 - an audible signal to indicate deployment of the lift;
 - clear warning notices displayed to advise passengers not to board a moving lift, and
 - a lift surface of non-slip material.
- Tail lifts must be maintained and operated in accordance with the British Standard Code of Practice for Tail Lifts BSEN1756. This code of practice requires that the tail lift to be tested once a year and inspected twice a year. Vehicle owners have to pay an extra test fee for this service and will need to supply evidence, if requested, that tail lifts meet the required standard.

15. The Council may vary the requirements of paragraphs 1 – 14 in their absolute discretion in exceptional circumstances but reserve the right to refuse to licence a vehicle if it is considered unsuitable for use as a private hire vehicle.

Executive private hire vehicles

Executive Private Hire Vehicle licences will only be granted to vehicles which comply with the following specifications.

16. The vehicle shall be of a make and model which the Council considers appropriate for an Exemption Notification. The Council may consult any person or organisation as it considers appropriate before deciding whether an Exemption Notification shall be granted in respect of any vehicle.
17. The makes and models of vehicle which may be considered for licensing as an executive vehicle are as follows. This is not an exhaustive list.
- MERCEDES S CLASS
 - MERCEDES V CLASS (MPV)
 - MERCEDES GLS
 - BMW 7 SERIES
 - BMW X7

- VOLVO S90
- VOLVO V90
- VOLVO XC90
- AUDI A8
- AUDI Q8
- LEXUS LS MODEL
- LEXUS LX
- JAGUAR XF
- ROLLS – ROYCE (SEDAN/SALOON)
- ROLLS – ROYCE CULLINAN
- BENTLEY (SEDAN/SALOON)
- BENTLEY BENAYGA
- LAND ROVER – RANGE ROVER
- TOYOTA LAND CRUISER

18. Without prejudice to the generality of Clauses 16 and 17 above, the vehicle shall comply with all the following minimum requirements:
- Be a recognised model of a four-door saloon motor car or people carrier but **not** a hatchback, kit car or vehicle substantively altered in appearance or modified in any way.
 - The vehicle interior and exterior shall be of the very highest quality in design and use of materials available and in exceptional condition.
 - The vehicle shall not be designed or adapted for off-road purposes.
 - Vehicles manufactured as people carriers may be considered for an exemption to display the plate. However, the vehicle shall be of the highest specification, quality and condition.
 - Each application will be considered on its own merits.
19. Any vehicle presented for licensing for the first time shall not be older than four years on the day that the fully and correctly completed application is received with the appropriate fee and will cease to be licensed once it reaches eight years old.
20. Only vehicles that satisfy Clauses 17 and 18 above are on the approved executive list and at the top of the range within the manufacturer's fleet of vehicles, may be considered for an Exemption Notice not to display the vehicle plate, which will be at the Council's discretion.
21. The Council may vary the requirements of paragraphs 16 to 20 in their absolute discretion in exceptional circumstances but reserve the right to refuse to licence a vehicle if it is considered unsuitable for use as a private hire vehicle.
22. For vehicles not included on the above list contact the Licensing Section by email: licensing@reading.gov.uk

Limousine/party vehicles

Limousine or Party Private Hire Vehicle Licenses will only be granted to vehicles which comply with the following specifications.

23. The vehicle shall be of a make and model which the Council considers appropriate for an Exemption Notification. The Council may consult any person or organisation as it considers appropriate before deciding whether an Exemption Notification shall be granted in respect of any vehicle.
24. Without prejudice to the generality of Clause 23 above, the vehicle shall comply with all the following minimum requirements:
- Be a recognised model of a four-door saloon motor car or people carrier but not a hatchback, kit car or vehicle substantively altered in appearance or modified in any way except as within the section Limousines/Party Vehicles below.
 - The vehicle interior and exterior shall be of the very highest quality in design and use of materials available and in exceptional condition.
 - The vehicle shall not be designed or adapted for off-road purposes.
 - Vehicles manufactured as people carriers may be considered for an exemption to display the plate. However, the vehicle shall be of the highest specification, quality and condition.
 - Each application will be considered on its own merits.
25. Any vehicle presented for licensing for the first time shall not be older than four years on the day that the fully and correctly completed application is received with the appropriate fee and will cease to be licensed once it reaches eight years old.
26. On being presented for licensing for the first time, the vehicle shall have proof of one of the following:
- Individual Vehicle approval certificate
 - A European whole vehicle certificate
 - A UK low vehicle type approval certificate
27. No Stretched Limousine/Party Vehicle shall be licensed by the Council where the conversion carried out results in the vehicle being more than 330.2cm (10 feet 10 inches) long. Where the conversion has been approved there shall be displayed on the vehicle a fixed plate giving the details of the company that carried out the conversion.
28. No Stretched Limousine/Party Vehicle shall be licensed by the Council where the maximum unladen weight of the vehicle exceeds 3,220.50kg (7,100 lbs).
29. A Stretched Limousine/Party Vehicle shall only be considered for licensing where the applicant produces evidence that the "stretch" was performed by the manufacturer or by a coachbuilder approved by the vehicle manufacturer. American limousines/party vehicles shall have been built by an approved coachbuilder under the QVM programme for Ford vehicles or the CMC programme for Cadillac vehicles. The onus shall be upon the applicant to prove that the vehicle meets the prescribed standards.
30. Any replacement parts fitted to a Stretched Limousine/Party Vehicle shall meet the approved standards of the stretched specifications i.e. tyres shall meet both the size and weight specifications.
31. Vehicles shall be capable of carrying no fewer than three and not more than eight passengers in addition to the driver. Side facing seats shall only be permitted on a Stretched Limousine/Party Vehicle if they meet the minimum requirements of lap belts fitted to each passenger seat of the side facing seats. A seat shall be a minimum width of

400mm. Stretched limousines shall only be licensed to carry a maximum of eight passengers regardless of how many seats are fitted to the vehicle.

32. Vehicles shall be always equipped with seat belts of an acceptable type in respect of every seat which can be used for the carriage of passengers. Seat belts shall comply with current legislation and always be in proper working order.
33. Each passenger shall have direct access to a door without the need to fold flat, tilt up or remove other seating.
34. Vehicles shall be fitted with at least four doors and four wheels.
35. The vehicle may be left or right-hand drive.
36. All paintwork shall be free of rust and corrosion and be of a very high standard.
37. Vehicles shall have adequate space for luggage.
38. All brakes and mechanical parts shall be kept in good order and condition.
39. The vehicle shall have a serviceable spare wheel, together with the proper tools and equipment to change the wheel in the event of a tyre or wheel becoming defective.
40. All tyres (including any spare) shall be suitable for the vehicle.
41. The vehicle shall not be designed or adapted for off road purposes.
42. The vehicle shall not be designed or adapted as a people carrier, minibus, people mover or other like vehicle.
43. The Council may vary the requirements of paragraphs 23 – 42 in their absolute discretion in exceptional circumstances but reserve the right to refuse to licence a vehicle if it is considered unsuitable for use as a private hire vehicle.

Note: **PRIOR TO** purchasing any vehicle to be used as an executive vehicle or limousine/party vehicle you are strongly advised to contact Reading Borough Council's Licensing Team via licensing@reading.gov.uk for advice concerning the different makes and models of vehicles considered appropriate for licensing for this type of work.

Appendix D – Private Hire Vehicles - Legislation and Conditions

Legislation relevant to the PROPRIETORS of private hire vehicles in the Borough of Reading.

LOCAL GOVERNMENT (MISC. PROVISIONS) ACT 1976

You must not use or permit the use of a vehicle without a private hire vehicle licence. **(Section 46)**

You must not employ a person who is not the holder of a private hire vehicle driver's licence to drive such a vehicle. **(Section 46)**

You must display the licence plates issued to the vehicle in the manner prescribed by the Council. **(Section 48)**

If you transfer your interest in your vehicle you must inform the council of this person's name and address within 14 days. **(Section 49)**

You must present the vehicle for inspection and testing and produce a certificate of insurance when required by the Council. **(Section 50)**

If the vehicle is involved in an accident which causes damage which materially affects the safety, performance or appearance of the vehicle or comfort or convenience of passengers you must report the damage to the Council as soon as reasonably practicable or in any case within 72 hours of the accident. **(Section 50)**

You must return the licence plate issued to the vehicle within seven days of the request of the Council when it has expired or been revoked or suspended. **(Section 58)**

The Council may suspend, revoke or refuse to renew a vehicle licence on any of the following grounds:

- (a) that the vehicle is unfit for use as a private hire vehicle;
- (b) any offence or non-compliance with the laws and conditions controlling the private hire trade; or;
- (c) any other reasonable cause. **(Section 60)**

An authorised officer of the council or police constable may inspect your vehicle at all reasonable times to ascertain its fitness for use and if he/she is not satisfied with its condition may, by notice in writing, require it to be made available for a further test at a date and time shown in the notice. The vehicle licence is suspended until this examination is carried out. Should you fail to present the vehicle for such a test within two months the licence is deemed to have been revoked. **(Section 68)**

You must not willfully obstruct a Council officer or police constable acting under the above Act, or without reasonable excuse fail to comply with any requirement made to you by such a person, or without reasonable cause fail to give any such person, any other assistance or information he may reasonably require in the performance of his duties under the above Act. **(Section 73)**

CONDITIONS ATTACHED TO PRIVATE HIRE VEHICLE LICENCES

These conditions shall apply to all proprietors of private hire vehicles that operate within the Borough of Reading.

In these conditions, unless the subject or context otherwise requires:

- (i) "The Act" means "The Act" means the Local Government (Miscellaneous Provisions)

Act 1976;

- (ii) "Authorised Officer" means any officer of Reading Borough Council authorised to deal with private hire vehicles;
- (iii) "The Borough" means the district controlled by Reading Borough Council;
- (iv) "The Council" means Reading Borough Council;
- (v) "Licence" means a Private Hire Vehicle Licence issued by the Council;
- (vi) "Proprietor" includes a part-proprietor and means the owner of the vehicle, or in relation to any vehicle which is the subject of a hiring agreement, means the person in possession of the vehicle under that agreement.
- (vii) "Passengers" means members of the public who have pre-booked a journey carried in a private hire vehicle;
- (viii) "Home-to-School transport contract" means a written contract between a local authority and a licensed private hire operator or hackney carriage driver for the purpose of transporting children from their usual abode to school.

The owner shall ensure that:

1. The vehicle is maintained in a clean comfortable, safe, watertight and mechanically sound condition and is in all other respects suitable for the purpose for which it is intended;
2. The vehicle is provided with a suitable AFFF (Aqueous Film Forming Foam) fire extinguisher of 1litre or greater capacity. The extinguisher shall be in a position readily available for use by the driver. The licence number shall be painted on the extinguisher.
3. The vehicle has been the subject of an MOT and compliance test as required.
4. Where a vehicle is fitted with a ramp or wheelchair lift, the owner must provide proof that the appropriate maintenance checks have been carried out every 6 months by a suitably qualified and competent person.

Subject to section 75 of the Act and to any notice thereunder given by the Council, the owner shall at all times:

5. Permanently display the licence plate issued by the Council securely on the rear exterior of the vehicle by fixing the plate backing bracket to the vehicle and attaching the plate to the bracket with the fixing clips, or in accordance with the reasonable instructions of an authorised officer;
6. Display the interior identification card issued by the Council in a position where it can be readily seen by all passengers;
7. The owner shall not willfully or negligently allow the plate or identification card attached to the vehicle in pursuance of this condition, to become concealed from public view or to become illegible in any way.
8. The owner shall report the loss of any plate, licence or card to the Licensing Section of the Council as soon as the loss becomes known and in the event of ceasing to use the vehicle for private hire purposes shall return the licence plate and interior identification card to the Council

within seven days.

9. In the event of a licence plate being stolen, lost, damaged or destroyed, the full cost of replacement shall be payable by the owner.
10. The owner of a private hire vehicle shall not by calling out or otherwise invite any person to hire such vehicle and shall not make use of the services of any person for such purpose.
11. The owner shall not carry or permit to be carried in such vehicle any more persons than the vehicle is licensed to carry.
12. The owner of the vehicle, or the driver if he is not the owner, shall before commencing employment deposit the vehicle licence and a copy of the certificate of insurance with the vehicle operator for retention by him until such time as the vehicle ceases to be operated by him.
13. Where an owner surrenders his vehicle licence and plate to the Council, a refund will be made equivalent in accordance with the Council's refund policy.
14. The owner shall notify the Licensing Section of the council in writing within 7 days of the following:
 - any change of address, telephone number or email address from that shown on the licence;
 - if the vehicle ceases to work for the operator with whom the licence is deposited.
 - any change in the engine capacity, colour, registration mark or internal features of the vehicle.
 - any conviction in any court involving the proprietor and/or the vehicle giving details of the date, offence, name of Court and penalty imposed.
15. A private hire vehicle shall not carry or display any signs or advertisements of any nature on the exterior of the vehicle apart from:
 - the licence plate issued to the vehicle;
 - side identification panels on the rear doors of the vehicle with the words "Private Hire, Advanced Bookings Only" and the licence plate number, printed in letters and numbers not less than 2.5cm (1") in height. This wording must NOT be handwritten.
 - Operator advertisement or livery approved by the Council.

Where, from time-to-time, changes are necessary to the private hire vehicle side panels, by reason of a change of vehicle, or plate number, the amendment must be carried out by an approved sign writer and must be of the same printed material, colour and design as the remainder of the printing on the side panel.

16. Without prejudice to the generality of conditions 14 and 15, a private hire vehicle shall **not** display any sign or notice:
 - which consists of or includes the word "taxi" or "cab" whether in the singular or plural and whether alone or as part of another word; or
 - which consists of the words "for hire" or the form of wording of which is in any way such as to suggest that the vehicle on which it is displayed is presently available for hire or would be so available if not already hired.
17. Nothing shall be done to the vehicle which will alter its design or appearance to lead any person to believe that the vehicle is a hackney carriage.

18. At all times during the currency of the licence the owner shall keep in force in relation to that vehicle a policy of insurance complying with the requirement of parts VI of the Road Traffic Act 1988.
19. You must, following a road traffic accident or any other incident involving a licensed Hackney Carriage or Private Hire Vehicle owned by you, give full details of yourself, the driver of the vehicle at the time of the incident, and of the insurance for the vehicle to any person reasonably requesting the information within seven days of such a request being made.

CONDITIONS APPLICABLE TO PRIVATE HIRE VEHICLES CARRYING OUT 'HOME-TO-SCHOOL' TRANSPORT CONTRACTS

When any private hire vehicle is fulfilling/undertaking a 'Home-to-School Transport Contract' journey the following conditions shall apply, notwithstanding that they may conflict with the conditions stated above.

20. No child under the age of 8 shall sit in the front passenger seat of any vehicle used for home-to-school transport contracts.
21. The proprietor shall use booster cushions conforming to British Standard BS AU 185 or European Standard ECE44 for use by small children where provided by STS, unless the seat belts installed in the vehicle are designed to be adjusted to the shoulder height of young children.
22. Where a vehicle is fitted with childproof locks on the rear doors, these must be used at all times when the vehicle is carrying children under the age of 18.
23. The vehicle shall display the school transport sign, to a type and standard normally applicable to PCV operators, prescribed in the Road Vehicles Lighting Regulations 1989 and amended in Statutory Instrument 1519 The Vehicles Lighting (Amendment) Regulation 1994, in such position as required by the Council, but only while the vehicle is actively involved in transporting pupils and at no other time.
24. The vehicle shall display, any signs as specified in the contract, such as the school number and contract route number.

APPEAL PROCEDURE

25. Any person aggrieved by any condition specified in this licence may appeal to a Magistrates' Court.
26. The procedure shall be by way of complaint for an order, and the Magistrates' Courts Act 1980 (or any re-enactment thereof) shall apply to the proceedings.
27. The time within which any such appeal may be brought shall be 21 days from the date on which notice of the requirement, or other decision was served upon the person desiring to appeal, and for this purpose the making of the complaint shall be deemed to be the bringing of the appeal.

Appendix E - Approval of advertising on licensed vehicles

1. Advertising Content – General

- 1.1. All advertisements must comply with the British Code of Advertising Practice, Sales Promotion and Direct Marketing and it is the responsibility of the agency or individual seeking the council's approval to ensure that they do so.
- 1.2. Each application will be considered on its merits, but advertisements containing the following will not be approved:
 - Those with political, religious, sexual or controversial texts
 - Those for gaming establishments or online gaming/gambling companies
 - Those for escort agencies, or massage parlours
 - Those displaying nude or semi-nude figures
 - Those which seek to involve the driver as an agent of the advertisers
 - Those likely to offend public taste (including material depicting bodily functions and the use of obscene or distasteful language)
 - Those which seek to advertise more than one company. Except where an event is being promoted which is being sponsored by no more than two sponsors.

2. Static Advertisements

- 2.1. In cabs with a glazed area above the partition, advertising may be permitted on that part of the bulkhead, behind the driver's seat.
- 2.2. No advertising material may be placed on the glazed passenger partition other than official approved notices unless approved by Licensing Officers.
- 2.3. The advertisement is not to exceed the area of screen provided.
- 2.4. Advertisements may be displayed within the passenger compartment on the floor area or on the base of the occasional (tip-up) seats.
- 2.5. Occasional seat advertisements must be encapsulated in clean non-flammable plastic.
- 2.6. The completed advertisement not to exceed the area of the base of the occasional seat and will be of a maximum of 16 inches square.

3. Moving Images

- 3.1 No moving images, e.g. television, video, computer or similar shall;
 - be capable of, or
 - be permitted,to be directly viewed by the driver whilst driving.
- 3.1. The screen shall be in such a position that it cannot be viewed with the aid of mirrors or other reflective material by the driver whilst driving, as outlined in Condition 3.1 above.
- 3.2. The screen shall not be in such a position so as to deliberately distract other drivers.
- 3.3. No scrolling or moving advertisement shall be exhibit whilst the vehicle is waiting/plying for hire on a recognised hackney carriage stand or when no passengers are being carried except:

- as part of a static display authorised by the Council;
- when undergoing a test or inspection by an authorised Officer of the Council, a Police Officer or other authorised person from the Advertising Standards Agency or similar body.

- 3.4. No scrolling or moving advertisement(s) may be shown to the annoyance of any passenger(s) who should be able to communicate easily with the driver to the effect that the advertisement(s) is/are not required.
- 3.5. A clear notice, either situated close to the moving image screen, which is visible to passenger(s) whilst on board, and advises that the moving images will be switched off at the passengers' request, must be displayed.
- 3.6. No unauthorised advertising material may be shown.
- 3.7. Only discs showing advertisements provided by authorised advertising agencies shall be used in the equipment provided.
- 3.8. Whilst authorised film trailers or clips may be shown without sound, no full-length film, programme or computer game by DVD or similar disc may be played.
- 3.9. Scrolling or moving adverts will comply with Condition 1.2 above and other relevant sections of these conditions.

4. Dispensers

- 4.1. No leaflet dispensers to be installed in the passenger compartment.

5. Audio Material

- 5.1. The Licensing Committee taking the view that the fare-paying passenger is a captive audience and paying premium rate for conveyance from one location to another in safety, comfort and privacy, must not be subjected to excessive or intrusive advertising.
- 5.2. Rear compartment audio systems for the sole purpose for advertising are not allowed.
- 5.3. Scheduled public radio broadcasts or audio material on general sale to the public (i.e. CDs, tapes) may be transmitted to the passenger compartment.
- 5.4. Audible advertisements are permitted only if received via a scheduled broadcast from a public radio station.
- 5.5. The audio material must be of a standard that would be acceptable to the Broadcast Standards Council and the authority for broadcasting to all age groups. It must not contain explicit sexual lyrics, profanities or any other language or sounds likely to cause offence.
- 5.6. A current copyright music licence must be obtained from the Performing Rights Society for the cab concerned and be available for inspection whenever the cab is presented for licensing.
- 5.7. Any audio system for the rear compartment of a cab must be approved by the Head of Environment and Consumer Services (or his duly authorised officer) before installation.

6. Conditions to be applied to liveried hackney carriages

- 6.1. All liveries must be approved by the Council and proposals must be accompanied by full colour, three-view artwork. The first cab of any contract must be presented at the Council offices for inspection of the finished livery.
- 6.2. The vehicles used must be less than two years old with bodywork in good condition. Vehicles more than two years old may only be used where any defects in bodywork have been remedied and the vehicle has been re-sprayed to an acceptable standard.
- 6.3. No secondary advertising of any kind will be permitted, whether in the form of the logo of the company preparing the vehicle or the name of the advertising agency.
- 6.4. Provision must be made for the immediate replacement of damaged panels. Vehicles will not be allowed to work with damaged or unmatched panels or be accepted for re-licensing in this condition.
- 6.5. No logos or words will be allowed on the boot lid area. (This includes the area between the top of the boot lid and the bottom of the rear screen).
- 6.6. If approved, the livery may remain on the vehicle/s for a maximum of one year. At the end of that year, an extension may be applied for a further 12 months maximum which may be granted subject to an inspection of the quality of the livery and bodywork of the vehicles involved. This would be subject to a renewal application process and fee.

7. Private Hire Vehicles

- 7.1 Private hire vehicles are permitted to display operator advertising and/or livery on the exterior of the vehicle subject to approval in Section 1 above.
- 7.2 Private Hire Vehicle licence holders shall only display their licence details on side panels located on the rear passenger doors. The side identification panels must include the words "Private Hire, Advanced Bookings Only" and the licence plate number, printed in letters and numbers not less than 2.5cm (1") in height. This wording must NOT be handwritten.

Appendix F – Private Hire Operator Licence Conditions

Legislation relevant to the OPERATORS of private hire vehicles within the Borough of Reading.

LOCAL GOVERNEMENT (MISC. PROVISIONS) ACT 1976

You must not operate any private hire vehicles without a private hire vehicle operator's licence **(Section 46)**.

You must not operate a vehicle as a private hire vehicle if it does not have a private hire vehicle licence **(Section 46)**.

You must not employ a person who is not the holder of a private hire vehicle driver's licence to drive a private hire vehicle **(Section 46)**.

You must provide the Local Authority on request of the details of booking records **(Section 56)**.

You must provide the Local Authority on request with the records of any private hire vehicles operated **(Section 56)**.

You produce your private hire operator's licence on request to any authorised officer of the Council or police constable **(Section 56)**.

You must not willfully obstruct a Council officer or police constable acting under the above Act, or without reasonable excuse fail to comply with any requirement made to you by such a person, or without reasonable cause fail to give any such person, any other assistance or information he may reasonably require in the performance of his duties under the above Act **(Section 73)**.

You must not provide any information or make any statement that you know to be false **(Section 73)**.

CONDITIONS ATTACHED TO PRIVATE HIRE VEHICLE OPERATOR LICENCES

These conditions shall apply to all operators of private hire vehicles within the Borough of Reading.

In these conditions, unless the subject or context otherwise requires:

- (i) "The Act" means "The Act" means the Local Government (Miscellaneous Provisions) Act 1976;
- (ii) "Authorised Officer" means any officer of Reading Borough Council authorised to deal with private hire vehicles;
- (iii) "The Borough" means the district controlled by Reading Borough Council;
- (iv) "The Council" means Reading Borough Council;
- (v) "Licence" means a Private Hire Vehicle Operator's Licence issued by the Council;
- (vi) "Proprietor" includes a part-proprietor and means the owner of the vehicle, or in relation to any vehicle which is the subject of a hiring agreement, means the person in possession of the vehicle under that agreement.
- (vii) "Passengers" means members of the public who have pre-booked a journey carried in a private hire vehicle;
- (viii) "Home-to-School transport contract" means a written contract between a local authority and a licensed private hire operator or hackney carriage driver for the purpose of transporting children from their usual abode to school.

1. The records required to be kept by the operator under sections 56(2) and (3) of the Local Government (Miscellaneous Provisions) Act 1976 shall be kept in a suitable book or on a computer or any other recordable device. Any information recorded must remain accurate for future reference. If using a book, the pages must be numbered consecutively. The operator shall enter or cause to be entered before commencement of each journey, the following particulars of every booking accepted:
 - name of the hirer
 - phone number of the hirer (unless they refuse to provide it)
 - date & time the booking is made
 - date & time pick up required
 - location of pick up
 - how the booking was received (i.e. telephone, email, web, in person)
 - price quoted for booking (Shall quote price)
 - identity of staff member accepting booking
 - time booking is allocated to driver
 - identity of driver accepting hiring
 - identity of vehicle used for booking
 - identity of staff member dispatching the job
 - time job completed
2. The above records shall be retained by the operator for a period of not less than six months and must be available for inspection on demand by any authorised officer of the Council or any Police Officer at all reasonable times. Any computerised system used must be able to produce an electronic document/copy of the details specified above. A backup of the records required to be kept must be made daily.
3. All records held in association with the company or firm, operated by virtue of this operator's licence, must be distinct and separate from that of any other company or firm.
4. If operating more than 5 vehicles, all booking records held in respect of the company or firm operated by virtue of this operator's licence, shall be held on a computerised system or in the event of temporary computer breakdown, booking records may be held in another manner and for a specified time period, both of which require approval by the Council in writing.
5. If operating 5 or less vehicles a manual bookings system, approved by the Council, in writing, may be used.
6. If operating more than 5 vehicles, all bookings allocated to Reading Borough Council licensed private hire drivers, operated by virtue of this operating licence, must be allocated by way of an electronic Personal Digital Assistant (PDA) or similar device, or in the event of temporary computer breakdown, in another manner and for a specified time period, both of which require approval by the Council in writing.
7. The information specified below, shall be submitted to the Council on or before the 7th day of each month in respect of the previous month:
 - the registration number of each vehicle operated;
 - the private hire vehicle licence number of each vehicle operated;
 - the date of expiry of each vehicle licence;
 - the date of expiry of each vehicle insurance;
 - the name of each private hire vehicle driver;
 - the private hire vehicle driver licence number of each driver;
 - the date of expiry of the private hire vehicle driver's licence of each driver;

- the dates the vehicles and drivers commenced and ceased work.
8. Bookings received through the internet or via an app-based booking system shall only be received at the company base stated on the operator's licence, unless otherwise approved by the Council in writing and only at such other addresses supplied on the application form to the Council and approved by the Council in writing.
 9. A private hire operator may sub-contract a booking to another licensed operator or hackney carriage driver. A record of whom the booking was sub-contracted to and when must be kept.
 10. If the operator uses a computerised booking system, officers shall be able to view the records to establish that they are entered sequentially and that it is able to establish the date and time at which the record was created.
 11. The operator shall be responsible for ensuring and evidencing that staff training and procedures are in place for controllers and dispatch staff in relation to the handling of personal information and conduct towards drivers, customers and members of the public.
 12. Bookings received by telephone shall only be received at the company base stated in the operator's licence, unless otherwise approved by the Council in writing and only on the telephone number(s) supplied on the application form to the Council or such other number(s) as may be approved by the Council on the application by the operator in writing.
 13. All records kept by the operator shall be kept for a minimum of 6 months following the booking (for booking records) or the date the vehicle or driver ceases to take bookings from the operator (for vehicle and driver records) and shall be made available upon request to an authorised officer of the council, police officer or any other relevant enforcement agency.
 14. Operators will be required to give access to their records and adequate instruction to licensing officers upon request so that the licensing officers can interrogate the records to carry out their enforcement duties. Records shall be maintained at the operator base for that purpose.
 15. Operators are required to report any complaints regarding a driver's behaviour, driving standards or the condition of the vehicle to the council within 72 hours of receipt of the complaint. This does not remove responsibility from the operator to conduct a proper investigation of the complaint.
 16. It is an offence for the operator of a private hire vehicle to fail or refuse to accept a booking for the vehicle if the reason for the failure or refusal is because the hirer or a person accompanying the hirer is disabled person who will be accompanied by an assistance dog. It is also an offence to make any additional charge for the carrying of an assistance dog.
 17. Operators must report all new convictions, cautions, warnings, reprimands, anti-social behaviour orders, community protection notices, criminal behaviour orders, community service orders, restraining orders, fixed penalties (including traffic offences), driver education courses and any disqualifications from driving in writing within 48 hours. In addition, all operators must inform the relevant council in writing within 48 hours if they are arrested, formally interviewed as a suspect or charged with an offence by the police.
 18. Operators must notify the relevant Council in writing of any change of name, postal address, email address or telephone number during the period of the licence within seven days of the change taking place.
 19. Where the private hire operator is trading as a limited company or partnership, the company

must advise the licensing authority within seven days of any change in directors or partners throughout the period of the licence.

20. If an operator is given notice to undertake a DBS check by the council, they must do so within 14 days of the request.
21. The operator shall only use trading or company name(s) that are included on the operator's licence, or other trading name(s) approved by the Council in writing.
22. Operators must keep a register of all staff involved in bookings and dispatching work including days and times of shifts worked, and they must obtain basic DBS checks for all such staff prior to them commencing work for the operator and annually thereafter. Evidence of the most recent check must be retained while the staff member works for the firm and for a period of 6 months after they leave, and this must be provided, on request, to any authorised officer. The staff member must be required as part of their contract to advise the operator of any cautions or convictions while they are employed in this role.
23. Operators must keep a written policy on employing ex-offenders in roles that would be on the register as above, and this must be provided to any person on request.

Appendix G – Hackney Carriage Driver's Byelaws, Conditions & Penalty

Points scheme

LEGISLATION, BYELAWS AND CONDITIONS APPLICABLE TO HACKNEY CARRIAGE VEHICLE DRIVER'S LICENCES & PENALTY POINTS ENFORCEMENT SYSTEM

Town Police Clauses Act 1847

Local Government (Miscellaneous Provisions) Act 1976

Public Health Act 1875

PART 1 – PENALTY POINTS SYSTEM

1. Operation of Penalty Points System

- 1.1. Without prejudice to any other course of action or remedy available to the Council, in the event of any contravention of any relevant statute, byelaw, regulation or hackney carriage vehicle driver condition, the Council may use this penalty points system as a means of enforcement. Where the system is used, if a breach or contravention occurs, as indicated in these conditions, the penalty points indicated within this document shall be allocated to the licence.
- 1.2. In the event that a driver surrenders their hackney carriage vehicle driver's licence or withdraws their application to renew a hackney carriage vehicle driver's licence or does not apply to renew a licence, any penalty points issued or in process will remain live and will be imposed on any subsequent hackney carriage vehicle driver's licence issued within 12 months of the issue of any penalty points.

2. Action where a suspected breach or non-compliance occurs

- 2.1. Where a suspected breach or noncompliance with the Local Government (Miscellaneous Provisions) Act 1976, Town Police Clauses Act 1847, Public Health Act 1875 or Hackney Carriage Vehicle Driver's Licence Byelaws and Conditions is detected, a letter will be sent to that person setting out the circumstances of the alleged breach or noncompliance. The letter shall offer an opportunity to either admit or deny the allegation. Where the breach is admitted the appropriate number of penalty points shall be allocated to the licence and a letter shall be sent to the licence holder confirming the allocation of points.
- 2.2. If the licence holder fails to respond to the letter setting out the circumstances of the alleged breach or non-compliance within 28 days, the appropriate number of penalty points shall be allocated to that individual's licence and a letter shall be sent confirming the allocation of points.
- 2.3. If the licence holder responds to the letter but denies the allegation due to them not being the vehicle driver at the time of the incident, they shall be given an opportunity to nominate another driver. If the licence holder fails to nominate another person the appropriate number of penalty points shall be allocated and again, a letter shall be sent to the licence holder confirming the allocation of points. That letter shall also explain the appeal options open to the licence holder.
- 2.4. If the licence holder denies the allegation due to a dispute of facts, they shall have the opportunity to challenge the matter as detailed in the disputes options, as set out at paragraph 7 below.

3. Use of alternative enforcement action in conjunction with penalty points

- 3.1. Where penalty points are shown in the conditions this shall not preclude alternative formal action, including prosecution or suspension/revocation, being taken by the Council.

- 3.2. Where enforcement actions such as prosecution or fixed penalty notices are used in respect of breaches, this shall not preclude the issuing of penalty points and penalty points will normally be awarded in addition to the alternative form of enforcement.
- 3.3. Where a driver also holds a private hire/school transport vehicle driver's licence any action taken in respect of their hackney carriage vehicle driver's badge will also apply to their private hire/school transport driver's badge.

4. First accumulation of 12 penalty points

- 4.1. If a licence holder accumulates 12 penalty points in any 12-month period the licence will be reviewed by officers, with particular focus on the circumstances relating to the current and earlier imposition of penalty points, and unless the review determines otherwise, the licence shall be suspended for 14 calendar days. Following the suspension the points shall be removed from the licence. In cases where a combination of breaches of licence conditions results in the number of penalty points reaching more than 12, and a suspension subsequently occurs, all the penalty points from the breaches resulting in the suspension shall be considered spent and no penalty points will be carried forward.
- 4.2. In the case of a breach of condition 13.5, resulting in 36 penalty points being awarded, the licence will be reviewed by officers, as above, and unless the review determines otherwise, no suspension shall occur and instead the licence shall be revoked. This revocation, and the rights of appeal against it, shall be notified in writing to the driver by officers.

5. Second accumulation of 12 penalty points

- 5.1. If, following a first suspension, a licence holder accumulates a further 12 points in any 12-month period, within 4 years of the end of the first suspension, the licence will be reviewed by officers, as above, and unless the review determines otherwise, the licence shall be suspended for a period of 28 calendar days. Following the suspension the points shall be removed from the licence. In cases where a combination of breaches of licence conditions results in the number of penalty points reaching more than 12, and a suspension subsequently occurs, all the penalty points from the breaches resulting in the suspension shall be considered spent and no penalty points will be carried forward.
- 5.2. In the case of a breach of condition 13.5, resulting in 36 penalty points being awarded, the licence will be reviewed by officers, as above, and unless the review determines otherwise, no suspension shall occur and instead the licence shall be revoked. This revocation, and the rights of appeal against it, shall be notified in writing to the driver by officers.

6. Third accumulation of 12 penalty points

- 6.1. If, following a second suspension, a licence holder accumulates a further 12 points in any 12-month period, within 4 years of the end of the second suspension, their hackney carriage vehicle driver's licence will be reviewed by officers, as above, and unless the review determines otherwise, the licence shall be revoked. This revocation, and the rights of appeal against it, shall be notified in writing to the driver by officers. In cases where a combination of breaches of licence conditions results in the number of penalty points reaching more than 12, and a revocation subsequently occurs, all the penalty points from the breaches resulting in the revocation shall be considered spent and no penalty points will be carried forward.

7. Disputes

7.1. Review by Senior Officer

- 7.1.1. In the event of the licence holder disputing that they are liable for points to be awarded against them, the licence holder may request, in writing within 28 days of being notified of the allegation, that the incident and awarding of penalty points be considered by a Senior Officer. Where this occurs, the Senior Officer shall consider the evidence attached to the incident and will aim to respond to the licence holder, in writing, within 28 days of being notified of the dispute. The Senior Officer shall decide whether it is appropriate to allocate the penalty points.
- 7.1.2. If the Senior Officer upholds the decision of the Licensing Officer, no greater punishment shall be imposed other than the awarding of the penalty points for those breaches or requirements.
- 7.1.3. If the award of points does not result in the licence holder accumulating 12 or more points on their licence, there is no further right of appeal.

7.2. Accumulation of 12 points or more – right to request a review by the Licensing Sub Committee

- 7.2.1. If the licence holder is unhappy with the findings of the Senior Officer and the award of penalty points results in the driver accumulating 12 or more points on their licence, which may result in a suspension/revocation, they may ask for the matter to be reviewed by the Council's Licensing Sub-Committee.
- 7.2.2. This request must be made in writing within 28 days of being notified of the Senior Officers' findings. When this occurs, a hearing shall be held where details of all the incidents that lead to the accumulation of at least 12 penalty points within a 12-month period shall be provided to the Sub-Committee in writing and the licence holder will have the opportunity to present evidence and information in support of his/her case.

8. Appeals to the Magistrates Court in connection with Penalty Points

- 8.1. Where a driver receives a period of suspension, that person shall be notified in writing within 14 days of the reason(s) for the suspension and shall have the right of appeal to the Magistrates' Court within 21 days of being served with a notice of the Council's decision.
- 8.2. Where a driver's licence is revoked, that person shall be notified in writing within 14 days of the reason(s) for the revocation and shall have a right of appeal to the Magistrates' Court within 21 days of being served a notice of the Council's decision.

9. Action where a private hire/school transport licence is also held

- 9.1. In the event of the suspension or revocation of a hackney carriage driver's licence an identical suspension or revocation shall apply in respect of any private hire/school transport driver's licence held by the same individual. This suspension or revocation and the rights of appeal against it shall be notified in writing to the driver by officers.

10. Action following revocation of licence

- 10.1 A person who has had a hackney carriage vehicle driver's licence revoked under the penalty points system of enforcement shall not be eligible for the issue of a further hackney carriage vehicle driver's or private hire/school transport driver's licence until three years have elapsed since the revocation. The Assistant Director of Planning, Transport & Public Protection is authorised to refuse any application for a licence in these circumstances.

Interpretation of Conditions and Byelaws attached to hackney carriage vehicle driver's licence

In these conditions, unless the subject or context otherwise requires:

- i. "The Act" means the Local Government (Miscellaneous Provisions) Act 1976, Town Police Clauses Act 1847 or Public Health Act 1875.
- ii. "Byelaw" means a condition made by the Council under Section 68, Town Police Clauses Act 1847 and Section 171 Public Health Act 1875.
- iii. "The Borough" means the Borough of Reading.
- iv. "The Council" means Reading Borough Council.
- v. "Home-to-School transport contract" means a written contract between a local authority and a licensed private hire operator or hackney carriage driver for the purpose of transporting children from their usual abode to school".
- vi. "Driver" means a person holding and acting in accordance with a hackney carriage vehicle driver's licence issued by the Council.
- vii. "Driving" includes parking or leaving a vehicle unattended.
- viii. "Licence" means hackney carriage vehicle driver's licence.
- ix. "Penalty Points" means the number of points, which may be attached to a hackney carriage vehicle driver's licence for a breach of the Act or the conditions/byelaws in this document.

Appeal Procedure in respect of conditions attached to licence

Any person aggrieved by any condition specified in this licence may appeal to a Magistrates' Court.

The procedure shall be by way of complaint for an order, and the Magistrates' Courts Act 1980 (or any re-enactment or amendment thereto) shall apply to the proceedings.

The time within which any such appeal may be brought shall be twenty-one days from the date on which notice of the requirement, or other decision was served upon the person desiring to appeal and for this purpose the making of the complaint shall be deemed to be the bringing of the appeal.

PART 2 – HACKNEY CARRIAGE VEHICLE DRIVER CONDITIONS AND BYELAWS

CONDITIONS AND BYELAWS

1. Action where a DVLA Driver's Licence or similar is suspended

- 1.1. Where a driver has been disqualified from driving by a court, their hackney carriage driver's licence will be revoked by an appropriate officer delegated by the Assistant Director of Planning, Transport and Public Protection.
- 1.2. You must not drive a hackney carriage vehicle if you no longer hold, have had suspended or are disqualified from holding a DVLA, European Economic Area or Northern Ireland driving licence for that type of vehicle. **To do so – 12 penalty points.**

2. Requirement to wear/display Reading Borough Council Hackney Carriage Driver's Badge

BYELAW 12

If a badge has been provided by the Council and delivered to the driver of a hackney carriage he shall, when standing or plying for hire, and when hired, wear that badge in such position and manner as to be plainly visible. **Failure to do so – 3 penalty points**

- 2.1. The badge must be worn using a lanyard or a clip fastened to the upper chest area. **Failure to do so – 3 penalty points.**
- 2.2. All drivers must ALWAYS display in the vehicle, in full view of passenger(s), the other hackney carriage driver's badge issued to you. **Failure to do so – 3 penalty points.**

3. Requirement to display a hackney carriage vehicle licence plate

- 3.1. You must not drive a licensed hackney carriage vehicle without a hackney carriage vehicle plate securely attached to the rear bumper or rear bodywork of the vehicle. **Failure to do so – 3 penalty points.**
- 3.2. You must not wilfully or negligently cause or suffer the licence plate or identification card allocated to your hackney carriage vehicle, to be concealed from public view or to be so defaced such that it is illegible. **To do so – 3 penalty points.**
- 3.3. You must not remove a hackney carriage vehicle licence plate from a hackney carriage vehicle, whilst the vehicle remains licensed. **To do so – 3 penalty points.**

4. Requirement to produce hackney carriage driver's licence

- 4.1. You must produce your hackney carriage vehicle driver's licence at the request of an authorised officer of Reading Borough Council and/or a Police officer, either forthwith, or, in the case of an Authorised Officer, at the Civic Offices, Reading and in the case of a Police Constable, the Police Station of your choice within the Borough of Reading within five days of the request. **Failure to do so – 3 penalty points.**

5. Medical fitness

- 5.1 You must undergo a medical examination as prescribed by the Council, confirming your fitness to drive a licensed hackney carriage vehicle as and when required by the Council. The frequencies at which medical examination must usually be undertaken are prior to obtaining your first licence, then at least every 5 years to age 60, then at least every 2 years to age 70

and at least once a year over the age of 70. **Failure to do so – suspension of licence until medical examination passed and 3 penalty points.**

- 5.2 You must not drive a hackney carriage vehicle if you are suffering from any disease or disability which would cause the vehicle being driven by you to be a danger to the public. **To do so – suspension/revocation of licence until medical examination passed and 3 penalty points**
- 5.3 You must ensure that you can, ALWAYS, meet the eyesight requirements specified by the Department of Transport driving test. **Failure to do so – suspension/revocation of licence until eyesight requirements met and 3 penalty points.**

6. Provision of information to the Council

- 6.1 You must not, when providing information to the Council, on applying for a hackney carriage vehicle driver's licence knowingly or recklessly make a false statement and/or knowingly omit any material information. **To do so – 6 penalty points.**
- 6.2 You must provide any relevant document or information requested within the specified timescale. **Failure to do so – 3 penalty points.**
- 6.3 Drivers must sign up to the DBS update service and maintain their annual payments – **failure to do so - 6 penalty points.**
- 6.4 If a driver is given notice to take an enhanced DBS check/DVLA check they must provide all information or documentation within 14 days in order to carry out the check – **failure to do so – 6 penalty points.**

7. Correct use of taximeter

BYELAW 5

The driver of a hackney carriage provided with a taximeter shall: -

- (a) when standing or plying for hire, keep the key, flag or other device fitted in pursuance of the byelaw in that behalf locked in the position in which no fare is recorded on the face of the taximeter; **Failure to do so - 3 penalty points.**
- (b) before beginning a journey for which a fare is charged for distance and time, bring the machinery of the taximeter into action by moving the said key, flag or other device, so that the word "HIRED" is legible on the face of the taximeter to indicate that the hackney carriage is hired or that a fare is being charged and keep the machinery of the taximeter in action until termination of hiring; **Failure to do so - 6 penalty points**
- (c) Cause the dial of the taximeter to be kept properly illuminated throughout any part of the hiring which is during the hours of darkness as defined for the purpose of the Road Traffic Act 1972 and also at any other time at the request of the hirer. **Failure to do so - 3 penalty points**

BYELAW 6

The driver of a hackney carriage shall not tamper with or permit any person to tamper with any taximeter with which the carriage is provided, with the fittings thereof, or with the seals affixed thereto. **To do so - 12 penalty points.**

8. Use of ranks

BYELAW 7

The driver of a hackney carriage shall, when plying for hire, in any street and not actually hired:

- (a) proceed with reasonable speed to one of the stands appointed or deemed to have been appointed under section 63 of the Local Government (Miscellaneous Provisions) Act 1976; **Failure to do so – 3 penalty points.**
- (b) if a stand, at the time of his arrival, is occupied by the full number of carriages authorised to occupy it, proceed to another stand; **Failure to do so – 3 penalty points.**
- (c) on arriving at a stand not already occupied by the full number of carriages authorised to occupy it, station the carriage immediately behind the carriage or carriages on the stand and so as to face in the same direction; **Failure to do so – 3 penalty points.**
- (d) from time to time when any other carriage immediately in front is driven off or moved forward cause his carriage to be moved forward so as to fill the place previously occupied by the carriage driven off or moved forward. **Failure to do so – 3 penalty points.**

8.1 You must not leave your hackney carriage vehicle unattended on a hackney carriage stand at any time unless it is a designated rest rank. **To do so - 6 penalty points.**

8.2 Drivers shall switch off the vehicle engine if waiting for more than one minute when picking up or dropping off passengers or whilst waiting on a rank. **Failure to do so – 3 penalty points.**

9. Prolonging of journeys and charging of fares

BYELAW 15

The driver of a hackney carriage shall be entitled to demand and take for the hire of the carriage the rate of fare prescribed by the Table of fares the of fare being calculated by distance unless the hirer expresses at the commencement of the hiring his desire to engage by time.

Provided always that where a hackney carriage furnished with a taximeter shall be hired by distance the driver thereof shall not be entitled to demand and take a fare greater than that recorded on the face of the taximeter, save for any extra charges authorised by the Table of Fares which it may not be possible to record on the face of the taximeter. **To do so – 6 penalty points**

BYELAW 16

A Statement of fares fixed by the Table of Fares shall be exhibited inside the carriage in clearly distinguishable letters and figures. The driver of a hackney carriage bearing a statement of fares in accordance with this bylaw shall not wilfully or negligently cause or suffer the letters or figures in the statement to be concealed or rendered illegible at any time while the carriage is plying or being used for hire. **Failure to do so – 3 penalty points.**

9.1. You must not without reasonable cause, unnecessarily prolong in distance or time, the journey for which the vehicle was hired. **To do so – 3 penalty points.**

9.2. When undertaking a journey which ends outside the licensed area (the Borough of Reading) you must not charge more than the fare shown on the taximeter unless a fare was agreed before commencement of the journey. **To do so – 6 penalty points**

9.3. When used as a private hire vehicle, i.e., when not plying for hire or standing on a taxi rank or accepting bookings through a third person, you must only charge the fare shown on the

taximeter from where the hirer commenced the journey. **To do so – 6 penalty points**

- 9.4. On payment of a fare by card, no extra or minimum charge shall be imposed on the hirer. **To do so - 6 penalty points**

10. Obstruction of authorised officers

- 10.1. You must not wilfully obstruct an authorised officer of the Council or a police constable acting under the Act, or without reasonable excuse fail to comply with any requirement made to you by such a person, or without reasonable cause, fail to give any such person any other assistance or information he may reasonably require in the performance of his duties under the above Act. **To do so – 6 penalty points.**

11. Requirement to use a licensed vehicle

- 11.1. When working as a hackney carriage driver, you must not use an unlicensed vehicle, this includes any vehicle where the hackney carriage vehicle licence has been suspended for any reason. **To do so – 12 penalty points**
- 11.2. When licensed as a driver of hackney carriage vehicles by the Council you must only use a hackney carriage vehicle licensed by Reading Borough Council, unless you are appropriately licensed to use a vehicle licensed by another authority. **Failure to do so – 12 penalty points.**

12. Requirement to report loss of licence/badge

- 12.1. You must report the loss of your licence and/or badge(s) to the Council as soon as such a loss becomes known. **Failure to do so – 3 penalty points.**

13. Conduct of driver

BYELAW 9

The driver of a hackney carriage shall behave in a civil and orderly manner and shall take all reasonable precautions to ensure the safety of persons conveyed in or entering or alighting from the vehicle. **Failure to do so – 3 penalty points.**

BYELAW 10

The driver of a hackney carriage who has agreed or has been hired to be in attendance with the carriage at an appointed time and place shall unless delayed or prevented by some sufficient cause, punctually attend with such carriage at such appointed time and place. **Failure to do so – 3 penalty points**

BYELAW 14

Every hackney carriage driver shall present a clean and tidy appearance. **Failure to do so – 3 penalty points.**

- 13.1. You must comply with every reasonable requirement of your passengers. **Failure to do so - 3 penalty points.**
- 13.2. You must not eat in your vehicle whilst you have a passenger or passengers on board. **Failure to do so – 3 penalty points.**
- 13.3. You must not smoke, vape or use any kind of electronic cigarette in a hackney carriage vehicle at any time. **To do so – 3 penalty points**
- 13.4. You must not behave in a sexually offensive manner towards passengers. **To do so – 12**

penalty points.

- 13.5. Without prejudice to the generality of condition 13.4, you are not permitted to have sexual intercourse with passengers whilst on duty or in a licensed vehicle. **To do so – 36 penalty points resulting in licence revocation.**
- 13.6. Without prejudice to the generality of condition 13.4, you are not permitted to have sexual contact, including intimate kissing, touching of private parts, or similar activity, with passengers whilst on duty or in a licensed vehicle. **To do so – 12 penalty points.**
- 13.7. Without prejudice to the generality of condition 13.4, you must not engage in any discussion or dialogue, including by telephone contact, social media, email or any other form of communication, of a sexual nature or about a sexual relationship with a passenger (be it a past, present or future relationship). **To do so – 12 penalty points**

14. Carriage of luggage

BYELAW 13

The driver of a hackney carriage so constructed as to carry luggage shall, when requested by any person hiring or seeking to hire the carriage:

- (a) convey a reasonable quantity of luggage. **Failure to do so – 3 penalty points**
- (b) afford reasonable assistance in loading and unloading. **Failure to do so – 3 penalty points**
- (c) afford reasonable assistance in removing it to or from the entrance of any building, station, or place at which he may take up or set down such person. **Failure to do so – 3 penalty points.**

15. Carriage of guide/assistance dogs or disabled passengers

- 15.1. You must not refuse to carry a guide dog, or assistance dog accompanying a passenger, unless you have a proven medical condition that would preclude such action. **Failure to do so – 12 penalty points.**
- 15.2. You must not charge a fee to carry a guide dog or an assistance dog. **To do so – 6 penalty points.**
- 15.3. You must advise the Council's Licensing Section in writing of any medical condition which would preclude you from carrying a guide dog or assistance dog. **Failure to do so - 3 penalty points.**
- 15.4. You must ensure that wheelchairs are loaded in the correct position and securely fixed using the floor restraint system and manufacturers straps designed for the vehicle. **Failure to do so – 6 penalty points.**
- 15.5. You must not refuse to carry a wheelchair user unless your vehicle is unsuitable in size to safely accommodate the wheelchair and wheelchair user. If you refuse the journey for this reason, you must provide reasonable assistance to facilitate the use of an alternatively suitable hackney carriage. **Failure to do so – 12 penalty points.**
- 15.6. You must not charge a higher price for any journey, for a person with a disability than would otherwise be charged for a person without such a disability for the same journey. **Failure to do so – 6 penalty points.**

- 15.7. You must provide reasonable assistance to any passengers with a disability, or those with reduced mobility, including providing reasonable assistance to safely load/unload wheelchairs or mobility aids. Unless you have a medical exemption certificate that allows you not to assist on medical grounds. **Failure to do so – 6 penalty points.**

16. Provision of receipts

- 16.1. You must, if requested by your hirer/passenger, give a receipt in respect of the fare paid. The receipt must state the fare paid, date, time and driver badge number. **Failure to do so – 3 penalty points.**

17. Lost Property

BYELAW 17

The driver of a hackney carriage shall immediately after the termination of any hiring or as soon as practicable thereafter carefully search the carriage for any property which may have been accidentally left therein. **Failure to do so – 3 penalty points.**

BYELAW 18

The driver of a hackney carriage shall if any property is accidentally left therein by any person who may have been conveyed in the carriage be found or handed to him:

- (a) carry it as soon as possible and in any event within 48 hours, if not sooner claimed by or on behalf of its owner, to the Civic Offices, Reading, or other office for the time being of the Borough Council, and leave it in the custody of the officer in charge on his giving a receipt for it; **Failure to do so – 3 penalty points**
- (b) be entitled to receive from any person to whom the property shall be re-delivered an amount equal to five pence on the pound of its estimated value (or the fare for the distance from the place of finding to the office of the council, whichever be the greater) but not more than five pounds.

- 17.1. Where the owner/loser of the property collects the property from you, no charge may be made for the return of that property. **Failure to do so – 3 penalty points.**

18. Suitability of vehicles

- 18.1. You must not drive a hackney carriage vehicle if the vehicle does not comply with the Road Vehicles (Construction and Use) Regulations 1986 as amended. **To do so – 3 penalty points for each breach found.**
- 18.2. You must, before commencing work each day, ensure that the vehicle is maintained in a clean, comfortable, safe, watertight and mechanically sound condition and is in all other respects suitable for the purpose for which it is intended. **Failure to do so – 3 penalty points for each breach found.**
- 18.3. You must ensure that any hackney carriage vehicle you drive complies with the Council's requirements in relation to tinted windows at all times. (See vehicle specifications). **Failure to do so – 3 penalty points.**
- 18.4. You must not make any changes to the specification, design or appearance of a vehicle without prior approval from a Licensing Enforcement Officer. **To do so – 3 penalty points for each breach found**

19. Requirement to notify Council of change of address, contact details or a conviction

- 19.1. You must notify the Council in writing of any change of address, contact number or email address within 7 days of the change taking place. **Failure to do so – 3 penalty points.**
- 19.2. You must notify the Council in writing of all new convictions and cautions within 48 hours from the date of formal notification. **Failure to do so - 6 penalty points.** This includes, but is not limited to, warnings, reprimands, anti-social behaviour orders, community protection notices, criminal behaviour orders, community service orders, restraining orders, fixed penalties (including traffic offences), driver education courses and any disqualifications from driving.
- 19.3. You must notify the council within 48 hours of any arrest and release, charge, caution or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, this includes fixed penalties (FPN). **Failure to do so – 6 penalty points.**

20. Insurance

- 20.1 You must not drive a hackney carriage vehicle if you are not insured to do so. **To do so – 12 penalty points.**
- 20.2 You must provide the Licensing Section of the Council with the original, valid certificate of insurance in respect of third-party risks which must cover your vehicle for hackney carriage purposes. **Failure to do so – 3 penalty points.**

21. Leaving the address shown on your licence for more than 28 days

- 21.1. You must notify the Council in advance, in writing, if you are to be away from the address shown on your licence for a period of more than 28 days. **Failure to do so – 3 penalty points.**
- 21.2. If you are to be away from your home address for a period of more than 28 days and someone else is to use your hackney carriage vehicle whilst you are away you must provide the name, address and home telephone number of that person to the Council prior to going away. **Failure to do so – 3 penalty points.**

22. Road traffic accidents and other incidents

- 22.1. Following a road traffic accident or any other incident involving a hackney carriage vehicle driven by you where there is a likelihood of any dispute over damage or injury, you must give full details of yourself, the owner of the vehicle and the insurance for the vehicle to any person reasonably requesting the information within seven days of such a request being made. **Failure to do so – 3 penalty points.**
- 22.2. If you are not the owner of the hackney carriage vehicle that is involved in a road traffic accident or any other incident while being driven by you, you must notify the owner of the vehicle as soon as is reasonably practicable, and in any case within 72 hours of the incident. **Failure to do so – 3 penalty points.**
- 22.3. If a hackney carriage vehicle driven by you is involved in an accident which causes damage which materially affects the safety, performance or appearance of the vehicle or comfort or convenience of the passengers you must report the damage to the Council as soon as reasonably practicable or in any case within 72 hours of the accident. **Failure to do so – 3 penalty points.**

23. Theft or loss of licence plate

- 23.1. You must report the loss or theft of any hackney carriage vehicle licence plate, hackney carriage vehicle licence or internal vehicle licence plate, to the Police and the Council, as soon as the loss becomes known and in the event of ceasing to use the vehicle for hackney carriage purposes shall return the external and internal licence plates, to the Council within seven days. **Failure to do so – 3 penalty points.**

24. Touting

BYELAW 8

The driver of a hackney carriage, when standing or plying for hire, shall not, by calling out or otherwise, importune any person to hire such carriage and shall not make use of the services of any other person for the purpose. **To do so – 12 penalty points**

25. Bus stops and lanes

- 25.1 At any time when driving a hackney carriage vehicle, you must not cause or permit the vehicle to stand or become stationary for any reason at any bus stop or in any bus lay-by. **To do so – 3 penalty points.**
- 25.2 At any time when driving a hackney carriage vehicle, you must not permit the vehicle to be driven in any bus lane, except for bus lanes that specifically permit use by hackney carriage vehicles. **To do so – 3 penalty points.**

26. Disabled bays

- 26.1. At any time when driving a hackney carriage vehicle, you must not cause or permit the vehicle to stand or become stationary for any reason in a disabled bay without displaying the appropriate badge or other lawful authority. **To do so - 3 penalty points.**

27. Dangerous parking/stopping

- 27.1. At any time when driving a hackney carriage vehicle, you must not cause or permit the vehicle to be parked, or stop, in such a position to cause an unnecessary obstruction or be in a dangerous position (e.g. double parked, parked/stopped at or close to a road junction, zigzags, any 'keep clear' markings or in the middle of the road, etc). **To do so - 3 penalty points.**
- 27.2. At any time when driving a hackney carriage vehicle, you must not cause or permit the vehicle to be driven on or become stationary on a footway. **To do so - 3 penalty points.**

28. Parking on yellow lines/contravening traffic laws

- 28.1. At any time when driving a hackney carriage vehicle, you must not cause or permit the vehicle to be stationary on double yellow lines or 'Red Routes' other than to pick up or drop off passengers. **To do so - 3 penalty points.**
- 28.2. At any time when driving a hackney carriage vehicle, you must not cause or permit the vehicle to be stationary on a single yellow line, in contravention of the notices displayed, other than to pick up or drop off passengers. **To do so - 3 penalty points.**
- 28.3. At any time when driving a hackney carriage vehicle, you must not contravene any traffic laws, regulations, orders or guidance outlined in the current highway code. **To do so - 3 penalty points.**
- 28.4. At any time when driving a hackney carriage vehicle, you must not drive in a manner that

causes your passengers discomfort, alarm or distress. **To do so – 3 penalty points**

29. Sounding of horn

- 29.1. You must not sound the horn of the vehicle you are driving, whilst it is stationary, to signify the vehicle is waiting for passengers. **To do so - 3 penalty points.**

30. Number of passengers carried

BYELAW 11

The driver of a hackney carriage shall not convey or permit to be conveyed in such carriage any greater number of persons than the number of persons specified on the plate affixed to the outside of the carriage provided that for the purpose of this byelaw two children under the age of twelve years shall be regarded as one person and children under the age of three years shall not be reckoned subject to the limitation that no hackney carriage licensed to carry three, four or five persons shall carry more than five, six or seven adults and children respectively.

To do so – 6 penalty points

- 30.1. You must not carry any other person in your vehicle without the permission of the hirer. **To do so - 3 penalty points.**

31. Giving or lending of vehicle or licence to others

- 31.1. You must not lend or give your licence to any other person, other than the copy of your licence that you are required by these conditions to give to your operator. **To do so - 6 penalty points.**
- 31.2. You must not permit any other person who is not a Reading Borough Council licensed hackney carriage vehicle driver to drive your licensed hackney carriage vehicle. **To do so - 6 penalty points.**

32. Playing of radio or similar

- 32.1. You must not play a radio or any other sound producing device to the annoyance or discomfort of your passengers. **To do so - 3 penalty points.**

33. Use of a mobile phone, navigation or similar device

- 33.1. You must not use a mobile phone, handheld communications/navigation device or similar when driving if it is not connected to a 'hands-free' system (Bluetooth earpiece or an inbuilt car system). **To do so - 12 penalty points. (When witnessed by a Licensing Officer, not for motoring convictions that are dealt with under the Convictions Policy).**

Devices include, but are not limited to, mobile telephones, tablets, a two-way radio, satellite navigation device or personal digital assistant. 'Use' of the device includes, but is not limited to, making a call (voice or video), texting, watching videos, making videos, searching on the device or interacting with it in anyway which may cause their attention to become distracted.

34. Signs and livery/advertisements

- 34.1. You must display on your vehicle, always when you are working as a hackney carriage driver, a roof sign in accordance with the Council's approved specification (see vehicle specifications). **Failure to do so – 3 penalty points.**
- 34.2. You must not permit any hackney carriage vehicle you are driving to display any signs or advertisements of any nature apart from Council approved livery designs/advertisements in

accordance with the Council's hackney carriage vehicle licence conditions. **To do so – 3 penalty points.**

35. Home-to-School Transport Contract Work

When a driver is fulfilling/undertaking a 'Home-to-School Transport Contract' journey the following conditions shall apply, notwithstanding that they may conflict with the conditions stated above.

- 35.1. You must ensure that each passenger is always wearing a seat belt during the journey, ensure that wheelchairs are loaded in the correct position and securely fixed using the floor restraint system and manufacturers straps designed for the vehicle. **Failure to do so – 6 penalty points.**
- 35.2. When undertaking a home-to-school transport contract, you must not carry any person in your vehicle other than any passengers (including escorts) that you are required to carry pursuant to the contract. **To do so - 3 penalty points.**
- 35.3. You must display on a vehicle being used for a home-to-school contract, the school transport sign, to a type and standard normally applicable to PCV operators, prescribed in the Road Vehicles Lighting Regulations 1989 and amended in Statutory Instrument 1519 The Vehicles Lighting (Amendment) Regulation 1994, in such position as required by the Council, but only while the vehicle is actively involved in transporting pupils and at no other time. **Failure to do so – 3 penalty points.**
- 35.4. You must display on your vehicle when being used for any home-to-school transport contract, any signs as specified in the contract, such as the school number and contract route number. **Failure to do so – 3 penalty points.**
- 35.5. You must comply with all the terms stipulated within any home-to-school contract held or journeys undertaken. **Failure to do so – 3 penalty points.**

Appendix H – Private hire and School Transport driver's conditions and penalty points scheme

LEGISLATION AND CONDITIONS APPLICABLE TO PRIVATE HIRE AND SCHOOL TRANSPORT VEHICLE DRIVER'S LICENCES & PENALTY POINTS ENFORCEMENT SYSTEM

Local Government (Miscellaneous Provisions) Act 1976

PART 1 – PENALTY POINTS SYSTEM

1. OPERATION OF PENALTY POINTS SYSTEM

- 1.1 Without prejudice to any other course of action or remedy available to the Council, in the event of any contravention of any relevant statute, byelaw, regulation or private hire/school transport vehicle driver condition, the Council may use this penalty points system as a means of enforcement. Where the system is used, if a breach or contravention occurs, as indicated in these conditions, the penalty points indicated within this document shall be allocated to the licence.
- 1.2 In the event that a driver surrenders their private hire/school transport vehicle driver's licence or withdraws their application to renew a private hire/school transport vehicle driver's licence or does not apply to renew a licence, any penalty points issued or in process will remain live and will be imposed on any subsequent private hire/school transport vehicle driver's licence issued within 12 months of the issue of any penalty points.

2. Action where a suspected breach or non-compliance occurs

- 2.1. Where a suspected breach or noncompliance with the Local Government (Miscellaneous Provisions) Act 1976, or Private Hire and School Transport Vehicle Driver Licence Conditions is detected, a letter will be sent to that person setting out the circumstances of the alleged breach or noncompliance. The letter shall offer an opportunity to either admit or deny the allegation. Where the breach is admitted the appropriate number of penalty points shall be allocated to the licence and a letter shall be sent to the licence holder confirming the allocation of points.
- 2.3 If the licence holder fails to respond to the letter setting out the circumstances of the alleged breach or non-compliance within 28 days, the appropriate number of penalty points shall be allocated to that individual's licence and a letter shall be sent confirming the allocation of points.
- 2.4 If the licence holder responds to the letter but denies the allegation due to them not being the vehicle driver at the time of the incident, they shall be given an opportunity to nominate another driver. If the licence holder fails to nominate another person the appropriate number of penalty points shall be allocated and again, a letter shall be sent to the licence holder confirming the allocation of points. That letter shall also explain the appeal options open to the licence holder.
- 2.5 If the licence holder denies the allegation due to a dispute of facts, they shall have the opportunity to challenge the matter as detailed in the disputes options, as set out at paragraph 7 below.

3. Use of alternative enforcement action in conjunction with penalty points

- 3.1. Where penalty points are shown in the conditions this shall not preclude alternative formal action, including prosecution or suspension/revocation, being taken by the Council.
- 3.2. Where enforcement action such as prosecution or fixed penalty notices are used in respect of breaches this shall not preclude the issuing of penalty points and penalty points will normally be awarded in addition to the alternative form of enforcement.
- 3.3. Where a driver also holds a hackney carriage vehicle driver's licence any action taken in respect of their private hire/school transport vehicle driver's badge will also apply to their hackney carriage driver's badge.

4. First accumulation of 12 penalty points

- 4.1. If a licence holder accumulates 12 penalty points in any 12-month period the licence will be reviewed by officers, with particular focus on the circumstances relating to the current and earlier imposition of penalty points, and unless the review determines otherwise, the licence shall be suspended for 14 calendar days. Following the suspension the points shall be removed from the licence. In cases where a combination of breaches of licence conditions results in the number of penalty points reaching more than 12, and a suspension subsequently occurs, all the penalty points from the breaches resulting in the suspension shall be considered spent and no penalty points will be carried forward.
- 4.2. In the case of a breach of condition 13.7, resulting in 36 penalty points being awarded, the licence will be reviewed by officers as above, and unless the review determines otherwise, no suspension shall occur and instead the licence shall be revoked. This revocation, and the rights of appeal against it, shall be notified in writing to the driver by officers.

5. Second accumulation of 12 penalty points

- 5.1. If, following a first suspension, a licence holder accumulates a further 12 points in any 12-month period, within 4 years of the end of the first suspension, the licence will be reviewed by officers, as above, and unless the review determines otherwise, the licence shall be suspended for a period of 28 calendar days. Following the suspension the points shall be removed from the licence. In cases where a combination of breaches of licence conditions results in the number of penalty points reaching more than 12, and a suspension subsequently occurs, all the penalty points from the breaches resulting in the suspension shall be considered spent and no penalty points will be carried forward.
- 5.2. In the case of a breach of condition 13.7, resulting in 36 penalty points being awarded, the licence will be reviewed by officers as above, and unless the review determines otherwise, no suspension shall occur and instead the licence shall be revoked. This revocation, and the rights of appeal against it, shall be notified in writing to the driver by officers.

6. Third accumulation of 12 penalty points

- 6.1. If, following a second suspension, a licence holder accumulates a further 12 points in any 12-month period, within 4 years of the end of the second suspension, their private hire vehicle driver's licence will be reviewed by officers as above, and unless the review determines otherwise, the licence shall be revoked. This revocation, and the rights of appeal against it, shall be notified in writing to the driver by officers. In cases where a combination of breaches of licence conditions results in the number of penalty points reaching more than 12, and a revocation subsequently occurs, all the penalty points from the breaches resulting in the revocation shall be considered spent and no penalty points will be carried forward.

7. Disputes

7.1. Review by Senior Officer

- 7.1.1 In the event of the licence holder disputing that they are liable for points to be awarded against them, the licence holder may request, in writing within 2 days of being notified of the allegation, that the incident and awarding of penalty points be considered by a Senior Officer. Where this occurs, the Senior Officer shall consider the evidence attached to the incident and will aim to respond to the licence holder, in writing, within 28 days of being notified of the dispute. The Senior Officer shall decide whether it is appropriate to allocate the penalty points.
- 7.1.2 If the Senior Officer upholds the decision of the Licensing Officer, no greater punishment shall be imposed other than the awarding of the penalty points for those breaches or requirements.
- 7.1.3 If the award of points does not result in the licence holder accumulating 12 or more points on their licence, there is no further right of appeal.

7.2. Accumulation of 12 points or more – right to request a review by the Licensing Sub-Committee

- 7.2.1. If the licence holder is unhappy with the findings of the Senior Officer and the award of penalty points results in the driver accumulating 12 or more points on their licence, which may result in a suspension/revocation, they may ask for the matter to be reviewed by the Council's Licensing Sub-Committee.
- 7.2.2. This request must be made in writing within 28 days of being notified of the Senior Officers findings. Where this occurs, a hearing shall be held where details of all the incidents leading to the accumulation of at least 12 penalty points within a 12-month period shall be provided to the Sub-Committee in writing. The licence holder will have the opportunity to present evidence and information in support of their case.

8. Appeals to the Magistrates Court in connection with Penalty Points

- 8.1 Where a driver receives a period of suspension, that person shall be notified in writing within 14 days of the reason(s) for the suspension and shall have the right of appeal to the Magistrates' Court within 21 days of being served with a notice of the Council's decision.
- 8.2 Where a driver's licence is revoked, that person shall be notified in writing within 14 days of the reason(s) for the revocation and shall have a right of appeal to the Magistrates' Court within 21 days of being served with a notice of the Council's decision.

9. Action where a hackney carriage licence is also held

- 9.1. In the event of the suspension or revocation of a private hire/school transport driver's licence an identical suspension or revocation shall apply in respect of any hackney carriage driver's licence held by the same individual. This suspension or revocation and the rights of appeal against it shall be notified in writing to the driver by officers.

10. Action following revocation of licence

- 10.1. A person who has had a private hire/school transport vehicle driver's licence revoked under the penalty points system of enforcement shall not be eligible for the issue of a further private hire/school transport vehicle driver's or hackney carriage driver's licence until three years have elapsed since the revocation. The Assistant Director of Planning, Transport and Public

Protection is authorised to refuse any application for a licence in these circumstances.

Interpretation of Conditions attached to private hire or school transport vehicle driver's licence

In these conditions, unless the subject or context otherwise requires:

- (i) "The Act" means the Local Government (Miscellaneous Provisions) Act 1976.
- (ii) "The Borough" means the Borough of Reading.
- (iii) "The Council" means Reading Borough Council.
- (iv) "Home-to-School transport contract" means a written contract between a local authority and a licensed private hire operator for the purpose of transporting children from their usual abode to school".
- (v) "Driver" means a person holding and acting in accordance with a private hire or school transport vehicle driver's licence issued by the Council.
- (vi) "Driving" includes parking or leaving a vehicle unattended.
- (vii) "Licence" means private hire or school transport vehicle driver's licence.
- (viii) "Penalty Points" means the number of points, which may be attached to a private hire or school transport vehicle driver's licence for a breach of the Act or the conditions in this document.

11. Appeal Procedure in respect of conditions attached to licence

- 11.1 Any person aggrieved by any condition specified in this licence may appeal to a Magistrates' Court.
- 11.2 The procedure shall be by way of complaint for an order, and the Magistrates' Courts Act 1980 (or any re-enactment or amendment thereto) shall apply to the proceedings.
- 11.3 The time within which any such appeal may be brought shall be twenty-one days from the date on which notice of the requirement, or other decision was served upon the person desiring to appeal and for this purpose the making of the complaint shall be deemed to be the bringing of the appeal.

PART 2 – PRIVATE HIRE AND SCHOOL TRANSPORT VEHICLE DRIVER CONDITIONS

CONDITIONS

1. Action where a DVLA Driver's Licence or similar is suspended

- 1.1 Where a driver has been disqualified from driving by a court, their private hire/school transport driver's licence will be revoked by an officer delegated by the Assistant Director of Planning, Transport & Public Protection.
- 1.2 You must not drive a private hire vehicle if you no longer hold, have had suspended or are disqualified from holding a DVLA, European Economic Area or Northern Ireland driving licence for that type of vehicle. **To do so – 12 penalty points.**

2. Requirement to wear/display Reading Borough Council Private Hire Badge

- 2.1. When driving a private hire vehicle, you must always wear one of your current private hire/school transport driver's badges issued to you over the top of any clothing so that it is clearly visible. The badge must be worn using a lanyard or a clip (fastened to the upper chest area). **Failure to do so – 3 penalty points.**
- 2.2. You must always display in the vehicle, in full view of passenger(s) at all times, the other private hire/school transport driver's badge issued to you. **Failure to do so – 3 penalty points.**

3. Requirement to display a private hire vehicle licence plate

- 3.1. You must not drive a licensed private hire vehicle without a private hire vehicle plate securely attached to the rear bumper or rear bodywork of the vehicle. **Failure to do so – 3 penalty points.**
- 3.2. You must not wilfully or negligently cause or suffer the licence plate or identification card allocated to your private hire vehicle, to be concealed from public view or to be so defaced such that it is illegible. **To do so – 3 penalty points.**
- 3.3. You must not remove a private hire vehicle licence plate from a private hire vehicle whilst the vehicle remains licensed. **To do so – 3 penalty points.**

4. Requirement to produce private hire driver's licence

- 4.1. You must produce your private hire/school transport vehicle driver's licence at the request of an authorised officer of Reading Borough Council and/or a Police officer, either forthwith, or, in the case of an Authorised Officer, at the Civic Offices, Reading and in the case of a Police Constable, the Police Station of your choice within the Borough of Reading within five days of the request. **Failure to do so – 3 penalty points.**

5. Medical fitness

- 5.1. You must undergo a medical examination as prescribed by the Council, confirming your fitness to drive a licensed private hire vehicle as and when required by the Council. The frequencies at which medical examination must usually be undertaken are prior to obtaining your first licence, then at least every 5 years to age 60, then at least every 2 years to age 70 and at least once a year over the age of 70. **Failure to do so – suspension of licence until**

medical examination passed and 3 penalty points.

5.2. You must not drive a private hire vehicle if you are suffering from any disease or disability which would cause the vehicle being driven by you to be a danger to the public. **To do so – suspension/revocation of licence until medical examination passed and 3 penalty points.**

5.3. You must ensure that you can, ALWAYS, meet the eyesight requirements specified by the Department of Transport driving test. **Failure to do so – suspension/revocation of licence until eyesight requirements met and 3 penalty points.**

6. Provision of information to the Council

6.1. You must not, when providing information to the Council on applying for a private hire vehicle driver's licence knowingly or recklessly make a false statement and/or knowingly omit any material information. **To do so – 6 penalty points.**

6.2. You must provide any relevant document or information requested within the specified timescale. **Failure to do so – 3 penalty points.**

6.3. Drivers must sign up to the DBS update service and maintain their annual payments. **Failure to do so - 6 penalty points.**

6.4. If a driver is given notice to take an enhanced DBS check/DVLA check they must provide all information or documentation within 14 days in order to carry out the check. **Failure to do so – 6 penalty points.**

7. Waiting on a hackney carriage stand

7.1. You must not cause or permit a vehicle to wait or stop on a hackney carriage stand without reasonable excuse. **To do so - 6 penalty points.**

8. Prolonging journeys

8.1. You must not without reasonable cause, unnecessarily prolong in distance or time, the journey for which the vehicle was hired. **To do so – 3 penalty points.**

9. Obstruction of authorised officers

9.1. You must not wilfully obstruct an authorised officer of the Council or a police constable acting under the Act, or without reasonable excuse fail to comply with any requirement made to you by such a person, or without reasonable cause, fail to give any such person any other assistance or information he may reasonably require in the performance of his duties under the above Act. **To do so – 6 penalty points.**

10. Copy of licence to be deposited with Operator

10.1. You must deposit the copy of your licence marked "operator copy" with your private hire vehicle operator, who shall retain such licence during the period of your employment with him and shall return it to you when you cease to be employed by or with that operator. **Failure to do so – 3 penalty points.**

11. Requirement to use a licensed vehicle and work for a licensed operator

11.1. When working as a private hire/school transport driver, you must not use an unlicensed

vehicle, this includes any vehicle where the private hire vehicle licence has been suspended for any reason. **To do so – 12 penalty points.**

- 11.2. When licensed as a driver of private hire vehicles by the Council you must only use a private hire vehicle licensed by Reading Borough Council, unless you are appropriately licensed to use a vehicle licensed by another authority. **Failure to do so – 12 penalty points.**
- 11.3. When licensed as a driver of private hire vehicles by the Council you must only work for a private hire vehicle operator who is also licensed by Reading Borough Council, unless you are appropriately licensed to work for an operator licensed by another authority. **Failure to do so – 12 penalty points.**
- 11.4. You must not take bookings from any person other than the licensed private hire vehicle operator for whom you are working. **To do otherwise – 3 penalty points.**
- 11.5. You must not take bookings personally direct from customers. **To do – 3 penalty points.**
- 11.6. If you change the operator that you work for you must notify the Council within 7 days in writing of your new operator. **Failure to do so – 3 penalty points.**

12. Requirement to report loss of licence/badge

- 12.1. You must report the loss of your licence and/or badge(s) to the Council as soon as such a loss becomes known. **Failure to do so – 3 penalty points.**

13. Conduct of driver

- 13.1. You must always conduct yourself in an orderly and professional manner and be civil towards your passengers, council officers, other road users and police officers. **Failure to do so – 3 penalty points.**
- 13.2. You must always present a clean and tidy appearance and wear appropriate clothing and footwear. **Failure to do so – 3 penalty points.**
- 13.3. You must comply with every reasonable requirement of your passengers. **Failure to do so – 3 penalty points.**
- 13.4. You must not eat in your vehicle whilst you have a passenger or passengers on board. **Failure to do so – 3 penalty points.**
- 13.5. You must not smoke, vape or use any kind of electronic cigarette in a private hire vehicle at any time. **To do so – 3 penalty points.**
- 13.6. You must not behave in a sexually offensive manner towards passengers. **To do so – 12 penalty points.**
- 13.7. Without prejudice to the generality of condition 13.6, you are not permitted to have sexual intercourse with passengers whilst on duty or in a licensed vehicle. **To do so – 36 penalty points resulting in licence revocation.**
- 13.8. Without prejudice to the generality of condition 13.6, you are not permitted to have sexual contact, including intimate kissing, touching of private parts, or similar activity, with passengers whilst on duty or in a licensed vehicle. **To do so – 12 penalty points.**
- 13.9. Without prejudice to the generality of condition 13.6, you must not engage in any discussion

or dialogue, including by telephone contact, social media, email or any other form of communication, of a sexual nature or about a sexual relationship with a passenger (be it a past, present or future relationship). **To do so – 12 penalty points.**

14. Carriage of luggage

- 14.1. You must convey a reasonable quantity of luggage. **Failure to do so - 3 penalty points.**
- 14.2. You must give reasonable assistance in removing luggage to or from the entrance of any building, station or place when picking up or setting down a passenger. **Failure to do so – 3 penalty points.**

15. Carriage of guide/assistance dogs and disabled passengers

- 15.1. You must not refuse to carry a guide dog, or assistance dog accompanying a passenger unless you have a proven medical condition that would preclude such action. **Failure to do so – 12 penalty points.**
- 15.2. You must not charge a fee for carrying a guide dog or assistance dog. **To do so – 6 penalty points.**
- 15.3. You must inform your operator in writing, of any medical condition that precludes you from carrying a guide dog or assistance dog. **Failure to do so - 3 penalty points.**
- 15.4. You must advise the Council in writing of any medical condition which would preclude you from carrying a guide dog or assistance dog. **Failure to do so - 3 penalty points.**
- 15.5. You must not charge a higher price for any journey, for a person with a disability than would otherwise be charged for a person without such a disability for the same journey. **Failure to do so – 6 penalty points.**
- 15.6. You must provide reasonable assistance to any passengers with a disability, or those with reduced mobility, including providing reasonable assistance to safely load/unload wheelchairs or mobility aids. Unless you have a medical exemption certificate that allows you not to assist on medical grounds. **Failure to do so – 6 penalty points.**

16. Provision of receipts

- 16.1. You must, if requested by your hirer/passenger, give a receipt of the operator for whom you work, in respect of the fare paid. The receipt must state the operating company, fare paid, date, time and driver badge number. **Failure to do so – 3 penalty points.**

17. Lost Property

- 17.1. You must search your vehicle at the end of each hiring or as soon as possible afterwards for any property which may have been left there. Any property accidentally left in your vehicle, if not claimed by the owner, must be taken to the Lost Property Office at Reading Police Station within 24 hours. **Failure to do so – 3 penalty points.**
- 17.2. Where within the first 24 hours, the property owner contacts you or your operator and the operator informs you that he/she has been contacted, an agreement should be reached in respect of the return of the property. This may be by the property being lodged at Reading Police Station, the owner/loser collecting the property from you or your operating base, the property being delivered to the owner/loser as soon as possible or by the property being returned by post/courier or similar. If agreement cannot be reached in respect of the return

of the property then the property must be taken without delay to the Lost Property Office at Reading Police Station. **Failure to do so – 3 penalty points.**

- 17.3. Where the owner/loser of the property collects the property from you or your operator base, no charge may be made for the return of that property. **Failure to do so – 3 penalty points.**
- 17.4. Where an agreement has been reached that the property will be returned either by posting, by courier, or by similar means no charge over and above the postage cost, courier cost or similar may be made for the return of the property. **To do so – 3 penalty points.**
- 17.5. Where the property is returned to the owner/loser by private hire vehicle, the normal charge for the journey may be made, but the charge must be agreed to by the owner/loser in advance of the journey being made. **Failure to do so – 3 penalty points.**

18. Suitability of vehicles

- 18.1. You must not drive a private hire vehicle if the vehicle does not comply with the Road Vehicles (Construction and Use) Regulations 1986 as amended. **To do so – 3 penalty points for each breach found.**
- 18.2. You must, before commencing work each day, ensure that the vehicle is maintained in a clean, comfortable, safe, watertight and mechanically sound condition and is in all other respects suitable for the purpose for which it is intended. **Failure to do so – 3 penalty points for each breach found.**
- 18.3. You must ensure that any private hire vehicle you drive complies with the Council's requirements in relation to tinted windows at all times. (See vehicle specifications). **Failure to do so – 3 penalty points.**
- 18.4. You must not make any changes to the specification, design or appearance of a vehicle without prior approval from a Licensing Enforcement Officer. **To do so – 3 penalty points for each breach found.**

19. Requirement to notify Council of change of address, contacts details or a conviction

- 19.1. You must notify the Council Licensing Section within 7 days in writing of any change of address, contact number and email address. **Failure to do so – 3 penalty points.**
- 19.2. You must notify the Council in writing of all new convictions and cautions within 48 hours from the date of formal notification. **Failure to do so - 6 penalty points.**

This includes, but is not limited to, warnings, reprimands, anti-social behaviour orders, community protection notices, criminal behaviour orders, community service orders, restraining orders, fixed penalties (including traffic offences), driver education courses and any disqualifications from driving.

- 19.3. You must notify the council within 48 hours of any arrest and release, charge, caution or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, this includes fixed penalties (FPN). **Failure to do so – 6 penalty points.**

20. Insurance

- 20.1. You must not drive a private hire vehicle if you are not insured to do so. **To do so – 12 penalty points.**

- 20.2. You must provide the Licensing Section of the Council with the original, valid certificate of insurance in respect of third-party risks which must cover your vehicle for private hire purposes. **Failure to do so – 3 penalty points.**

21. Leaving the address shown on your licence for more than 28 days

- 21.1. You must notify the Council in advance, in writing, if you are to be away from the address shown on your licence for a period of more than 28 days. **Failure to do so – 3 penalty points.**
- 21.2. If you are to be away from your home address for a period of more than 28 days and someone else is to use your private hire vehicle whilst you are away you must provide the name, address and home telephone number of that person to the Council prior to going away. **Failure to do so – 3 penalty points.**

22. Road traffic accidents and other incidents

- 22.1. Following a road traffic accident or any other incident involving a private hire vehicle driven by you where there is a likelihood of any dispute over damage or injury, you must give full details of yourself, the owner of the vehicle and the insurance for the vehicle to any person reasonably requesting the information within seven days of such a request being made. **Failure to do so – 3 penalty points.**
- 22.2. If you are not the owner of the private hire vehicle that is involved in a road traffic accident or any other incident while being driven by you, you must notify the owner of the vehicle as soon as is reasonably practicable, and in any case within 72 hours of the incident. **Failure to do so – 3 penalty points.**
- 22.3. If a private hire vehicle driven by you is involved in an accident which causes damage which materially affects the safety, performance or appearance of the vehicle or comfort or convenience of the passengers you must report the damage to the Council as soon as reasonably practicable or in any case within 72 hours of the accident. **Failure to do so – 3 penalty points.**

23. Theft or loss of licence plate

- 23.1. You must report the loss or theft of any private hire vehicle licence plate, private hire vehicle licence or internal vehicle licence plate, to the Police and the Council, as soon as the loss becomes known and in the event of ceasing to use the vehicle for private hire purposes shall return the external and internal licence plates, to the council within seven days. **Failure to do so – 3 penalty points.**

24. Action whilst not engaged in carriage of customers

- 24.1. At any time when not engaged in the carriage of passengers or goods, you must proceed without delay to either the nearest lawful parking area e.g. lawful car park, a road or street without any parking restriction or your operator base, provided sufficient legal parking exists. **Failure to do so – 3 penalty points.**
- 24.2. Drivers shall switch off the vehicle engine if waiting for more than one minute when picking up or dropping off passengers or whilst waiting. **Failure to do so – 3 penalty points.**

25. Plying for hire

- 25.1. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to

stand or ply for hire or otherwise be used so as to suggest that it is a hackney carriage vehicle. **To do so - 12 penalty points if contravention during a test purchase operation by Reading Borough Council and a prosecution has not been undertaken, all other cases - 6 penalty points.**

- 25.2. You must not, by calling out or otherwise, invite any person to hire such vehicle and shall not make use of the services of any other person for such purpose. **To do so – 12 penalty points.**

26. Bus stops and lanes

- 26.1. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to stand or become stationary for any reason at any bus stop or in any bus lay-by. **To do so – 3 penalty points.**
- 26.2. At any time when driving a private hire vehicle, you must not permit the vehicle to be driven in any bus lane, except for bus lanes that specifically permit use by private hire vehicles. **To do so – 3 penalty points**

27. Disabled bays

- 27.1. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to stand or become stationary for any reason in a disabled bay without displaying the appropriate badge or other lawful authority. **To do so - 3 penalty points.**

28. Dangerous parking/stopping

- 28.1. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to be parked, or stop, in such a position to cause an unnecessary obstruction or be in a dangerous position (e.g. double parked, parked/stopped at or close to a road junction, zigzags, any 'keep clear' markings or in the middle of the road, etc). **To do so - 3 penalty points.**
- 28.2. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to be driven on or become stationary on a footway. **To do so - 3 penalty points.**

29. Parking on yellow lines/contravening traffic laws

- 29.1. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to be stationary on double yellow lines, or 'Red Routes' other than to pick up or drop off passengers. **To do so - 3 penalty points.**
- 29.2. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to be stationary on a single yellow line, in contravention of the notices displayed, other than to drop off or pick up passengers. **To do so - 3 penalty points.**
- 29.3. At any time when driving a private hire vehicle, you must not contravene any traffic laws, regulations, orders or guidance outlined in the current highway code. **To do so - 3 penalty points.**
- 29.4. At any time when driving a private hire vehicle, you must not drive in a manner that causes your passengers discomfort, alarm or distress. **To do so – 3 penalty points**

30. Sounding of horn

- 30.1. You must not sound the horn of the vehicle you are driving, whilst it is stationary, to signify the vehicle is waiting for passengers. **To do so - 3 penalty points.**

31. Number of passengers carried

- 31.1. In the event of a parent or guardian of a child asking you to carry a child in your vehicle when a suitable child restraint is not available, you may carry the child provided the following arrangements are adhered to;
- (a) if the child is under 3 years old the child must travel unrestrained (not held in the standard adult seat belt of your car) in the rear of your vehicle; or
 - (b) if the child is 3 years or older the child must use the adult seat belt in the rear of your vehicle. **Failure to do so – 6 penalty points**
- 31.2. You must not carry more persons than specified on the vehicle licence plate. One child under the age of 3, carried in accordance with condition 32.1(a) above does not count towards the total number of persons permitted to be carried. **To do so - 3 penalty points.**
- 31.3. You must not carry more persons than the number of seats with seat belts fitted. One child under the age of 3, carried in accordance with condition 32.1(a) above does not count towards this total. **To do so – 3 penalty points.**
- 31.4. You must not carry any other person in your vehicle without the permission of the hirer. **To do so - 3 penalty points.**

32. Giving or lending of vehicle or licence to others

- 32.1. You must not lend or give your licence to any other person, other than the copy of your licence that you are required by these conditions to give to your operator. **To do so - 6 penalty points.**
- 32.2. You must not permit any other person who is not a Reading Borough Council licensed private hire vehicle driver to drive your licensed private hire vehicle. **To do so - 6 penalty points.**

33. Playing of radio or similar

- 33.1. You must not play a radio or any other sound producing device to the annoyance or discomfort of your passengers. **To do so - 3 penalty points.**

34. Use of a mobile phone, communications/navigation or similar device

- 34.1. You must not use a mobile phone, communications/navigation device or similar when driving if it is not connected to a 'handsfree' system (Bluetooth earpieces or an inbuilt car system). **To do so - 12 penalty points. (When witnessed by a Licensing Officer, not for motoring convictions that are dealt with under the Convictions Policy).**

Devices include, but are not limited to, mobile telephones, tablets, a two-way radio, satellite navigation device or personal digital assistant.

'Use' of the device includes, but is not limited to, making a call (voice or video), texting, watching videos, making videos, searching on the device or interacting with it in any way which may cause your attention to become distracted.

35. Signs

- 35.1. You must always display on your vehicle side identification panels in accordance with the Council's approved specification. **Failure to do so – 3 penalty points.**
- 35.2. Where from time-to-time changes are necessary to the private hire vehicle side identification panels due to a change of vehicle registration, operator or plate number the amendment must be carried out by a professional sign writer and must be the same printed material, colour and design as the remainder of the printing on the panel. **Failure to do so – 3 penalty points.**
- 35.3. You must not permit any private hire vehicle you are driving to display any signs or advertisements of any nature on the exterior of the vehicle apart from the licence plate for the vehicle, Council approved side identification panels or advertisements approved in accordance with the Council's private hire vehicle and operator licence conditions. **To do so – 3 penalty points.**

36. Home to School transport contract journeys

When a driver is fulfilling/undertaking a 'Home-to-School Transport Contract' journey the following conditions shall apply, notwithstanding that they may conflict with the conditions stated above.

- 36.1. You must ensure that each passenger is always wearing a seat belt during the journey and ensure wheelchairs are loaded in the correct position and securely fixed using the floor restraint system and manufacturers' straps designed for the vehicle. **Failure to do so – 6 penalty points.**
- 36.2. When undertaking a home-to-school transport contract, you must not carry any person in your vehicle other than the passengers (including escorts) that you are required to carry pursuant to the contract. **To do so - 3 penalty points.**
- 36.3. You must display on a private hire vehicle being used for home-to-school contracts, the school transport sign, to a type and standard normally applicable to PCV operators, prescribed in the Road Vehicles Lighting Regulations 1989 and amended in Statutory Instrument 1519 The Vehicles Lighting (Amendment) Regulation 1994, in such position as required by the Council, but only while the vehicle is actively involved in transporting pupils and at no other time. **Failure to do so – 3 penalty points.**
- 36.4. You must display on your vehicle when being used for any home-to-school transport contract, any signs as specified in the contract, such as the school number and contract route number. **Failure to do so – 4 penalty points.**
- 36.5. You must comply with all the terms stipulated within any home-to-school contract held or journeys undertaken. **Failure to do so – 3 penalty points.**

37. Drivers of Executive Private Hire Vehicles

When a driver is using a Private Hire Vehicle that has been licensed as an Executive Private Hire Vehicle the following conditions shall apply, notwithstanding that they may conflict with the conditions stated above.

- 37.1. You must ALWAYS display the private hire vehicle licence identification disc issued by the Council within the nearside of the front windscreen. **Failure to do so – 3 penalty points.**
- 37.2. You must ALWAYS carry within the vehicle the 'Exemption Notification' issued by the council in respect of the licensed private hire vehicle and driver, which you must present for inspection at the request of an Authorised Officer of the Council, a Police Constable or the

hirer. **Failure to do so – 3 penalty points.**

- 37.3. The private hire vehicle licence identification plate issued by the Council, shall not be affixed to the vehicle and shall not be displayed in, on or from the vehicle at any time, except as provided in condition 37.5 (ii). **To do so – 3 penalty points.**
- 37.4. The vehicle shall not be fitted with side identification panels at any time. **To do so – 3 penalty points.**
- 37.5. You must ensure that the private hire vehicle licence identification plate issued by the Council, shall be:
- (i) Carried within the boot of vehicle at all times;
 - (ii) Fixed in the boot in a way it can be easily inspected and not cause damage to any luggage carried;
 - (iii) Produced for inspection, upon the request of:
 - an authorised officer of the council;
 - a police officer (including traffic wardens);
 - the hirer.
- Failure to do so – 3 penalty points.**
- 37.6. You shall always convey within the vehicle, but are not obliged to wear, your private hire driver's identification badge issued by the Council. **To fail to do so – 3 penalty points.**
- 37.7. The driver of an executive private hire vehicle shall be appropriately dressed in a smart business or morning suit when the vehicle is hired. **To fail to do so – 3 penalty points.**
- 37.8. You must not carry more passengers than specified within the vehicle licence, unless it is a stretched limousine, which is specifically designed or adapted and licensed to carry a maximum of eight passengers. **To do so – 3 penalty points.**
- 37.9. You must not settle accounts and/or tender direct payment by any method, including, credit card, debit card, cheque, cash, online or via any Apps from passengers. Payment may only be made to the operator's office either before or after the journey. **To do so – 3 penalty points.**

Appendix I - Hackney Carriage & Private Hire Criminal Convictions Policy

The Council approved the Hackney Carriage and Private Hire Convictions Policy on 07 November 2023 which provides guidance on determining suitability of new applicants and existing licence holders where the applicant or licence holder has been convicted of a criminal offence.

Information for applicants and existing licence holders

1. This policy is intended to provide guidance on determining suitability of new applicants and existing licence holders where the applicant or licence holder has been convicted of a criminal or driving offence.
2. The policy lists the types of offences that may give concern to the Licensing Authority. For the more serious offences the expectation is that an application will be refused, or an existing licence holder will have their licence revoked. For other offences the policy gives the time scales that it is expected will have elapsed since the conviction before an application will be granted.
3. The Council operates a Scheme of Delegation from the Assistant Director for Planning, Transport & Public Protection to Licensing Officers. The scheme gives delegated authority to officers to make decisions on behalf of the Assistant Director regarding the grant, renewal, suspension and revocation of hackney carriage and private hire licences.
4. The Policy states that each case will be treated on its own merits. Where an applicant or Licence Holder has an offence listed in this policy it will not necessarily mean an automatic barring or revocation. However, the applicant or licence holder can expect that their application or licence will be considered by the appropriate officer delegated by the Assistant Director for Planning, Transport & Public Protection, or a Licensing Sub-Committee, who will take account of this policy. The obligation will be on the applicant or licence holder to put forward reasons and/or evidence in support of their case.
5. If an application is refused or a licence is revoked the applicant or licence holder will have the right to appeal to the Magistrate's Court. The appeal to the Magistrate's Court should be made within 21 days of the applicant or licence holder being notified by the Licensing Authority of the decision to refuse or revoke.
6. Where a licence holder is convicted of an offence where the Licensing Authority believes that the safety of the public may be at immediate risk, the licence may be suspended/revoked with immediate effect. The licence holder will have the right to appeal to the Magistrate's Court against a suspension/revocation issued with immediate effect, however they may not use the licence until any decision is made by the Court.
7. The bar has been raised. Existing licence holders that have been granted licences prior to this policy coming into effect may have convictions on their record that fall within the timescales within this policy. The Licensing Authority will have made decisions on those licences based on policies in place at the time where the timescales may have been less, or those offences not included. It is not reasonable that those licences should be automatically revoked. The Licensing Authority will review all existing licences in light of this policy and where the Licensing Authority has concerns about a particular licence holder and/or there are further offences, breaches or complaint, the licence holder may be reviewed by the appropriate officer delegated by the Assistant Director for Planning, Transport & Public Protection or a Licensing Sub-Committee who will take into account all matters including any previous offences that may now fall within this current policy. In particular, serious account

will be taken of any history of safeguarding matters. Where appropriate, existing licence holders may be requested to apply for a new enhanced DBS certificate in order that the Council can review historic offences in line with this policy.

OVERVIEW

8. The function of licensing is the protection of the public. A member of the public stepping into a motor vehicle driven by a stranger must have confidence that the driver is safe and suitable.
9. Taxi legislation provides that any person must satisfy the authority that they are a fit and proper person to hold a licence. If a licence holder falls short of the fit and proper standard at any time, the licence should be revoked or not renewed on application to do so.
10. These guidelines apply to all new applications for a taxi or private hire driver licence and all licensed taxi and private hire drivers.
11. In addition, where relevant, they will also be applied to taxi and private hire vehicle licence applicants and licence holders, and private hire operator licence applicants and licence holders. Where such applicants and licence holders are not applying for, or already hold a taxi or private hire/school transport driver's licence, they will be required to provide a basic criminal conviction check on application and then at regular intervals. The Licensing Authority will take account of any current criminal convictions showing on the basic criminal conviction check, or criminal conviction received, in accordance with this policy.
12. Taxi legislation specifically identifies offences involving dishonesty, indecency or violence as a concern when assessing whether an individual is 'fit and proper' to hold a taxi or private hire vehicle licence.
13. This policy is based on the Statutory Taxi and Private Hire Vehicle Standards issued by the Department of Transport in July 2020, Annex - Assessment of Previous Convictions.
<https://www.gov.uk/government/publications/statutory-taxi-and-private-hire-vehicle-standards>;
and the Taxi and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022
<https://www.legislation.gov.uk/ukpga/2022/14/enacted>
14. The Licensing Authority will consider each case on its own merits; applicants and licensees are entitled to a fair and impartial consideration of their application.
15. In each case appropriate weight should be given to the evidence provided. This will include assessing the risk of re-offending and harm.
16. The Licensing Authority will be looking at the entirety of the individual when making the decision whether an applicant or licence holder is a safe and suitable person. Other factors that the Licensing Authority will take into account when making a decision include but are not exhaustively:
 - Relevance and date of the offence;
 - Sentence imposed by the court;
 - Age of person and circumstances when the offence was committed; and
 - Subsequent periods of good behaviour.

Their overall conviction history

- Any history of complaints made to the Licensing Authority against an existing licence holder. Unproven complaints may in some circumstances be taken into account if it is

considered that there is a strong likelihood that the complaints are justified and the nature and/or number of complaints raise concern regarding the suitability of the applicant.

- Whether the applicant has intentionally misled the Licensing Authority or has lied as part of the application process.
- Information provided by other agencies or other services at the Licensing Authority. This may include information disclosed by the Police or Safeguarding Services.
- Any other matters that are relevant.

17. Convictions for attempt or conspiracy offences will be regarded as a conviction for the substantive crime (ref: Taxi and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022 Sections 1(1), 1(2),1(3)
<https://www.legislation.gov.uk/ukpga/2022/14/enacted#section-1-1>).
18. A caution is regarded in the same way as a conviction.
19. Fixed penalties and community resolutions will also be considered in the same way as a conviction.
20. Hackney carriage and private hire/school transport drivers are exempt from the provisions of the Rehabilitation of Offenders Act 1974. This means that there are no “spent” convictions and that any and all criminal convictions (apart from “protected convictions” and “protected cautions”) can be considered by the local authority in assessing safety and suitability, but only relevant spent convictions should be considered.
21. Where a period is given below, it should be taken to be a minimum in considering whether a licence should be granted or renewed in most cases. This places passenger safety as the priority while enabling past offenders to sufficiently evidence that they have been successfully rehabilitated so that they might obtain or retain a licence.
22. It is important to recognise that matters which have not resulted in a criminal conviction, whether that is the result of an acquittal, a conviction being quashed, where a decision not to prosecute has been made or an investigation which is continuing where the individual has been bailed, can and will be considered by the licensing authority. In addition, complaints where there was no police involvement will also be considered.
23. Within this document, any reference to “conviction” will also include matters that amount to criminal behaviour, but which have not resulted in a conviction.
24. In the case of any new applicant who has been charged with any offence and is awaiting trial, the determination will be deferred until the trial has been completed or the charges withdrawn. Where an existing licensee is charged, it will be for the licensing authority to decide what action to take in the light of these guidelines.
25. Any offences committed, or unacceptable behaviour reported whilst driving a hackney carriage or private hire vehicle, concerning the use of a hackney carriage or private hire vehicle, or in connection with an operator of a private hire vehicle will be viewed as aggravating features, and the fact that any other offences were not connected with the hackney carriage and private hire trades will not be seen as mitigating factors.
26. In addition to the nature of the offence or other behaviour, the quantity of matters and the

period over which they were committed will also be considered. Patterns of repeated unacceptable or criminal behaviour are likely to cause greater concern than isolated occurrences as such patterns can demonstrate a propensity for such behaviour or offending.

27. It is also important to recognise that once a licence has been granted, there is a continuing requirement on the part of the licensee to maintain their safety and suitability. The licensing authority has powers to take action against the holder of all types of licence (drivers, vehicles, and operators) and it must be understood that any convictions or other actions on the part of the licensee which would have prevented them being granted a licence on initial application will lead to that licence being revoked. There is a further ongoing duty to notify the licensing authority of arrest and/or prosecution within the timescales set out in the adopted statutory standards.
28. Any dishonesty by any applicant or other person on the applicant's behalf which is discovered to have occurred in any part of any application process (e.g., failure to declare convictions, false names or addresses, falsified references) will result in a licence being refused, or if already granted, revoked, and may result in prosecution.
29. Where an applicant/licensee is convicted of an offence which is not detailed in this guidance, the licensing authority will take that conviction into account and use these guidelines as an indication of the approach that should be taken.
30. These guidelines do not replace the duty of the licensing authority to refuse to grant a licence where they are not satisfied that the applicant or licence holder is a fit and proper person.
31. Where a situation is not covered by these guidelines, the authority must consider the matter from first principles and determine the fitness and propriety of the individual.

OFFENCES

Barred lists

32. A licence will not be granted to a person who is on any barred list. Any licence holder found to be on any barred list will have their licence revoked.

Crimes resulting in death

33. Where an applicant or licensee has been convicted of a crime which resulted in the death of another person or was intended to cause the death or serious injury (where there was an intention or strong likelihood of death) of another person they will not be licensed. A licence holder who is convicted of the above will have their licence revoked.

Exploitation

34. Where an applicant or licensee has been convicted of a crime involving, related to, or has any connection with abuse, exploitation, use or treatment of another individual irrespective of whether the victim or victims were adults or children, they will not be licensed.

This includes (this is not an exhaustive list)

- (a) Slavery,
- (b) Child sexual abuse,
- (c) Exploitation,
- (d) Grooming,
- (e) Psychological,
- (f) Emotional,

- (g) Financial abuse,
- (h) Domestic abuse,
- (i) Harassment and stalking.

Offences involving violence against the person

- 35. Licensed drivers have close regular contact with the public who could be at risk from violent behaviour. Drivers are often entrusted with the care of children, young persons and vulnerable adults. The Licensing Authority seeks to protect the safety of the public and minimise risk.
- 36. Where an applicant has a conviction for an offence of violence against the person, or connected with any offence of violence, a licence will not be granted until at least TEN YEARS have elapsed since the completion of any sentence imposed. A licence holder convicted of the above will have their licence revoked.

Examples of Violent offences include (this is not an exhaustive list)

- (a) Arson,
- (b) Malicious wounding or grievous bodily harm,
- (c) Actual bodily harm,
- (d) Grievous bodily harm with intent,
- (e) Robbery,
- (f) Riot,
- (g) Assault Police,
- (h) Any racially aggravated assault,
- (i) Violent disorder,
- (j) Resisting arrest,
- (k) Common assault/battery,
- (l) Affray,
- (m) Obstruction.

Possession of a weapon

- 37. Where an applicant has a conviction for possession of a weapon or any other weapons-related offence, a licence will not be granted until at least SEVEN YEARS have elapsed since the completion of any sentence imposed. A licence holder convicted of the above will have their licence revoked.

Sexual offences

- 38. As licensed drivers often carry unaccompanied and vulnerable passengers, the Licensing Authority will take a strong line in relation to applicants or existing licence holders with convictions for sexual offences. All sexual and indecency offences should be considered as serious.
- 39. Where an applicant has a conviction for any offence involving or connected with illegal sexual activity, a licence will not be granted. A licence holder convicted of the above will have their licence revoked.
- 40. In addition to the above, the licensing authority will not grant a licence to any applicant who is currently on the Sex Offenders Register or on any barred list. A licence holder who goes on any of the above will have their licence revoked.
- 41. Sexual/Indecency Offences include (this is not an exhaustive list)
 - (a) Rape,

- (b) Assault by penetration,
- (c) Offences involving children or vulnerable adults,
- (d) Trafficking, sexual abuse against children and / or vulnerable adults and preparatory offences (as defined within the Sexual Offences Act 2003),
- (e) Making or distributing obscene material,
- (f) Possession of indecent photographs depicting child pornography,
- (g) Sexual assault,
- (h) Indecent assault,
- (i) Exploitation of prostitution,
- (j) Soliciting (kerb crawling),
- (k) Making obscene / indecent telephone calls,
- (l) Indecent exposure,
- (m) Any similar offences (including attempted or conspiracy to commit) offences.

42. Any licence holder charged with, convicted, or issued with a formal caution for any of the offences mentioned above should expect to have their licence revoked with immediate effect.

Dishonesty

43. Drivers of hackney carriage and private hire vehicles are expected to be persons of trust. It is comparatively easy for a dishonest driver to defraud the public by demanding more than the legal fare and in other ways. In certain situations, drivers will know that a property is empty whilst the occupants are away on holiday for a set period of time after taking them to the airport or railway station. For these reasons convictions of dishonesty are treated very seriously.
44. Where an applicant has a conviction for any offence where dishonesty is an element of the offence, a licence will not be granted until at least SEVEN YEARS have elapsed since the completion of any sentence imposed. A licence holder convicted of any of the above will have their licence revoked.
45. Dishonesty offences include (this is not an exhaustive list):
- (a) Theft,
 - (b) Burglary,
 - (c) Fraud,
 - (d) Benefit fraud,
 - (e) Handling or receiving stolen goods,
 - (f) Forgery,
 - (g) Conspiracy to defraud,
 - (h) Obtaining money or property by deception,
 - (i) Other deception,
 - (j) Any similar offence.

Drugs

46. Where an applicant has any conviction for, or related to, the supply of drugs, or possession with intent to supply or connected with possession with intent to supply, a licence will not be granted until at least TEN YEARS have elapsed since the completion of any sentence imposed.
47. Where an applicant has a conviction for possession of drugs, or related to the possession of drugs, a licence will not be granted until at least FIVE YEARS have elapsed since the completion of any sentence imposed. In these circumstances, any applicant may also have to undergo drugs testing for a period at their own expense to demonstrate that they are not using controlled drugs. A licence holder convicted of the above will have their licence

revoked.

Discrimination

48. Where an applicant has a conviction involving or connected with discrimination in any form, a licence will not be granted until at least SEVEN YEARS have elapsed since the completion of any sentence imposed. A licence holder convicted of the above will have their licence revoked.
49. Examples of Discrimination offences include (this is not exhaustive list):
- (a) Racially aggravated common assault,
 - (b) Any racially aggravated offence against a person or property,
 - (c) Any offences (including attempted or conspiracy to commit offences) that are similar to those above,
 - (d) Offences under The Equality Act 2010,
 - (e) Any offence considered to be a hate crime. (A hate crime is any criminal offence which is perceived by the victim, or anybody else, to be motivated by hostility or prejudice towards someone's: race, religion, sexual orientation, transgender identity or disability).

Motoring convictions

50. Hackney carriage and private hire/school transport drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviour of a safe road user and one that is suitable to drive professionally.
51. For the purposes of this policy a minor traffic offence is one where the DVLA has imposed no more than 3 penalty points on the applicant's DVLA driving licence for the offence. A major conviction is one where the DVLA has imposed more than 3 penalty points on the applicant's DVLA driving licence for the offence. There is more information about endorsement codes and penalty points on the Government's website: <https://www.gov.uk/penalty-points-endorsements/endorsement-codes-and-penalty-points>.
52. For the purposes of this policy, a 'valid' traffic offence is the same definition as used by the DVLA. Points that stay on a DVLA licence for 4 years are 'valid' for 3 years. Points that stay on a DVLA driving licence for 11 years are 'valid' for 10 years. There is more information on the Government's website: <https://www.gov.uk/penalty-points-endorsements/how-long-endorsements-stay-on-your-driving-licence>.
53. Where an applicant has more than one minor traffic offence a licence would be refused whilst the relevant points remain 'valid' on their driving licence.
54. Where an applicant has a major conviction, the application will be refused whilst the relevant points remain 'valid' on their driving licence.
55. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the Licensing Authority considers that the licensee remains a fit and proper person to retain a licence.

Where there is a second occurrence of a minor traffic offence, whilst the first minor traffic offence is valid, or a single occurrence of a major traffic offence of up to 6 points, a licence holder can agree to complete an extended driving assessment, at their own expense, through an approved provider, as an alternative to a review/revocation of their licence by an appropriate officer delegated by the Assistant Director for Planning, Transport & Public Protection or a Licensing Sub-Committee.

56. Where a licence holder has more than 6 valid penalty points for driving offences, their licence will be revoked.

Drink driving/driving under the influence of drugs

57. Where an applicant has a conviction for drink driving or driving under the influence of drugs, a licence will not be granted until at least SEVEN YEARS have elapsed since the completion of any sentence or driving ban imposed. In the case of driving under the influence of drugs, any applicant may also have to undergo drugs testing at their own expense to demonstrate that they are not using controlled drugs. A licence holder convicted of the above will have their licence revoked.

Using a hand-held device whilst driving

58. Where an applicant has a conviction for using a hand-held mobile telephone or a hand-held device whilst driving, a licence will not be granted until at least FIVE YEARS have elapsed since the conviction or completion of any sentence or driving ban imposed, whichever is the later. A licence holder convicted of the above will have their licence revoked.

‘Totting up’ offences

59. Any driver who has accumulated 12 or more points on their DVLA licence and has not been disqualified under the totting up procedure by a court as a result of making exceptional hardship arguments shall not be able to advance such arguments before the licensing authority as they are not a relevant consideration in determining what action the authority should take. Any such driver will not be licensed for a period of FIVE YEARS from the date of the accumulation of 12 or more points.
60. Any driver who has been disqualified as a result of “totting-up”, which erases the points when the licence is restored, will not be licensed for a period of FIVE YEARS from the date of the disqualification. Other disqualifications will need to be investigated, the reasons ascertained, and a decision will be based on the results of that investigation.

Hackney Carriage and Private Hire Offences

61. Where an applicant has a conviction for any offences under any relevant hackney carriage or private hire legislation, a licence will not be granted until at least FIVE YEARS have elapsed since the conviction. A licence holder convicted of the above will have their licence revoked.

Appendix J - Glossary of Terms

Term	Description
Authorised officer	An officer authorised by the council under the relevant legislation governing the licensing of hackney carriage and private hire vehicles, operators and drivers
MOT/Compliance testing centre	One of the designated test centres located within the borough boundary where vehicles may be MOT and compliance tested.
Compliance certificate	Test of mechanical fitness for a licensed vehicle and its compliance with the standards set out in this policy
Convictions and cautions	Applicants should note that any reference in this document to 'conviction' includes all convictions, warnings, reprimands, criminal behaviour orders, injunctions, cautions, community service orders, restraining orders and fixed penalties (including traffic offences), including those that are regarded as being spent under the 1974 Rehabilitation of Offenders Act (see Regulated Occupation below).
Council	Reading Borough Council in its capacity as licensing authority
DBS	Disclosure and Barring Service. Formerly Criminal Records Bureau (CRB)
DfT	The Department for Transport
DfT guidance	The Department for Transport - Hackney Carriage and Private Hire Vehicle Licensing: Best Practice Guidance, published in March 2010 and Private Hire Vehicle Licensing: Guidance Note, published in August 2011 Statutory Taxi & Private Hire Vehicle Standards July 2020 (updated 25 November 2022) Taxi & Private Hire Vehicles (Safeguarding & Road Safety) Act 2022
DfT guidance on stretched limousines	The Department for Transport Guidance for Operators of Stretched Limousines, published March 2013.
DVLA	Driver and Vehicle Licensing Agency
DVSA	Driver and Vehicle Standards Agency
EEA	European Economic Area
Licensing Applications Committee	The committee of Councillors at Reading Borough Council responsible for the Council's Licensing functions including hackney carriage and private hire licensing in the borough of Reading.
Group 2 Medical	The DVLA Group 2 standard of medical fitness for professional drivers.
Guidance on suitability etc.	The Institute of Licensing's 'Guidance on determining the suitability of applicants and licensees in the hackney and private hire trades' published in April 2018 (updated 28 October 2024).

Hackney carriage	A vehicle licensed to ply for hire throughout their respective area.
Hackney carriage driver	A person who is licensed to drive hackney carriage vehicles for hire and reward without a prior booking, can ply for hire from the roadside and designated ranks within the borough of Reading.
HGV	Heavy Goods Vehicle
Low emission vehicle (LEV)	One with CO2 emissions of 120 g/km or lower
Licensing Applications Sub-Committee	A Taxi Licensing Panel of Committee members dealing with hackney carriage and private hire/school transport licensing in the borough of Reading.
Passenger	A traveller in a vehicle other than the driver.
Private hire driver	A person who is licensed to drive private hire vehicles for hire and reward (pre-booked only) and must work for a private hire operator
Private hire vehicle	A motor vehicle constructed or adapted to seat fewer than 9 passengers, other than a hackney carriage or public service vehicle or a London cab or tramcar, which is provided for hire with the services of a driver for the purpose of carrying passengers
Private hire operator	A person who makes provision for the acceptance of private hire bookings to undertake themselves or pass to others to undertake. 'Operate' means in the course of business to make provision for the invitation or acceptance of bookings for a private hire vehicle
PSV	Passenger Service Vehicle
Regulated occupation	The principles of the Rehabilitation of Offenders Act 1974 do not apply to applicants for hackney carriage and private hire drivers' licences. This is because the driving of taxis is listed as a 'Regulated Occupation' in relation to which questions may be asked as to the suitability of individuals to be granted a licence. See also Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) Order 2002.
Private hire (School Transport) driver	A person who is licensed to drive private hire vehicles but is restricted to undertake 'home-to-school contract work only.
Taxi	This word has no meaning in law but is routinely used in government documents to describe hackney carriages and Private hire vehicles. To avoid confusion, the use is limited to instances where reference is made to other documents which have used it.
Ultra-low emission vehicle	An ultra-low emission vehicle is a vehicle that produces less than 75g/km of CO2.
Vehicle or licensed vehicle	Both a hackney carriage and private hire vehicle.

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Appendix 2

POLICY CONSULTATION REMARKS SUMMARY

Section 1 - Introduction

This section received 4 comments from respondents, relating to paragraph 1.2 'Healthy Environment' and 'Inclusive Economy'.

Healthy Environment – wanting to know if incentives will be given to the trade to reduce CO2 emissions like a reduction in fees or grants. The respondents said reducing CO2 emissions places a financial burden on the trade.

Inclusive Economy – how will the objective be met and what support will be provided to encourage drivers back to Reading when they can be licensed by other LA's with less stringent conditions. Has the Council done an impact assessment on new proposals that affect the trade?

Section 2 – Legislation & Best Practice Guidance:

There were 2 comments, one was 'none', the second asked why an impact assessment had not been done of the number of drivers that have been licensed by other LA's and what can be done to retain numbers.

Section 3 – Applications for Licenses

There were 4 comments on this section, all of which did not agree with the applications requiring to be made 6 weeks before expiry. A window of 1-2 weeks was suggested by one, another that automatic reminders should be implemented. There was general feedback in this section that communication relating to applications was an issue and that there needs to be a phone number available. One respondent said that not being allowed to work if the application is not processed before expiry should not be in the policy (relating to vehicles and operators)

Section 4 – Guidance on suitability to hold a licence

There were 39 comments in total within this section broken down as follows:

4.3 – reporting time for new convictions, cautions etc: 37 comments saying time frame for notification should be 72 hours, not 48 hours.

4.6 – Revocation with immediate effect – 2 comments about the processes this will follow, concerns unsubstantiated complaints will lead to this

Section 5 – Changes to details

No comments made on this section.

Section 6 – Enforcement

There were 4 comments made all about the complaints system. One that it should be less negative. Three comments were that this is not required in PHV's as the operator should be the first point of call for complainants.

Section 7 – Hackney carriage & private hire vehicles

There were 429 comments made on this section.

7.1 Applications – 6 weeks before expiry was not agreed with by many respondents.

7.2 Criminal record checks – update service should be utilised more and questions on how long would be required to have lived in another country before a certificate of good conduct would be required (section 7.2.2).

7.4 Specifications – large number of comments on category N and S vehicles. General feeling that N categories should be allowed as many hybrid/electric vehicles are simply written off due to cost of repairs. Also clarification wanted whether 7.4.5 relates to ALL vehicles or new to fleet.

7.7 Reporting to council – large number saying should be 72 hours not 48 hours for convictions and arrests (7.7.1 and 7.7.2). A couple of comments that change of address etc should be 14 days.

7.9 Emissions – 13 comments, majority asking if incentives will be given and fully electric by 2030 is unrealistic.

7.10 Testing – there were many comments on this section, mainly disagreeing that MOTs should be alternated between the 2 testing centres. comment recurring that recurring advisories and minor defects should not have to be fixed, some feedback was this should only relate to mechanical advisories.

7.12 Signage and advertising - 28 comments on this section. Most of which agree to remove roof signs for private hire. 18 comments requesting card payment stickers to be added (7.12.10) especially for PHV.

7.13 Plate exemption – 11 comments made, majority saying should not have to provide contract work and that modern apps/business credit cards mean corporate accounts are not as common.

7.14 Equipment – fire extinguishers and first aid kit, 4 comments should not be required to carry either due to health and safety.

7.16 CCTV – 25 comments, most asking if permission needed for dashcam.

7.18 Accidents – 2 comments saying timeframe is too short, 7 or 14 days suggested.

7.21 HCVs & accessibility - 28 comments, most saying larger wheelchairs cannot be accommodated and need to be loaded side facing

Section 8 – Hackney carriage and private hire drivers

There were 202 comments made for this section of the document.

General - 79 comments requesting that school transport driver's licences remain.

8.4 Medicals – 63 comments, majority agree they are required but should be allowed for them to be done by any medical doctor qualified to do Group 2 medicals, not just their own GP. Concerns raised that often GPs will not do them or appts are limited..

8.7 Practical driving assessment - 22 Comments on this, most suggest 5 years, some disagree completely.

8.8 English language – 26 comments, majority of feedback this should only be applied to new applicants.

8.9 Knowledge test – few comments that location tests are no longer needed as SatNav commonly used.

8.11 Safeguarding training – few comments saying not required. 1 comment saying it should be more specialised -

Section 9 – Private hire operators

This section had 22 comments; many were in relation to DBS checks and safeguarding training for office and dispatch staff.

There were several comments that planning permission for premises was not needed and that premises or being allowed to be completely cloud-based should be allowed

Hackney Carriage Vehicle Specifications

There were 27 comments made. Majority disagreeing with emissions policy and suggestion that fully electric should be up to 20 years old due to expense of buying them.

Private Hire Vehicle Specifications

There were 78 comments made on this section of the document.

There were 48 comments raised in relation to SEND children being transported in vehicles that have seats facing each other. All say that this is more often than not the best way to transport them due to their needs

The rest of the comments relate mainly to the age policy; most unhappy and feel older vehicles should be allowed to remain on the fleet as long as they still pass required tests. A few comments say the PHV age policy should be the same as for HCVs

Accessible vehicles – 6 comments, many saying that age limit for WAVs should be extended to 15 for smaller ones and 20 for larger ones

Some comments saying small MPV's should be allowed for up to 6 seats if the V5 says they have that many seats.

Several objections to Mercedes E Class no longer being accepted as Executive vehicles.

Private Hire Vehicle Legislation and Conditions

There were 9 comments on this section. Two were saying timescales for accident reporting and plate return should be 14 days.

There was 1 comment in relation to condition 14 – saying it should be 14 days not seven as this is what the 1974 act says.

One comment that door stickers not required and should only be operator logo and details.

One comment that written maintenance checks are not necessary and one that it is not the Council's business to check these.

One comment that school children will need to sit in the front if there are 3 and an escort.

Approval of advertising/livery on licensed vehicles

One comment on this section asking why PHV can't have advertising, double standard.

Private Hire Operator Licence Conditions

There were 20 comments on this section.

Condition 8 - 2 comments – apps and bookings systems are cloud-based so not relevant.

Condition 9 - 1 comment it is not required.

Condition 10 – 2 comments officers shouldn't have access to the system.

Condition 11 – 1 comment that 'totally responsible' is vague and overboard.

Condition 12 – 2 comments calls and bookings now cloud-based so not relevant.

Condition 13 – 2 comments that this contradicts condition 2 and one that their computer systems only allow records to be stored for 6 months.

Condition 15 – 3 comments that this is not necessary.

Condition 16 – 1 comment that charge should be applicable if excessive hair left behind.

Condition 17 – 2 comments – not necessary for operators as not drivers, should only be offences that affect 'fit and proper'. One that it should be criminal offence only, 14 days for motoring and only if they reach 6 points.

Condition 18 – 1 comment 14 days

Condition 20 – 1 comment saying '14 days or as soon as is practicable'.

Condition 22 – 1 comment office staff should be exempt.

Hackney Carriage Driver's Bylaws, Conditions and Penalty Points Scheme

There were 1,198 comments on this section. The majority were in relation to the number of points allocated to each section and that they should be reduced.

Many comments asking what if don't receive the letter or are way for 3 months.

Sections 4, 5 & 6 - There were a number of comments that time between accumulation of points should be reduced from 4 years to 2.

Section 8 – many comments this new system should mean a clean slate.

Condition 6.3 – many comments that it takes longer than 14 days for a DBS check to be done.

Condition 12.2 – should be changed to not eating, should be allowed to drink.

Private Hire Driver's Conditions & Penalty Points Scheme

There were 92 comments made on this section. Many comments were about increasing the points for breaches and should be reduced.

Condition 13.3 – many comments should be allowed to drink.

Condition 26 – 34 comments that restricting stopping in bus lanes is an issue.

Condition 37.9 – 4 comments on card payments for executive work as many done using corporate credit cards and not contracts.

Hackney Carriage & Private Hire Criminal Convictions Policy

There were 20 comments on this section, no suggestions for any changes or objections to the contents.

General comments and feedback

There were 18 comments that were not about any specific part of the document. These included:

- Funding/incentives for cleaner/greener vehicles.
- Engage with the trade to promote services.
- Increase in the number of hackney ranks especially Craven Road and Friar Street.
- Issues with drivers leaving to work for other authorities.
- Collaborative approach with trade.
- Removal of school transport driver as separate licence category.

PUBLIC CONSULTATION COMMENTS

Section 1 - Introduction

Date posted	Comment	Bubble location number	Page
10/19/2025 - 5:46pm	What incentives are the Council giving the trade to reduce CO2 emissions, will there be reduction in licensing fees and grants from the local authority to buy green vehicles or just it just statements which will have a financial burden on our trade.	23	5
10/25/2025 - 11:40am	What incentives are the council giving the trade to reduce CO2 emmissions , will there be reduction in licensing fees and grants from the local authority to buy green vehicles or just it just statements which will have a financial burden on our trade.	24	5
09/02/2025 - 4:42pm	If this is the case why are RBC so hellbent on alienating the Reading PH drivers by making new inane rules and regulations that no out of town cars are having to follow	28	5
10/19/2025 - 4:11pm	How will these objectives be met and what support will you be offering the industry and business to retain potential drivers or bring back Reading resident drivers to come back to be licensed in Reading. When they can work legally with other Boroughs with less stringent byelaws. Have officers made an impact assessment on these new proposals on revenue loss to both Reading Taxi business and RBC?	29	5

Section 2 - Legislation & Best Practice guidance

Date posted	Comment	Bubble location number	Page
10/08/2025 - 5:37pm	None	15	2
10/19/2025 - 4:17pm	Yes local authorities to decide the conditions, so why have RBC not done an impact assessment on how many drivers form Reading are working with South Oxfordshire, Fareham, Portsmouth & Wolverhampton and how can they do things different to retain drivers and vehicle licensed.	31	6

Section 3 - Applications for licences

Date posted	Comment	Bubble location number	Page
10/27/2025 - 10:48am	I am writing to express concern regarding the current delays and lack of responsiveness in the application process. At present, it appears that applications are taking an unusually long time to be processed, often leaving applicants waiting for weeks without updates or guidance. In addition, there seems to be very limited customer support available to help new applicants navigate their queries or understand the next steps. This can be particularly challenging when the matter requires urgent attention or clarification. I kindly request that the Council reviews its current application procedures and communication systems to help ensure a more efficient and responsive process. Having a dedicated support line or contact person for new applicants, along with clearer timelines and updates, would greatly improve the experience and reduce frustration. Thank you for your attention to this matter. I appreciate the important work the Council does, and I hope these points can be taken into consideration to improve the service for everyone.	32	7
10/27/2025 - 10:54am	I would like to take this opportunity to share some suggestions that could help strengthen the relationship between the Council and the licensed driver community. Firstly, it would be highly beneficial if the Council could introduce an automatic reminder system to notify drivers when their licences are due for renewal or about to expire. This small but meaningful step would help prevent unnecessary lapses, reduce administrative delays, and support compliance among drivers and operators. Secondly, I believe the Council should view and treat its relationship with Private Hire Drivers, Operators, and Hackney Carriage Drivers as a partnership rather than a purely regulatory one. By fostering a more collaborative and transparent approach, we can work together towards shared goals—improving service	33	7

	quality, safety, and efficiency for both drivers and the public. Ultimately, the aim should be to create a seamless and supportive system where communication is open, processes are clear, and everyone feels valued as part of the same community serving the people of Reading. Thank you for considering these suggestions. I hope they can contribute to a more positive and productive working relationship between the Council and the driving community.		
10/24/2025 - 11:01am	I strongly object to the proposed requirement for licence renewal applications to be submitted a "minimum of 6 weeks before expiry." This requirement appears designed to manage council inefficiency rather than serve public safety, effectively transferring administrative costs to licensees. This is thrown into sharp relief by the fact that the Council demands licensees respond to its own communications, such as reporting convictions, within a punitive 48-hour window, while granting itself a 6-week (or 42-day) buffer. This double standard is unacceptable. This new condition is unreasonable, unjustified, and will impose a significant and unnecessary burden for the following reasons: The consultation document provides no evidence or rationale for this drastic increase in processing time. Historically, renewals were processed efficiently within one week with valid documentation. With modern digital verification systems (MOT, insurance etc.), processing should be faster, not slower. What has changed in the Council's internal processes to justify a 500% increase in the required lead time? The Council must publish the data, workflow analysis, or business case that demonstrates this necessity. The policy explicitly states that "priority will not be given to applications... even if this means the licence will expire." This punitive stance shows complete disregard for livelihoods and will force vehicles off the road due to administrative delays, not safety concerns, causing direct financial loss to drivers and operators. This rule creates an unnecessary cliff-edge that punishes licensees for the Council's own processing timelines. Using a "first come, first served" system does not justify a 6-week window. An efficient administration should process renewals based on actual work required, not arbitrary buffers for its own inefficiency. This policy must be withdrawn. Any new timeframe must be evidence-based and proportionate. A reasonable 1–2-week timeframe should be adopted unless irrefutable evidence justifies 6 weeks. The punitive language regarding prioritisation must be removed. The Council has a duty to process applications efficiently, and its failure to do so should not result in the loss of a licensee's	34	7

	livelihood. This proposed change creates significant operational and financial hardship without any demonstrable benefit to public safety.		
10/19/2025 - 4:25pm	We strongly object this proposal that a vehicle and or an Operator cannot work to due new license not being issued, as this could be delay caused by DBS taking time and the 6 weeks for vehicles is unfair. We propose that a vehicle should get an MOT and compliance done within 14 days before expiry and one application is submitted council to allow the vehicle to be still operation. Also if the operator has submitted an application before 14 days of expiry then to be allowed to continue their Operations.	35	7

Section 4 - Guidance on suitability to hold a licence

Date posted	Comment	Bubble location number	Page
10/06/2025 - 5:35pm	8 4.3 Reporting Procedures 72 hours not 48 hours	10	1
10/27/2025 - 11:00pm	8 4.3 Reporting Procedures 72 hours not 48 hours	12	1
10/02/2025 - 4:27pm	On behalf of Capital Cars Reading , we are writing to raise concerns regarding several private hire licensing policies. We fully support the Council's commitment to safety and high standards; however, we believe certain requirements are overly restrictive, impractical, or disproportionate. We request that the Council review and amend the following policies: 1. Reporting Timeframe for Convictions and Other Matters (Clause 4.3) While we understand the importance of timely reporting, the current 48-hour timeframe is too restrictive in practice. Circumstances such as weekends, bank holidays, or staff leave can prevent timely submission. We propose that the reporting period be extended to 14 days from the date of formal notification. This allows licence holders to comply fully while maintaining accountability.	17	3
10/09/2025 - 10:57am	8 4.3 Reporting Procedures 72 hours not 48 hours	37	8

10/19/2025 - 4:42pm	i think 72hrs is enough time to report	39	8
10/27/2025 - 9:38am	I believe this should be 72 hours	38	8
10/19/2025 - 4:42pm	i think 72hrs is enough time to report	39	8
10/12/2025 - 9:50pm	72 hours not 48 hours	40	8
10/27/2025 - 1:20pm	This should be 72 hours instead of 48 hours	41	8
10/23/2025 - 3:05pm	72 hours not 48 hours	42	8
10/06/2025 - 10:18pm	72 hours, not 48 hours	44	8
10/26/2025 - 10:47am	it should be 72 hours not 48 hours.	45	8
10/19/2025 - 4:36pm	Report any criminal convictions yes, with the exception of driving offences to be reported when a driver reaches 6points on his DVLA license. We don't think its necessary to report driving offences of 3 points as it does not impact on a driver to continue to be licensed.	46	8
10/27/2025 - 10:59pm	7 days	47	8
10/26/2025 - 8:23pm	Should be 72 hours not 48 hours reporting	48	8
10/26/2025 - 8:27pm	72 hrs	49	8
10/25/2025 - 4:25pm	72 hours not 48 hours	50	8
10/26/2025 - 7:04pm	72 hours and not 48 hours	51	8
10/22/2025 - 2:39pm	72 hrs not 48 hrs	52	8

10/27/2025 - 10:57pm	72 hours	53	8
10/27/2025 - 11:11pm	It should be 72 hours not 48	54	8
10/11/2025 - 8:09pm	48 hours seems too short - 72 hours seems more reasonable	55	8
10/20/2025 - 2:50pm	This time frame is not enough, should be 72 hours	56	8
10/27/2025 - 5:33pm	72 hours only	57	8
10/20/2025 - 7:55pm	72 hours, not 48	58	8
10/26/2025 - 5:43pm	This should be 72 hours	59	8
10/19/2025 - 4:05pm	72 hours not 48 hours	60	8
10/27/2025 - 10:14pm	72 Hours not 48 Hours	61	8
10/24/2025 - 6:08pm	I disagree; it should be 72 hours instead of 48 hours.	62	8
10/26/2025 - 5:22pm	-it should be 72 hours	63	8
10/25/2025 - 9:34pm	72 hours not 48 hours	64	8
10/12/2025 - 8:55pm	I disagree, it should be 72 hours	65	8
10/21/2025 - 9:14pm	I disagree. I request this to be changed to 72 hours instead of 48 hours.	66	8
10/25/2025 - 4:53pm	It should be 72 hours	67	8
10/26/2025 - 12:56pm	72 hours not 48	68	8

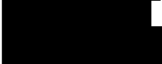
10/09/2025 - 12:25pm	8 4.3 Reporting Procedures 72 hours not 48 hours	69	8
10/27/2025 - 1:33pm	page 8 4.3 72 hours not 48hurs	71	8
10/24/2025 - 11:02am	4.6 I have grave concerns regarding the clause permitting revocation "with immediate effect" where information "raises grave doubts," and the subsequent offering of representations. As drafted, this process is unjust, procedurally unsafe, and risks violating the principles of natural justice. The clause states that a licence can be revoked first, and then the licence holder "will be given an opportunity to make representations." This is a fundamentally unfair process. Making representations after the devastating professional and financial blow of an immediate revocation is not a meaningful right. It places the entire burden on the licensee to overturn a decision already made, rather than allowing them to challenge the information before the penalty is applied. The term "grave doubts" is dangerously vague and subjective. What qualifies? An anonymous tip? An unsubstantiated allegation on social media? This low threshold, combined with the power of immediate revocation, gives the Council an excessively wide and discretionary power that could be misused or applied inconsistently.: The clause does not specify that this power should only be used in cases of immediate and serious risk to public safety. Without this crucial qualifier, it could be used for issues that are serious but do not justify bypassing the normal, fair process of a suspension pending a full hearing.	72	8
10/27/2025 - 11:08am	4.6 The Council should exercise due diligence and conduct thorough investigations into any information received about a driver or operator before taking enforcement action, such as revoking a licence. Decisions should be based on verified evidence rather than unsubstantiated claims. It is important to recognise that information received may at times be false, misleading, or motivated by personal grievances or bias. A fair and transparent investigative process will help protect individuals from unjust treatment and maintain trust between the Council and the trade.	73	8

Section 6: Enforcement

Date posted	Comment	Bubble location number	Page
10/24/2025 - 11:03am	6.6. While I support ensuring passengers can make complaints, the current approach of mandating complaint cards in vehicles is inefficient and misses a crucial opportunity to create a more effective, streamlined system. Filling the vehicle with information cards that passengers rarely read is a passive and ineffective solution. A more proactive, logical, and efficient model already exists within the proposed policy itself. Unlike Hackney Carriages, all private hire journeys are pre-booked through an operator, who is the first point of contact for any complaint. The operator investigates and attempts to resolve the issue directly with the passenger, as per the proper complaint's procedure demanded in Condition 15 on Page 50. If the passenger remains unsatisfied, or the complaint is serious (e.g., involves safety or safeguarding), the operator directs them to the licensing authority. This ensures only unresolved or serious complaints are escalated to the Council.	82	9
10/12/2025 - 9:55pm	Why are we referencing something negative to be only option, it should be feedback or review rather than a word "complaint "	83	9
10/19/2025 - 4:41pm	This should not include Private Hire vehicles as they work under an Operator who should be the first port of call to deal with complaints	84	9

09/17/2025 - 10:57am	PHVs are primarily family cars. A large A4 or similar-sized placard can obstruct windows, create blind spots, look unsightly, and get in the way of passengers. Drivers take pride in keeping their cars clean and professional. A large, bulky notice can make the interior look cluttered and temporary. It can flap around, get damaged, and be generally annoying for the driver, A small, professionally produced sticker meets these requirements perfectly Places he corner of the bottomwindscreen on the passenger's side	85	9

Section 7 - Hackney Carriage and Private Hire Vehicles

Date posted	Comment	Bubble location number	Page
10/21/2025 - 10:34am	Dear I would to comments in few things which does effect over trade and delay the process of working as a taxi driver which is 1) Mot,,, we should be allowed doing MOT in any test center which is allowed from the Reading Borough Council at any time because its over convenient and reliability of the driver that what time and what date he wants and the most important thing is when you have to book a re-test then we have to wait for week the most to book a retest so then can you tell me that shell I tell my mortgage company that they don't have time and prolong my payments for one week. There is no resean to make things for difficult for the driver which the driver want to give best service at Reading Borough. 2) The category Cab ,,,, this should be allowed for us as previously also was allowed and we do care about over cab because this is over bread and butter but there are lots of driver which are not confident in driving and anything can happen so because of that we should be allowed to put back catogary cab because buying this cab is expensive and its not that it's available always in the market and we won't be able to afford that so please should give us freedom of this because this is again over leaving and we cant be on risk.  Hackney Carriage Driver  Hackney Carriage Driver We both have a same advice to the consultation.	1	1

10/06/2025 - 5:35pm	10 7.1.5 Application 6 weeks advance Q When should the mot be done in advance? Test 3 weeks in advance? 10 7.2.2 Certificate of good conduct Q how long out of UK for one to be required 11 7.4.5 Category S & N not permitted I do not agree with this, as both Category N & S can be given a marker due to age of vehicle Q Once licensed does same rule apply 12 7.7.1 Reporting to council 48 hours This should be within 72 hours 12 7.7.2 Reporting to council 48 hours This should be within 72 hours 13 7.10.3 Alternating mot tests every 6 months This was for a trial period, to allow testing centres to improve, this should not be made permanent. We suggest more testing station. We should have a choice of where we want to take our vehicle 13 7.10.4 Mot Advisory, 2nd mot should not have same advisory This should be only on mechanical advisories	10	1

	14 7.12.2 Private hire no roof sign Agree as private hire use their roof signs to attract customers to them. 15 7.12.10 Stickers permitted in vehicles Add card payments stickers? 16 7.16.3 CCTV Q Do we need permission to install dash cams? 17 7.21.7 Wheelchair transporting Due to changes in size of wheelchairs, we can't always transport them front and back facing, at times it has to be side facing		
10/27/2025 - 11:00pm	10 7.1.5 Application 6 weeks advance Q When should the mot be done in advance? Test 3 weeks in advance? 10 7.2.2 Certificate of good conduct Q how long out of UK for one to be required 11 7.4.5 Category S & N not permitted I do not agree with this, as both Category N & S can be given a marker due to age of vehicle Q Once licensed does same rule apply 12 7.7.1 Reporting to council 48 hours This should be within 72 hours 12 7.7.2 Reporting to council 48 hours This should be within 72 hours 13 7.10.3 Alternating mot tests every 6 months This was for a trial period, to allow testing centres to improve, this should not be made permanent. We suggest more testing station. We should have a choice of where we want to take our vehicle 13 7.10.4 Mot Advisory, 2nd mot should not have same advisory This should be only on mechanical advisories 14 7.12.2 Private hire no roof sign Agree as private hire use their roof signs to attract customers to them. 15 7.12.10 Stickers permitted in vehicles Add card payments stickers?	12	1

	PAGE SECTION RBC PROPOSAL GUIDE RESPONSE 16 7.16.3 CCTV Q Do we need permission to install dash cams? 17 7.21.7 Wheelchair transporting Due to changes in size of wheelchairs, we can't always transport them front and back facing, at times it has to be side facing		
10/02/2025 - 4:27pm	On behalf of Capital Cars Reading , we are writing to raise concerns regarding several private hire licensing policies. We fully support the Council's commitment to safety and high standards; however, we believe certain requirements are overly restrictive, impractical, or disproportionate. We request that the Council review and amend the following policies: 2. MOT and Compliance Test Centres (Clause 7.10.3) We strongly disagree with the requirement to alternate MOT and compliance test centres. Drivers should have the freedom to choose any authorised centre, based on convenience, trust, and location. Mandating alternation causes unnecessary disruption and provides no clear benefit. If fairness is a concern, the appropriate solution is to authorise more test centres, rather than restricting choice. We request that the Council allow drivers to select the MOT/compliance centre that works best for them.	17	3
10/24/2025 - 11:01am	I strongly object to the proposed requirement for licence renewal applications to be submitted a "minimum of 6 weeks before expiry." This requirement appears designed to manage council inefficiency rather than serve public safety, effectively transferring administrative costs to licensees. This is thrown into sharp relief by the fact that the Council demands licensees respond to its own communications, such as reporting convictions, within a punitive 48-hour window, while granting itself a 6-week (or 42-day) buffer. This double standard is unacceptable. This new condition is unreasonable, unjustified, and will impose a significant and unnecessary burden for the following reasons: The consultation document provides no evidence or rationale for this drastic increase in processing time. Historically, renewals were processed efficiently within one week with valid documentation. With modern digital verification systems (MOT, insurance etc.), processing should be faster, not slower. What has changed in the Council's internal processes to justify a 500% increase in the required lead time? The Council must publish the data, workflow analysis, or business case that demonstrates this necessity. The policy explicitly states that "priority will not be given to applications... even if this means the licence will expire." This punitive stance shows complete disregard for livelihoods and	34	7

	will force vehicles off the road due to administrative delays, not safety concerns, causing direct financial loss to drivers and operators. This rule creates an unnecessary cliff-edge that punishes licensees for the Council's own processing timelines. Using a "first come, first served" system does not justify a 6-week window. An efficient administration should process renewals based on actual work required, not arbitrary buffers for its own inefficiency. This policy must be withdrawn. Any new timeframe must be evidence-based and proportionate. A reasonable 1–2-week timeframe should be adopted unless irrefutable evidence justifies 6 weeks. The punitive language regarding prioritisation must be removed. The Council has a duty to process applications efficiently, and its failure to do so should not result in the loss of a licensee's livelihood. This proposed change creates significant operational and financial hardship without any demonstrable benefit to public safety.		
10/19/2025 - 4:25pm	We strongly object this proposal that a vehicle and or an Operator cannot work to due new license not being issued, as this could be delay caused by DBS taking time and the 6 weeks for vehicles is unfair. We propose that a vehicle should get an MOT and compliance done within 14 days before expiry and one application is submitted council to allow the vehicle to be still operation. Also if the operator has submitted an application before 14 days of expiry then to be allowed to continue their Operations.	35	7
10/27/2025 - 1:37pm	page 10 7.1.5 when should the mot be done in advance ? test 3 weeks in advance	70	8
10/27/2025 - 1:51pm	page 12 7.7.1 this should within 72 hours	74	8
10/27/2025 - 1:57pm	page 13 7.10.4 this should be only on mechanical advisories	75	8
10/27/2025 - 1:54pm	page 13 7.10.3 we suggest mor MOT testing station .we should have a choice of where we want take our vehicle	76	8
10/27/2025 - 1:49pm	page 11 7.4.5 i do note agree with this, as both category N & S can can given a marker due to age of vehicle	77	8

10/27/2025 - 2:00pm	page 14 7.12.2 agree as private hire use their roof signs to attract customer to them	78	8
10/27/2025 - 1:40pm	page 10 7.2.2 how long out of uk one to be required	79	8
10/27/2025 - 1:42pm	page 12 7.7.2 this should 72hours	80	9
10/25/2025 - 9:44pm	This should be only on mechanical advisories.	364	13
10/25/2025 - 1:55pm	not required as these vehicles should be allowed to do ordinary work as well. Companies use roof sign and door stickers clearly state company name and has advance bookings only and the stickers more or less the same it's important to retain so a passenger know they are getting into right vehicle. Provided the advisory are mechanical and are defect makes the vehicle insecure and un-road worthy we should be given a choice which MOT garage to use into more remote garage since it's taking longer to book remote test and driver than end up losing financially due to vehicles being taken off to the road. there should not be a need to prove contract work to be licensed as an executive vehicle since a lot of work these days are coming in daily and payment is made via visa but shares card rather than being invoice monthly. Companies use roof sign and door stickers clearly state company name and has advance bookings only and the stickers more or less the same it's important to retain so a passenger know they are getting into right vehicle. it should be our choice my company is based next door to an mt center i want to use the mt center at my convenience this should should not be dedicated by reading borough council. what incentives is the council giving to buy electric and hybrid vehicles how about a reduction in fees or grants maybe reading borough council can share the 26 million grants from the DFT national government.	87	10
10/25/2025 - 4:29pm	When should the MOT be done in advance? Test 3 weeks in advance?	89	10
10/21/2025 - 9:17pm	In accordance with this, how long in advance should the MOT be done?	90	10
10/24/2025 - 6:08pm	How far in advance should the MOT be done?	91	10
10/26/2025 - 5:45pm	When should the mot be done in advance? Test 3 weeks in advance	92	10

10/26/2025 - 5:23pm	so how long before we can do the mot?and long before the test should be done?	93	10
10/27/2025 - 5:42pm	Test 3 weeks	94	10
10/12/2025 - 9:59pm	When or how many weeks in advance do we need to get our vehicle for a mot test?	95	10
10/23/2025 - 3:07pm	when should the MOT be done in advance? test 3 weeks in advance?	96	10
09/17/2025 - 11:10am	6-week minimum processing time for a renewal when all information and documents can be submitted online does seem excessive, inefficient, and frustrating.	97	10
10/22/2025 - 2:42pm	When should the MOT be done in advance? Test 3 weeks in advance?	98	10
10/27/2025 - 11:12pm	When should the mot be done in advance? Test 3 weeks in advance?	99	10
10/26/2025 - 7:05pm	Test 3 weeks in advance.	100	10
10/11/2025 - 8:11pm	How far in advance should the MOT be done? Should the test be for e.g. 3 weeks in advance	101	10
10/19/2025 - 4:46pm	if the application is 6 weeks in advance then can we have the vehicle MOT'd 4 weeks before expiry?	102	10
10/26/2025 - 11:46pm	72 hours	103	10
10/27/2025 - 12:09am	When should the vehicle MOT be done in advance? MOT test three weeks in advance?	104	10
10/12/2025 - 10:00pm	2-3 weeks in advance before license expires	105	10
10/19/2025 - 6:02pm	6 weeks in advance for a vehicle license is unfair, when it only 7 working days from application. Anything longer means the loses days of having to do an MOT 6 weeks in advance. Previously RBC used to renew within vehicle licenses within 3 working days. We are paying higher fees to RBC and getting lousy service from licensing.	106	10

10/27/2025 - 10:16pm	When should the MOT be done in advance?	107	10
10/27/2025 - 10:17pm	test 3 weeks in advance?	107	10
10/27/2025 - 1:25pm	Test 3 weeks in advance?	108	10
10/26/2025 - 8:28pm	6 weeks	109	10
10/27/2025 - 1:22pm	When should the mot be done in advance?	110	10
10/26/2025 - 12:57pm	Should be 3 weeks in advance not 6	111	10
10/20/2025 - 2:56pm	How early can we do an mot, I suggest 3 weeks in advance	112	10
10/20/2025 - 7:57pm	How far should the MOT be done in advance? Test 3 weeks in advance?	113	10
10/09/2025 - 12:26pm	10 7.1.5 Application 6 weeks advance Q When should the mot be done in advance? Test 2/3 weeks in advance?	114	10
10/22/2025 - 1:37pm	72 hours not 48 hours	115	10
10/26/2025 - 10:50am	should the mot be done 3 weeks in advance? when should it be done?	116	10
10/12/2025 - 8:57pm	I agree	117	10
10/19/2025 - 4:06pm	When should the MOT be done in advance? Test 3 weeks in advance?	118	10
10/25/2025 - 9:36pm	Test three weeks in advance	119	10
10/26/2025 - 8:25pm	How soon can an MOT take place? 3 weeks before expiry then according to this?	120	10

10/09/2025 - 11:01am	10 7.1.5 Application 6 weeks advance Q How long before should the MOT be done in advance? Test 2/3 weeks in advance?	121	10
10/09/2025 - 11:08am	10 7.2.2 Certificate of good conduct Q how long out of the country for one to be required	122	10
10/27/2025 - 11:18am	The Council should enhance its understanding and utilisation of the DBS Update Service. When an applicant is already registered with the Update Service, the Council should carry out the appropriate due diligence by checking the information available through that system rather than requiring a new DBS application. This approach would not only ensure compliance and efficiency but also reduce unnecessary costs and delays for applicants while maintaining robust safeguarding standards.	123	10
10/26/2025 - 5:46pm	How long out of UK for for one to required - I do not agree with this, as both category N and S can be given a marker due to age of vehicle	124	10
10/26/2025 - 5:48pm	ignore the second sentence, only look at first question	124	10
10/25/2025 - 4:59pm	For how long straight out of UK can be stayed?	125	10
10/19/2025 - 4:49pm	not sure how this would be endorsed.	126	10
10/26/2025 - 8:29pm	How long????	127	10
10/23/2025 - 3:08pm	How long out of the UK for one to be required?	128	10
10/26/2025 - 7:06pm	How long out of UK for one to be required?	129	10
10/27/2025 - 12:20am	How long it will be for someone out of UK so he need good character certificate	130	10
10/27/2025 - 1:26pm	How long out of UK for one required?	131	10
10/27/2025 - 11:04pm	How much time spent out of the uk should a letter of good conduct be required ?	132	10

10/09/2025 - 12:26pm	10 7.2.2 Certificate of good conduct Q how long should you be out of UK for one to be required	133	10
10/22/2025 - 2:44pm	How long out of the UK for one to be required?	134	10
10/27/2025 - 11:01pm	how long out of the uk before one if required	135	10
10/20/2025 - 2:58pm	How long do you have to be out of UK for one to be required?	136	10
10/27/2025 - 5:48pm	How long not been in UK this is also condition.	137	10
10/27/2025 - 10:18pm	how long out of UK for one to be required?	138	10
10/26/2025 - 5:24pm	how long we can stay out of the UK before we can take good conduct certificate?	139	10
10/11/2025 - 8:13pm	How long out of the UK for one to be required?	140	10
10/25/2025 - 4:31pm	How long out of UK for one to be required?	141	10
10/27/2025 - 8:38am	This is extreme. No professional job or jobs involving the public require this nor does TFL. This should be if certain number of years having left the country. Some have also for other reasons and have not returned to that country, so are unable to produce such report.	142	10
10/26/2025 - 10:51am	if the DBS check is required, how long for one to be out of the UK (how many months) for this to be checked?	143	11
10/19/2025 - 4:06pm	How long out of the UK for one to be required?	144	11
10/26/2025 - 7:02pm	A reason should be provided as to why the council is requesting a random dbs check. The person being requested should have the right to know why he/she is being requested.	145	11
10/09/2025 - 12:28pm	11 7.4.5 Category S & N not permitted I do not agree with this, as both Category N & S can be given a marker due to age of vehicle also what	146	11

	about if the vehicle is fixed by the insurance company and according to manufacturers standard Q Once licensed does same rule apply		
10/26/2025 - 1:00pm	I do not agree with this, as both category N & S can be given a marker due to age of vehicle	147	11
10/09/2025 - 11:07am	11 7.4.5 Category S & N not permitted I don't agree with this, as both Category N & S can be given a marker due to the age of vehicle also if the vehicle is repaired by insurance company that is in accordance to manufacturer's should be allowed Q Once licensed does same rule apply	148	11
10/25/2025 - 6:31pm	CAT N&S should be allowed	149	11
10/24/2025 - 11:03am	I object to the inclusion of Category 'N' (non-structural damage) in the list of write-off categories that automatically disqualify a vehicle from being licensed. While the intentions behind banning Category 'A', 'B', and 'S' vehicles are understood and supported for clear safety reasons, the blanket ban on Category 'N' is unreasonable, disproportionate, and not evidence based. A Category 'N' write-off is assigned when a vehicle has sustained non-structural damage and is deemed uneconomical to repair by an insurer. This is primarily a financial calculation, not a judgement on the vehicle's safety, roadworthiness, or structural integrity post-repair. Common reasons for a 'Cat N' classification include high repair costs relative to the vehicle's pre-accident value, which is often the case for licensed vehicles as they are normally high-mileage. The council's own licensing process already provides a robust mechanism to ensure vehicle safety and quality. All licensed vehicles are required to undergo rigorous, independent twice-yearly MOT testing and additional council inspections. These inspections are specifically designed to assess a vehicle's roadworthiness, mechanical safety, and overall condition. A properly repaired Category 'N' vehicle can pass these exacting standards. If it does, the vehicle has demonstrably been returned to a safe and roadworthy condition. Therefore, a blanket ban is an unnecessary duplication that ignores the proven effectiveness of the existing inspection regime. This policy will unfairly penalise drivers and operators for purely financial decisions made by insurers. It removes safe, roadworthy vehicles from the trade, forcing licensees to bear the significant financial burden of purchasing a replacement vehicle unnecessarily. This is particularly impactful for drivers of high-mileage vehicles, where a minor incident can lead to a 'Cat N' classification despite the vehicle	150	11

	remaining perfectly safe after professional repair. The inclusion of Category 'N' should be removed from the policy. The focus should be on the vehicle's current, verifiable condition, not its past financial history. This would uphold the council's commitment to high-quality vehicles without imposing an arbitrary and unjustified ban that will cause significant financial hardship without a proven safety benefit.		
10/26/2025 - 5:49pm	Once licensed does same rule apply	151	11
10/26/2025 - 5:49pm	I do not agree with this, as both category N and S can be given a marker due to age of vehicle.	152	11
10/22/2025 - 2:46pm	I donot agree with this as both categories N & S can be given a marker due to age of vehicle. Q- Once licensed does the same rule apply?	153	11
10/23/2025 - 3:09pm	I dont agree with this as both category N and S can be given a marker due to age of vehicle. Q once licensed does the same rule apply?	154	11
10/26/2025 - 7:07pm	I don't agree with this as both Category N and S can be given a marker due to the age of the vehicle.	155	11
10/27/2025 - 11:07pm	I do not agree as vehicle will be repaired to meet council standards	156	11
10/26/2025 - 10:54am	does the same rule apply when you are licensed?	157	11
10/25/2025 - 9:40pm	I do not agree with this, as both category N and S can be given a marker due to age of the vehicle	158	11
10/27/2025 - 11:14pm	I don't agree with this, council already didn't support the people who brought the new electric vehicle, this should be allowed to bring cat S Or N most of the insurance companies don't have issue with it. That will help drivers to save some cost of buying cars who are changing in 2028	159	11
10/26/2025 - 1:31pm	don't agree with this as both category S AND N can be given a marker due to the age of the vehicle. there's no point me investing in a expensive vehicle if category s and n are to stand,	160	11
10/27/2025 - 5:51pm	Don't agree it's depends on age as well.	161	11
10/12/2025 - 10:03pm	I do not agree with this, as both Category N & S can be given a marker due to age of vehicle. I can agree if it's only new to fleet	162	11
10/19/2025 - 4:53pm	i would agree with A,B,C not to be permitted. N on the other hand is only cosmetic, therefore if the body work is good then i don't see why it would be an issue to license	163	11

10/26/2025 - 8:30pm	Do not agree If the vehicle has passed government standards. There is no reason for it to be allowed	164	11
10/27/2025 - 12:23am	I don't agree with that. Category S and N should be allowed. They can be given a marker due to age of vehicle.	165	11
10/27/2025 - 10:20pm	i do not agree with this, as both Category N & S can be given a marker due to age of vehicle	166	11
10/27/2025 - 1:29pm	I do not agree with this, as both Category N & S can be given marker due to age of vehicle.	167	11
10/20/2025 - 3:01pm	I do not agree with this, Cat A B and S is obviously understandable, but Category N is non structural damaged, this should be permitted, because panals are easily replaced, as long as the structure is ok.	168	11
10/27/2025 - 11:07pm	dont agree, as marker can be given due to age of car, also if car can pass mot and meet standards, there is no reason for car to be rejected	169	11
10/11/2025 - 8:15pm	Once licenced, does the same rule apply?	170	11
10/26/2025 - 7:07pm	Why? Categories A, B and S are understandable but why category N? If the vehicle passes its MOT check then the council should have no issues with the vehicle. If the law states it's legal (by passing the MOT) and safe to drive, then the council shouldn't be refusing because they are not above the law.	171	11
10/27/2025 - 10:20pm	once licensed does the same rule apply?	172	11
10/25/2025 - 4:33pm	I do not agree with this as both category N &S can be given a marker due to age of vehicle. Q . Once licenced does the same rule apply.	173	11
10/21/2025 - 9:24pm	I disagree because I am investing in a cab. If insurance brands my cab to be category N or S due to minor structural damage, such as a dent in the door, I will lose out on my investment. I think this is unfair and should be reconsidered.	174	11
10/11/2025 - 8:14pm	I disagree here - both Cat N and S can be given a marker simply due to the age of the vehicle.	175	11
10/26/2025 - 8:30pm	Do NOT agree with CAT S and N vehicles not being allowed, if these have been repaired to a high standard and passed by DVLA why won't RBC allow? Iso say a licensed vehicle has an CAT S and N marker on them after getting licensed, does that mean they have to change?	176	11

10/24/2025 - 6:13pm	I disagree. Categories 'S' and 'N' should be reconsidered. When investing in our vehicles, it would be a shame not to be reimbursed by insurance and also not be issued a licence. I think it is unfair and inconsiderate.	177	11
10/19/2025 - 6:14pm	Vehicles which have accidents and are considered as N & S should be licensed, since they maybe written off due to cost of repair in many cases. However these vehicles can be repaired at lower cost privately. In particular this rule should not apply to a vehicles which is already licensed.	178	11
10/26/2025 - 10:53am	category N and S can be given a marker due to the age of the vehicle so i do not agree.	179	11
10/26/2025 - 5:26pm	category N and S can be given as due to age of vehicle. how about if its already licensed.	180	11
10/12/2025 - 9:03pm	do not agree with categories N+S	181	11
10/19/2025 - 4:08pm	I do not agree with this as both Category N & S can be given a marker due to age of vehicle Q Once licensed does same rule apply?	182	12
10/09/2025 - 12:28pm	12 7.7.1 Reporting to council 48 hours This should be within 72 hours 12 7.7.2 Reporting to council 48 hours This should be within 72 hours	183	12
10/09/2025 - 11:10am	12 7.7.1 Reporting to council 48 hours This should be within 72 hours 12 7.7.2 Reporting to council 48 hours This should be within 72 hours	184	12
09/18/2025 - 11:44am	All insurance details are updated and visible on the MID	185	12
10/24/2025 - 11:04am	This policy is outdated, impractical, and fails to acknowledge the modern reality of digital administration and document management. Contradicts the Move to Digital Government: MOT status can be verified instantly online by an enforcement officer using the government's website. Insurance can be verified instantly using the Motor Insurance Database (MID).	186	12
09/17/2025 - 11:17am	Need updating and MOT are now available online for anyone to view	187	12

10/25/2025 - 2:00pm	this should be done only when vehicle is considered unroad worthy and within 14 DAYS. why are there no incentives electric and ybrid are not cheap for private hire either this clause should only concern criminal convictions. When there is a driving conviction of less than six points on a DVLA license there is no need to report this. Since a course who undertaken with no points being awarded thus the driver should not need to report this.	188	12
10/26/2025 - 1:33pm	i think it should be 72 hours,	190	12
10/27/2025 - 11:08pm	7 Days	191	12
10/12/2025 - 10:05pm	This should be 72 hrs	192	12
10/19/2025 - 4:55pm	72hrs is preferred	193	12
10/27/2025 - 10:21pm	this should be within 72 hrs	194	12
10/26/2025 - 1:01pm	This should be within 72 hours	195	12
10/19/2025 - 3:10pm	7.7..1 We disagree with the council's requirement for drivers to report any penalty points or convictions within 48 hours. This timeframe is unreasonable and impractical, as a driver may be out of the country, unwell, or otherwise unavailable within that short period. Enforcing such a strict deadline could unfairly penalise drivers who have no intention of withholding information. There is no legal requirement under the Local Government (Miscellaneous Provisions) Act 1976 or any related taxi licensing legislation that obliges drivers to report convictions within 48 hours. For more than 48 years, the existing system — which allows a reasonable period, commonly up to 28 days or disclosure at licence renewal — has worked effectively across the country without issue. If this framework has functioned successfully and fairly for decades, there is no justifiable reason to alter it now. We therefore request that the council maintain or return to the established and proven standard, ensuring fairness, proportionality, and consistency with long-standing national practice.	196	12

10/23/2025 - 3:10pm	This should be with 72 hours	197	12
10/27/2025 - 12:26am	This should be 72 hours	198	12
10/26/2025 - 8:30pm	72 hrs	199	12
10/22/2025 - 2:47pm	This should be within 72 Hours	200	12
10/27/2025 - 1:31pm	This should be within 72 hours	201	12
10/20/2025 - 3:02pm	This should be 72 hours atleast.	202	12
10/27/2025 - 11:07pm	should be 72 hours	203	12
10/27/2025 - 11:08pm	7 days*	203	12
10/27/2025 - 5:53pm	72 hours with in	204	12
10/26/2025 - 7:07pm	This should be within 72 hours.	205	12
10/27/2025 - 11:15pm	It's should be 72 hours 48 hours is very less.	206	12
10/19/2025 - 6:20pm	This clause should only concern criminal convictions, when there is a driving conviction of less then 6 points on a DVLA license there is no no need to report this. Since a course was undertaken with no points being awarded, thus the driver should not need to report this.	207	12
10/25/2025 - 6:37pm	It should be 72 hours a d eccl the driving course that should be left with traffic offences because it not be issued any p points, if driving course being offered, that should not be report to Council	208	12
10/11/2025 - 8:15pm	Again, 72 hours seems more reasonable	209	12
10/25/2025 - 4:37pm	It should be 72 hours	210	12

10/26/2025 - 5:50pm	Should be within 72 hours	211	12
10/26/2025 - 5:27pm	it should be in 72 hours	212	12
10/19/2025 - 4:09pm	This should be within 72 hours	213	12
10/25/2025 - 9:41pm	This should be within 72 hours	214	12
10/21/2025 - 9:25pm	I disagree; it should be 72 hours, not 48 hours.	215	12
10/26/2025 - 10:55am	this should be done within 72 hours not 48	216	12
10/26/2025 - 8:32pm	Should be 72 hours not 48	217	12
10/12/2025 - 9:05pm	I don't not agree as I think it should be at least 72 hours or more	218	12
10/24/2025 - 6:14pm	I disagree, it should be 72 hours instead of 48 hours.	219	12
10/25/2025 - 6:40pm	It should be reported in 72 hours, only if driver being charged, just reporting arrest it could be false rest	220	12
10/26/2025 - 5:50pm	Should be within 72 hours	221	12
10/21/2025 - 9:26pm	I disagree; it should be 72 hours instead of 48 hours.	222	12
10/24/2025 - 6:15pm	I disagree; it should be 72 hours instead of 48 hours.	223	12
10/26/2025 - 5:27pm	it should be in 72 hours	224	12
10/27/2025 - 11:09pm	7 days	225	12
10/22/2025 - 2:47pm	This should be within 72 hours	226	12

10/27/2025 - 11:09pm	7 days	227	12
10/26/2025 - 8:30pm	72 hrs	228	12
10/23/2025 - 3:10pm	This should be within 72 hours	229	12
10/26/2025 - 1:34pm	this should be 72 hours	230	12
10/12/2025 - 10:06pm	How am I supposed to deal with this if I'm under the custody?? Again it should be minimum 72 hours	231	12
10/27/2025 - 12:30am	This should be within 72 hours.	232	12
10/27/2025 - 1:32pm	This should be within 72 hours.	233	12
10/27/2025 - 11:16pm	It's should be 72 hours not 48	234	12
10/19/2025 - 4:56pm	72 hrs	235	12
10/20/2025 - 3:02pm	This should be atleast 72 hours	236	12
10/26/2025 - 7:07pm	This should be within 72 hours	237	12
10/27/2025 - 5:53pm	72 hours with in	238	12
10/26/2025 - 1:01pm	This should be within 72 hours	239	12
10/27/2025 - 10:22pm	should be within 72 hrs	240	12
10/25/2025 - 4:38pm	It should be 72 hours	241	12
10/26/2025 - 8:32pm	Should again be 72 hours not 48	242	12

10/26/2025 - 10:55am	this should be done within 72 hours not 48	243	12
10/19/2025 - 4:09pm	This should be within 72 hours	244	12
10/11/2025 - 8:16pm	Again, 72 hours seems more reasonable	245	12
10/25/2025 - 9:41pm	This should be within 72 hours	246	12
10/12/2025 - 9:06pm	I do not agree we should have more time ,at least 72 hours	247	12
10/12/2025 - 10:12pm	When we are trying to get information from any organisations including Councils they say 4 weeks deal with the queries but they require us to sort them out within a week, this is a bit Hippocratic. So this should be at least 2 weeks after original change of information submitted and received!!!	248	12
10/19/2025 - 6:22pm	According to 1976 act it should be 14 days so please correct this condition	249	12
10/19/2025 - 6:23pm	This should be done only when vehicle is considered un-road worthy and within 14 days.	250	12
10/19/2025 - 6:24pm	2030 is not realistic date and should be decided after review in 2028	251	12
10/19/2025 - 6:25pm		252	13
10/26/2025 - 7:12pm	This target is completely unrealistic. No vehicle on the planet is emission free. Currently, EV vehicles are bigger contributors to CO2 emissions than combustion engine vehicles and this also puts an unnecessary financial burden on vehicle owners because EV and Hybrid vehicles are greatly overpriced and very expensive to maintain.	253	13
10/27/2025 - 8:42am	Zero carbon by 2030 is too soon. Many taxis are now hybrid, and Reading does not have the facilities for all electric charging. This should be extended or changed for lower carbon emissions. Also, it is too expensive.	254	13
10/24/2025 - 11:05am	I object to the discriminatory policy outlined in clauses 7.9.3 and 7.9.4, which provide financial incentives for eco-friendly Hackney Carriage vehicles while explicitly offering no such incentives for Private Hire vehicles. The justification that incentives are unnecessary because electric vehicles "are readily available" is illogical, unfair, and fails to address the primary barrier to adoption.	255	13

	The Council is creating a two-tier system, actively supporting one part of the trade (Hackney Carriage) to meet environmental goals while neglecting the other (Private Hire). Both groups operate in the same area, contribute to the same emissions, and are subject to the same Council's environmental strategy. They should be supported equally. The core issue is not availability, but cost. Electric and hybrid vehicles remain significantly more expensive to purchase than their petrol or diesel equivalents, both new and used. This financial barrier is the same for a Private Hire driver as it is for a Hackney Carriage driver. To claim otherwise is to ignore the economic reality faced by licensees. By offering an incentive to Hackney Carriage drivers only, the Council is directly helping them overcome this financial barrier while leaving Private Hire drivers to bear the full cost alone. This unfairly disadvantages Private Hire operators and drivers. If the Council's genuine goal is to reduce emissions across the entire licensed vehicle fleet, then it must encourage all licensees to transition to cleaner vehicles. A policy that only targets one segment of the trade will inevitably result in a slower overall reduction in emissions from the Private Hire sector, undermining the Council's own environmental objectives. This discriminatory policy must be removed. The Council must apply a single, fair standard across the entire trade. To do otherwise is to admit that the Council's commitment to air quality is secondary to an unfair and arbitrary distinction between two types of licensed drivers.		
10/26/2025 - 7:15pm	Where is the evidence to support this claim? To produce one EV vehicle, the entire production and life cycle of a combustion engine is produced. Not to mention charging the EV vehicle. Electricity used to charge said vehicles is still largely generated by coal burning which produced emissions. Please get your facts right.	256	13
10/19/2025 - 6:40pm	What incentives is the council giving to buy electric and hybrid vehicles? How about a reduction in fees and or grants, maybe RBC can share the 26 million grant from the DFT National Government	257	13
10/26/2025 - 3:52pm	I firmly oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy regarding recurring advisories. The DVSA framework already ensures consistent national standards for vehicle safety and quality. Forcing drivers to switch testing centres introduces unnecessary costs, time delays, and administrative complexities. With the rising costs of fuel, insurance, and maintenance, this change will impose further	258	13

	burdens on drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many of these do not affect safety. I urge the Council to adopt a fair, risk-based approach that focuses on genuine safety issues while also supporting drivers' livelihoods.		
10/26/2025 - 7:17pm	Completely unfair. Some vehicles owners are not able to fund an upgrade to more expensive vehicles such as the LEVC. They shouldn't be penalised for their financial circumstance.	259	13
09/18/2025 - 11:48am	Yes, while low emission and electric vehicles are indeed available on the market for any private hire proprietor to purchase, the significant upfront cost of acquiring them acts as a major financial barrier. Without licensing incentives—such as reduced fees or faster application processing—there is little financial motivation for operators to choose a more expensive, greener vehicle over a cheaper, conventional one. So, while they are technically available, the cost discourages their adoption without a supportive policy framework.	260	13
10/03/2025 - 3:50pm	What does this mean? To my knowledge Black cabs have "readily available vehicles" to them as well, why is the council behaving in a two tier manner still in this age? There is very little practical difference between taxis and phv, it would be nice if you'd acted like it as well.	261	13
09/04/2025 - 2:03pm	Other Councils offer reduced fees for low emission vehicles to encourage the switch over. These vehicles maybe readily available, but their cost is considerable higher. If RBC is trying to reduce carbon & NOX emissions they should offer reduced fees to any driver wanting to change their vehicle	262	13
10/15/2025 - 1:18pm	The existing scheme places Hackney Carriage operators at a clear advantage while leaving Private Hire drivers without comparable support, despite both sectors providing essential local transport services. Each plays an important role in improving mobility, accessibility, and environmental outcomes, yet the current approach disrupts fair competition and undermines the consistency that licensing systems are designed to uphold. Limiting grants or fee reductions to Hackney Carriages effectively penalises Private Hire operators who are equally committed to adopting low- and zero-emission vehicles. The notion that environmentally friendly vehicles are easily accessible to Private Hire businesses fails to consider practical barriers such as high purchase costs, limited charging networks, and financial pressures on small operators. This one-sided approach could weaken the sector's overall progress toward cleaner transport, contradicting the Council's stated principles of fairness, inclusion, and sustainability. Alternative Proposal and Constructive Recommendations Introduce a balanced incentive programme that includes both Hackney Carriage and Private Hire vehicles meeting recognised low- or zero-emission standards. Undertake a comprehensive review to compare the economic and environmental outcomes of offering	263	13

	incentives across both licence categories. Develop an engagement process with representatives from the Private Hire sector to ensure the revised framework reflects real-world operational and financial conditions. Align the revised approach with the Council's duties of equality and impartiality, ensuring that all licence holders are treated with the same consideration. By adopting a collaborative and inclusive policy, the Council can more effectively encourage sustainable fleet upgrades, support small business owners, and deliver stronger overall environmental benefits.		
10/27/2025 - 2:28pm	I oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, along with the policy on recurring advisories. The DVSA framework already ensures consistent national standards that maintain vehicle safety and quality. Forcing drivers to switch centres incurs unnecessary costs, time, and administrative difficulties. With rising costs for fuel, insurance, and maintenance, this change will impose additional burdens on drivers and operators. Furthermore, penalizing recurring minor advisories is disproportionate, particularly when many do not affect safety. I urge the Council to adopt a fair, risk-based approach that addresses genuine safety issues while supporting drivers' livelihoods.	264	13
10/19/2025 - 6:42pm	why are there no incentives electric and hybrid are not cheap for Private Hire either	265	13
10/27/2025 - 1:24pm	I strongly object to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The DVSA framework already provides consistent national standards for vehicle safety and quality. Mandating that drivers switch centres adds unnecessary costs, time, and administrative complexity. Given the rising expenses of fuel, insurance, and maintenance, this change will further burden drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many do not impact safety. I urge the Council to implement a fair, risk-based approach that focuses on genuine safety concerns while supporting drivers' livelihoods.	266	13
10/19/2025 - 6:47pm	We should be given a choice which MOT garage to use and to more MOT garages, since its taking longer to book MOT tests and drivers then end up losing financially due to vehicles being taken off the road.	267	13
10/27/2025 - 2:36pm	I strongly object to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The DVSA framework already provides consistent national standards for vehicle safety and quality. Mandating that drivers switch centres adds unnecessary costs, time, and administrative complexity. Given the rising expenses of fuel, insurance, and maintenance, this change will further burden drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many do not impact safety. I urge the	268	13

	Council to implement a fair, risk-based approach that focuses on genuine safety concerns while supporting drivers' livelihoods.		
10/27/2025 - 11:15pm	this was a trial period, should not be made permanent. going forth more testing centers should be introduced. also the mot centers are operating via licencing requirements, if they are not up to standard in the eyes of the council, they should not be operating. the drivers should not be penalised for licencing lack of confidence in these centers which drivers are forced to use.	269	13
10/27/2025 - 10:50am	I firmly oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy regarding recurring advisories. The DVSA framework already ensures consistent national standards for vehicle safety and quality. Forcing drivers to switch testing centres introduces unnecessary costs, time delays, and administrative complexities. With the rising costs of fuel, insurance, and maintenance, this change will impose further burdens on drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many of these do not affect safety. I urge the Council to adopt a fair, risk-based approach that focuses on genuine safety issues while also supporting drivers' livelihoods.	270	13
10/26/2025 - 4:23pm	I am against the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The DVSA framework already establishes consistent national standards for vehicle safety and quality. Forcing drivers to switch testing centres creates unnecessary costs, time delays, and administrative burdens. With the escalating costs of fuel, insurance, and maintenance, this change will further strain drivers and operators. Additionally, penalizing recurring minor advisories is disproportionate, as many of these do not affect safety. I urge the Council to adopt a fair, risk-based strategy that targets real safety issues while also supporting drivers' livelihoods.	271	13
10/26/2025 - 7:18pm	Have more centres available. The TFL hasn't restricted it's drive by this problem so why have you?	272	13
10/24/2025 - 2:08pm	I object to the proposed requirement that hackney carriage and private hire vehicles alternate between MOT and compliance testing centres, along with the policy on recurring advisories. The DVSA framework provides consistent national standards that ensure vehicle safety and quality. Requiring drivers to switch centres leads to unnecessary costs, time, and administrative complications. Given the rising costs of fuel, insurance, and maintenance, this change will further burden drivers and operators. Penalizing recurring minor advisories is also disproportionate, especially when many do not impact safety. I urge the Council to take a fair, risk-based approach that addresses genuine safety concerns while supporting the livelihoods of drivers.	273	13

10/27/2025 - 10:43am	I want to object the new rule that says hackney carriage and private hire cars must keep switching between MOT and compliance testing centres, and also the rule about repeat advisories. The DVSA system already makes sure that all garages follow same national standards, so making us change centres doesn't make sense. It just waste time and money, and adds more paperwork for drivers and companies who already struggling with high cost of fuel, insurance and repairs. Also, punishing drivers for small repeated advisories is not fair, because many of those things are not even about safety. The Council should use a more fair and sensible system that looks at real safety issues instead of minor ones. This way drivers can keep their business running without extra stress and still make sure the vehicles on the road are safe for everyone.	274	13
10/27/2025 - 1:14pm	I oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, along with the policy on recurring advisories. The DVSA framework already ensures consistent national standards that maintain vehicle safety and quality. Forcing drivers to switch centres incurs unnecessary costs, time, and administrative difficulties. With rising costs for fuel, insurance, and maintenance, this change will impose additional burdens on drivers and operators. Furthermore, penalizing recurring minor advisories is disproportionate, particularly when many do not affect safety. I urge the Council to adopt a fair, risk-based approach that addresses genuine safety issues while supporting drivers' livelihoods.	275	13
10/09/2025 - 11:13am	13 7.10.4 Mot Advisory, 2nd mot should not have same advisory This should be only on mechanical advisories	276	13
10/24/2025 - 1:44pm	I object to the proposed mandate for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as to the policy on recurring advisories. The DVSA framework already provides consistent national standards that ensure vehicle safety and quality. Requiring drivers to switch centres adds unnecessary costs, time, and administrative complexity. Given the increasing costs of fuel, insurance, and maintenance, this change will further burden drivers and operators. Additionally, penalizing recurring minor advisories is disproportionate, as many do not pose safety risks. I urge the Council to implement a fair, risk-based strategy that targets genuine safety issues while supporting the livelihoods of drivers.	277	13
10/03/2025 - 3:53pm	I'd strongly suggest in increasing the number of centers. There should be at least 4.	278	13
10/27/2025 - 12:45pm	I firmly oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy regarding recurring advisories. The	279	13

	DVSA framework already ensures consistent national standards for vehicle safety and quality. Forcing drivers to switch testing centres introduces unnecessary costs, time delays, and administrative complexities. With the rising costs of fuel, insurance, and maintenance, this change will impose further burdens on drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many of these do not affect safety. I urge the Council to adopt a fair, risk-based approach that focuses on genuine safety issues while also supporting drivers' livelihoods.		
10/24/2025 - 2:05pm	I firmly oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy regarding recurring advisories. The DVSA framework already ensures consistent national standards for vehicle safety and quality. Forcing drivers to switch testing centres introduces unnecessary costs, time delays, and administrative complexities. With the rising costs of fuel, insurance, and maintenance, this change will impose further burdens on drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many of these do not affect safety. I urge the Council to adopt a fair, risk-based approach that focuses on genuine safety issues while also supporting drivers' livelihoods.	280	13
10/24/2025 - 3:25pm	I strongly object to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The DVSA framework already provides consistent national standards for vehicle safety and quality. Mandating that drivers switch centres adds unnecessary costs, time, and administrative complexity. Given the rising expenses of fuel, insurance, and maintenance, this change will further burden drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many do not impact safety. I urge the Council to implement a fair, risk-based approach that focuses on genuine safety concerns while supporting drivers' livelihoods.	281	13
10/24/2025 - 1:36pm	I strongly oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy concerning recurring advisories. The DVSA framework already establishes consistent national standards that ensure vehicle safety and quality. Forcing drivers to change testing centres incurs unnecessary costs, time delays, and administrative burdens. With the rising expenses of fuel, insurance, and maintenance, this change will place an additional strain on drivers and operators. Moreover, penalizing recurring minor advisories is disproportionate, especially when many do not impact safety. I urge the Council to adopt a fair, risk-based approach that addresses genuine safety concerns while also supporting drivers' livelihoods.	282	13
10/27/2025 - 11:31am	The council should consider allowing drivers the flexibility to use any MOT testing centre of their choice, rather than restricting them to only the two listed shops.	283	13

	Reasoning: This would promote fair competition among local garages and prevent monopolisation. Drivers may have established relationships with other reputable garages that offer better service, convenience, or pricing. Allowing choice ensures greater transparency and encourages garages to maintain high standards. It would also reduce potential delays or scheduling issues if the two listed shops are fully booked.		
10/19/2025 - 6:48pm	We should choose which MOT centre to use and yes to more MOT centres	284	13
10/24/2025 - 1:20pm	I wish to register my objection to the proposal requiring hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, and to the policy on repeat advisories. The DVSA already enforces a comprehensive national testing framework that ensures vehicle safety and consistency. Forcing drivers to use different centres does not improve standards—it simply adds financial and administrative strain at a time when operators are already struggling with increased running costs. Furthermore, penalising recurring advisories—many of which are minor or non-safety-related—is disproportionate and counterproductive. Instead, the Council should focus its efforts on genuine safety risks and adopt a fair, risk-based system that supports, rather than penalises, local drivers.	285	13
10/27/2025 - 8:42am	Why only 2? There should be more choice and have freedom of sending any approved MOT centre	286	13
10/27/2025 - 2:41pm	I oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, along with the policy on recurring advisories. The DVSA framework already ensures consistent national standards that maintain vehicle safety and quality. Forcing drivers to switch centres incurs unnecessary costs, time, and administrative difficulties. With rising costs for fuel, insurance, and maintenance, this change will impose additional burdens on drivers and operators. Furthermore, penalizing recurring minor advisories is disproportionate, particularly when many do not affect safety. I urge the Council to adopt a fair, risk-based approach that addresses genuine safety issues while supporting drivers' livelihoods.	287	13
10/24/2025 - 3:51pm	I oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, along with the policy on recurring advisories. The DVSA framework already ensures consistent national standards that maintain vehicle safety and quality. Forcing drivers to switch centres incurs unnecessary costs, time, and administrative difficulties. With rising costs for fuel, insurance, and maintenance, this change will impose additional burdens on drivers and operators. Furthermore, penalizing recurring minor advisories is disproportionate, particularly when many do not	288	13

	affect safety. I urge the Council to adopt a fair, risk-based approach that addresses genuine safety issues while supporting drivers' livelihoods.		
10/27/2025 - 2:34pm	I am against the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The DVSA framework already establishes consistent national standards for vehicle safety and quality. Forcing drivers to switch testing centres creates unnecessary costs, time delays, and administrative burdens. With the escalating costs of fuel, insurance, and maintenance, this change will further strain drivers and operators. Additionally, penalizing recurring minor advisories is disproportionate, as many of these do not affect safety. I urge the Council to adopt a fair, risk-based strategy that targets real safety issues while also supporting drivers' livelihoods.	289	13
10/24/2025 - 2:23pm	I object to the proposed requirement that hackney carriage and private hire vehicles alternate between MOT and compliance testing centres, along with the policy on recurring advisories. The DVSA framework provides consistent national standards that ensure vehicle safety and quality. Requiring drivers to switch centres leads to unnecessary costs, time, and administrative complications. Given the rising costs of fuel, insurance, and maintenance, this change will further burden drivers and operators. Penalizing recurring minor advisories is also disproportionate, especially when many do not impact safety. I urge the Council to take a fair, risk-based approach that addresses genuine safety concerns while supporting the livelihoods of drivers.	290	13
10/27/2025 - 2:45pm	I am opposed to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as to the policy on recurring advisories. The DVSA framework already establishes consistent national standards for vehicle safety and quality. Requiring drivers to switch centres adds unnecessary costs, time, and administrative complexity. Given the increasing costs of fuel, insurance, and maintenance, this change will further burden	291	13
10/24/2025 - 3:43pm	I oppose the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, along with the policy on recurring advisories. The DVSA framework already ensures consistent national standards that maintain vehicle safety and quality. Forcing drivers to switch centres incurs unnecessary costs, time, and administrative difficulties. With rising costs for fuel, insurance, and maintenance, this change will impose additional burdens on drivers and operators. Furthermore, penalizing recurring minor advisories is disproportionate, particularly when many do not affect safety. I urge the Council to adopt a fair, risk-based approach that addresses genuine safety issues while supporting drivers' livelihoods.	292	13

10/09/2025 - 12:29pm	13 7.10.3 Alternating mot tests every 6 months This was for a trial period, to allow testing centres to improve, this should not be made permanent. We suggest more testing station. We should have a choice of where we want to take our vehicle 13 7.10.4 Mot Advisory, 2nd mot should not have same advisory This should be only on mechanical advisories	293	13
10/27/2025 - 2:19pm	We are fully in favor of rigorous medical assessments to verify driver fitness and ensure public safety. However, requiring that these assessments be conducted exclusively by an applicant's GP is impractical and unwarranted. Local GP surgeries are facing lengthy delays, which can result in missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor ensures the same level of safety. Allowing assessments from any certified healthcare professional would reduce delays, relieve pressure on the NHS, and bring the Council's policy in line with national best practices.	294	13
10/27/2025 - 3:32pm	From a driver's perspective, the proposal to alternate between MOT and compliance testing centres makes little practical sense. The DVSA already provides strict, consistent national safety standards, and switching centres only adds unnecessary costs, time pressures, and confusion. With the current rise in fuel, insurance, and maintenance costs, this policy would make it even harder for drivers to stay afloat. Penalising recurring advisories—especially minor, non-safety-related ones—is unfair and doesn't reflect real operating conditions. The Council should focus on genuine safety risks rather than adding extra hurdles for hardworking drivers.	295	13
10/24/2025 - 11:06am	I am writing to express significant concerns regarding the current policy mandating that vehicle compliance tests must alternate between only two council-approved testing centres. While I fully support the necessity of rigorous vehicle safety checks, this specific policy creates undue and disproportionate burdens on licensed Operators/Drivers. The requirement to use two centres on opposite sides of the town imposes a direct and costly impact on livelihoods. Attending a test often necessitates taking a half-day off work, resulting in substantial lost earnings. This is compounded by high fuel costs for what is essentially a 30-minute test. This policy functions as a tax on license holders. Creation of a Closed Market (Duopoly), By restricting testing to only two approved centres, the council has created a closed market, or duopoly. This structure guarantees both centres a constant stream of	296	13

	business irrespective of their pricing, wait times, customer service, or geographic convenience. On any given test, a driver has zero choice—they are forced to use one specific centre, effectively creating a monopoly Lack of Choice and Inflated Costs, Without the ability to choose based on price or convenience, operators are denied the benefits of market competition. This closed system creates an environment where fees can be set notably higher than those for a standard MOT, without a clear and commensurate increase in the value or quality of the service provided. Fundamental Contradiction in Policy Logic: The stated goal of the alternating centre policy is to ensure consistent and rigorous standards. However, if both centres are properly audited and managed by the council, they should be applying the exact same standard. The very need for forced alternation inherently suggests a lack of confidence in the consistency or rigour of one or both centres. If that is the case, the solution is to address the auditing and management of the centres directly and authorise additional testing facilities, not to impose a logistical and financial penalty on the drivers. Proposed Solution We strongly urge the committee to address this issue by authorise additional testing facilities in strategically located areas across the borough. Expanding the number of approved centres is essential to: Provide equitable geographic coverage, significantly reducing travel times, fuel expenses, and lost income for drivers. Inject competition into the market, incentivising all centres to improve efficiency, customer service, and potentially reduce costs. Increase appointment availability, reducing wait times and ensuring vehicles can be tested promptly without risking licence expiration.		
09/22/2025 - 6:32am	I am writing to express significant concerns regarding the current policy mandating that vehicle compliance tests must alternate between only two council-approved testing centres. While I fully support the necessity of rigorous vehicle safety checks, this specific policy creates undue and disproportionate burdens on licensed Operators/Drivers. The primary issues are as follows: Significant Logistical and Financial Hardship, the requirement to use two centres on opposite sides of the town imposes a direct and costly impact on livelihoods. Attending a test often necessitates taking a half-day off work, resulting in substantial lost earnings. This is compounded by high fuel costs for what is	297	13

	essentially a 30-minute test. This policy functions as a tax on license holders. Creation of a Closed Market (Duopoly), By restricting testing to only two approved centres, the council has created a closed market, or duopoly. This structure guarantees both centres a constant stream of business irrespective of their pricing, wait times, customer service, or geographic convenience. On any given test, a driver has zero choice—they are forced to use one specific centre, effectively creating a monopoly Lack of Choice and Inflated Costs, Without the ability to choose based on price or convenience, operators are denied the benefits of market competition. This closed system creates an environment where fees can be set notably higher than those for a standard MOT, without a clear and commensurate increase in the value or quality of the service provided. Fundamental Contradiction in Policy Logic: The stated goal of the alternating centre policy is to ensure consistent and rigorous standards. However, if both centres are properly audited and managed by the council, they should be applying the exact same standard. The very need for forced alternation inherently suggests a lack of confidence in the consistency or rigour of one or both centres. If that is the case, the solution is to address the auditing and management of the centres directly and authorise additional testing facilities, not to impose a logistical and financial penalty on the drivers. Proposed Solution We strongly urge the committee to address this issue by authorise additional testing facilities in strategically located areas across the borough. Expanding the number of approved centres is essential to: Provide equitable geographic coverage, significantly reducing travel times, fuel expenses, and lost income for drivers. Inject competition into the market, incentivising all centres to improve efficiency, customer service, and potentially reduce costs. Increase appointment availability, reducing wait times and ensuring vehicles can be tested promptly without risking licence expiration.		
10/26/2025 - 5:51pm	This was for trial period, to allow testing centres to improve, this should not be made permanent. We suggest more testing station. we should have a choice of where we want to take our vehicle.	298	13
10/27/2025 - 2:19pm	: I want to object the new rule that says hackney carriage and private hire cars must keep switching between MOT and compliance testing centres, and also the rule about repeat advisories. The DVSA system already makes sure that all garages follow same national standards, so making us change centres doesn't make sense. It just waste time and money, and adds more paperwork for drivers and companies who already struggling with high cost of fuel, insurance and repairs. Also, punishing drivers for	299	13

	small repeated advisories is not fair, because many of those things are not even about safety. The Council should use a more fair and sensible system that looks at real safety issues instead of minor ones. This way drivers can keep their business running without extra stress and still make sure the vehicles on the road are safe for everyone.		
10/25/2025 - 6:46pm	That was on trails for 6 months, council should get more test station, and driver will take the vehicle where is the appointment available, driver should have a choice where he would like to take his vehicle	300	13
10/27/2025 - 11:16pm	I disagree with this process as it will not have any benefit to improve MOT standards, there should be other methods to ensure mot centres meet both highway standards and council requirement. Also I suggest more mot centres for drivers.	301	13
10/26/2025 - 1:38pm	I disagree with this you should have a choice for the Mot. or we should be given more Mot centres,	302	13
10/27/2025 - 3:17pm	I object to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the approach to recurring advisories. The existing DVSA framework already provides robust, nationally consistent safety standards. Forcing drivers to switch testing centres introduces unnecessary expense, time loss, and administrative complexity. With fuel, insurance, and maintenance costs already rising, this proposal adds yet another burden on drivers and operators. Furthermore, penalising vehicles for recurring minor advisories—many of which do not affect safety—is disproportionate and counterproductive. A fair, risk-based policy would maintain safety while supporting those who rely on these vehicles for their livelihood.	303	13
10/26/2025 - 1:14pm	i disagree with this because no such law and you should have a choice where the Mot is done, if all other commercial vehicles like buses. reading councils work vans get they Mot done from 2 separate garages then that would be more fair,	304	13
10/27/2025 - 6:04pm	Agree as private hire use their roof signs to attract customers to them	305	13
10/26/2025 - 7:20pm	Why? We should have the right to decide where to take our vehicle.	306	13
10/25/2025 - 4:40pm	That was a trial period, this should not made permanent. We should have more more test stations. We should have choice to go where our choice.	307	13
10/27/2025 - 11:18pm	Totally disagree This should be the choice of the driver sometimes if MOT is failed Same test centre don't have appointment for many days and drivers are losing money while waiting for their appointment or should have more MOT centres	308	13

10/24/2025 - 6:16pm	I strongly disagree. This is not a legal requirement. It will be an inconvenience for drivers such as myself, and this clause should be reconsidered.	309	13
09/17/2025 - 12:14pm	I am writing to express significant concerns regarding the current policy mandating that vehicle compliance tests must alternate between only two council-approved testing centres. While I fully support the necessity of rigorous vehicle safety checks, this specific policy creates undue and disproportionate burdens on licensed operators. The primary issues are as follows: Significant Logistical and Financial Hardship The requirement to use two centres on opposite sides of the town imposes a direct and costly impact on livelihoods. Attending a test often necessitates taking a half-day off work, resulting in substantial lost earnings. This is compounded by high fuel costs for what is essentially a 30-minute test. This policy functions as a tax on license holders. Creation of a Closed Market (Duopoly) By restricting testing to only two approved centres, the council has created a closed market, or duopoly. This structure guarantees both centres a constant stream of business irrespective of their pricing, wait times, customer service, or geographic convenience. On any given test, a driver has zero choice—they are forced to use one specific centre, effectively creating a monopoly Lack of Choice and Inflated Costs Without the ability to choose based on price or convenience, operators are denied the benefits of market competition. This closed system creates an environment where fees can be set notably higher than those for a standard MOT, without a clear and commensurate increase in the value or quality of the service provided. Fundamental Contradiction in Policy Logic The stated goal of the alternating centre policy is to ensure consistent and rigorous standards. However, if both centres are properly audited and managed by the council, they should be applying the exact same standard. The very need for forced alternation inherently suggests a lack of confidence in the consistency or rigour of one or both centres. If that is the case, the solution is to address the auditing and management of the centres directly, not to impose a logistical and financial penalty on the drivers. Proposed Solution We strongly urge the committee to address this issue by licensing additional testing facilities in strategically located areas across the borough. Expanding the number of approved centres is essential to: Provide equitable geographic coverage, significantly reducing travel times, fuel expenses, and lost income for drivers.	310	13

	Inject competition into the market, incentivising all centres to improve efficiency, customer service, and potentially reduce costs. Increase appointment availability, reducing wait times and ensuring vehicles can be tested promptly without risking licence expiration.		
10/21/2025 - 9:28pm	I disagree. I think this is unnecessary and an inconvenience because it is not a legal requirement to take our vehicles to two separate testing centres.	311	13
10/15/2025 - 1:20pm	I wish to object to the proposed rule requiring hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The existing DVSA testing framework already guarantees national consistency, and forcing drivers to switch centres introduces unnecessary inconvenience, potential inconsistencies, and additional administrative work. More importantly, this change would place extra financial strain on drivers and operators who are already struggling in a difficult and competitive market, especially given rising costs of fuel, insurance, and maintenance. The proposal to penalise repeat minor advisories is also disproportionate, as many advisories are advisory only and pose no immediate safety risk. I urge the council to reconsider and adopt a fairer, risk-based approach that focuses on genuine safety issues while supporting the financial sustainability of local drivers and businesses.	312	13
10/26/2025 - 7:08pm	This was for a trial period, to allow testing centres to improve, and this should not be made permanent. We suggest more testing stations. We should have a choice of where we want to take our vehicle for testing.	313	13
10/27/2025 - 10:23pm	this was only for a trial period, allowing test centres to improve. we should have the choice of where we want to take our vehicles	314	13
10/19/2025 - 6:50pm	Its should be our choice, my company is based next door to an MOT center, I want use the MOT center at my convenience, this should not be dictated by RBC	315	13
10/23/2025 - 3:12pm	This was for a trial period to allow testing centres to improve this should not be made permanent. We suggest more testing stations we should have a choice of where we want to take our vehicle	316	13
10/19/2025 - 2:55pm	If both testing centres are operating in accordance with the Government's requirements and fulfilling their duties properly, then it should be the driver's choice to use whichever test centre they find most suitable to visit. According to the Motor Vehicles (Tests) Regulations 1981, as authorised under the Road Traffic Act 1988, any authorised MOT testing station that meets the prescribed standards is permitted to conduct vehicle tests. Therefore, restricting drivers to a specific centre when multiple authorised options are available would be inconsistent with the intent of these regulations.	317	13

	Before the council implemented this new condition, motorists were free and content to use any MOT station that was convenient and suitable for them.		
10/27/2025 - 1:58pm	I am opposed to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as to the policy on recurring advisories. The DVSA framework already establishes consistent national standards for vehicle safety and quality. Requiring drivers to switch centres adds unnecessary costs, time, and administrative complexity. Given the increasing costs of fuel, insurance, and maintenance, this change will further burden	318	13
10/24/2025 - 12:15pm	I want to object the new rule that says hackney carriage and private hire cars must keep switching between MOT and compliance testing centres, and also the rule about repeat advisories. The DVSA system already makes sure that all garages follow same national standards, so making us change centres doesn't make sense. It just waste time and money, and adds more paperwork for drivers and companies who already struggling with high cost of fuel, insurance and repairs. Also, punishing drivers for small repeated advisories is not fair, because many of those things are not even about safety. The Council should use a more fair and sensible system that looks at real safety issues instead of minor ones. This way drivers can keep their business running without extra stress and still make sure the vehicles on the road are safe for everyone.	319	13
10/27/2025 - 12:35am	Not agreed. This was initially for trial period to allow testing centres to improve, this should not be made permanent rule. We suggest more testing centres. We should have free choice of where we would like to take our vehicles for test.	320	13
10/19/2025 - 5:00pm	should be allowed to go to either testing centre.	321	13
10/22/2025 - 2:49pm	This was for a trail period to allow testing centres to improve, this should not be made permanent. We suggest more testing stations. We should have a choice of where we want to take our vehicle	322	13
10/27/2025 - 5:56pm	Give free hand to driver please.need more tests centre is better	323	13
10/20/2025 - 3:08pm	Totally disagree with this because both mot centres are doing the same job, we should have a choice of where we want to take our vehicle. if there is an issue with standards, than I recommend that we have another mot centre, which is open 6 days a week atleast (like Autocraft) with more than one mot bay. Currently we have Autocraft which is open 6 days a week, with 2 bays, whereas UCV is open 5 days a week with one mot bay.	324	13
10/27/2025 - 11:18pm	this was a trail period, should not be made permanent. going forth more testing centers should be introduced. also the mot centers are operating via licencing requirements, if they are not up to standard in	325	13

	the eyes of the council, they should not be operating. the drivers should not be penalised for licencing lack of confidence in these centers which drivers are forced to use.		
10/26/2025 - 5:28pm	we should have a choice to where to take our cabs.it was for trial period and we need more testing stations.	326	13
10/19/2025 - 4:10pm	This was for a trial period to allow testing centre to improve, this should not be made permanent. We want more MOT testing stations so we have a choice for our vehicle for MOT	327	13
10/26/2025 - 8:36pm	This was only set out as a trial for 6 months, the driver should have a choice of where to go to, UCV do not offer a re test sometimes even within 48 hours of the vechile failing MOT, this is not fair as it can take a huge financial burden on a driver.	328	13
10/26/2025 - 8:33pm	Do not agree, we should have the right to go to which ever we want to. As sometime the one which is allocated for that particular time it may not be able to give you an appointment. If you have to re-book you will not get a slot for 4 to 5 days. Big loss for us	329	13
10/25/2025 - 9:43pm	This was for a trial period, to allow testing centres to improve; this should not be made permanent. We suggest more testing stations. We should have a choice of where we want to take our vehicle.	330	13
10/12/2025 - 9:10pm	I do not agree , as the driver should have their own choice where to take their vehicle for MOT . Also I think more test centers should be made for better convenience .	331	13
10/11/2025 - 8:18pm	I disagree here - this was implemented for a trial period to allow test centres to improve and should not be made a permanent change. We suggest more testing stations or leave as it is. We should have a choice of where to take our vehicle.	332	13
10/26/2025 - 1:03pm	This was for a trial period, to allow testing centres to improve, this should not be made permanent. We suggest more testing stations. We should have a choice of where we want to take our vehicle	333	13
10/26/2025 - 11:00am	This arrangement was intended as a trial period to allow testing centres to improve and should not be made permanent. We recommend establishing more testing stations to increase accessibility. vehicle owners should have the freedom to choose where they wish to have their vehicles tested.	334	13
10/15/2025 - 12:13pm	the proposed policy requiring licensed hackney carriage and private hire vehicles to alternate MOT and compliance testing centres, combined with potential penalties for recurring minor advisories, is disproportionate and unnecessarily burdensome. All DVSA-approved test centres follow the same national standards, and forcing operators & drivers to switch centres adds cost, travel, and administrative complexity without improving safety. Moreover, penalising repeated minor advisories, many of which are non-critical guidance, risks unfairly punishing operators & drivers who have taken reasonable maintenance steps.	335	13

	A fairer, more effective approach would be risk-based, focusing enforcement on genuine safety issues while allowing operators to maintain continuity with trusted testing centres.		
10/24/2025 - 3:30pm	I strongly object to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The DVSA framework already provides consistent national standards for vehicle safety and quality. Mandating that drivers switch centres adds unnecessary costs, time, and administrative complexity. Given the rising expenses of fuel, insurance, and maintenance, this change will further burden drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many do not impact safety. I urge the Council to implement a fair, risk-based approach that focuses on genuine safety concerns while supporting drivers' livelihoods.	336	13
10/24/2025 - 6:06pm	This should be only on mechanical advisories.	337	13
10/26/2025 - 5:52pm	This should only be on mechanical advisories.	338	13
10/24/2025 - 11:06am	the proposed policy that allows for the suspension or revocation of a vehicle licence based on the recurrence of MOT "minor defects/advisories." This rule is unreasonable, disproportionate, and fails to account for the operational reality of licensed vehicles. An MOT advisory is, by definition, a note of an item that may need attention in the future but does not constitute a failure and does not make the vehicle unroadworthy. Licensed vehicles accumulate mileage far more quickly than average cars. It is entirely normal for certain wear-and-tear items (e.g., slight play in a joint, slight corrosion on a non-structural component, a repaired stone chip on the windscreen) to persist or reappear as advisories across consecutive MOTs due to this intense usage pattern. This policy would effectively punish drivers for the normal consequences of doing their job. A vehicle being used intensively for work will naturally have components that wear. To threaten a driver's livelihood—suspension or revocation of the licence—over recurring advisories that do not affect the vehicle's roadworthiness is a grossly disproportionate response. This rule creates immense anxiety for licensees. A driver could address an advisory, only for the same item to be noted again 6 months later after thousands more miles of use, through no fault of their own, and still face losing their licence. This places an unfair and unpredictable burden on operators. I would suggest: This clause must be amended to focus on actual roadworthiness and failures, not speculative advisories. The policy should be re-written to state	339	13

	Dangerous or Major MOT failures. A recurring Major defect that indicates a persistent, serious safety issue. Advisories should be removed from this clause entirely. They serve as a useful monitor for the proprietor but are an entirely inappropriate basis for the severe penalty of licence suspension or revocation. The current proposal criminalises normal vehicle use		
10/12/2025 - 10:17pm	This is definitely no no, for general view. It should only for mechanical parts	340	13
10/19/2025 - 5:02pm	this should only be for mechanical advisories	341	13
10/25/2025 - 6:53pm	If mot has pass from the mot station then it should not be take any action on minors and advicery as if has been repaired and after six same problem will come back, how that's driver fault, that's not fair, if mot passed then it's safe that's why tester passed the MOT	342	13
10/26/2025 - 1:44pm	i disagree with this because that's wear and tear on the vehicle, Mot is for the vehicle to be examined mechanical safety of the vehicle,	343	13
10/23/2025 - 3:13pm	This should be only on mechanical advisory	344	13
10/24/2025 - 6:17pm	I disagree, it should only be for mechanical advisories.	345	13
10/27/2025 - 10:23pm	this should only be on mechanical advisories	346	13
10/26/2025 - 7:22pm	Why? They're listed as advisories for a reason. If they pass with advisories then they are lawful and safe to drive. You are not above the law, you shouldn't make up rules just because you feel like it.	347	13
10/27/2025 - 6:00pm	If only on mechanical advisories	348	13
10/27/2025 - 11:21pm	disagree, , as long as the car is repaired and road worthy for testing, it should not be subject to suspension or to be revoked.	349	13
10/27/2025 - 12:39am	Not agreeing. This should be only for mechanical advisories.	350	13
10/27/2025 - 11:20pm	I disagree as long the car meets the standard of highway and Mot compliance it should not be subject suspension or revocation.	351	13
10/26/2025 - 1:03pm	This should be only on mechanical advisories	352	13

10/25/2025 - 4:44pm	Some advisories are not mechanical and it should be treated fairly,as it came happen anytime in a car.	353	13
10/22/2025 - 2:50pm	This should be only on mechanical advisories	354	13
10/11/2025 - 8:19pm	This should only be a rule for mechanical advisories. This rule seems too harsh as drafted.	355	13
10/19/2025 - 6:51pm	Provided the advisory are mechanical and a defect makes the vehicle insecure sand un-road worthy.	356	13
10/26/2025 - 7:09pm	This should only be on mechanical advisories.	357	13
10/20/2025 - 3:09pm	This should be for mecanical advisories only	358	13
10/26/2025 - 5:31pm	mechanical advisories are diferent to minor advisories as it can happen anytime with the cab as taxis run more as compare to regular cars. if MOT is passed there shouldnt be a problem.	359	13
10/19/2025 - 3:03pm	7.10.4 Minor MOT defects that are not classified as MOT failures should not be used as grounds to suspend a vehicle from operating as a private hire or taxi, even during a second test. Under the Driver and Vehicle Standards Agency (DVSA) guidance and the Motor Vehicles (Tests) Regulations 1981 made under the Road Traffic Act 1988, minor defects are defined as issues that do not have a significant effect on the safety or environmental performance of the vehicle and therefore do not make the vehicle unroadworthy. For example, a small chip on the windscreen outside the driver's direct line of vision is categorised as a minor defect and should not prevent a driver from continuing lawful operation. Furthermore, suspending a vehicle for such minor issues directly impacts the driver's ability to work, effectively removing their livelihood over matters that have no bearing on road safety. This approach is disproportionate and inconsistent with national MOT and DVSA standards. The council should therefore only impose suspension where major or dangerous defects are identified, ensuring policies remain fair, reasonable, and in line with established road safety legislation.	360	13
10/19/2025 - 4:11pm	This should be only on mechanical advisories	361	13
10/12/2025 - 9:11pm	I do not agree , as this should only be for mechanical adversaries	362	13

10/26/2025 - 11:01am	This should only be for mechanical advisories.	363	13
10/25/2025 - 9:44pm	This should be only on mechanical advisories.	364	13
10/26/2025 - 7:23pm	No point. you take a million years to respond and act.	365	13
10/09/2025 - 11:12am	13 7.10.3 Alternating mot tests every 6 months This was for a trial period, to allow testing centres to improve, this should not be made permanent. I suggest more testing station. We should have a choice of where we want to take our vehicle	366	13
10/26/2025 - 7:25pm	If they're trained, then why do they book drivers for tyres which in some cases are still legal? They should produce their qualifications if that's the case when they do an inspection.	367	13
10/25/2025 - 9:45pm	Agree, as private hire use their roof sign to attract customers to them.	368	14
10/03/2025 - 3:54pm	It's not that they confuse them it's that the public is unaware of the differences or just doesn't care most of the time.	369	14
10/27/2025 - 11:21pm	agree, can be mistaken for a hackney carriage	370	14
10/25/2025 - 6:56pm	Agreed as private use roof sings and door stickers to attract their Coustomer	371	14
10/26/2025 - 5:53pm	Agree as private hire use their roof sings to attract customers to them	372	14
10/26/2025 - 7:09pm	I agree as private hire use their roof signs to attract customers.	373	14
10/23/2025 - 3:14pm	Agree as private hire use their roof sign to attract customers to them	374	14
10/24/2025 - 6:18pm	I agree, as private hire use their signs to attract customers.	375	14
10/20/2025 - 3:11pm	Agree as private hire use their roof signs to attract customers to them.	376	14
10/27/2025 - 10:24pm	agreed as the private hire vehicles use their roof signs to attract customers	377	14

10/26/2025 - 1:04pm	Agree as private hire use their roof sign to attract customers to them.	378	14
10/25/2025 - 4:46pm	It should be side stickers.	379	14
10/19/2025 - 6:58pm	Companies use roof sign and door stickers clearly state company name and has advance bookings only and the stickers more or less the same. Its important to retain so a passengers know they are getting into the right vehicle.	380	14
10/12/2025 - 9:12pm	I agree	381	14
10/27/2025 - 11:19pm	This should be only on mechanical advisories	382	14
10/19/2025 - 4:11pm	Agree as private hire use their roof signs to track passengers to them	383	14
10/12/2025 - 10:21pm	Agree as private hire use their roof signs to attract customers to them.	384	14
10/22/2025 - 2:51pm	Agree as private hire use their roof signs to attract customers to them	385	14
10/26/2025 - 8:38pm	Agree with this, as they attract customers	386	14
10/27/2025 - 11:21pm	I agree	387	14
10/24/2025 - 6:17pm	I disagree. Private hire use their roof signs to attract customers.	388	14
10/26/2025 - 11:02am	I agree with this comment as private hire users use their roof signs to attract more customers.	389	14
10/26/2025 - 8:34pm	Should not be allowed. As it attracts customers.	390	14
10/11/2025 - 8:20pm	I agree with this and think it should be included.	391	14
10/09/2025 - 11:13am	14 7.12.2 Private hire no roof sign Agree as private hire use their roof signs to attract customers to them.	392	14

10/09/2025 - 12:29pm	14 7.12.2 Private hire no roof sign Agree as private hire use their roof signs to attract customers to them.	393	14
10/24/2025 - 11:07am	mandatory requirement for physical side panels as the primary method of identifying a Private Hire Vehicle. This policy is outdated and fails to reflect the reality of modern booking technology and customer interaction. In the modern private hire industry, all journeys are pre-booked via telephone or operator's digital platform (app or website). The customer's primary confirmation is a digital notification—a text message, an in-app alert, or a screen pop-up—which provides the vehicle's make, model, colour, and registration number. This is how customers correctly and safely identify their pre-booked vehicle. Mandatory external signage is largely redundant for this core function. also, it leads to unfair Enforcement: It can lead to drivers being wrongly accused of illegal 'plying for hire' by enforcement officers or the public when they are merely parked or on their way to a pre-booked job. A more modern and proportional policy would state: "Private Hire Vehicles must be clearly identifiable to enforcement officers. This can be achieved through a licence plate attached to the rear of the vehicle. This approach maintains enforceability, enhances driver security, and aligns the licensing policy with the 21st-century technological landscape of the private hire industry.	394	14
09/18/2025 - 11:59am	I propose an amendment to the vehicle signage requirements. For private hire vehicles, the external rear licence plate is sufficient identification. The mandatory door signage or roof sign is redundant, as passengers receive full vehicle and driver details electronically prior to pick up. This signage also unnecessarily commercializes the vehicle when it is a private hire vehicles Given that the booking process is now entirely digital, with passengers receiving a full detailed confirmation text, we believe the requirement for side door panels is outdated. as the rear licence plate provides adequate official identification for enforcement purposes without compromising public safety.	395	14
10/09/2025 - 11:14am	15 7.12.10 Stickers permitted in vehicles card payments stickers and no smoking	396	15
10/12/2025 - 10:24pm	Again why use the word of “complaint “ update it this to review or feedback	397	15
10/19/2025 - 9:54pm	Complaints procedures should only refer to Hackney vehicles as Private Hire is operated via via private companies and an Operators, so the passengers book via them hence complaints should be dealt the company as a first port of call.	398	15

10/26/2025 - 5:53pm	Add card payments stickers?	399	15
10/25/2025 - 9:45pm	Add card payments stickers	400	15
10/27/2025 - 6:06pm	Add card payments stickers	401	15
10/26/2025 - 1:05pm	Add card payment stickers?	402	15
10/23/2025 - 3:16pm	Add card payment stickers	403	15
10/25/2025 - 6:59pm	The only sings Hackney carriage must be card payment sticker	404	15
10/22/2025 - 2:52pm	Add card payment stickers?	405	15
10/26/2025 - 7:10pm	Add card payment stickers?	406	15
10/27/2025 - 12:44am	Kindly add card payment sticker as well.	407	15
10/27/2025 - 10:25pm	add card payment stickers?	408	15
10/26/2025 - 11:05am	could you add card payment stickers or no?	409	15
10/25/2025 - 4:47pm	Card payments stickers should be only	410	15
10/19/2025 - 5:05pm	should show card payment accepted	411	15
10/11/2025 - 8:20pm	Can we display card payment stickers?	412	15
10/20/2025 - 3:11pm	Add card payment stickers	413	15
10/27/2025 - 8:44am	Purpose? No other council requires such items and is excessive	414	15

10/12/2025 - 9:15pm	I only agree with the last bullet point	415	15
10/19/2025 - 4:12pm	add card payment stickers	416	15
10/24/2025 - 11:07am	I wish to formally object to this applying for vehicle licence plate exemptions on the following grounds: The requirement to provide detailed "evidence of contract work" for each vehicle is an unnecessary administrative burden. The definition of an "executive type vehicle" used for private hire should be based on the vehicle's specifications (e.g., model, age), not the specific contract it is serving. The purpose of licensing is to ensure safety and standards, which is achieved by licensing the vehicle itself to a high standard, not by micromanaging its individual bookings. Requesting copies of client contracts as "evidence" raises significant data protection and privacy issues under the UK GDPR. These contracts are commercially sensitive and contain confidential information about our clients and their business. We cannot, in good faith or legally, share this private third-party information with the Council without explicit consent, which would be impractical to obtain for every application. The policy as stated creates a direct conflict between licensing rules and data protection law. The policy is unacceptably vague. The term "evidence of contract work" is not defined. What specific documents are required? A redacted contract? A letter from a client? This lack of clarity gives the Council unlimited discretion and creates uncertainty for operators, making the application process subjective and potentially unfair. The statement that exemptions "should not be assumed to continue" further reinforces this uncertainty and discourages investment in higher-quality vehicles. Our Request: We urge the Council to revise this policy. The exemption for executive vehicles should be granted based on the vehicle's objective attributes and a declaration of its intended use (e.g., pre-booked executive/private hire work), not on the disclosure of private commercial contracts. This would maintain standards, protect customer privacy, and reduce an unnecessary bureaucratic hurdle for legitimate businesses	417	15
10/19/2025 - 7:09pm	There should not be a need to prove contract work to be license as an executive vehicle, since a lot of work these days are coming in daily and payment is made via visa purchase card rather than being invoiced monthly.	418	15
09/18/2025 - 12:11pm	I wish to formally object to this applying for vehicle licence plate exemptions on the following grounds: Unnecessary Bureaucracy and Burden: The requirement to provide detailed "evidence of contract work" for each vehicle is an unnecessary	419	15

	administrative burden. The definition of an "executive type vehicle" used for private hire should be based on the vehicle's specifications (e.g., model, age), not the specific contract it is serving. The purpose of licensing is to ensure safety and standards, which is achieved by licensing the vehicle itself to a high standard, not by micromanaging its individual bookings. Serious Customer Privacy Concerns: Requesting copies of client contracts as "evidence" raises significant data protection and privacy issues under the UK GDPR. These contracts are commercially sensitive and contain confidential information about our clients and their business. We cannot, in good faith or legally, share this private third-party information with the Council without explicit consent, which would be impractical to obtain for every application. The policy as stated creates a direct conflict between licensing rules and data protection law. Lack of Clarity and Unfair Discretion: The policy is unacceptably vague. The term "evidence of contract work" is not defined. What specific documents are required? A redacted contract? A letter from a client? This lack of clarity gives the Council unlimited discretion and creates uncertainty for operators, making the application process subjective and potentially unfair. The statement that exemptions "should not be assumed to continue" further reinforces this uncertainty and discourages investment in higher-quality vehicles. Our Request: We urge the Council to revise this policy. The exemption for executive vehicles should be granted based on the vehicle's objective attributes and a declaration of its intended use (e.g., pre-booked executive/private hire work), not on the disclosure of private commercial contracts. This would maintain standards, protect customer privacy, and reduce an unnecessary bureaucratic hurdle for legitimate businesses		
10/24/2025 - 11:08am	Regarding plate exemptions on the grounds that it is unacceptably vague, subjective, and gives the Council unlimited discretion without providing clear, objective criteria for applicants. This creates a high degree of uncertainty and risk for businesses. Unlawful Vagueness and Lack of Objective Criteria: The policy fails the basic requirement of transparency. Key terms are undefined: What specific definition of "executive type vehicles" will be used? (e.g., a specific vehicle list, engine size, age, model?). What constitutes sufficient "evidence of contract work"? (e.g., a minimum value, a specific type of client, a contract duration?). What are the exact grounds on which the Council will "determine applications... on a case-by-case	420	15

	basis"? Without these clear, published criteria, the decision-making process is opaque and vulnerable to accusations of bias, inconsistency, and maladministration. Licensees cannot know how to comply, which is a fundamental flaw in any licensing policy. The statement that operators "should not automatically assume... that the plate exemption will continue" makes long-term business planning impossible. An operator may invest significantly in a high-specification vehicle based on an existing exemption, with no guarantee that this investment is protected upon renewal. This stifles investment in the very "executive" fleet the clause claims to support. Requiring operators to provide "up to date evidence... on request" is an open-ended burden without clear limits on how often or what specifically can be requested, creating persistent uncertainty. This clause must be rewritten to provide clarity, fairness, and predictability. The Council must publish clear, measurable, and objective criteria. The amended policy must explicitly define: A definitive list of vehicle models/specifications that qualify as an "executive type vehicle." The specific conditions under which an exemption will and will not be granted or renewed. A fair process must be based on transparent rules, not the subjective and unchallengeable discretion of a council officer. The current wording is unacceptable and must be changed.		
10/19/2025 - 3:24pm	7.13.2 We believe the current restriction on the use of executive hire vehicles for "contract work only" is outdated and should be reviewed to reflect modern business practices. The world has moved forward, and many corporate clients now provide their staff with company credit or payment cards to cover travel expenses directly. It is now common for business travellers to pay for executive journeys at the point of service rather than through a pre-arranged written contract. Under Section 75(1)(b) of the Local Government (Miscellaneous Provisions) Act 1976, exemptions for executive vehicles (often licensed as private hire vehicles) were originally designed for pre-booked, contract-based work that was not advertised to the general public. However, the law does not prohibit card payments being taken in the vehicle, provided the booking was made in advance through a licensed operator, as required under Section 46 of the same Act. Furthermore, modern taxi and private hire apps now allow customers to link their cards to their accounts, meaning payment is automatically processed at the end of each trip — whether it is for personal or business use. In these cases, it is virtually impossible to distinguish between "contract work" and "individual bookings," and enforcing such a distinction serves no practical or legal purpose in today's digital booking environment.	421	15

	Given these developments, the council's rules should be updated to reflect current industry practice. Allowing executive vehicle operators to serve business clients and accept card payments in the vehicle would remain fully compliant with existing legislation and align with Department for Transport (DfT) Best Practice Guidance (2022), which encourages councils to modernise licensing frameworks in line with technological and commercial changes. We therefore respectfully request that the council revise the restriction on executive vehicle use, ensuring that operators can provide services to legitimate business clients using modern, traceable payment methods without being penalised for doing so.		
10/22/2025 - 10:18am	12	422	15
10/19/2025 - 7:10pm	Not required as these vehicles should be allow to do ordinary work as well.	423	15
10/09/2025 - 12:30pm	15 7.12.10 Stickers permitted in vehicles card payments stickers shouldbe displayed?	424	15
10/03/2025 - 3:57pm	What public safety concerns? Aren't the driver and vehicle subjected to the same level of checks as any taxi and normal driver?	425	15
10/19/2025 - 3:27pm	7.13.3 Under UK law, councils can impose local licensing conditions for reasons of public safety or safeguarding, but those conditions must always be reasonable, proportionate, and evidence-based under the Local Government (Miscellaneous Provisions) Act 1976 and the Department for Transport (DfT) Statutory Taxi and Private Hire Vehicle Standards (2020). If the executive vehicle, its operator, and its driver are already licensed, DBS-checked, and deemed fit and proper under the council's own licensing regime, then there is no legal or safeguarding basis to ban those vehicles from undertaking home-to-school contract work. This work falls squarely within the definition of pre-booked, contract-based private hire under Section 75(1)(b) of the 1976 Act.	426	15
10/19/2025 - 7:15pm	All drivers go through safeguarding and enhanced DBS so why is RBC proposing this change.	427	15
10/24/2025 - 11:09am	The current policy must carry fire extinguisher is based on decades-old vehicle technology and is no longer fit for purpose. It fails to address the significant risks posed by modern vehicles, specifically the proliferation of high-strength lithium-ion batteries. These are now present not only in Electric Vehicles	428	15

	(EVs) but also in the hybrid systems, start-stop mechanisms, and complex electronics of most new cars. The standard extinguisher is ineffective and potentially dangerous when used on a new battery fire. These fires are a thermal runaway event, characterised by: Extreme Heat: They burn at temperatures far exceeding the rating of a standard extinguisher, capable of damaging infrastructure, as seen recently on the A329M where the road surface required resurfacing after a car fire. Toxic Hazards: They release highly toxic and flammable vapours, creating a significant inhalation risk. Re-ignition: The fire cannot be smothered and can reignite spontaneously hours or even days later. Our current rule risks creating a false sense of security. In a high-stress situation, an untrained driver's instinct may be to retrieve the extinguisher. This act alone is hazardous, as opening the boot or bonnet (where high-voltage components are often located) can expose them to electrocution and introduce oxygen, intensifying the fire. My recommended safety guidance, which I already provide company driver and advise owner driver, is clear and aligns with all professional firefighting advice: DO NOT ATTEMPT TO FIGHT THE FIRE. Prioritise Life: Ensure all passengers evacuate immediately and get to a safe distance. Call Emergency Services Immediately By mandating equipment that is useless for the primary emerging risk, the current policy inadvertently encourages unsafe behaviour and puts our drivers and passengers at unnecessary risk. In a panic, instinct says "use the extinguisher." This means opening the boot/bonnet, exposing the driver to electrocution, and intensifying the fire First aid Kit Liability and "risk to life" laws to protect those who render aid in good faith, these laws have limits. A council explicitly requiring a non-medically trained person to use a first-aid kit moves the situation from "voluntary aid" to an "expected duty of care." If a driver, despite best intentions, makes an injury worse due to a lack of training, the council and driver could be exposed to legal action. The rule, therefore, creates a legal risk. I tell my driver and advise owner drivers: make the scene safe and call professional help, Driver Mindset and Stress: As I identified with the fire extinguisher, in a high-stress situation like a serious accident, an untrained person will either panic and do nothing or might feel compelled to act because "they have a kit," potentially causing more harm. Their primary role, like with a fire, should be to make the scene safe and call professional help		
09/19/2025 - 7:46am	The current policy must carry fire extinguisher is based on decades-old vehicle technology and is no longer fit for purpose. It fails to address the significant risks posed by modern vehicles, specifically the	429	15

	proliferation of high-strength lithium-ion batteries. These are now present not only in Electric Vehicles (EVs) but also in the hybrid systems, start-stop mechanisms, and complex electronics of most new cars. The standard extinguisher is ineffective and potentially dangerous when used on a new battery fire. These fires are a thermal runaway event, characterised by: Extreme Heat: They burn at temperatures far exceeding the rating of a standard extinguisher, capable of damaging infrastructure, as seen recently on the A329M where the road surface required resurfacing after a car fire. Toxic Hazards: They release highly toxic and flammable vapours, creating a significant inhalation risk. Re-ignition: The fire cannot be smothered and can reignite spontaneously hours or even days later. Our current rule risks creating a false sense of security. In a high-stress situation, an untrained driver's instinct may be to retrieve the extinguisher. This act alone is hazardous, as opening the boot or bonnet (where high-voltage components are often located) can expose them to electrocution and introduce oxygen, intensifying the fire. My recommended safety guidance, which I already provide company driver and advise owner driver, is clear and aligns with all professional firefighting advice: DO NOT ATTEMPT TO FIGHT THE FIRE. Prioritise Life: Ensure all passengers evacuate immediately and get to a safe distance. Call Emergency Services Immediately: . By mandating equipment that is useless for the primary emerging risk, the current policy inadvertently encourages unsafe behaviour and puts our drivers and passengers at unnecessary risk. In a panic, instinct says "use the extinguisher." This means opening the boot/bonnet, exposing the driver to electrocution, and intensifying the fire		
09/19/2025 - 8:17am	Liability and "risk to life" laws to protect those who render aid in good faith, these laws have limits. A council explicitly requiring a non-medically trained person to use a first-aid kit moves the situation from "voluntary aid" to an "expected duty of care." If a driver, despite best intentions, makes an injury worse due to a lack of training, the council and driver could be exposed to legal action. The rule, therefore, creates a legal risk . I tell my driver and advise owner drivers: make the scene safe and call professional help, Driver Mindset and Stress: As I identified with the fire extinguisher, in a high-stress situation like a serious accident, an untrained person will either panic and do nothing or might feel compelled to act because "they have a kit," potentially causing more harm. Their primary role, like with a fire, should be to make the scene safe and call professional help.	430	15

10/19/2025 - 9:55pm	first aid kit should not be a requirement	431	15
10/27/2025 - 2:03pm	page 15 7.12.10 add card payment stickers ?	432	15
10/03/2025 - 4:01pm	What is the punishment for passengers if they don't heed the warnings from the driver to not smoke and/or vape in the car? What is the mechanism for dealing with unruly customers?	433	16
10/26/2025 - 5:54pm	Do we need permission to install dash cameras?	434	16
10/19/2025 - 9:57pm	this should be by choice of driver Operator only and not made mandatory	435	16
10/25/2025 - 9:47pm	Do we need permission to install dash cams?	436	16
10/26/2025 - 1:05pm	Do we need permission to install dash cams?	437	16
10/25/2025 - 7:01pm	Do we need permission to install dascam	438	16
10/23/2025 - 3:16pm	Do we need permission to install a dashcam?	439	16
10/27/2025 - 12:52am	I think we should be allowed to install cameras in passenger compartment for safety reasons same like London black cabs. They have a panic button to record voice in emergency situations for 3 minutes. Do we need permission to install dash cam?	440	16
10/26/2025 - 7:11pm	Do we need permission to install dashcams?	441	16
10/27/2025 - 10:25pm	do we need permission to install dashcams?	442	16
10/24/2025 - 6:19pm	Do we require permission to install Dash cams ?	443	16
10/27/2025 - 11:26pm	disagree	444	16
10/26/2025 - 5:32pm	do we require permission for cams ?	445	16

10/26/2025 - 8:35pm	Dash cam aswell???	446	16
10/27/2025 - 6:08pm	Do we need permission to install dash cams	447	16
10/22/2025 - 2:52pm	Do we need permission to install dash cam?	448	16
10/19/2025 - 4:12pm	Q Do we need permission to install dash cams?	449	16
10/20/2025 - 3:12pm	Do we need permission to install dash cams?	450	16
10/25/2025 - 4:49pm	Can we install CCTV?or do we need permission?	451	16
10/26/2025 - 11:06am	Can we install dashcams and if so do we have to inform you or have permission to install them?	452	16
10/11/2025 - 8:21pm	Do we need permission to install dash cameras as these do not film inside the vehicle?	453	16
10/27/2025 - 11:28pm	I disagree	454	16
10/19/2025 - 9:59pm	Private Hire should not need a permission from the council as each company will have there own rates set via their taxi software on to their PDA.	455	16
10/19/2025 - 10:00pm	This rule should only apply for Hackneys only	456	16
10/09/2025 - 12:31pm	16 7.16.3 CCTV Q Do we need permission to install dash cams?	457	16
10/09/2025 - 11:32am	16 7.16.3 CCTV Q Do we need permission to install dash cams?	458	16
10/12/2025 - 10:31pm	If council is making the card payment as completely compulsory then council also has to be willing to pay for the system failure losses and compensate those losses for this decision!!!!	459	16
10/19/2025 - 3:34pm	7.18.1 Under Section 50(3) of the Local Government (Miscellaneous Provisions) Act 1976, a council may require the proprietor of a licensed vehicle (hackney carriage or private hire) to report an accident "within such time and in such form as the district council may by notice specify."	460	16

	This means councils do have the power to set a local reporting timeframe — but the law does not define a specific period such as 3 days, 7 days, etc. However, in case law and best practice, any requirement imposed by a council must be reasonable and proportionate. A 3-day limit can be unreasonable in situations such as: The driver being injured or hospitalised, The accident occurring on a weekend or public holiday, or Delays in obtaining insurance or police reference details. Many UK councils set the reporting period at 7 days, and some allow up to 14 days in exceptional circumstances. This is consistent with Department for Transport (DfT) best practice guidance for taxi and private hire licensing, which emphasises proportionality and practicality in administrative requirements.		
10/19/2025 - 10:01pm	Within 14 days if not reported before	461	16
10/27/2025 - 2:06pm	page 16 7.16.3 do we need permission to install dash came?	462	16
10/19/2025 - 10:07pm	Private Hire should let the office know, if customer cannot be contacted then police can be contacted to dispose of the property	463	17
09/19/2025 - 11:59am	This rule is a classic case of a government checking a box ("we mandated accessible cars") without understanding or asking what the real-world mechanics of delivering a reliable service The Gap Between Intent and Reality The current mandate for a 1:10 ratio of Wheelchair Accessible Vehicles (WAVs) is a well-intentioned policy aimed at improving accessibility. However, its design focuses solely on vehicle supply, overlooking the critical operational logistics required to deliver a reliable, on-demand service. This creates a "false promise" for users and sets up operators for failure, ultimately risking a worse experience for the disabled community. The False Availability Problem: A quota system confuses vehicle ownership with service availability. A single WAV in a fleet of ten cars offers no guarantee it will be free, nearby, or in service when a user needs it. For example: The vehicle may be on a long job, completing a fare for a non-wheelchair user to remain economically viable. In urban areas like Reading, a WAV could be stuck in traffic on the opposite side of the town, making timely arrival impossible. This inevitable unavailability will lead to frequent booking rejections, breeding mistrust and frustration among users who rightly expect the service to be reliable.	464	17

	The rule dilutes effort across operators who have little incentive to specialize. Their goal is to meet the minimum legal requirement at the lowest cost, not to invest in high-quality vehicles, dedicated dispatch systems, or comprehensive driver training. This approach actively undermines the existing specialist providers who have built their business model on reliable, safe accessible transport. To move beyond a box-ticking exercise and create a guaranteed level of service, we propose the following measures: Create a Tiered Licensing System to Support Specialists: Instead of forcing all operators to provide a sub-standard service, the focus should be on empowering those who excel at it. We propose incentivizing specialization through: Substantially Reduced Licensing Fees for operators who commit their entire or majority fleet to WAV services. Of which there are over 5 in Reading The Issuance of Free Licence Plates WAVs operators/drivers Mandate Certified Training for All WAV Drivers: Safety is non-negotiable. Operating a WAV and securing a passenger requires specific skills. Regulation must require that any driver of a WAV holds a certified qualification in passenger assistance, disability awareness, and wheelchair securement. Shift from Vehicle Quotas to Service Standards: accessible bookings. Operators choosing to provide WAV services should be licensed against their ability to reliably meet these service-level agreements, not just their vehicle count. If the goal is genuine accessibility, not just the appearance of it. By channelling support and incentives towards dedicated, specialist providers and mandating strict training and service standards, we can build a reliable, high-quality service that the disabled community can truly depend on. The current quota system risks failing everyone involved and must be reconsidered.		
10/24/2025 - 11:10am	7.20.3 This rule is a classic case of a government checking a box ("we mandated accessible cars") without understanding or asking what the real-world mechanics of delivering a reliable service The Gap Between Intent and Reality, the current mandate for a 1:10 ratio of Wheelchair Accessible Vehicles (WAVs) is a well-intentioned policy aimed at improving accessibility. However, its design focuses solely on vehicle supply, overlooking the critical operational logistics required to deliver a reliable, on-demand service. This creates a "false promise" for users and sets up operators for failure, ultimately making a worse experience for the disabled community. The False Availability Problem: A quota system confuses vehicle ownership with service availability. A single WAV in a fleet of ten cars offers no guarantee it will be free, nearby, or in service when a user needs it. For example:	465	17

	The vehicle may be on a long job, completing a fare for a non-wheelchair user to remain economically viable. In Reading, a WAV would be stuck in traffic on the opposite side of the town, making arrival impossible. This inevitable unavailability will lead to frequent booking rejections, breeding mistrust and frustration among users who rightly expect the service to be reliable. The current framework discourages specialisation by incentivising operators to prioritise minimum legal requirement at the lowest cost or by operating multiple smaller licences. This creates a market that fails to reward, and in fact penalises, established specialist providers who have invested in superior vehicles, advanced dispatch systems, and rigorous driver training to deliver a reliable, safe, and accessible service. To move beyond a box-ticking exercise and create a guaranteed level of service, I propose the following measures: Create a Licensing System to Support Specialists: Instead of forcing all operators to provide a sub-standard service, the focus should be on empowering those who excel at it. I propose incentivizing specialization through: Substantially Reduced Licensing Fees for operators who commit their entire or majority fleet to WAV services. Of which there are over 5 in Reading The issuing of Free Licence Plates to WAVs operators/drivers Mandate Certified Training for All WAV Drivers: Safety is non-negotiable. Operating a WAV and securing a passenger requires specific skills. Regulation must require that any driver of a WAV holds a certified qualification in passenger assistance, disability awareness, and wheelchair securement. Shift from Vehicle Quotas to Service Standards: accessible bookings. Operators choosing to provide WAV services should be licensed against their ability to reliably meet these service-level agreements, not just their vehicle count. If the goal is genuine accessibility, not just the appearance of it. By channelling support and incentives towards dedicated, specialist providers and mandating strict training and service standards, we can build a reliable, high-quality service that the disabled community can truly depend on. The current quota system risks failing everyone involved and must be reconsidered.		

10/27/2025 - 1:38pm	licenced vehicles should then be permitted to remain licensed up to 15 years, or 20 years for larger WAVs, aligning private hire standards with those of the Hackney trade. Furthermore, the 1-in-10 WAV ratio requirement for operators should be abolished. There is already sufficient WAV coverage within the area, and current demand does not justify the high acquisition and running costs associated with these vehicles. Removing this requirement would ensure a more practical and economically viable regulatory framework for operators.	466	17
10/27/2025 - 1:59pm	Once licensed, such vehicles should be eligible for renewal up to 15 years of age, and up to 20 years for larger Wheelchair Accessible Vehicles (WAVs), to ensure consistency with the Hackney Carriage trade and promote parity across the sector. In addition, the current WAV ratio requirement—stipulating one WAV in every ten vehicles for private hire operators—should be reviewed and removed. Demand for WAV services remains limited, and there are already sufficient companies specialising in this provision. The current policy imposes unnecessary financial burdens on operators, as the cost of purchasing and maintaining WAVs significantly exceeds the level of public demand.	467	17
10/19/2025 - 10:11pm	This should not be made mandatory as there are plenty of companies offering this service and Operators can refer users to companies that do offer this service. I have 4 WAV vehicles and there is not enough work to keep them going. Also the cost of a WAV is higher and not economically sustainable to acquire WAVS as requested by RBC.	468	17
10/19/2025 - 3:46pm	7.20.3 No national law requires a specific quota of wheelchair-accessible vehicles (WAVs) for private hire operators. The Equality Act 2010, particularly Sections 165–167, governs accessibility duties for taxis and designated wheelchair-accessible vehicles. These sections place specific duties on drivers of designated wheelchair-accessible taxis and private hire vehicles if their vehicle is on the council’s *Section 167 “designated list.” However, the Act does not require a private hire operator or fleet to own or operate a specific number of WAVs. The Local Government (Miscellaneous Provisions) Act 1976 allows councils to impose licensing conditions on private hire operators and vehicles — but only if those conditions are reasonable, proportionate, and justified by public need.	469	17

	Department for Transport (DfT) Statutory Taxi and Private Hire Vehicle Standards (2020) and Best Practice Guidance (2022) both emphasise flexibility and the need for councils to avoid placing disproportionate financial burdens on licensees. The DfT guidance recommends encouraging accessibility, not mandating fixed ratios. In contrast, hackney carriage (taxi) licensing is a separate legal regime. Hackneys are permitted to ply for hire and pick up passengers at ranks or on the street; councils often have greater scope to require those vehicles to be wheelchair accessible. Private hire vehicles (PHVs) operate only through pre-bookings, which makes it lawful and practical for them to refer or subcontract bookings to an accessible vehicle when required — fully compliant with the Equality Act 2010. In short: ■ Councils may encourage accessibility, ⊘ But they cannot lawfully require every operator to maintain a fixed ratio of wheelchair-accessible vehicles if it is financially or operationally disproportionate.		
10/09/2025 - 11:32am	17 7.21.7 Wheelchair transporting Due to changes in size of wheelchairs, we can't always transport them front and back facing, at times it has to be side facing	470	17
10/09/2025 - 12:32pm	17 7.21.7 Wheelchair transporting Due to changes in size of wheelchairs, we can't always transport them front and back facing, at times it has to be side facing.	471	17
10/19/2025 - 10:13pm	And also access from rear doors in the case of some Private Hire WAVS	472	17
10/26/2025 - 5:56pm	Due to changes in size of wheelchairs, we cant always transport them front and back facing, at times it has to be side facing.	473	17
10/12/2025 - 10:33pm	Due to changes in size of wheelchairs, we can't always transport them front and back facing, at times it has to be side facing..	474	17
10/27/2025 - 12:55am	Due to changes in wheelchair size, it's not always possible to transport them front or back facing. Some times it has to be side facing.	475	17
10/24/2025 - 6:20pm	Due to the size of wheelchairs, it is not always possible to transport them with the front and back facing; at times, it must be side-facing.	476	17
10/27/2025 - 11:30pm	The wheelchair may be large and cannot face forwards or backwards may be sideways	477	17

10/27/2025 - 11:20pm	Due to changes in size of wheelchairs, we can't always transport them front and back facing, at times it has to be side facing	478	17
10/27/2025 - 6:12pm	Due to changes in size of wheelchair we can't always transport them front and back facing.at time it has to be Side facing	479	17
10/26/2025 - 7:12pm	Due to changes in the size of wheelchairs, we cannot always transport them front and back-facing. At times, it has to be side-facing.	480	17
10/26/2025 - 1:06pm	Due to changes in size of wheelchairs, we can't always transport them front and back facing at times it has to be side facing	481	17
10/26/2025 - 1:50pm	we should only transport the standard wheelchairs because that's what the test involved, by taking any other wheelchair can be a safety concern.	482	17
10/19/2025 - 5:10pm	why should we need to obtain permission for dashcams?	483	17
10/26/2025 - 8:35pm	Sometimes it's not possible	484	17
10/20/2025 - 3:14pm	Due to changes in size of wheelchairs, we can't always transport them facing front or back, at times it has to go side facing	485	17
10/27/2025 - 10:26pm	because of change in size of wheelchairs, we cant always transport them fron and back faciing. at times it has to be side facing	486	17
10/11/2025 - 8:23pm	Due to the change in size of wheelchairs (especially those with electric motors that are heavier and larger) it is not always possible to transport them front and back facing - they have to be loaded side facing.	487	17
10/27/2025 - 11:28pm	sometimes wheel chair is too big and has to be sideways facing	488	17
10/23/2025 - 3:17pm	Due to change in size of wheel chairs we cant always transport them front and back facing at times it has to be side facing	489	17
10/26/2025 - 5:33pm	some wheelchairs are not standard and require facing sideways,this should have been considered.	490	17
10/25/2025 - 7:06pm	Some time size of the wheelchair drive have to put wheelchair in sideways	491	17
10/22/2025 - 2:54pm	Due to change in size of wheel chairs we cant always transport them front and back facing at times. It has to be side facing.	492	17

10/19/2025 - 5:12pm	This is not always possible. With different sized wheelchairs some have to be side facing.	493	17
10/26/2025 - 11:08am	Due to variations in wheelchair sizes, it is not always possible to transport them in a front- or rear-facing position; in some cases, side-facing transport is necessary.	494	17
10/19/2025 - 4:13pm	Due to changes in the size of wheelchairs we cant always transport them front and back facing at the time it has to be side facing because the electric wheelchairs are too big	495	17
10/26/2025 - 8:42pm	Due to size of wheelchairs sometimes you can not get a wheelchair front or rear facing,	496	17
10/25/2025 - 9:48pm	Due to changes in the size of wheelchairs, we can't always transport them from and back facing; at times, it has to be side facing.	497	17
10/27/2025 - 2:14pm	page 17 7.21.27 due to change in size of wheel chairs ,we can't always transport them front and back facing, at time it has to be side facing	498	17
10/26/2025 - 5:25pm	I strongly object to the proposed requirement for hackney carriage and private hire vehicles to alternate between MOT and compliance testing centres, as well as the policy on recurring advisories. The DVSA framework already provides consistent national standards for vehicle safety and quality. Mandating that drivers switch centres adds unnecessary costs, time, and administrative complexity. Given the rising expenses of fuel, insurance, and maintenance, this change will further burden drivers and operators. Moreover, penalizing recurring minor advisories is excessive when many do not impact safety. I urge the Council to implement a fair, risk-based approach that focuses on genuine safety concerns while supporting drivers' livelihoods.	499	18

Section 8 - Hackney carriage and Private Hire Drivers

Date posted	Comment	Bubble location number	Page
10/06/2025 - 5:35pm	21 8.4.2 Medical examination Should be any GP who provides group 2 medicals	10	1

	23 8.7.1 Driving test New application from now yes, previous license holders 5 years.(this is for drivers who do not renew their badges) 24 8.8.1 English language Q Is this for new applicants or includes existing drivers, if includes existing drivers than we disagree.		
10/27/2025 - 11:00pm	21 8.4.2 Medical examination Should be any GP who provides group 2 medicals 23 8.7.1 Driving test New application from now yes, previous license holders 5 years.(this is for drivers who do not renew their badges) 24 8.8.1 English language Q Is this for new applicants or includes existing drivers, if includes existing drivers than we disagree	12	1
10/24/2025 - 2:22pm	I am deeply concerned about the proposed removal of the school transport badge and the requirement to obtain a private hire badge instead. This change would significantly impact many drivers, particularly those from communities where cultural or religious expectations limit the types of work available. School transport offers a safe, structured, and community-based role that fits around family responsibilities while providing a vital source of income. It allows drivers to work locally and build trusted relationships with children and families. For many, transitioning to private hire work is neither appropriate nor feasible due to safety concerns, unsociable hours, and cultural barriers. Requiring a private hire badge and a full knowledge test—designed for drivers operating city-wide—is excessive for school transport, where routes are fixed and supported by GPS. If this change goes ahead, it risks pushing many capable, caring, and experienced drivers out of work. I urge decision-makers to reconsider and preserve a fair, inclusive route for those who wish to provide safe, reliable school transport for local children.	500	21
10/24/2025 - 12:23pm	As a female driver working in school transport, I am deeply concerned about the proposed removal of the school transport badge and the requirement to obtain a private hire badge instead. This change would	501	21

	have a serious impact on women like me, particularly those from communities where cultural or religious expectations restrict the types of work we can do. School transport offers a safe, structured, and community-based role that fits around family responsibilities and provides a vital source of income. It allows women to work locally and build trusted relationships with children and families. For many of us, moving into private hire work is neither appropriate nor feasible due to safety concerns, unsociable hours, and cultural barriers. Requiring a private hire badge and a full knowledge test—designed for drivers operating city-wide—is excessive for school transport, where routes are fixed and supported by GPS. If this change goes ahead, it risks pushing many capable, caring, and experienced women out of work. I urge decision-makers to reconsider and preserve a fair, inclusive route for women who wish to provide safe, reliable school transport for local children.		
10/24/2025 - 1:43pm	I am a female driver in the school transport sector, and I am very worried about the potential removal of the school transport badge, which would require us to obtain a private hire badge instead. This change could have significant repercussions for women like myself, particularly those from backgrounds where cultural or religious norms limit our job options. School transport provides a secure and structured job that aligns with family obligations while offering crucial income. It allows women to work in their communities and build reliable relationships with children and families. Many of us find the transition to private hire work impractical due to safety concerns, irregular hours, and cultural limitations. The demand for a private hire badge and a comprehensive knowledge test—designed for citywide operations—is disproportionate for school transport, where routes are predetermined and GPS-assisted. If this change occurs, it may drive many diligent and caring women out of their jobs. I implore decision-makers to reconsider and uphold an inclusive path for women in safe school transport roles.	502	21
10/24/2025 - 1:29pm	As a woman working in school transport, I'm deeply concerned about the proposal to remove the dedicated school transport badge and require drivers to obtain a private hire licence instead. This change would disproportionately affect women—especially those from cultural or religious backgrounds where work options are limited. School transport provides a safe, structured, and community-focused role that fits around family life and allows us to build trusted relationships with children and parents. Shifting to private hire work is not a realistic or safe alternative for many of us, due to late hours, unfamiliar passengers, and broader safety concerns. The requirement to pass a full city-wide knowledge test is excessive for school routes, which are fixed and supported by GPS. If implemented, this policy risks excluding experienced, caring drivers and undermining a vital service for local families. I urge the Council	503	21

	to protect an inclusive pathway that enables women to continue providing safe, reliable school transport in their communities.		
10/27/2025 - 2:34pm	As a female driver involved in school transport, I am troubled by the proposed removal of the school transport badge and the shift to requiring a private hire badge. This change could significantly affect women like me, particularly those from communities bound by cultural or religious expectations regarding work. School transport is a safe, structured role that accommodates family responsibilities while providing a vital source of income. It allows women to work locally and establish trust with children and families. Many of us find the move to private hire work unsuitable due to safety concerns, irregular hours, and cultural limitations. The requirement for a private hire badge and a full knowledge test—designed for citywide operations—is excessive for our predetermined routes supported by GPS. If this change is enacted, it risks displacing many capable, caring women from their roles. I urge decision-makers to reconsider and maintain an inclusive pathway for women who wish to provide safe school transport.	504	21
10/27/2025 - 2:22pm	As a female driver in the school transport sector, I am deeply concerned about the proposed removal of the school transport badge in favor of a private hire badge. This change could have a profound impact on women like myself, particularly those from communities where cultural or religious expectations limit our job options. School transport provides a safe, structured role that accommodates family commitments and is a crucial source of income. It allows women to work locally and build trusted relationships with families and children. The transition to private hire work presents safety challenges, irregular hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for citywide driving—is excessive for our fixed GPS-supported routes. If this change takes effect, it could push many capable and caring women out of work. I strongly urge decision-makers to rethink this policy and preserve an equitable pathway for women providing safe school transport.	505	21
10/24/2025 - 3:52pm	We completely endorse thorough medical assessments to verify driver fitness and ensure public safety. However, insisting that these evaluations be performed exclusively by an applicant's own GP is both impractical and excessive. Local GP offices are currently inundated with patients, causing delays that can lead to missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered doctor provides the same safety standard. Permitting assessments from any certified healthcare professional would minimize delays, relieve pressure on the NHS, and align the Council's policy with national best practices.	506	21
10/24/2025 - 2:09pm	As a female driver in the school transport industry, I feel compelled to express my concerns regarding the proposed removal of the school transport badge, which would necessitate obtaining a private hire badge. This change poses a significant threat to women like me, especially those in communities where cultural	507	21

	or religious norms restrict our employment opportunities. School transport provides a safe, structured working environment that fits well with family responsibilities and offers essential income. It allows women to work within their communities and build trust with children and families. The shift to private hire work is fraught with safety issues, unpredictable hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for city-wide drivers—is unreasonable for the fixed, GPS-supported routes we operate. If this policy is implemented, it could drive many skilled and compassionate women out of the workforce. I strongly encourage decision-makers to rethink this initiative and preserve a fair and inclusive option for women providing school transport.		
10/27/2025 - 3:29pm	As a driver involved in school transport, I wish to raise serious concerns about the proposal to discontinue the school transport badge in favour of the private hire licence. This measure would disproportionately affect drivers who depend on school transport work as a structured, community-based occupation. School transport differs significantly from private hire services—it operates on fixed routes, at set times, and under clear safeguarding arrangements. Requiring a private hire badge and a comprehensive city-wide knowledge test is excessive for this purpose and does not reflect the nature of the role. The proposed change could lead to the loss of many competent and experienced drivers. I urge the Council to adopt a more balanced policy that maintains a distinct licensing route for school transport, ensuring safety and inclusion without creating unnecessary barriers.	508	21
10/26/2025 - 9:15am	The provision for a restricted private hire badge also known as a school run drivers licence has been removed. Reasons cited are that it is 1 subsidised and no longer affordable 2 it is a 'lesser standard', 3 drivers that either hold a school run drivers licence or wish to do school transport can simply apply for a full licence. 4 It gives them the chance to carry out more work if they wish. 1 The removal of this will not save money as drivers will licence in other districts or cease working as they will not pass the knowledge test nor wish to take it. If this was purely about money then the subsidy should be withdrawn and the subsidised vehicle licence cancelled.	509	21

	2. Apart from the knowledge test it is no difference in standards of a full private hire licence. In fact School run drivers have additional safeguarding requirements that are needed to be attained to carry out school transport. They are a specialised driver, not a lesser driver. 3 School run drivers have no interest in private hire work. If they did they would apply for a full private hire licence. It is disingenuous to suggest they would. 4. They have no interest in private hire work. It is a different form of transport not a transport licence option. Finally like other forms of testing and licensing regimes they are specialised, bus, school, wheelchair etc. it should not be regarded as anything other than a skill that is learned specifically to carry out transport for a section of the travelling community that need expectations and safeguarding standards met for their safety and comfortable travel. If this new regulation wants to be inclusive and fit for purpose the school run/ vulnerable adult transport provision should be kept, it should be to a much higher standard and policed by licensing. I find a complete lack up of understanding on this role illustrated not only for the above reasons but by present opinions that it should be policed by school transport and not licensing as it is a cost, it is a responsibility of both departments. It is funded by tax payers and should be policed to the highest standard, both departments are funded by the same taxpayer.. Also if all transport of any kind was done by private hire drivers licensing would bear the cost anyway		
10/24/2025 - 3:25pm	As a female driver in the school transport sector, I am deeply concerned about the proposed removal of the school transport badge in favor of a private hire badge. This change could have a profound impact on women like myself, particularly those from communities where cultural or religious expectations limit our job options. School transport provides a safe, structured role that accommodates family commitments and is a crucial source of income. It allows women to work locally and build trusted relationships with families and children. The transition to private hire work presents safety challenges, irregular hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for citywide driving—is excessive for our fixed GPS-supported routes. If this change takes effect, it could push many capable and caring women out of work. I strongly urge decision-makers to rethink this policy and preserve an equitable pathway for women providing safe school transport.	510	21
10/24/2025 - 3:44pm	We strongly support thorough medical assessments to ensure that drivers are fit for their roles and to protect public safety. However, mandating that these assessments be completed only by an applicant's own GP is impractical and unnecessary. Local GP surgeries are already experiencing significant	511	21

	backlogs, leading to missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical done by any qualified GMC-registered doctor meets the same safety standards. Allowing evaluations from any certified practitioner would ease delays, reduce pressure on the NHS, and align the Council's policy with national best practices.		
10/27/2025 - 2:22pm	As a female driver working in school transport, I am very concerned about the proposed change to eliminate the school transport badge and require a private hire badge instead. This shift could have serious implications for women like me, especially those from communities where cultural or religious norms limit employment choices. School transport offers a secure, organized role that fits around family responsibilities and provides a vital source of income. It enables women to work locally and build trusted relationships with children and families. Many of us find it challenging to transition into private hire work due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for city-wide drivers—is excessive for school transport, where routes are fixed and supported by GPS. If this change is implemented, it risks pushing many skilled and compassionate women out of the workforce. I implore decision-makers to reconsider and maintain a fair, inclusive option for women providing reliable school transport.	512	21
10/24/2025 - 3:33pm	As a female driver working in school transport, I am very concerned about the proposed change to eliminate the school transport badge and require a private hire badge instead. This shift could have serious implications for women like me, especially those from communities where cultural or religious norms limit employment choices. School transport offers a secure, organized role that fits around family responsibilities and provides a vital source of income. It enables women to work locally and build trusted relationships with children and families. Many of us find it challenging to transition into private hire work due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for city-wide drivers—is excessive for school transport, where routes are fixed and supported by GPS. If this change is implemented, it risks pushing many skilled and compassionate women out of the workforce. I implore decision-makers to reconsider and maintain a fair, inclusive option for women providing reliable school transport.	513	21
10/24/2025 - 2:20pm	the proposal to remove the dedicated school transport badge and require all drivers to hold a private hire badge instead. This change may seem administrative, but in practice, it would have a serious impact on many experienced drivers who currently provide a safe and trusted service for local schools and families. School transport work is very different from private hire driving. It is structured, predictable, and community-based. Our routes are fixed, our passengers are the same every day, and our focus is on safety, reliability, and care for children—many of whom have special educational needs or disabilities	514	21

	(SEND). The current school transport badge reflects these specific responsibilities and the trust required for this role. Requiring drivers to obtain a private hire badge and complete a full knowledge test—originally designed for drivers operating across the city—is unnecessary and unfair for those of us who only transport schoolchildren on set routes. The nature of our work does not involve taking bookings, handling cash, or driving to unfamiliar locations. Forcing us into the same system as private hire drivers ignores the realities of school transport and places extra financial and administrative burdens on individuals who are simply trying to serve their local communities. If this change goes ahead, it will discourage many capable and experienced drivers from continuing in school transport, potentially leading to staff shortages and disruption for children and families who rely on consistent, familiar drivers. The Council should recognise that school transport is a specialised and essential service. A separate badge, with appropriate vetting, training, and safeguarding checks, already ensures high standards of safety and professionalism. I urge decision-makers to reconsider this proposal and retain a dedicated school transport licensing route. This would be a fair, practical, and balanced approach that supports drivers, protects livelihoods, and maintains the trusted service our schools depend on.		
10/27/2025 - 3:18pm	While we agree on the need for strict medical standards, requiring drivers to use only their own GP is unrealistic. Local surgeries are overwhelmed, causing long waits and delayed renewals that impact drivers' livelihoods. A DVLA Group 2 medical from any GMC-registered doctor offers the same level of safety. Allowing flexibility would reduce strain on the NHS and better reflect national standards.	515	21
10/24/2025 - 3:55pm	As a female driver in the school transport field, I am alarmed by the proposed removal of the school transport badge, which would require drivers to obtain a private hire badge. This change could greatly affect women like me, particularly those from communities where cultural or religious expectations restrict our job opportunities. School transport provides a safe, structured environment that aligns with family commitments and offers essential income. It allows women to work locally and develop trusted relationships with children and families. The transition to private hire work is fraught with safety concerns, unsociable hours, and cultural barriers. The requirement for a private hire badge and an extensive knowledge test—designed for citywide driving—is excessive for our fixed GPS-supported routes. If this change goes through, it may displace many capable and caring women from the workforce. I urge decision-makers to reconsider and preserve an inclusive pathway for women in school transport.	516	21

10/27/2025 - 2:46pm	As a female driver in school transport, I am deeply worried about the proposed removal of the school transport badge in favor of a private hire badge. This change could have significant consequences for women like me, especially those from communities where cultural or religious norms limit our employment options. School transport offers a safe, structured role that accommodates family responsibilities and provides a vital source of income. It allows women to work locally and build trusted relationships with families and children. Many of us find transitioning to private hire work impractical due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for citywide operations—is excessive for our fixed, GPS-supported routes. If this change is enacted, it risks pushing many skilled and caring women out of their jobs. I strongly encourage decision-makers to rethink this initiative and maintain an equitable path for women providing safe school transport.	517	21
10/15/2025 - 1:22pm	As an established school transport operator, I must strongly oppose the proposal to withdraw the school transport driver badge. This policy would seriously undermine service quality, equality of opportunity, and the stability of the local workforce. The school transport badge was originally introduced to tackle driver shortages — an issue that has never fully gone away. In recent years, we have already seen a significant loss of skilled drivers to neighbouring boroughs, driven by declining trade, restrictive policies, and at times heavy-handed enforcement. Removing the badge, or forcing drivers to transition into the private hire licensing system, would only accelerate this loss. Other councils have taken a far more balanced and supportive approach, offering frameworks that value school transport work. If Reading pursues this change, many drivers will simply move to more welcoming authorities, leaving the borough short of qualified drivers and jeopardising the delivery of reliable school transport services. Our workforce is made up of professional drivers from a wide range of backgrounds — including women, semi-retired individuals, and people managing long-term health conditions. For many, school transport work offers a rare combination of flexibility, safety, and predictable hours that fit around family or health needs. These conditions do not exist within the private hire trade, which typically involves unsociable working hours, a lack of safety assurance, and limited compatibility with part-time or daytime-only work. School transport driving is a specialised role that demands empathy, patience, and consistency. Our drivers work with children who have complex physical, behavioural, and emotional needs. They manage specialist equipment such as wheelchairs and harnesses, and build trusted relationships with pupils and	518	21

	families — something that cannot be replaced by casual private hire drivers unfamiliar with this environment. The badge system provides a structured, accountable, and supportive framework that allows these professionals to perform their roles safely and effectively. It also underpins diversity and inclusion in the workforce by offering accessible employment to groups who might otherwise be excluded from the wider transport sector. Removing it would disproportionately affect women and those with caring responsibilities, health conditions, or mobility challenges, pushing many capable drivers out of the profession. Rather than abolish the school transport badge, the council should modernise it. Practical improvements could include: Aligning badge fees with private hire licensing costs to ensure fairness, Replacing the outdated local knowledge test with an English and communication assessment, and Incorporating GPS-based navigation standards to reflect modern operating practices. These measures would maintain professionalism, ensure cost fairness, and preserve access to safe, inclusive employment. The school transport badge is not just an administrative formality — it is the foundation of a stable, community-focused workforce that families depend on every day. Removing it would reverse years of progress and deepen existing driver shortages. I urge the council to reconsider and to work collaboratively with operators and drivers to modernise, not dismantle, a system that continues to serve Reading well.		
10/14/2025 - 1:40pm	I wish to raise serious concerns regarding the proposal to withdraw the school transport driver badge licence. From operational, social, and equality perspectives, this change would have deeply damaging consequences, not only for our workforce but also for the families and children we serve every day. Our organisation currently employs a diverse group of drivers, including women, several semi-retired individuals, and others managing health conditions who depend on this work as their primary income or as a vital source of supplementary earnings. For many, the school transport role offers more than just employment, it provides structure, purpose, and a sense of contribution to their community.	519	21

	Removing the school transport badge would have immediate and far-reaching repercussions. The role offers a rare balance, with flexible hours, safe working conditions, and a predictable routine aligned with school schedules. For women, carers, semi-retired people, and those with health challenges who can only work part-time, this balance is almost impossible to find elsewhere in the transport industry. It is essential to recognise that the private hire trade is not a realistic or appropriate alternative for most of these individuals. The sector is male-dominated, often involves long and unsociable hours, and carries safety concerns that deter many from participation. The existing school transport badge system, by contrast, provides a formal, structured, and supportive environment that enables people from varied backgrounds, including those with limited physical capacity or specific personal circumstances, to remain economically active and engaged in meaningful work. Removing this system would strip away one of the few accessible and inclusive pathways into the transport sector for underrepresented groups. It would likely force many skilled, caring, and experienced drivers out of employment altogether, leading to both social and operational harm. The impact would also reach beyond drivers themselves. Passenger assistants, many of whom are women, frequently request or require female colleagues for cultural, religious, or safeguarding reasons. A reduction in female drivers would therefore create staffing shortages, reduce flexibility, and undermine the inclusivity and responsiveness that the service currently provides. What may appear to be a minor administrative adjustment would, in practice, dismantle a well-functioning, balanced system that has long enabled school transport to operate safely, efficiently, and inclusively. Service quality would also inevitably decline. School transport is a specialised area of work requiring dedicated, trained professionals who understand how to support children with disabilities, sensory sensitivities, and behavioural challenges. Our drivers are skilled in handling car seats, wheelchairs, walkers, and harnesses, and they build trusting relationships with families over time. This continuity and care cannot be replicated by private hire drivers whose work is transient and not tailored to the needs of vulnerable passengers.		

	Families also value the assurance that comes from being able to request a female driver when appropriate. Removing the badge system would make it difficult or impossible to meet such requests, eroding inclusivity and parental confidence in the service. While we appreciate the financial pressures the council faces, abolishing the badge entirely is not a balanced or proportionate solution. A more constructive and equitable approach would be to: Align the school transport badge fee with that of the private hire licence to address cost parity, Replace the outdated area knowledge test with a practical English-speaking assessment, and Incorporate modern GPS-based navigation standards to reflect current operational realities. These adjustments would modernise the system, reduce unnecessary barriers to entry, and maintain an inclusive workforce that represents our community's diversity and needs. In summary, the school transport badge underpins a workforce that is safe, skilled, and community-focused. It enables women, semi-retired individuals, and those with health conditions to participate meaningfully in the labour market through fair, flexible, and dignified work. Abolishing it would reverse years of progress in equality, workforce stability, and service quality. I therefore urge the council to reconsider this proposal and to protect a system that works, not just for operators, but for the children, families, and communities who rely on it every single day.		
10/27/2025 - 2:41pm	As a female driver in the school transport sector, I am deeply concerned about the proposed removal of the school transport badge in favor of a private hire badge. This change could have a profound impact on women like myself, particularly those from communities where cultural or religious expectations limit our job options. School transport provides a safe, structured role that accommodates family commitments and is a crucial source of income. It allows women to work locally and build trusted relationships with families and children. The transition to private hire work presents safety challenges, irregular hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for citywide driving—is excessive for our fixed GPS-supported routes. If this change takes effect, it could push many capable and caring women out of work. I strongly urge decision-makers to rethink this policy and preserve an equitable pathway for women providing safe school transport.	520	21

10/24/2025 - 3:45pm	As a female driver working in school transport, I am very concerned about the proposed change to eliminate the school transport badge and require a private hire badge instead. This shift could have serious implications for women like me, especially those from communities where cultural or religious norms limit employment choices. School transport offers a secure, organized role that fits around family responsibilities and provides a vital source of income. It enables women to work locally and build trusted relationships with children and families. Many of us find it challenging to transition into private hire work due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for city-wide drivers—is excessive for school transport, where routes are fixed and supported by GPS. If this change is implemented, it risks pushing many skilled and compassionate women out of the workforce. I implore decision-makers to reconsider and maintain a fair, inclusive option for women providing reliable school transport.	521	21
10/27/2025 - 10:19am	I submit this as an operator of school run vehicles I do not agree with the removal of the school run drivers licence as a lesser licence and the fact that it is subsidised by the council. nor the logic that drivers can apply for a full PH licence when they renew. 1. Removing this licence will cause a severe shortage of drivers in an already shrinking pool of drivers holding an RBC private hire drivers license. This will simply add to the exodus of available staff as they licence elsewhere causing more loss of income. 2. The school run drivers license is not a lesser licence. Drivers have to go through the same testing regime as a private hire driver just omitting the knowledg/location test. These drivers have to attain a much higher qualification on medical training, autism training and skills training. They are a specialised transport service. It is disingenuous to suggest this isa lesser licence. 3. School run drivers will not apply for the full licence because of the knowledge/location test and that they are part time drivers who will never engage in private hire work, nor are they interested in it.. 4. If this is a fiscal matter then remove the school run driver vehicle licence and the subsidy on the school run drivers licence. 5. I maintain that the school run department/Brighter futures for children do not agree with this proposal. where is the proof of this agreement from staff that have to allocate tenders and find drivers. Top management do not have an awareness of day to day functions. 6. It is the function of licensing with their now extensive team of licensing officers to inspect transport for children and vulnerable adults. It is invalid to say that is causes costs on licensing as they would have to inspect anyway if they were all ph licenced vehicles. School transport is and should be a joint	523	21

	responsibility. There is no ring fenced finance for licensing, their costs are born collectively by the tax payer.		
10/27/2025 - 2:02pm	My name is [REDACTED] school run badge number [REDACTED] I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	524	21
10/26/2025 - 4:21pm	As a female driver in the school transport sector, I am deeply concerned about the proposed removal of the school transport badge in favor of a private hire badge. This change could have a profound impact on women like myself, particularly those from communities where cultural or religious expectations limit our job options. School transport provides a safe, structured role that accommodates family commitments and is a crucial source of income. It allows women to work locally and build trusted relationships with families and children. The transition to private hire work presents safety challenges, irregular hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for citywide driving—is excessive for our fixed GPS-supported routes. If this change takes effect, it could push many capable and caring women out of work. I strongly urge decision-makers to rethink this policy and preserve an equitable pathway for women providing safe school transport.	525	21
10/26/2025 - 3:53pm	As a female driver involved in school transport, I am troubled by the proposed removal of the school transport badge and the shift to requiring a private hire badge. This change could significantly affect women like me, particularly those from communities bound by cultural or religious expectations regarding work. School transport is a safe, structured role that accommodates family responsibilities while providing a vital source of income. It allows women to work locally and establish trust with children and families. Many of us find the move to private hire work unsuitable due to safety concerns, irregular hours, and cultural limitations. The requirement for a private hire badge and a full knowledge test—designed for citywide operations—is excessive for our predetermined routes supported by GPS. If this change is enacted, it risks displacing many capable, caring women from their roles. I urge decision-makers to reconsider and maintain an inclusive pathway for women who wish to provide safe school transport.	526	21

10/24/2025 - 2:04pm	As a female driver in the school transport industry, I feel compelled to express my concerns regarding the proposed removal of the school transport badge, which would necessitate obtaining a private hire badge. This change poses a significant threat to women like me, especially those in communities where cultural or religious norms restrict our employment opportunities. School transport provides a safe, structured working environment that fits well with family responsibilities and offers essential income. It allows women to work within their communities and build trust with children and families. The shift to private hire work is fraught with safety issues, unpredictable hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for city-wide drivers—is unreasonable for the fixed, GPS-supported routes we operate. If this policy is implemented, it could drive many skilled and compassionate women out of the workforce. I strongly encourage decision-makers to rethink this initiative and preserve a fair and inclusive option for women providing school transport.	527	21
10/27/2025 - 8:54am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	528	21
10/27/2025 - 8:58am	My name is [REDACTED] school run badge number 9 [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	529	21
10/27/2025 - 8:56am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	530	21
10/27/2025 - 8:53am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	531	21

10/27/2025 - 8:46am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	532	21
10/27/2025 - 8:51am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	533	21
10/27/2025 - 8:48am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	534	21
10/27/2025 - 2:07pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	535	21
10/27/2025 - 10:56am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	536	21
10/27/2025 - 9:02am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	537	21
10/27/2025 - 1:57pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	538	21

10/27/2025 - 11:07am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	539	21
10/27/2025 - 11:46am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	540	21
10/27/2025 - 12:08pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	541	21
10/27/2025 - 9:01am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	542	21
10/27/2025 - 2:27pm	We wholeheartedly support comprehensive medical evaluations to ensure driver fitness and protect public safety. However, requiring that these assessments only be conducted by an applicant's personal GP is impractical and unwarranted. Local GP practices are currently overwhelmed, leading to delays that can result in missed renewal deadlines and lost income for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered physician offers the same level of safety assurance. Allowing assessments from any certified practitioner would help reduce delays, lessen the burden on the NHS, and bring the Council's policy in line with national best practices.	543	21

10/27/2025 - 2:27pm	As a female driver in school transport, I am deeply worried about the proposed removal of the school transport badge in favor of a private hire badge. This change could have significant consequences for women like me, especially those from communities where cultural or religious norms limit our employment options. School transport offers a safe, structured role that accommodates family responsibilities and provides a vital source of income. It allows women to work locally and build trusted relationships with families and children. Many of us find transitioning to private hire work impractical due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for citywide operations—is excessive for our fixed, GPS-supported routes. If this change is enacted, it risks pushing many skilled and caring women out of their jobs. I strongly encourage decision-makers to rethink this initiative and maintain an equitable path for women providing safe school transport.	544	21
10/27/2025 - 12:35pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	545	21
10/27/2025 - 10:38am	As a female driver in the school transport industry, I feel compelled to express my concerns regarding the proposed removal of the school transport badge, which would necessitate obtaining a private hire badge. This change poses a significant threat to women like me, especially those in communities where cultural or religious norms restrict our employment opportunities. School transport provides a safe, structured working environment that fits well with family responsibilities and offers essential income. It allows women to work within their communities and build trust with children and families. The shift to private hire work is fraught with safety issues, unpredictable hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for city-wide drivers—is unreasonable for the fixed, GPS-supported routes we operate. If this policy is implemented, it could drive many skilled and compassionate women out of the workforce. I strongly encourage decision-makers to rethink this initiative and preserve a fair and inclusive option for women providing school transport.	546	21
10/24/2025 - 2:04pm	We strongly support comprehensive medical assessments to verify driver fitness and ensure public safety. However, insisting that these evaluations be performed exclusively by an applicant's own GP is impractical and unnecessary. Local GP surgeries are already facing significant delays, leading to missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered doctor provides the same safety standard. Allowing	547	21

	assessments from any certified healthcare professional would help reduce delays, relieve pressure on the NHS, and bring the Council's policy in line with national best practices.		
10/27/2025 - 12:13pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	548	21
10/27/2025 - 12:30pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	549	21
10/27/2025 - 12:05pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	550	21
10/27/2025 - 11:58am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	551	21
10/27/2025 - 12:27pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	552	21
10/27/2025 - 12:23pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	553	21

10/27/2025 - 11:36am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	554	21
10/27/2025 - 11:51am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	555	21
10/27/2025 - 11:22am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	556	21
10/27/2025 - 12:15pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	557	21
10/27/2025 - 10:58am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	558	21
10/27/2025 - 11:33am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	559	21
10/27/2025 - 11:13am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	560	21

10/27/2025 - 9:00am	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	561	21
10/26/2025 - 5:26pm	As a female driver working in school transport, I am very concerned about the proposed change to eliminate the school transport badge and require a private hire badge instead. This shift could have serious implications for women like me, especially those from communities where cultural or religious norms limit employment choices. School transport offers a secure, organized role that fits around family responsibilities and provides a vital source of income. It enables women to work locally and build trusted relationships with children and families. Many of us find it challenging to transition into private hire work due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for city-wide drivers—is excessive for school transport, where routes are fixed and supported by GPS. If this change is implemented, it risks pushing many skilled and compassionate women out of the workforce. I implore decision-makers to reconsider and maintain a fair, inclusive option for women providing reliable school transport.	562	21
10/27/2025 - 11:02am	My name is [REDACTED] school run badge number 9 [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	563	21
10/27/2025 - 12:19pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	564	21
10/27/2025 - 12:42pm	As a female driver involved in school transport, I am troubled by the proposed removal of the school transport badge and the shift to requiring a private hire badge. This change could significantly affect women like me, particularly those from communities bound by cultural or religious expectations regarding work. School transport is a safe, structured role that accommodates family responsibilities while providing a vital source of income. It allows women to work locally and establish trust with children and families. Many of us find the move to private hire work unsuitable due to safety concerns, irregular hours, and cultural limitations. The requirement for a private hire badge and a full knowledge test—designed for citywide operations—is excessive for our predetermined routes	565	21

	supported by GPS. If this change is enacted, it risks displacing many capable, caring women from their roles. I urge decision-makers to reconsider and maintain an inclusive pathway for women who wish to provide safe school transport.		
10/27/2025 - 12:02pm	My name is [REDACTED] school run badge number [REDACTED]. I will not renew my badge as a full private hire licence. I have no knowledge of Reading to pass this licence and I can only work part time. please do not remove the school run drivers licence.	566	21
10/27/2025 - 1:25pm	As a female driver working in school transport, I am very concerned about the proposed change to eliminate the school transport badge and require a private hire badge instead. This shift could have serious implications for women like me, especially those from communities where cultural or religious norms limit employment choices. School transport offers a secure, organized role that fits around family responsibilities and provides a vital source of income. It enables women to work locally and build trusted relationships with children and families. Many of us find it challenging to transition into private hire work due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for city-wide drivers—is excessive for school transport, where routes are fixed and supported by GPS. If this change is implemented, it risks pushing many skilled and compassionate women out of the workforce. I implore decision-makers to reconsider and maintain a fair, inclusive option for women providing reliable school transport.	567	21
10/27/2025 - 2:17pm	page 21 8.4.2 should be any GP who provides group 2 medicals	568	21
10/27/2025 - 10:52am	We strongly support comprehensive medical assessments to verify driver fitness and ensure public safety. However, insisting that these evaluations be performed exclusively by an applicant's own GP is impractical and unnecessary. Local GP surgeries are already facing significant delays, leading to missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered doctor provides the same safety standard. Allowing assessments from any certified healthcare professional would help reduce delays, relieve pressure on the NHS, and bring the Council's policy in line with national best practices.	569	21
10/27/2025 - 1:59pm	We completely endorse thorough medical assessments to verify driver fitness and ensure public safety. However, insisting that these evaluations be performed exclusively by an applicant's own GP is both impractical and excessive. Local GP offices are currently inundated with patients, causing delays that can lead to missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered doctor provides the same safety standard. Permitting assessments from	570	21

	any certified healthcare professional would minimize delays, relieve pressure on the NHS, and align the Council's policy with national best practices.		
10/27/2025 - 1:11pm	We completely support thorough medical assessments to ensure driver fitness and protect public safety. However, insisting that these evaluations be conducted solely by an applicant's own GP is both impractical and unnecessary. Local GP surgeries are already experiencing long wait times, resulting in missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor maintains the same safety standard. Allowing assessments from any certified practitioner would help minimize delays, ease the strain on the NHS, and align the Council's policy with national best practices.	571	21
10/09/2025 - 12:33pm	21 8.4.2 Medical examination Should be any GP who provides group 2 medicals	572	21
10/27/2025 - 2:37pm	As a female driver working in school transport, I am very concerned about the proposed change to eliminate the school transport badge and require a private hire badge instead. This shift could have serious implications for women like me, especially those from communities where cultural or religious norms limit employment choices. School transport offers a secure, organized role that fits around family responsibilities and provides a vital source of income. It enables women to work locally and build trusted relationships with children and families. Many of us find it challenging to transition into private hire work due to safety concerns, irregular hours, and cultural barriers. The requirement for a private hire badge and a full knowledge test—intended for city-wide drivers—is excessive for school transport, where routes are fixed and supported by GPS. If this change is implemented, it risks pushing many skilled and compassionate women out of the workforce. I implore decision-makers to reconsider and maintain a fair, inclusive option for women providing reliable school transport.	573	21

10/27/2025 - 2:00pm	As a female driver in the school transport sector, I am highly concerned about the proposed policy change that would remove the school transport badge and require a private hire badge instead. This alteration could severely impact women like myself, particularly those from communities where cultural or religious expectations limit job opportunities. School transport provides a safe, structured working environment that accommodates family responsibilities and offers essential income. It allows women to work locally and foster trusted relationships with children and families. The shift to private hire work raises safety issues, involves unsociable hours, and presents cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for broader city driving—is excessive for the fixed routes we operate with GPS support. If this change proceeds, it may lead to the displacement of many capable and compassionate women. I urge policymakers to reconsider and ensure a fair and inclusive route for women providing school transport.	574	21
10/19/2025 - 10:19pm	For these drivers the application charges should only be for the time the license is issued its unreasonable to expect 3 years fees when the license being issued is only for to 2 years.	575	21
10/27/2025 - 2:26pm	As a private hire driver, I fully agree that medical checks are important to keep both drivers and public safe. But making drivers only use their own GP for the medical is not fair or realistic. Many local doctors are too busy and appointments take weeks or even months, which makes it hard for us to renew our licence on time. This delay means we can't work and lose income. There is really no difference in a DVLA Group 2 medical done by my GP or by any other GMC registered doctor – both follow the same rules. The Council should let any qualified doctor do the assessment. This would help drivers get back on the road faster, reduce pressure on local surgeries, and still keep the same high safety standards like other areas in the UK already do.	576	21
10/27/2025 - 10:42am	As a private hire driver, I fully agree that medical checks are important to keep both drivers and public safe. But making drivers only use their own GP for the medical is not fair or realistic. Many local doctors are too busy and appointments take weeks or even months, which makes it hard for us to renew our licence on time. This delay means we can't work and lose income. There is really no difference in a DVLA Group 2 medical done by my GP or by any other GMC registered doctor – both follow the same rules. The Council should let any qualified doctor do the assessment. This would help drivers get back on the road faster, reduce pressure on local surgeries, and still keep the same high safety standards like other areas in the UK already do.	577	21
10/26/2025 - 5:26pm	We are fully in favor of rigorous medical assessments to verify driver fitness and ensure public safety. However, requiring that these assessments be conducted exclusively by an applicant's GP is impractical and unwarranted. Local GP surgeries are facing lengthy delays,	578	21

	which can result in missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor ensures the same level of safety. Allowing assessments from any certified healthcare professional would reduce delays, relieve pressure on the NHS, and bring the Council's policy in line with national best practices.		
10/27/2025 - 2:46pm	We completely support thorough medical assessments to ensure driver fitness and protect public safety. However, insisting that these evaluations be conducted solely by an applicant's own GP is both impractical and unnecessary. Local GP surgeries are already experiencing long wait times, resulting in missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor maintains the same safety standard. Allowing assessments from any certified practitioner would help minimize delays, ease the strain on the NHS, and align the Council's policy with national best practices.	579	21
10/27/2025 - 2:40pm	We are fully in favor of rigorous medical assessments to verify driver fitness and ensure public safety. However, requiring that these assessments be conducted exclusively by an applicant's GP is impractical and unwarranted. Local GP surgeries are facing lengthy delays, which can result in missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor ensures the same level of safety. Allowing assessments from any certified healthcare professional would reduce delays, relieve pressure on the NHS, and bring the Council's policy in line with national best practices.	580	21
10/27/2025 - 2:16pm	We completely support thorough medical assessments to ensure driver fitness and protect public safety. However, insisting that these evaluations be conducted solely by an applicant's own GP is both impractical and unnecessary. Local GP surgeries are already experiencing long wait times, resulting in missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor maintains the same safety standard. Allowing assessments from any certified practitioner would help minimize delays, ease the strain on the NHS, and align the Council's policy with national best practices.	581	21
10/27/2025 - 12:44pm	We fully back thorough medical assessments to confirm driver fitness and safeguard public safety. However, requiring these assessments to be done only by an applicant's personal GP is impractical and excessive. Local GP practices are currently burdened with long wait times, which can lead to missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered physician offers equivalent safety assurances. Allowing assessments by any certified practitioner would reduce delays, alleviate pressure on the NHS, and align the Council's policy with national best practices.	582	21

10/24/2025 - 1:30pm	We fully recognise the importance of rigorous medical assessments in ensuring driver competence and safeguarding public safety. However, the current requirement that these assessments be conducted exclusively by an applicant's own GP is both restrictive and counterproductive. With NHS GP practices already under immense strain, many drivers are facing significant delays in securing appointments. These delays often result in missed license renewal deadlines, causing unnecessary disruption to livelihoods. Importantly, a DVLA Group 2 medical conducted by any GMC-registered doctor meets the same high standards of clinical scrutiny and safety. Permitting assessments from any qualified practitioner would not only streamline the process for drivers but also alleviate pressure on overstretched GP services. Such a change would align local policy with national best practice and support a more efficient, fair, and accessible licensing system.	583	21
10/24/2025 - 2:22pm	We completely support thorough medical assessments to ensure driver fitness and protect public safety. However, insisting that these evaluations be conducted solely by an applicant's own GP is both impractical and unnecessary. Local GP surgeries are already experiencing long wait times, resulting in missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor maintains the same safety standard. Allowing assessments from any certified practitioner would help minimize delays, ease the strain on the NHS, and align the Council's policy with national best practices.	584	21
10/27/2025 - 3:29pm	We support robust medical checks to confirm driver fitness and uphold public safety. However, the stipulation that assessments must be undertaken solely by an applicant's own GP is unnecessarily restrictive. Owing to current pressures on primary care services, many drivers experience delays that lead to lost income and disrupted service. A DVLA Group 2 medical conducted by any suitably qualified GMC-registered practitioner meets the same professional and safety standards. Revising this policy to accept assessments from any certified doctor would reduce delays, support drivers, and align the Council's approach with established national guidance.	585	21
10/27/2025 - 2:33pm	We strongly support thorough medical assessments to ensure that drivers are fit for their roles and to protect public safety. However, mandating that these assessments be completed only by an applicant's own GP is impractical and unnecessary. Local GP surgeries are already experiencing significant backlogs, leading to missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical done by any qualified GMC-registered doctor meets the same safety standards. Allowing evaluations	586	21

	from any certified practitioner would ease delays, reduce pressure on the NHS, and align the Council's policy with national best practices.		
10/27/2025 - 1:15pm	As a female driver in the school transport sector, I am deeply concerned about the proposed removal of the school transport badge in favor of a private hire badge. This change could have a profound impact on women like myself, particularly those from communities where cultural or religious expectations limit our job options. School transport provides a safe, structured role that accommodates family commitments and is a crucial source of income. It allows women to work locally and build trusted relationships with families and children. The transition to private hire work presents safety challenges, irregular hours, and cultural barriers. The requirement for a private hire badge and a comprehensive knowledge test—designed for citywide driving—is excessive for our fixed GPS-supported routes. If this change takes effect, it could push many capable and caring women out of work. I strongly urge decision-makers to rethink this policy and preserve an equitable pathway for women providing safe school transport.	587	21
10/24/2025 - 3:32pm	We completely support thorough medical assessments to ensure driver fitness and protect public safety. However, insisting that these evaluations be conducted solely by an applicant's own GP is both impractical and unnecessary. Local GP surgeries are already experiencing long wait times, resulting in missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor maintains the same safety standard. Allowing assessments from any certified practitioner would help minimize delays, ease the strain on the NHS, and align the Council's policy with national best practices.	588	21
10/27/2025 - 3:21pm	As a male driver working in school transport, I am very concerned about the proposal to remove the school transport badge and require drivers to obtain a private hire badge instead. This change would have a serious impact on many of us who rely on school transport work as a stable, community-based role. School transport provides a safe, structured environment that fits around family life and allows drivers to build trusted relationships with children, parents, and schools. Unlike private hire work, these roles are local, predictable, and centred on safety rather than commercial driving. Requiring a private hire badge and a full knowledge test—intended for city-wide drivers—is unnecessary for school transport, where routes are fixed and supported by GPS.	589	21

	If implemented, this policy risks driving many capable, responsible, and experienced school transport drivers out of the profession. I urge decision-makers to reconsider and maintain a fair and accessible licensing route that supports those dedicated to transporting children safely and reliably		
10/26/2025 - 3:53pm	We strongly support comprehensive medical assessments to verify driver fitness and ensure public safety. However, insisting that these evaluations be performed exclusively by an applicant's own GP is impractical and unnecessary. Local GP surgeries are already facing significant delays, leading to missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered doctor provides the same safety standard. Allowing assessments from any certified healthcare professional would help reduce delays, relieve pressure on the NHS, and bring the Council's policy in line with national best practices.	590	21
10/24/2025 - 2:09pm	We fully back thorough medical assessments to confirm driver fitness and safeguard public safety. However, requiring these assessments to be done only by an applicant's personal GP is impractical and excessive. Local GP practices are currently burdened with long wait times, which can lead to missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered physician offers equivalent safety assurances. Allowing assessments by any certified practitioner would reduce delays, alleviate pressure on the NHS, and align the Council's policy with national best practices.	591	21
10/24/2025 - 2:17pm	We all understand the importance of confirming that drivers meet the DVLA Group 2 medical standards. However, the current rule requiring drivers to use only their own GP for these medical assessments is unfair, impractical, and creates unnecessary hardship. Many local GP practices are already struggling with high demand, and it can take weeks or even months to secure an appointment. This delay directly affects drivers' livelihoods — if we can't renew our licences on time, we are unable to work and lose our income. For many of us, this creates serious financial stress and uncertainty. There is no real difference between a DVLA Group 2 medical completed by a driver's personal GP and one carried out by any other GMC-registered doctor. Both professionals follow the same strict DVLA guidelines, complete the same forms, and are bound by the same ethical and medical standards. Therefore, limiting assessments to only personal GPs adds no extra safety benefit.	592	21

	Allowing drivers to have their medicals completed by any qualified and registered doctor would be a fair and practical solution. It would ease pressure on busy GP surgeries, speed up the licensing process, and help drivers get back on the road faster — without compromising public safety. Many councils across the UK already accept medicals from GMC-registered practitioners, recognising that what matters most is the accuracy and validity of the assessment, not who performs it. I urge the Council to adopt this fair and flexible approach to support drivers, protect livelihoods, and maintain the same high medical and safety standards expected in our industry.		
10/24/2025 - 3:26pm	We completely support thorough medical assessments to ensure driver fitness and protect public safety. However, insisting that these evaluations be conducted solely by an applicant's own GP is both impractical and unnecessary. Local GP surgeries are already experiencing long wait times, resulting in missed renewal deadlines and income loss for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor maintains the same safety standard. Allowing assessments from any certified practitioner would help minimize delays, ease the strain on the NHS, and align the Council's policy with national best practices.	593	21
10/26/2025 - 4:20pm	We fully back thorough medical assessments to confirm driver fitness and safeguard public safety. However, requiring these assessments to be done only by an applicant's personal GP is impractical and excessive. Local GP practices are currently burdened with long wait times, which can lead to missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered physician offers equivalent safety assurances. Allowing assessments by any certified practitioner would reduce delays, alleviate pressure on the NHS, and align the Council's policy with national best practices.	594	21
10/24/2025 - 11:10am	The requirement for a medical examination to be conducted by "a GP at the applicant's registered GP surgery." This condition is outdated, impractical, and does not reflect the current structure of the UK's primary healthcare system. It is now increasingly common and often necessary for patients to attend specialist clinics, private medical centres, or NHS treatment hubs for medical examinations and procedures. Many General Practitioner (GP) surgeries no longer have the capacity or offer this service directly, instead referring patients to external providers. This policy would effectively penalise an applicant for following their own doctor's advice and the standard pathways of modern healthcare.	595	21

	Mandating an appointment at one specific location (the registered surgery) creates a significant bottleneck. Waiting times for non-urgent appointments like a driver medical can be prohibitively long, unnecessarily delaying the licensing process and preventing qualified individuals from working. This is not an issue of fitness, but of administrative red tape. The Council's legitimate concern is that the medical examination is conducted to the correct standard. This should be the focus of the policy, not the specific building where it takes place. A medical report from a fully qualified and GMC-registered doctor at an approved medical centre or clinic is equally valid, and often more readily available. The policy must be updated to reflect 21st-century healthcare practices.		
10/26/2025 - 5:58pm	Should be any GP who provides group 2 medicals.	596	21
10/24/2025 - 1:17pm	We fully support the need for thorough medical assessments to ensure driver fitness and uphold public safety standards. It is essential that all licensed drivers meet the appropriate health criteria, and we recognise the importance of medical checks in maintaining trust and safety within the transport sector. However, the current requirement that these assessments be carried out exclusively by an applicant's own GP is both impractical and unnecessarily restrictive. Many local GP surgeries are already under significant pressure, with long waiting times for appointments. This often results in delays that prevent drivers from renewing their licences on time, leading to avoidable income loss and disruption to essential transport services. Importantly, the DVLA Group 2 medical standard—used nationally for professional drivers—can be reliably performed by any GMC-registered doctor. These practitioners are fully qualified to assess driver fitness to the same rigorous standard, regardless of whether they are the applicant's personal GP. By allowing drivers to access medical assessments from any certified provider, the Council would not only maintain safety standards but also reduce administrative bottlenecks, ease pressure on overstretched NHS services, and support drivers in staying compliant without unnecessary delays.	597	21

	This approach is already recognised as best practice across many licensing authorities and aligns with DVLA guidance. Updating the policy to reflect this would demonstrate a fair, efficient, and modern approach to licensing—one that protects public safety while respecting the practical realities faced by drivers and healthcare providers alike.		
09/02/2025 - 4:50pm	My doctors surgery limits the amount of private medicals it does They take too much time is the excuse Currently the wait is more than 12 weeks to get on the list for an appointment. Other doctors are holding open surgeries for medicals These surgeries are run by qualified doctors that do exactly the same medical as the one I'm registered with but on a 1st come 1st seen basis on certain dates	598	21
10/24/2025 - 1:44pm	We fully advocate for rigorous medical evaluations to ensure driver fitness and protect public safety. Nonetheless, requiring that these assessments be taken only with an applicant's personal GP is unfeasible and unwarranted. Local GP offices are currently overwhelmed, resulting in delays that can cause missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered physician guarantees the same level of safety. Permitting assessments from any certified practitioner would minimize delays, lessen the burden on the NHS, and align the Council's policy with national best practices.	599	21
10/25/2025 - 7:08pm	Should be any GP who do group 2 medical	600	21
10/27/2025 - 6:14pm	Should be any gp who provides group 2 medical	601	21
10/24/2025 - 6:21pm	It should be a choice to be able to go to any GP which allows group 2 medicals.	602	21
10/27/2025 - 1:35pm	As a female driver in the school transport field, I am alarmed by the proposed removal of the school transport badge, which would require drivers to obtain a private hire badge. This change could greatly affect women like me, particularly those from communities where cultural or religious expectations restrict our job opportunities. School transport provides a safe, structured environment that aligns with family commitments and offers essential income. It allows women to work locally and develop trusted relationships with children and families. The transition to private hire work is fraught with safety concerns, unsociable hours, and cultural barriers. The requirement for a private hire badge and an extensive knowledge test—designed for citywide driving—is excessive for our fixed GPS-supported routes. If this change goes through, it may displace many capable and caring women from the	603	21

	workforce. I urge decision-makers to reconsider and preserve an inclusive pathway for women in school transport.		
10/09/2025 - 11:33am	21 8.4.2 Medical examination Should be any GP who provides group 2 medicals	604	21
10/26/2025 - 1:07pm	Should be any GP who provides group 2 medicals	605	21
10/27/2025 - 11:32pm	Any GP who provides group 2 medicals	606	21
10/12/2025 - 10:34pm	Should be any GP who provides group 2 medicals	607	21
10/24/2025 - 12:14pm	As a private hire driver, I fully agree that medical checks are important to keep both drivers and public safe. But making drivers only use their own GP for the medical is not fair or realistic. Many local doctors are too busy and appointments take weeks or even months, which makes it hard for us to renew our licence on time. This delay means we can't work and lose income. There is really no difference in a DVLA Group 2 medical done by my GP or by any other GMC registered doctor – both follow the same rules. The Council should let any qualified doctor do the assessment. This would help drivers get back on the road faster, reduce pressure on local surgeries, and still keep the same high safety standards like other areas in the UK already do.	608	21
10/27/2025 - 1:26pm	We are fully in favor of rigorous medical assessments to verify driver fitness and ensure public safety. However, requiring that these assessments be conducted exclusively by an applicant's GP is impractical and unwarranted. Local GP surgeries are facing lengthy delays, which can result in missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered doctor ensures the same level of safety. Allowing assessments from any certified healthcare professional would reduce delays, relieve pressure on the NHS, and bring the Council's policy in line with national best practices.	609	21
10/23/2025 - 3:18pm	should be any GP who provides group 2 medicals	610	21

10/26/2025 - 8:22pm	Some of the doctors do not provide this service. Most of them charge way to much	611	21
10/26/2025 - 4:20pm	We fully back thorough medical assessments to confirm driver fitness and safeguard public safety. However, requiring these assessments to be done only by an applicant's personal GP is impractical and excessive. Local GP practices are currently burdened with long wait times, which can lead to missed renewal deadlines and financial losses for drivers. A DVLA Group 2 medical conducted by any qualified GMC-registered physician offers equivalent safety assurances. Allowing assessments by any certified practitioner would reduce delays, alleviate pressure on the NHS, and align the Council's policy with national best practices.	612	21
10/26/2025 - 7:13pm	Should be any GP that provides group 2 medicals.	613	21
10/27/2025 - 10:27pm	should be any GP who provides group 2 medicals	614	21
10/20/2025 - 3:15pm	Disagree, should be any GP who can provide group to medicals	615	21
10/27/2025 - 11:31pm	should be any gp who provides group 2 medicals	616	21
10/27/2025 - 12:56am	Not agreeing. Should be any GP who is authorised to do group 2 medical.	617	21
10/15/2025 - 1:20pm	While we fully support the need for rigorous medical checks to ensure driver fitness and protect public safety, the new requirement for applicants to obtain their medical assessment only from their registered GP is unnecessary, impractical, and counterproductive. Local GP surgeries are already operating under immense pressure, with long waiting times and limited appointment availability, making it increasingly difficult for drivers to secure timely appointments. As a result, many applicants have experienced significant delays, with the licence renewal process often extending well beyond the Council's six-week target period. There is no meaningful difference in the reliability or accuracy of a DVLA Group 2 medical examination conducted by an applicant's own GP compared with one performed by any other suitably qualified, GMC-registered doctor. The essential factor is that the practitioner is properly certified and competent to carry out the assessment to the DVLA's required standard — not their personal relationship with the patient. Many councils across the UK already accept medicals from any registered doctor who can complete the appropriate forms and provide valid evidence. Restricting applicants to their own GP	618	21

	therefore serves no proven safety purpose and instead creates unnecessary administrative barriers, slows down processing, and directly impacts drivers' ability to continue working. Proposed Amendment for Fairness and Efficiency We respectfully urge the Council to revise this policy so that medical assessments can be completed by any GMC-registered doctor who meets DVLA Group 2 medical standards, rather than restricting applicants to their registered GP. This amendment would: Maintain public safety and medical integrity by ensuring all assessments meet DVLA standards. Improve efficiency by reducing delays and enabling quicker licence renewals. Ease the burden on local GP practices already struggling with capacity issues. Support drivers' livelihoods by preventing unnecessary loss of income due to administrative delays. Adopting this approach would align the Council's policy with national best practice, demonstrating a fair, proportionate, and evidence-based commitment to both public safety and the wellbeing of the local licensed driver community.		
10/19/2025 - 10:22pm	Medical should be undertaken by any doctor as long as the Dr doing the medical is qualified do so.	619	21
10/27/2025 - 2:37pm	We wholeheartedly support comprehensive medical evaluations to ensure driver fitness and protect public safety. However, requiring that these assessments only be conducted by an applicant's personal GP is impractical and unwarranted. Local GP practices are currently overwhelmed, leading to delays that can result in missed renewal deadlines and lost income for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered physician offers the same level of safety assurance. Allowing assessments from any certified practitioner would help reduce delays, lessen the burden on the NHS, and bring the Council's policy in line with national best practices.	620	21
10/22/2025 - 2:55pm	Should be any GP who provided group 2 medicals	621	21

10/27/2025 - 1:37pm	We wholeheartedly support comprehensive medical evaluations to ensure driver fitness and protect public safety. However, requiring that these assessments only be conducted by an applicant's personal GP is impractical and unwarranted. Local GP practices are currently overwhelmed, leading to delays that can result in missed renewal deadlines and lost income for drivers. A DVLA Group 2 medical performed by any qualified GMC-registered physician offers the same level of safety assurance. Allowing assessments from any certified practitioner would help reduce delays, lessen the burden on the NHS, and bring the Council's policy in line with national best practices.	622	21
10/14/2025 - 1:43pm	While we fully support the need for appropriate medical checks to ensure driver fitness and public safety, this new restriction is unnecessary, impractical, and counterproductive. Local GP surgeries are already under immense pressure, with long waiting times and limited appointment availability. Requiring applicants to use only their registered GP has caused avoidable delays — in many cases extending the licence application process well beyond the six-week target period. There is no material difference in medical reliability between a driver's own GP and any qualified, GMC-registered doctor who is competent to carry out the same DVLA Group 2 standard medical assessment. Many councils across the UK accept medicals from any certified practitioner, provided the correct form and evidence are submitted. By restricting applicants to their registered GP, the Council is creating unnecessary administrative barriers, slowing down badge renewals, and impacting drivers' ability to work. We therefore respectfully request that the Council amends this policy to allow medicals to be completed by any GMC-registered doctor who meets the required standards, not solely the applicant's own GP. This change would maintain public safety standards while improving efficiency and supporting applicants' livelihoods.	623	21
10/19/2025 - 3:59pm	8.4.2 There is no national law that specifically requires a taxi or private hire driver's medical assessment to be carried out only by their own registered GP. Under the Local Government (Miscellaneous Provisions) Act 1976, councils have the power to ensure drivers are "fit and proper" to hold a licence (Sections 51, 59, and 61). This includes setting a medical	624	21

	fitness standard — but the method of assessment must be reasonable, proportionate, and evidence-based. Most councils follow the DVLA Group 2 medical standards (the same as for bus and lorry drivers), but the DVLA itself does not require the medical to be performed by the applicant's own GP. The DVLA allows any registered doctor who has access to the applicant's medical history and who is competent to assess them to complete the report. Many councils across the UK allow any registered GP or an approved medical provider to perform the test, as long as they use the correct DVLA form. Restricting this to one's own GP can be: Unfair if that GP refuses, is unavailable, or charges excessive fees; Impractical for drivers who have recently moved or changed surgeries; An unnecessary burden when the same standard can be met through a qualified alternative provider. Therefore, while a council can set medical requirements, limiting it to the driver's registered GP only is not required by law, not proportionate, and may conflict with fairness and equal access principles under administrative law and the DfT Statutory Taxi and Private Hire Vehicle Standards (2020).		
10/11/2025 - 8:24pm	This should be any GP who can provide group 2 medical certificates.	625	21
10/26/2025 - 1:54pm	i disagree you should be able to do your medical examination at any available GP practice.	626	21
10/26/2025 - 5:35pm	any GP who provides group 2 medicals should be allowed as it could save time for many drivers .	627	21
10/19/2025 - 4:14pm	should be any GP who provides group2 medicals	628	21
10/26/2025 - 11:09am	This should be any GP that provides group 2 medical	629	21
10/25/2025 - 9:49pm	Should be any GP who provides group 2 medicals	630	21
10/19/2025 - 10:23pm	Within 14 days	631	21
10/19/2025 - 10:24pm	within 14 days	632	22

10/26/2025 - 6:00pm	New application from now yes, previous license holders 5 years - this is for drivers who do not renew their badges.	646	23
10/25/2025 - 7:11pm	New applicant from now on yes, previous drive not unless they didn't renew their licence last 5 years	647	23
10/27/2025 - 10:28pm	new application from now yes, previous licence holders 5 year. (this is for drivers who do not renew their badges)	648	23
10/12/2025 - 10:35pm	New application from now yes, previous license holders 5 years.(this is for drivers who do not renew their badges)	649	23
10/27/2025 - 1:00am	It's ok for new applicants. Previous license holders 5 years. (for drivers who don't renew their badge)	650	23
10/19/2025 - 10:37pm	Any driver who has not renewed and or holds Private Hire Drivers badge currently and or within 5 years should not have to do the tests as we want drivers to come back to Reading.	651	23
10/26/2025 - 8:24pm	Previous licence holders 5 year	652	23
10/26/2025 - 7:14pm	New application from now yes. Previous license holders 5 years (this is for drivers who don't renew their badges)	653	23
10/26/2025 - 1:08pm	New application from now yes, previous licence holders 5 years. This is for drivers who do not renew their badges	654	23
10/23/2025 - 3:20pm	New applications from now Yes Previous license holders 5 years (this is for drivers who donot renew their badge)	655	23
10/20/2025 - 3:18pm	I suggest, all new application from now 3 years, but previous license holders should not have to do a driving test under 3 years. I suggest 5 years if you have to put time limit	656	23
10/27/2025 - 11:34pm	for new applicants this can be applied, previous licence holders, 5 years	657	23
10/27/2025 - 6:17pm	New application form now yes previously 5 years who did not renew their badges	658	23
10/22/2025 - 2:56pm	New application form now yes, previous license holders 5 years. (this is for drivers who do not renew their Badges)	659	23
10/26/2025 - 5:37pm	this should be for new drivers and previous drivers who do not renew there badges .	660	23

10/27/2025 - 11:35pm	5 years	661	23
10/26/2025 - 1:57pm	New applicants from now, but previous licence holders 5 years.	662	23
10/19/2025 - 4:14pm	new application from now yes, previous license holders, 5 years this is for drivers who dont renew their badges	663	23
10/26/2025 - 11:11am	The new requirements will apply to all new applications moving forward. Existing licence holders who do not renew their badges will be subject to a five-year period before reapplication	664	23
10/11/2025 - 8:26pm	For previous licence holders, this should be specified as minimum 5 years (for those drivers who do not renew their licence/badges).	665	23
10/25/2025 - 9:50pm	New application from now, yes, previous licence holders for 5 years. (This is for drivers who do not renew their badges).	666	23
10/26/2025 - 6:01pm	Is this for new applicants or includes existing drivers, if this includes existing then disagree as we have already passed all the necessary tests before, it makes no sense to do this again.	667	24
10/24/2025 - 6:27pm	I disagree. Up until now, this has not been a concern which has been raised before. It is a shame not to be inclusive, as even our customers have language barriers. This does not stop us from doing our jobs. I also think an assessment is not an accurate measure of language proficiency. Furthermore, I have been in the role since 2008, and I do not think the lack of language proficiency has ever been a concern.	668	24
10/19/2025 - 10:41pm	Any new applicants and in particular who does not hold the entry certificates to the U.K for English	669	24
10/26/2025 - 11:12am	Could you please confirm whether this applies exclusively to new applicants or also to current drivers? We would not be in agreement if existing drivers are included.	670	24
10/27/2025 - 11:37pm	Disagree	671	24
10/27/2025 - 1:02am	Disagree if it's includes existing drivers.	672	24
10/12/2025 - 10:36pm	Is this for new applicants or includes existing drivers, if includes existing drivers than it's too late	673	24
10/27/2025 - 6:19pm	Only for now and new drivers not the old driver	674	24
10/19/2025 - 5:17pm	This should only be for the new drivers and not existing.	675	24

10/26/2025 - 1:09pm	Is this for new applicants or includes existing drivers if includes existing drivers than we disagree	676	24
10/25/2025 - 7:15pm	Is this for new applicant or exists driver? if included existing drivers the we not agree	677	24
10/26/2025 - 7:15pm	Is this for new applicants or includes existing drivers, if it includes existing drivers, then we disagree?	678	24
10/27/2025 - 11:36pm	disagree, current tests are sufficient	679	24
10/20/2025 - 3:20pm	Is this for new applicants or does this include existing drivers. This should not include existing drivers as they already have a license.	680	24
10/23/2025 - 3:20pm	Is this for new applications or includes existing drivers. If includes existing drivers then we disagree	681	24
10/26/2025 - 8:25pm	New yes Old drivers no	682	24
10/11/2025 - 8:27pm	Is this only for new applicants, or including existing drivers? If so, I disagree with this.	683	24
10/27/2025 - 10:29pm	is this for new applicants or does this include existing drivers? if it includes existing, then we do not agree	684	24
10/26/2025 - 5:38pm	this should be for new drivers .	685	24
10/20/2025 - 3:22pm	Is this for new applicants or does this include existing drivers. This should not include existing drivers as they already have a license.	686	24
10/26/2025 - 2:00pm	i disagree with this should be only for new applications only.	687	24
10/19/2025 - 4:15pm	Q is this for new applications or including existing drivers? If this is for existing drivers then we disagree	688	24
10/26/2025 - 8:45pm	This should always be the case with new drivers and maybe even existing drivers, we should know the basic of the language,	689	24
10/25/2025 - 9:51pm	Is this for new applicants or includes existing drivers? If it includes an existing driver, then we disagree.	690	24

10/21/2025 - 11:31am	I am responding to the consultation on the STD badge and knowledge test. I am a retired driver who has recently returned to part-time driving to stay active and supplement my income. I am worried the proposed knowledge test may discriminate against older returning drivers, as like myself I find formal testing scary. I am committed to safe driving, yet these requirements could stop me from working, which is important for my social and financial wellbeing. Please consider providing different options for experienced drivers who can demonstrate competence through their track record. Kind regards, 	691	24
10/24/2025 - 11:11am	The broad and undefined requirement for private hire drivers to have a "good working knowledge of the area" on the grounds that it is an outdated concept made obsolete by modern technology and the fundamental nature of pre-booked private hire work. The Nature of Private Hire is Pre-Booked Navigation: The policy itself correctly states that private hire vehicles (PHVs) are pre-booked and are not hailed. The entire workflow for a PHV driver is now managed through a Smartphone or PDA (Personal Digital Assistant) which: Provides the exact pick-up and drop-off address at the time of booking. Uses live, satellite-based navigation to calculate and guide the driver along the most direct or quickest route in real-time, accounting for live traffic, road closures, and accidents. Ensures the customer is charged for the specific route taken, as monitored by the operator's system. A satellite navigation system is demonstrably more accurate and efficient than a driver's memory for the vast majority of journeys, especially in unfamiliar parts of the borough or for complex addresses. Relying on a driver's personal knowledge over live data from a system designed for this exact purpose does not provide a "quality service"—it introduces the potential for human error and outdated knowledge. The justification that the law requires the "most direct and therefore cheapest route" is, in fact, an argument for using modern navigation. GPS systems are the most objective and reliable tool for fulfilling this legal requirement, providing a verifiable record of the route taken.	712	24

	What constitutes a "good working knowledge" is entirely subjective and impossible to measure fairly. It creates a vague standard that can be used to unfairly penalise drivers and is not a realistic reflection of the skills needed to perform the job safely and efficiently in the 21st century. The policy must distinguish between the needs of Hackney Carriage drivers (who are hailed and need immediate local knowledge) and Private Hire drivers (who operate on a pre-booked basis). to insist on a skill that has been rendered redundant by technology is to ignore the reality of the modern private hire industry and sets drivers up to be judged on an arbitrary and anachronistic standard.		
10/23/2025 - 3:39pm	I am an experienced school transport driver and have been providing safe and reliable transport for decades. I understand the need for standards, but the proposed knowledge test may unnecessarily exclude skilled drivers who already have impeccable safety records. Some drivers, particularly those semi-retired or balancing work with home duties, could be disadvantaged. I urge the Licensing Team to consider alternative methods, such as route observations or practical assessments, rather than relying on written tests. Kind regards, 	649	24
10/27/2025 - 11:31am	Dear Licensing Team, I am writing in response to the recent proposal regarding changes to driver licensing within Reading Borough Council. While we appreciate the Council's intent to review and modernise its licensing policies, we would like to express several concerns and observations from the perspective of local operators and licensed drivers. 1. Impact on School Transport Drivers Neighbouring authorities such as Wokingham and Bracknell currently operate a School Transport Driver Badge, which allows them to retain experienced drivers dedicated solely to school and community transport. Requiring Reading's school transport drivers to transition to a Private Hire Badge would only encourage further migration to neighbouring authorities — a trend we have already witnessed repeatedly. We currently employ over 50 dedicated school transport drivers who work exclusively within school and community services. The majority are long-serving, experienced professionals — many of them women	1615	24

	— who have clearly stated that they do not wish to apply for a Private Hire Badge. Their reasons are both practical and justified: • They wish to undertake only school and community transport, not general private hire work. • The Private Hire Knowledge Test is complex and unrelated to the fixed routes and safeguarding responsibilities involved in school transport. Many fear they would struggle with the test despite having decades of safe, incident-free driving experience. • Approximately 90% of our school transport drivers fall within this group, some with over 20 years of service, balancing their roles with family and personal commitments. Importantly, many women have gained financial independence through their roles as School Transport Drivers. If this opportunity were to be discontinued, they would lose that independence, as the majority have stated they would not apply for a Private Hire Licence. To add additional burdens to staff who effectively carry out a part-time role — 190 days per year — would be both unjustified and an injustice to those involved. School Transport Drivers perform a vital and regulated role, and maintaining their specific licence category ensures consistency, safety, and professionalism within this sector. Furthermore, Hackney, Private Hire, and School Driver Badges each have their own clear limitations and purposes. Reading Borough Council should maintain all three categories, as both Wokingham and Bracknell Councils continue to do successfully. Reducing the framework to only two options would result in a loss of both drivers and licensing income to neighbouring authorities. Following internal discussions, these drivers have expressed their willingness to pay the full Private Hire licence fee (without subsidy) if they can retain their current School and Community Driver status. This model has been implemented successfully in Wokingham Borough Council and Bracknell Forest Council, where this category continues to operate effectively and supports local service continuity. 2. Driver Migration and Competitiveness The example of Wolverhampton Council demonstrates how a balanced and efficient licensing system can attract and retain drivers. Their simplified and flexible approach — supported by appropriate deregulation — has resulted in a substantial increase in licensed drivers. Conversely, Reading Borough Council's policies have often lacked consistency and have not fully reflected the realities faced by fee-paying licensees and service operators. This has already driven many Reading-based drivers to migrate to Oxfordshire and West Berkshire. Implementing further restrictive or impractical measures will only intensify this trend, diminishing Reading's driver base and threatening the stability of its school transport services.		

	3. Recommendations for Policy Review To ensure Reading remains competitive, fair, and supportive of its local workforce, we recommend the following: • Retain a School Driver Licence Category: Maintain a dedicated category for school and community drivers to reflect the specialised, safeguarding-focused nature of their work. • Vehicle Plates: Instead of abolishing school plates, consider converting them to Private Hire plates for administrative consistency while maintaining their “school service” designation. • Vehicle Age Policy: Apply consistent age limits across all vehicle categories. Currently, Private Hire vehicles must be under five years old upon entry, whereas Hackney Carriages may be older. This inconsistency is unfair and discourages investment. • Encouragement of Greener Vehicles: Allow Electric and Hybrid vehicles a 10-year age limit upon entry, aligning with national sustainability policies and supporting investment in environmentally friendly transport. • MOT Testing Efficiency: The requirement to use two MOT garages is not working in practice. Booking delays at UCV are lengthy, and the lack of weekend availability further disrupts operations. 4. Need for Consistency and Long-Term Vision The government continues to emphasise sustainability and environmental responsibility in local transport. These goals can only be achieved through consistent and supportive local licensing frameworks. We therefore urge Reading Borough Council to align its policies with both national priorities and regional best practices, ensuring fairness, sustainability, and continuity of school and community transport services. Licensing policies have a direct and significant impact on the people who invest in, operate, and deliver essential school and community transport within Reading. We respectfully urge the Licensing Team to reconsider the proposed changes and to engage meaningfully with local operators and drivers to develop a balanced, inclusive, and practical policy that safeguards the local workforce and ensures uninterrupted service to the community. Many Thanks ABC Travel		
10/22/2025 - 11:42am	I am responding to the consultation on the school transport driver (STD) badge. I am a retired professional who returned to part-time driving to stay active and contribute to the community.	593	24

	The proposed knowledge test feels too much for many of us older drivers, who have years of experience but are not confident with formal exams. I am genuinely worried that failing such a test would mean losing my job even though I've never had a complaint or accident. I ask the Licensing Team to please recognise the value of real-world experience and provide supportive, practical assessments instead of formal tests that could push skilled drivers out of work. Kind regards, ██████		
10/22/2025 - 1:42pm	I am writing regarding the proposed changes to the school transport driver (STD) badge, particularly the knowledge test. I am a school transport driver who balances driving with household responsibilities and family care. The knowledge test, while well-intentioned, could be very stressful for someone like me, as it requires time and preparation I struggle to fit into my daily routine. I have been driving safely for many years and know the routes and children well. Removing or restricting the badge based on a test could unfairly exclude experienced drivers like myself, which may also impact continuity of care for the children. I urge the Licensing Team to consider alternative assessments or support for drivers balancing work and personal responsibilities, to ensure experienced drivers are not unfairly disadvantaged.	599	24
10/23/2025 - 1:02pm	I am an experienced school transport driver and have been providing safe and reliable transport for a very long time. I understand the need for standards, but the proposed knowledge test may unnecessarily exclude skilled drivers who already have impeccable safety records. Some drivers, particularly those semi-retired, could be disadvantaged. I urge the Licensing Team to consider alternative methods, such as route observations or practical assessments, rather than relying on written tests. Kind regards,	614	24

10/21/2025 - 10:33am	I am deeply concerned about the proposed knowledge test requirement for the STD Badge. This test feels unnecessary and excessive for drivers with proven experience. I have been a school transport driver for many years and take great pride in my work and safety record. I am fearful that many competent drivers could fail the test not because they lack knowledge, but because they are not used to exams. Losing the badge would mean losing our jobs, which is extremely unfair after years of dedicated service. I strongly urge the Licensing Team to recognise experience and safety history as valid measures of competence and to avoid introducing barriers that could force good drivers out of work. Kind regards, [REDACTED]	581	24
10/21/2025 - 10:28am	Dear Licensing team, I am writing regarding the proposed knowledge test school transport driver (STD) badge. The knowledge test, while well-intentioned, could be very stressful for someone like me, as it requires time and preparation I struggle to fit into my daily routine. I have been driving safely for many years and know the routes and children well. Removing or restricting the badge based on a test could unfairly exclude experienced drivers like myself, which may also impact continuity of care for the children. I urge the Licensing Team to consider alternative assessments or support for drivers balancing work and personal responsibilities, to ensure experienced drivers are not unfairly disadvantaged. Kind regards, [REDACTED]	580	24
10/21/2025 - 11:12am	I wish to raise concerns about the STD badge consultation. I am a driver who also cares for elderly family members at home.	583	24

	Balancing driving duties with caregiving means that taking time off for preparation or testing is challenging. Experienced drivers like me could be unfairly penalized despite excellent safety records. I hope the Licensing Team will consider the impact on drivers with caregiving responsibilities and ensure that practical experience is valued alongside formal testing. Kind regards, ██████		
10/21/2025 - 11:23am	I am a part-time driver and also manage significant home responsibilities. I am concerned that the proposed STD badge knowledge test could disproportionately affect part-time or semi-retired drivers like myself. Many of us are committed, safe drivers with years of experience, yet the rigid testing process could exclude competent individuals. I urge the Licensing Team to introduce support measures or flexible testing, so experienced drivers are not unfairly removed from providing vital school transport services. Kind regards, ██████	584	24
10/22/2025 - 12:22pm	8.9.1 While I understand the council's point about drivers having the ability to read maps and discuss routes with passengers, in practice, such situations are quite rare. Due to the nature of the business, the shortest route on a map is not always the quickest or most economical option. Traffic congestion and road conditions can make a longer route faster and cheaper for the passenger. For this reason, most drivers now rely on sat nav systems, which provide real-time traffic updates and help select the most efficient route under current conditions. This approach benefits both the passenger and the driver by saving time and reducing unnecessary costs.	595	24

10/19/2025 - 4:14pm	8.9.1 Under Section 51 and 59 of the Local Government (Miscellaneous Provisions) Act 1976, councils must be satisfied that an applicant for a private hire or hackney carriage driver's licence is a "fit and proper person." The Act gives councils discretion to decide what evidence or testing is necessary — this can include a local knowledge test, language test, or customer service assessment. However, there is no national legal requirement for a knowledge test for private hire drivers. The Department for Transport (DfT) Statutory Taxi and Private Hire Vehicle Standards (2020) and Best Practice Guidance (2022) make clear that licensing conditions must be reasonable, proportionate, and relevant to the type of work carried out. For hackney carriage drivers, who can pick up passengers without pre-booking, local area knowledge remains important for public safety and efficient service. But for private hire drivers, who operate via pre-booked jobs using GPS or app-based dispatch systems, requiring a traditional "local knowledge" test may no longer be proportionate or necessary. The DfT encourages councils to modernise licensing conditions to reflect technological developments, such as app-based navigation and real-time routing systems.	327	24
10/27/2025 - 2:30pm	page 24 8.8.1 is this for new applicants ? or includes existing drivers, than we disagree	1709	24
10/19/2025 - 10:42pm	This is out of date with GPS and Google maps installed in the phones and PDA so no more rip off	465	24
10/19/2025 - 10:44pm	Sorry out of date and money making excersize which many other councils do not require.	466	24

10/09/2025 - 12:11pm	24 8.8.1 English language Q Is this for new applicants or includes existing drivers, if includes existing drivers than i disagree as they already have a badge.	77	24
10/09/2025 - 12:35pm	24 8.8.1 English language Q Is this for new applicants or includes existing drivers, if includes existing drivers than we disagree as they were already given a badge to drive.	106	24
10/19/2025 - 10:45pm	not required with Google GPS and Maps rip off	467	24
09/02/2025 - 4:52pm	Does this really need to be done every time? The people running the session give out the answers to the questions so everyone passes anyway	11	25
10/26/2025 - 8:37am	Safeguarding Training should be to a much higher standard. Present availability of courses are limited and not fit for purpose. If private hire licenses are to be restricted to full licences then every taxi/private hire driver should go through training for the safe carriage of children and vulnerable adults. Courses should be much more thorough to include procedures and strategies to protect both driver, passenger assistant and passenger	985	25
10/26/2025 - 7:36pm	We shouldn't be required to take this training before every renewal. Completely pointless and information being shared during these sessions is found online. Date and availability needs to be increased to more than once a month and we shouldn't be required to pay for it. Where is the evidence to suggest these sessions are successful?	1432	25
10/27/2025 - 1:44pm	I am Mushtaq Ahmed, owner and director of Green Metro Cars Reading Ltd. I have only one area that causes me concern. The removal of the School Run Drivers Licence. After working with all the surrounding authorities and of course Reading. We are a proud to be a Reading operator and always have been licensed in Reading. We take over 1000 children to school everyday. We depend on staff that can only qualify for the school Run Drivers licence. These are dedicated loyal staff that do a wonderful job. I will lose them as will many other operators. Please just put the prices up do not destroy a system that is tried and tested.	1667	25

Section 9:

Date posted	Comment	Bubble location number	Page
10/02/2025 - 4:27pm	On behalf of Capital Cars Reading , we are writing to raise concerns regarding several private hire licensing policies. We fully support the Council's commitment to safety and high standards; however, we believe certain requirements are overly restrictive, impractical, or disproportionate. We request that the Council review and amend the following policies: 3. Safeguarding Training and DBS Checks for Office Staff (Clauses 9.3.5 & 9.5.1) Office staff who handle bookings and dispatch have no direct contact with passengers; their roles are entirely administrative. Requiring safeguarding training and DBS checks for such positions is unnecessary, disproportionate, and burdensome. If the goal is passenger safety, checks should be limited to staff who interact directly with passengers. Extending them to office staff adds administrative burden without improving safety. We request that this policy be revised to focus only on staff with direct passenger contact. 4. Operator Base Location (Clause 9.7.1) Securing suitable premises within the approximate 5-mile radius of Reading is extremely difficult and costly. The restriction places a significant financial and operational burden on businesses, particularly small or growing operators. We request that the Council adopt a more flexible approach, allowing operators to establish bases slightly outside the boundary, provided they continue to meet all regulatory and safety obligations. This would support local businesses while still ensuring effective regulation.	17	3
10/19/2025 - 4:25pm	We strongly object this proposal that a vehicle and or an Operator cannot work to due new license not being issued, as this could be delay caused by DBS taking time and the 6 weeks for vehicles is unfair. We propose that a vehicle should get an MOT and compliance done within 14 days before expiry and one application is submitted council to allow the vehicle to be still operation. Also if the operator has submitted an application before 14 days of expiry then to be allowed to continue their Operations.	35	7
10/19/2025 - 10:50pm	Sorry we cannot afford to pay 5 year fees in one go don't have the business and drivers anymore due to your polices of driving them out to other councils such as Fareham to then work here. Until RBC sorts out their licensing problems and carry out an impact assessment on the damage done to our trade its impossible to expect us to fill your coffers with 5 year fees in advance.	714	25

10/19/2025 - 4:34pm	9.3.2 The proposed requirement for all directors and the company secretary of a limited company to undergo DBS checks is unnecessary, excessive, and not supported by law. Under the Local Government (Miscellaneous Provisions) Act 1976, the responsibility for ensuring the proper operation of the business lies solely with the licensed operator. The Department for Transport (DfT) Statutory Taxi and Private Hire Vehicle Standards (2020) only recommend that DBS checks be carried out on those involved in the management or control of bookings and dispatch, but this is not a mandatory legal requirement. Modern operator systems now automatically manage bookings, dispatch, and records, meaning that other company officers such as directors or secretaries have no direct role or access to passenger information. Since the operator alone is accountable for the conduct of the business, any DBS requirement should be limited strictly to the operator named on the licence. Requiring DBS checks for additional directors or administrative officers who are not operationally involved would be disproportionate and impose an unnecessary burden on legitimate companies without improving public safety. We therefore respectfully request that the council limit the DBS requirement solely to the licensed operator, in line with the Local Government (Miscellaneous Provisions) Act 1976 and DfT guidance. This ensures fairness, proportionality, and compliance with the law while maintaining high public safety standards.	715	25
10/19/2025 - 10:57pm	This should be changed from the age of maturity and 12-6 months as many of our trade may go abroad to visit family and its unrealistic to expect this level of [REDACTED] led actions and enquiries to stress us out when you may have visited family abroad due too death of a family member and then come back and have to go through this Poolaava...	716	25
10/19/2025 - 10:58pm	14 days or as soon as practically possible	717	26
09/02/2025 - 4:56pm	Not cost effective to the operators that employ people purely to take booking at the traditional busy times. And what happens to those companies that close their Reading office at night and divert calls to Pakistan I know of at least 4 that do this Do the staff there need British DBS checks?	718	26

10/27/2025 - 2:12pm	The trade is currently navigating a period of considerable difficulty, and the proposed licensing requirements risk adding further financial and operational pressures on operators. Many businesses are struggling to remain viable under rising costs and increasing regulatory demands. In this context, it is essential that operators are allowed flexibility in how they manage staffing, including the ability to engage overseas personnel to provide round-the-clock services in a cost-effective manner. Requiring full DBS checks for all staff, particularly those based overseas, is often impractical and can prevent operators from maintaining essential 24/7 coverage. A reasonable alternative would be to accept police clearance certificates or equivalent vetting procedures from staff in other jurisdictions, ensuring safety and accountability without imposing disproportionate barriers. Modern operator models frequently rely on remote or international teams to deliver efficient and continuous service. Licensing requirements should reflect these operational realities rather than enforcing outdated on-site staffing expectations. By allowing flexible, practical staffing solutions, the Council can support the trade's sustainability while maintaining appropriate standards of safety and professionalism. The policy requiring all call-taking and app bookings to be carried out from a physical office, supported by planning permission, is no longer realistic or relevant. Many other councils have modernised their frameworks to permit cloud-based operator systems and the use of PO Boxes, acknowledging the widespread shift towards remote and digital working environments. Expecting operators to maintain a permanently staffed office, when even council departments now operate remotely with limited public contact, is inconsistent and economically unsustainable. Likewise, the requirement for DBS and safeguarding checks on dispatch staff is impractical in the current context, as most operators no longer have walk-in customers. Responsibility for staff conduct should rest with the licensed operator, as already required under existing legislation, rather than through additional administrative burdens that do not meaningfully enhance public safety.	719	26

10/27/2025 - 2:05pm	At a time when the trade is already facing significant challenges, the current licensing proposals are unsupportive and place operators under severe financial strain. Operators ought to have the option of employing cost-effective overseas staff for 24/7 operations. It is not always feasible to obtain DBS checks for such staff, and a police clearance equivalent should be considered as a practical alternative.	720	26
10/27/2025 - 2:00pm	The policy requiring all call-taking and app bookings to be carried out from a physical office, supported by planning permission, is no longer realistic or relevant. Many other councils have modernised their frameworks to permit cloud-based operator systems and the use of PO Boxes, acknowledging the widespread shift towards remote and digital working environments. Expecting operators to maintain a permanently staffed office, when even council departments now operate remotely with limited public contact, is inconsistent and economically unsustainable. Likewise, the requirement for DBS and safeguarding checks on dispatch staff is impractical in the current context, as most operators no longer have walk-in customers. Responsibility for staff conduct should rest with the licensed operator, as already required under existing legislation, rather than through additional administrative burdens that do not meaningfully enhance public safety.	721	26
10/19/2025 - 11:03pm	This should not be a requirement as most companies don't have walk in trade and some of us employ staff abroad. it should left to the company and operators to staff as they see fit since all they are doing is answering phones and dispatching drivers. this would be give away app based companies. Is it RBC policy to carry out DBS for their own phone handlers?	722	26
10/19/2025 - 11:05pm	As long as long RBC charges fees the period the right to work is related and not more AND then request extra fees on renewal when they may have already charged fees for more then right to work period	723	26
10/24/2025 - 11:11am	I object to the mandatory requirement for all staff involved in bookings to undergo formal safeguarding training as a condition of the operator's licence. While the goal of promoting safeguarding is supported, this specific condition is disproportionate, poorly defined, and fails to distinguish between different business models.	724	26

	Disproportionate for Fully Digital/Remote Operations: The policy does not account for operators who run a fully digital business with no public-facing office. In these cases: All bookings are made by customers through a telephone, app or website. The "staff" involved are the software engineers and support staff who maintain the digital platform, not individuals interacting with customer. The term "all staff involved in bookings and dispatching work" is dangerously vague. Does this include: A software developer who fixes a bug in the app? An accountant who handles invoicing related to bookings.? A customer service agent who handles a complaint about a fare? Capturing all these roles under a mandatory training requirement creates an unreasonable and costly burden that does little to directly protect the public. The critical point of contact for passenger safety is the driver. The operator's primary role is to ensure that only fully vetted, licensed drivers are using the platform and that the journey details are accurately recorded. The system itself is a greater safeguarding tool than the person answering the phone. This clause must be amended to be risk-based and proportionate. It should target the specific roles where interaction with the public presents a genuine safeguarding relevance. The policy should be rephrased to focus on: "Staff who have direct, interaction with the public for the purpose of taking bookings." Applying a one-size-fits-all approach to vastly different business models is impractical and unfairly penalises small and technologically modern operators.		
10/27/2025 - 1:40pm	The policy requiring all call-taking and app bookings to be carried out from a physical office, supported by planning permission, is no longer realistic or relevant. Many other councils have modernised their frameworks to permit cloud-based operator systems and the use of PO Boxes, acknowledging the widespread shift towards remote and digital working environments. Expecting operators to maintain a permanently staffed office, when even council departments now operate remotely with limited public contact, is inconsistent and economically unsustainable. Likewise, the requirement for DBS and safeguarding checks on dispatch staff is impractical in the current context, as most operators no longer have walk-in customers. Responsibility for staff conduct should rest	725	26

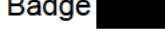
	with the licensed operator, as already required under existing legislation, rather than through additional administrative burdens that do not meaningfully enhance public safety.		
10/19/2025 - 4:39pm	9.5.1 The Department for Transport (DfT) Statutory Taxi and Private Hire Vehicle Standards (2020) recommend safeguarding awareness training for drivers and operators, particularly those who have direct contact with the public or handle booking information. However, the DfT guidance does not require every member of office or administrative staff to undertake recurring safeguarding training, especially if they: - Have no direct contact with passengers, - Do not manage or dispatch drivers, and - Do not handle personal or sensitive passenger data. Requiring safeguarding training every three years for all staff — including those with no customer-facing or operational role — would likely be considered disproportionate and beyond what national guidance	726	26
10/19/2025 - 11:07pm	Should not be mandatory and or we can do the training in house	727	26
10/19/2025 - 11:12pm	Other Councils don't have these requirements and Reading is such a small town its virtually impossible. How about not issuing licenses to those who hold badges and licenses for other Borough Councils, do you want a test of loyalty and or our money only...	728	26
10/19/2025 - 11:15pm	Whilst having an operator base is practical however RBC has policy developers sitting miles away writing what is good for us via Cloud does that mean RBC wants us to not take advantage latest technology to work from home and abroad even?	729	26
10/22/2025 - 12:56pm	9.7.2 I would like to comment on the recent proposal suggesting that private hire operators must obtain planning permission to run a taxi office. While I completely agree that operators should have a proper and suitable office based within the borough — ensuring accountability and accessibility — I do not believe that requiring separate planning permission is necessary or practical. Private hire offices are low-impact businesses that generally operate quietly and do not create significant disturbance to surrounding properties. The licensing process already ensures that the premises meet the council's standards for safety, management, and compliance. Adding an additional layer of planning control would only complicate matters and create unnecessary costs and delays for operators.	730	26

	Reading already has some of the toughest licensing conditions in the area, and as a result, many drivers have chosen to move to neighbouring boroughs with more reasonable fees and fewer restrictions. Imposing further requirements such as planning permission will only make it harder for existing operators to continue trading and may discourage new businesses from setting up in the borough. Such measures risk driving operators out of Reading altogether, which would ultimately harm both the trade and the local community that depends on reliable private hire services. I therefore urge the council to reconsider this aspect of the proposal and avoid introducing additional barriers that serve little practical benefit.		
10/19/2025 - 4:45pm	9.7.2 Under Section 55 of the Local Government (Miscellaneous Provisions) Act 1976, an operator's licence is granted to a person who makes provisions for the invitation or acceptance of bookings for private hire vehicles. The Act does not require the operator's premises to have planning permission as a pre-condition of licensing. Planning permission and licensing are separate legal regimes: Licensing ensures that the operator and their systems comply with public safety and record-keeping requirements. Planning deals with land use and building control under the Town and Country Planning Act 1990. In practice, many operators now use cloud-based or app-based systems, meaning that no drivers or passengers visit the base, and bookings are handled remotely via software. The base may simply be an office in an industrial estate or a home office, used only for record-keeping or compliance purposes. The DfT Statutory Taxi and Private Hire Vehicle Standards (2020) and DfT Best Practice Guidance (2022) do not require planning permission for operator licensing. Instead, they emphasise that licensing authorities should avoid imposing conditions that are unnecessary, disproportionate, or duplicative of other regulatory regimes. Therefore, requiring planning permission in such cases — particularly where there is no public access or vehicle movement — would likely be unreasonable and beyond the statutory intent of the licensing framework.	731	26
10/19/2025 - 4:49pm	9.7.4 Under Section 55 of the Local Government (Miscellaneous Provisions) Act 1976, a private hire operator's licence is issued in respect of a specific premises — i.e., the base or address from which bookings are accepted. However, the law does not state that an operator must cease trading immediately if they change address. It only requires that an operator not accept bookings from an unlicensed premises on a permanent basis.	732	27

	The DfT Statutory Taxi and Private Hire Vehicle Standards (2020) and DfT Best Practice Guidance (2022) both emphasise that licensing authorities should apply the law fairly, proportionately, and with flexibility, particularly where operational changes are made for legitimate reasons such as emergencies, loss of lease, or relocation. If an operator's premises become unusable due to unforeseen circumstances (e.g., fire, landlord issues, or urgent closure), it would be unreasonable and commercially damaging to require them to stop all operations until a new licence is formally issued — especially given that modern operators can continue dispatching bookings remotely via cloud systems. In such cases, the council can lawfully allow a temporary variation or grace period pending approval of the new base address, provided the operator continues to meet record-keeping and compliance standards. This approach balances enforcement with fairness and aligns with administrative law principles of reasonableness and proportionality (<i>Associated Provincial Picture Houses v Wednesbury Corporation</i> [1948]).		
10/24/2025 - 11:12am	I object to the requirement for an operator to "evidence that comparable safeguarding protections are applied" when sub-contracting a booking to another operator or Hackney Carriage driver who is already licensed. This requirement is bureaucratic, redundant, and creates an unnecessary administrative burden without enhancing public safety. The fundamental principle of licensing is that a Council, through its own rigorous processes, has already vetted and approved all licensed operators and drivers. By granting them a licence, a Council certifies that they have met the required standards, which includes safeguarding protocols. It is illogical and inefficient to require one licensee to prove the compliance of another licensee a Council should already be the ultimate source of this assurance. This rule forces operators to create a parallel paper trail to prove something the Council already knows and certifies. This involves: Constantly collecting and filing copies of other operators' safeguarding policies. Seeking confirmation from other licensees that their training is up-to-date.	733	27

	Maintaining this evidence for inspection. This is a waste of time and resources for all parties involved, including council officers who must then check this unnecessary paperwork. The act of sub-contracting to another licensed operator or driver should, in itself, be deemed sufficient evidence of compliance. The licence is the evidence.		

Hackney Carriage Vehicle Specifications

Date posted	Comment	Bubble location number	Page
10/21/2025 - 10:34am	Dear I would to comments in few things which does effect over trade and delay the process of working as a taxi driver which is 4) Euro 6 cabs should also get advantage to drive till 2032 because it's comply with smoke standards and we should get 4 years add or 15 years since the other cabs are getting to drive. So why can't Euro 6 get 15 years of age then? 5) electric cabs also should get 18 years so then we can be peace of mind to drive it , at last moment if Reading Borough Council don't give extension then what the driver will do so then it have to be 18 years full till cabs be off the road.  Badge  Hackney Carriage Driver  Badge  Hackney Carriage Driver We both have a same advice to the consultation.	1	1
10/06/2025 - 5:35pm	28 Appendix A Hackney Carriage vehicle specification	10	1

	This is incorrect, it is agreed as follows *1st Oct 2023 Maximum age limit 15 years or 1 oct 2028 *1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years		
10/27/2025 - 11:00pm	28 Appendix A Hackney Carriage vehicle specification This is incorrect, it is agreed as follows *1st Oct 2023 Maximum age limit 15 years or 1 oct 2028 *1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years	12	1
10/23/2025 - 3:24pm	This is incorrect it is agreed as follows 1st October 2023 maximum age limit 15 years or 1st October 2028. 1st October 2025 replacement vehicles less than 8 years old. 1st October 2028 replacement vehicle less than 7 years old max age limit upto 18 years. fully electric vehicle max age limit 20 years	734	28
10/26/2025 - 6:03pm	This is incorrect, it is agreed as follows: 1st Oct 2023 max age limit 15 years or 1 Oct 2028 1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years Fully electric vehicles max age 20 years	735	28
10/19/2025 - 4:17pm	this is incorrect, it should be every cabs limit 15 years. When 15 years limit is over then cab should be off the road	736	28
10/27/2025 - 10:32pm	this is incorrect. it is agreed as follows: - 1st oct 2023. Max age limit 15 years or 1 oct 2028	737	28

	-1st oct 2025 replacement vehicles less than 8 yrs old 1st oct 2028 replacement vehicles less than 7 yrs old max age limit upto 18 yrs fully electric vehicles. max age limit 20 yrs.		
10/25/2025 - 9:53pm	This is incorrect; it is agreed as follows: - 1st october 2023 maximum age limit 15 years or 1 october 2028 - 1st october 2025 replacement vehicles less than 8 years old, 1st October 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years	738	28
10/27/2025 - 1:10am	This is incorrect, it is agreed as follows, 1st October 2023 Maximum age limit 15 years or 1 October 2028 1st October 2025 Replacement vehicles less than 8 years old. 1st October 2028 Replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles maximum age limit 20 years.	739	28
10/27/2025 - 11:44pm	incorrect it is agreed as follows: 1st oct 2023 max age limit 15 years or 1st oct 2028 1st oct 2025 all replacement vehicles less than 8 years 1st oct 2028 replacement vehicles less than 7 years old, max age limit 18 years full electric cars max age 20 years	740	28
10/26/2025 - 1:12pm	This is incorrect, it is agreed as follows. 1st Oct 2023 maximum age limit 15 years or 1 Oct 2038. 1st Oct 2025 replacement vehicles less than 8 years old. 1st Oct 2028 replacement vehicles less than 7 years old. Max age limit up to 18 years	741	28
10/27/2025 - 11:22pm	This is incorrect, it is agreed as follows *1st Oct 2023 Maximum age limit 15 years or 1 oct 2028 *1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years	742	28

10/12/2025 - 10:38pm	This is incorrect, it is agreed as follows *1st Oct 2023 Maximum age limit 15 years or 1 oct 2028 *1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years	743	28
10/26/2025 - 7:17pm	This is incorrect, it is agreed as follows: 1st October 2023- Maximum age limit 15 years or 1st Oct 2028. 1st October 2025- Replacement vehicles that are less than 8 years old. 1st October 2028- Replacement vehicles that are less than 7 years old, maximum age limit up to 18 years.	744	28
10/20/2025 - 3:26pm	This is incorrect, it is agreed as follows; 1st October 2023 maximum age limit 15 years or 1st October 2028 1st October 2025 replacement vehicles less than 8 years old. 1st October 2028 replacement vehicles less than 7 years old with max age limit upto 18 years Fully electric vehicles max age 20 years	745	28
10/26/2025 - 5:40pm	it was agreed before that age limit will be 15 years or 1oct2028	746	28
10/27/2025 - 11:42pm	15 years	747	28
10/11/2025 - 8:30pm	This is incorrect - it is agreed as follows: - 1 Oct 2023: max age limit 15 years or from 1 Oct 2028 - 1 Oct 2025: replacement vehicle less than 8 years old - 1 Oct 2028: replacement vehicle less than 7 years old maximum age limit up to 18 years - Full electric vehicle maximum age limit 20 years	748	28
10/25/2025 - 7:24pm	This is correct, it's has been agreed as followed 1st October 2023 maximum age 15 years or 1st October 2028 1st October 2025 replacement vehicle less than 8 years old 1st October 2028 replacement vehicle less than 7 years old maximum age limit up to 18 years old	749	28
10/27/2025 - 11:43pm	18 Years	750	28

10/19/2025 - 5:22pm	Electric vehicles should atleast be given 20 yrs, with the cost of these vehicles new 15yrs is not enough	751	28
10/09/2025 - 12:35pm	28 Appendix A Hackney Carriage vehicle specification This is incorrect, it is agreed as follows *1st Oct 2023 Maximum age limit 15 years or 1 oct 2028 *1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years	752	28
10/27/2025 - 11:45pm	Full electric 20 years	753	28
10/26/2025 - 11:14am	this information is incorrect. The agreement is as follows: • From 1 October 2023 – Maximum vehicle age limit: 15 years, or until 1 October 2028 (whichever comes first). • From 1 October 2025 – Replacement vehicles must be less than 8 years old. • From 1 October 2028 – Replacement vehicles must be less than 7 years old, with a maximum vehicle age limit of 18 years. • Fully electric vehicles will have a maximum age limit of 20 years.	754	28
10/09/2025 - 12:12pm	28 Appendix A Hackney Carriage vehicle specification This is incorrect, it is agreed as follows *1st Oct 2023 Maximum age limit 15 years or 1 oct 2028 *1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years	755	28
10/26/2025 - 7:38pm	Why? Why are Mercedes Vito Taxis subjected to this?	756	28
10/27/2025 - 2:51pm	page 28 this is incorrect, it is agreed as follows	757	28

	*1st oct 2023 maximum age limit 15 years or *1 oct 2028 1*oct 2025 replacement vehicles less than 8 years old .or 1st oct 2028 replacement vehicles less than 7 years old, max age limit up to18 years . full electric vehicles max age limit 20 years		

Private Hire Vehicle Specifications:

Date posted	Comment	Bubble location number	Page
10/02/2025 - 4:27pm	On behalf of Capital Cars Reading , we are writing to raise concerns regarding several private hire licensing policies. We fully support the Council's commitment to safety and high standards; however, we believe certain requirements are overly restrictive, impractical, or disproportionate. We request that the Council review and amend the following policies: 5. Executive Vehicle List (Clause 17.0) We note that the Mercedes E-Class is not included on the approved executive vehicle list. This model is widely recognised as an executive vehicle, offering exceptional comfort, safety, and quality, comparable to other approved vehicles. Excluding it unnecessarily restricts options for operators. We request that the Council amend the list to include the Mercedes E-Class, ensuring flexibility for operators while maintaining the high standards expected of executive vehicles. We urge the Council to review these policies to ensure they are practical, proportionate, and supportive of local businesses, while maintaining the high standards and safety that passengers expect.	17	3
10/24/2025 - 11:12am	I object to the different age limits applied to Hackney Carriage and Private Hire vehicles. This creates a systemically unfair, discriminatory, and unjustified two-tier system that disadvantages Private Hire operators and drivers at every stage of a vehicle's life. The discriminatory treatment is clear and consistent across the vehicle's lifecycle: 1. At First Licence: A Hackney Carriage vehicle can be licensed for the first time when it is up to 8 years old. A Private Hire vehicle can be licensed for the first time when it is up to only 5 years old.	758	35

	2. At Maximum Age: Hackney Carriage vehicles can be licensed up to 15 years (with possible extensions) from October 2028. Private Hire vehicles face a maximum age limit of just 10 years (with possible extensions) from February 2028. There is no logical, safety, or environmental reason for this distinction. No Safety Justification: A vehicle's roadworthiness is determined by its mechanical condition, proven through rigorous twice-yearly MOT and council compliance testing—not its age or license type. A 6-year-old Private Hire vehicle is not inherently less safe than a 6-year-old Hackney Carriage vehicle. The policy contradicts itself by acknowledging this with its compliance test extension clause, while still imposing arbitrary age cut-offs. No Environmental Justification: Both vehicle types operate in the same area, contribute to the same emissions, and are subject to the same ULEV requirements. The environmental impact of a vehicle is based on its engine, not its license type Severe Financial Impact: This policy forces Private Hire operators to source newer, more expensive vehicles from the outset and then replace them 5 years sooner than their Hackney Carriage counterparts. This imposes a crippling double financial burden, making Private Hire operation significantly more expensive and less sustainable. Undermines Local Business: This systemic disadvantage will further drive operators to license with cheaper, faster authorities, undermining the Council's goal of a robust, locally controlled fleet and reducing choice for Reading residents. The Council must apply a single, consistent age policy across both Hackney Carriage and Private Hire vehicle classes. The age limits for first licence and maximum age should be standardized for all licensed vehicles, with a consistent and transparent extension process based solely on a vehicle's condition and compliance test results. To do otherwise is to admit that the policy is not based on safety or environmental evidence, but on an arbitrary and unfair distinction that causes significant harm to the Private Hire trade from the moment a vehicle is first licensed until it is retired.		

10/03/2025 - 4:57pm	Can someone explain to me why would you put an age limit on an electric vehicle? This goes completely against a net zero strategy. This just feels like a punishment on PHV drivers that have to pay and get an electric car that is generally more expensive than a normal one and then, throw it away after 10 years so we put some more CO2 into the air and mine more cobalt, manganese, lithium and other rare earths required to make these cars. Instead of reducing the CO2 footprint you are increasing it.	759	35
10/24/2025 - 2:09pm	As a school transport driver, I've observed that the "facing each other" seating layout is not effective for SEND transport. Many children require clear boundaries and personal space for their safety and comfort. When seats are arranged to face one another, it can lead to anxiety and behavioral issues, sometimes resulting in physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety involves more than just seatbelts and vehicle condition; it also depends on the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to support children are much more appropriate. The current restrictions and layout requirements do not adequately address the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet proper safety and support standards instead of enforcing unsuitable designs.	760	35
10/26/2025 - 3:49pm	As a driver in school transport, I've found that the "facing each other" seating configuration simply doesn't work for SEND transport. Many of the children need clear boundaries and personal space for their safety and comfort. When seats face one another, it can create anxiety or behavioral challenges, and may even lead to physical contact between passengers, putting both pupils and assistants at risk. A distinct separation between seats is often essential to maintain calm and ensure everyone's safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also involves having an appropriate layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are far more suitable. The existing layout requirements do not reflect the genuine needs of SEND passengers. The Council should take practical experience into account and permit vehicles that adhere to proper safety and support standards rather than enforcing unsuitable designs.	761	35
10/19/2025 - 11:22pm	Replacement vehicles to be set at from new to 7 years and then 15 years. this will give the trade better options to change over older vehicles to euro 6 and Electric or Hybrid. this makes sense economical for the trade and better for the environment to encourage a reasonable change over. In fact it should be the same as the hackney trade..	762	35

10/26/2025 - 5:27pm	As a school transport driver, I've realized that the "facing each other" seating layout is ineffective for SEND transport. Many of the children require clear boundaries and adequate space for their safety and comfort. When seats are oriented to face each other, it can lead to anxiety and behavioral issues, and sometimes even physical contact between passengers, which risks safety for both pupils and assistants. A clear physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety goes beyond just seatbelts and vehicle condition; it also relies on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are significantly more appropriate. The current restrictions and layout requirements do not reflect the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet the necessary safety and support standards instead of enforcing unsuitable designs.	763	35
10/26/2025 - 4:24pm	As a driver for school transport, I have found that the "facing each other" seating layout is not suitable for SEND transport. Many of the children we carry need clear boundaries and personal space for their safety and comfort. When seats face each other, it can lead to anxiety or behavioral issues, and may cause physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure everyone's safety during the journey. For SEND transport, safety is not solely about seatbelts and vehicle condition; it also involves the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are much more appropriate. The current restrictions and layout requirements do not accurately reflect the real needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that meet proper safety and support standards, rather than enforcing unsuitable designs.	764	35
10/19/2025 - 11:24pm	Not economically via able for the trade the next review should 2035 should be same as the Hackney	765	35
10/19/2025 - 11:26pm	The Private Hire trade has suffered the most in terms of loss of revenue and work, Wokingham recently extended the age of their vehicles due to losing drivers for just this policy. They reverted to older vehicles so I would be in favor of keeping the age of vehicles on parr with the Hackney trade...	766	35
10/27/2025 - 2:38pm	As a school transport driver, I have found that the "facing each other" seating layout simply does not work for SEND transport. Many of the children we carry require clear boundaries and space for their own safety and comfort. When seats are arranged to face each other, it can lead to anxiety and behavioral issues, and may even result in physical contact between passengers, which endangers both pupils and assistants. A distinct physical separation between seats is often needed to maintain calm and ensure everyone's safety during the journey. For SEND transport, safety is not solely about seatbelts and vehicle	767	35

	condition; it also depends on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are far more suitable. The current restrictions and layout requirements do not adequately address the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.		
10/27/2025 - 1:34pm	As a driver in school transport, I've found that the "facing each other" seating configuration is not effective for SEND transport. Many of the children we transport need clear boundaries and personal space for their safety and comfort. When seats face one another, it can lead to anxiety and behavioral challenges, sometimes resulting in physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also involves having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to help children are much more appropriate. The current restrictions and layout requirements do not reflect the genuine needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that adhere to proper safety and support standards instead of enforcing unsuitable designs.	768	35
10/27/2025 - 2:01pm	As a school transport driver, I've come to realize that the "facing each other" seating layout is not effective for SEND transport. Many of the children we carry require clear boundaries and personal space for their safety and comfort. When seats are arranged to face one another, it can cause anxiety and behavioral issues, and sometimes lead to physical contact between passengers, putting both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also involves having the right layout within the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are much more appropriate. The current restrictions and layout requirements do not adequately reflect the real needs of SEND passengers. The Council should take practical experience into account and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.	769	35
10/27/2025 - 1:27pm	As a driver for school transport, I've discovered that the "facing each other" seating arrangement is not suitable for SEND transport. Many children need clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can cause anxiety and behavioral problems, leading to physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often crucial for maintaining calm and ensuring safety throughout the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also requires the right layout	770	35

	inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to aid children are much more effective. The current restrictions and layout requirements do not reflect the actual needs of SEND passengers. The Council should take practical experience into consideration and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.		
10/27/2025 - 10:51am	As a school transport driver, I've observed that the "facing each other" seating layout is not effective for SEND transport. Many children require clear boundaries and personal space for their safety and comfort. When seats are arranged to face one another, it can lead to anxiety and behavioral issues, sometimes resulting in physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety involves more than just seatbelts and vehicle condition; it also depends on the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to support children are much more appropriate. The current restrictions and layout requirements do not adequately address the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet proper safety and support standards instead of enforcing unsuitable designs.	771	35
10/24/2025 - 11:13am	I strongly object to the policy that a "Small MPV" vehicle "will only be licensed to carry a maximum of 4 passengers." This rule is illogical, arbitrary, and contradicts the vehicle's legal and designed purpose. If a vehicle is designed, manufactured, and certified by its maker and the DVLA as a 6-seater (with 6 full seatbelts, 6 seating positions, and is listed as such on the V5C), then the council has no reasonable or evidence-based grounds to arbitrarily downgrade its licensed capacity to 4 passengers. A vehicle's passenger capacity is determined by its manufacturer following rigorous safety testing and certification. The council is substituting its own judgement without providing any evidence that a manufacturer-certified 6-seat Small MPV is unsafe to carry 6 passengers, while the same vehicle in a "Large MPV" category would be deemed safe. This is an inconsistent and unjustifiable position. This policy actively harms the trade and the public by Reducing Efficiency, it forces operators to use a larger, less fuel-efficient vehicle this contradicts the councils own environmental policy (a Large MPV) to perform a job that a smaller, more efficient vehicle is perfectly capable of doing Increasing Costs: It imposes higher vehicle purchase, insurance, and running costs on operators, which will inevitably be passed on to the public. Reducing Service Availability: It unnecessarily limits the number of 6-seater vehicles available for pre-booked groups and families, reducing service quality.	772	35

	The council provides no safety data or rationale to justify this restriction. The Euro NCAP classification is a safety rating system within vehicle categories, not a determinant of passenger capacity. A 5-star rated Small MPV is an extremely safe vehicle. The policy confuses vehicle size classification with passenger capability. This arbitrary restriction must be removed. The licensed passenger capacity of a vehicle must be based on its actual, physical design and its V5C registration document. This policy should be amended to state something on the lines of "The licensed passenger capacity of a vehicle will be determined by the number of full, factory-fitted passenger seats with seatbelts, as certified by the manufacturer. This applies to all vehicle classification groups." This is a fair, transparent, and evidence-based approach that respects vehicle design, supports business efficiency, and serves the needs of the travelling public		
10/27/2025 - 10:46am	As a private hire driver who also does school transport, I want to highlight how important it is to have the right type of vehicle for our passengers. Many of the pupils I transport, especially SEND children, need smaller MPVs because they are safer and easier to access. These vehicles have lower steps, space for assistants, and can be fitted properly with booster seats, harnesses, and wheelchair support. Bigger MPVs or minibuses often cause problems – the steps are too high, and the layout doesn't work well for special seating or secure restraints. For many of my passengers, small MPVs are simply the best and safest option. The current Council rule limiting small MPVs to four passengers doesn't make sense. If a vehicle is built and approved by the manufacturer and DVLA as a six-seater, with six fitted seatbelts, then reducing it to four is unfair and not based on safety evidence. Drivers like me have already invested a lot of money in these vehicles, expecting to use them for school and community contracts. This policy cuts our income and increases costs, forcing us to use bigger, less efficient vehicles. The Council should follow national standards and license vehicles according to their certified seating capacity.	773	35
10/27/2025 - 3:14pm	In my experience as a school transport driver, "facing each other" seating layouts do not work for SEND transport. Many of our passengers need clear boundaries and personal space to feel safe and calm. Face-to-face seating can lead to anxiety, behavioural issues, and even physical contact between children. For SEND transport, safety includes both emotional well-being and vehicle design. Forward-facing seats in smaller MPVs provide the stability and separation required, along with enough room for assistants to offer help when needed. The Council should review current layout restrictions and allow vehicles that better meet the real safety and support needs of SEND pupils.	774	35

10/24/2025 - 3:56pm	As a driver in school transport, I've found that the "facing each other" seating configuration is not effective for SEND transport. Many of the children we transport need clear boundaries and personal space for their safety and comfort. When seats face one another, it can lead to anxiety and behavioral challenges, sometimes resulting in physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also involves having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to help children are much more appropriate. The current restrictions and layout requirements do not reflect the genuine needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that adhere to proper safety and support standards instead of enforcing unsuitable designs.	775	35
10/27/2025 - 2:26pm	As a driver in school transport, I've found that the "facing each other" seating configuration is not effective for SEND transport. Many of the children we transport need clear boundaries and personal space for their safety and comfort. When seats face one another, it can lead to anxiety and behavioral challenges, sometimes resulting in physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also involves having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to help children are much more appropriate. The current restrictions and layout requirements do not reflect the genuine needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that adhere to proper safety and support standards instead of enforcing unsuitable designs.	776	35
10/27/2025 - 2:15pm	As a school transport driver, I've realized that the "facing each other" seating layout is ineffective for SEND transport. Many of the children require clear boundaries and adequate space for their safety and comfort. When seats are oriented to face each other, it can lead to anxiety and behavioral issues, and sometimes even physical contact between passengers, which risks safety for both pupils and assistants. A clear physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety goes beyond just seatbelts and vehicle condition; it also relies on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are significantly more appropriate. The current restrictions and layout requirements do not reflect the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet the necessary safety and support standards instead of enforcing unsuitable designs.	777	35

10/27/2025 - 2:35pm	As a school transport driver, I've realized that the "facing each other" seating layout is ineffective for SEND transport. Many of the children require clear boundaries and adequate space for their safety and comfort. When seats are oriented to face each other, it can lead to anxiety and behavioral issues, and sometimes even physical contact between passengers, which risks safety for both pupils and assistants. A clear physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety goes beyond just seatbelts and vehicle condition; it also relies on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are significantly more appropriate. The current restrictions and layout requirements do not reflect the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet the necessary safety and support standards instead of enforcing unsuitable designs.	778	35
10/24/2025 - 3:13pm	As a driver for school transport, I've discovered that the "facing each other" seating arrangement is not suitable for SEND transport. Many children need clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can cause anxiety and behavioral problems, leading to physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often crucial for maintaining calm and ensuring safety throughout the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also requires the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to aid children are much more effective. The current restrictions and layout requirements do not reflect the actual needs of SEND passengers. The Council should take practical experience into consideration and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.	779	35
10/27/2025 - 2:40pm	As a school transport driver, I have found that the "facing each other" seating layout simply does not work for SEND transport. Many of the children we carry require clear boundaries and space for their own safety and comfort. When seats are arranged to face each other, it can lead to anxiety and behavioral issues, and may even result in physical contact between passengers, which endangers both pupils and assistants. A distinct physical separation between seats is often needed to maintain calm and ensure everyone's safety during the journey. For SEND transport, safety is not solely about seatbelts and vehicle condition; it also depends on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are far more suitable. The current restrictions and layout requirements do not adequately address the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.	780	35

10/27/2025 - 2:29pm	As a private hire driver who also does school transport, I want to highlight how important it is to have the right type of vehicle for our passengers. Many of the pupils I transport, especially SEND children, need smaller MPVs because they are safer and easier to access. These vehicles have lower steps, space for assistants, and can be fitted properly with booster seats, harnesses, and wheelchair support. Bigger MPVs or minibuses often cause problems – the steps are too high, and the layout doesn't work well for special seating or secure restraints. For many of my passengers, small MPVs are simply the best and safest option. The current Council rule limiting small MPVs to four passengers doesn't make sense. If a vehicle is built and approved by the manufacturer and DVLA as a six-seater, with six fitted seatbelts, then reducing it to four is unfair and not based on safety evidence. Drivers like me have already invested a lot of money in these vehicles, expecting to use them for school and community contracts. This policy cuts our income and increases costs, forcing us to use bigger, less efficient vehicles. The Council should follow national standards and license vehicles according to their certified seating capacity	781	35
10/24/2025 - 1:24pm	As a school transport driver working with SEND children, I've seen firsthand how important vehicle layout is to their safety and wellbeing. The "facing each other" seating arrangement often leads to anxiety, overstimulation, and even physical contact between passengers—especially for children who need clear boundaries and personal space. This setup can escalate behavioural issues and make it harder for assistants to manage the journey safely. For SEND transport, safety goes beyond seatbelts and vehicle checks—it's about creating a calm, structured environment. Smaller MPVs with forward-facing seats and room for assistants to support children are far more appropriate. The current layout rules don't reflect the realities of SEND transport, and I urge the Council to consider practical experience and allow vehicles that genuinely meet the needs of these vulnerable passengers.	782	35
10/14/2025 - 1:56pm	It is essential to recognise that both school and community transport services rely on vehicles that are appropriately sized and configured for their passengers. For SEND pupils and adult community users, smaller MPVs are often the safest and most practical choice. Many passengers have limited mobility, require help with wheelchair transfers, or depend on specialist seating such as high-back booster seats and harnesses. Larger MPVs and minibuses can be unsuitable — their higher step-in height makes access difficult, and their seating layouts often prevent the correct fitting or adjustment of restraints and safety harnesses.	783	35

	By contrast, small MPVs offer lower entry steps, easier access for assistants, and greater flexibility for drivers managing securements and passenger support. In many cases, these vehicles are far better suited to the physical and safeguarding needs of SEND and adult community passengers. Despite this, the Council's current policy states that a "Small MPV will only be licensed to carry a maximum of 4 passengers." This rule is illogical, arbitrary, and inconsistent with both vehicle safety standards and manufacturer certification. If a vehicle has been designed, built, and certified by its manufacturer and the DVLA as a six-seater, with six factory-fitted seatbelts and six designated seating positions listed on the V5C registration document , the Council has no reasonable or evidence-based justification for reducing its licensed capacity to four passengers. These vehicles are specifically designed and approved to carry the number of passengers specified by the manufacturer. If they meet all DVLA and DVSA safety requirements and are legal for UK road use, they should be deemed safe and suitable for licensing without further local restrictions. This issue is comparable to the treatment of Category S/N vehicles. Once a vehicle has been properly repaired, inspected, MOT-tested, and approved to national standards, it should not face additional local barriers or restrictions unless clear, evidence-based safety concerns exist. Such policies are disproportionate and unsupported by evidence. The Council should not replace nationally verified safety testing with its own subjective assessments. Any additional restriction must be justified with verifiable safety data - not imposed arbitrarily. This rule harms both operators and the public by: Reducing efficiency: Operators are forced to use larger, less fuel-efficient vehicles when smaller MPVs would suffice. Increasing costs: Larger vehicles incur higher purchase, insurance, and running costs, ultimately increasing fares and contract costs.		

	Limiting service availability: Restricting six-seater MPVs reduces the number of suitable vehicles for pre-booked groups, families, and SEND passengers. Increasing fleet requirements: If small MPVs are licensed to carry only four passengers, the Council will have to deploy additional vehicles and drivers to transport the same number of SEND students — increasing operational costs, traffic congestion, and environmental impact. No evidence suggests that a manufacturer-certified six-seater MPV poses any greater risk than a larger vehicle carrying the same number of passengers. Euro NCAP ratings assess vehicle safety within categories, not passenger capacity — and a 5-star-rated small MPV is demonstrably safe. The restriction is therefore unjustified and inconsistent. Passenger capacity should be determined by a vehicle's certified design and manufacturer documentation, as recorded on the V5C registration. The policy should be revised to adopt a fair, transparent, and evidence-based standard: “The licensed passenger capacity of a vehicle will be determined by the number of full, factory-fitted passenger seats with seatbelts, as certified by the manufacturer and recorded on the V5C registration document. This applies to all vehicle classification groups.” Adopting this approach would align licensing with national standards, promote efficiency, reduce costs and emissions, and ensure decisions are consistent, reasonable, and legally defensible.		
10/24/2025 - 2:07pm	As a school transport driver, I've observed that the “facing each other” seating layout is not effective for SEND transport. Many children require clear boundaries and personal space for their safety and comfort. When seats are arranged to face one another, it can lead to anxiety and behavioral issues, sometimes resulting in physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety involves more than just seatbelts and vehicle condition; it also depends on the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to support children are much more appropriate. The current restrictions and layout requirements do not adequately address the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet proper safety and support standards instead of enforcing unsuitable designs.	784	35

10/24/2025 - 3:46pm	As a school transport driver, I've realized that the "facing each other" seating layout is ineffective for SEND transport. Many of the children require clear boundaries and adequate space for their safety and comfort. When seats are oriented to face each other, it can lead to anxiety and behavioral issues, and sometimes even physical contact between passengers, which risks safety for both pupils and assistants. A clear physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety goes beyond just seatbelts and vehicle condition; it also relies on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are significantly more appropriate. The current restrictions and layout requirements do not reflect the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet the necessary safety and support standards instead of enforcing unsuitable designs.	785	35
10/27/2025 - 2:47pm	As a school transport driver, I've realized that the "facing each other" seating layout is ineffective for SEND transport. Many of the children require clear boundaries and adequate space for their safety and comfort. When seats are oriented to face each other, it can lead to anxiety and behavioral issues, and sometimes even physical contact between passengers, which risks safety for both pupils and assistants. A clear physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety goes beyond just seatbelts and vehicle condition; it also relies on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are significantly more appropriate. The current restrictions and layout requirements do not reflect the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet the necessary safety and support standards instead of enforcing unsuitable designs.	786	35
10/24/2025 - 3:26pm	As a school transport driver, I've realized that the "facing each other" seating layout is ineffective for SEND transport. Many of the children require clear boundaries and adequate space for their safety and comfort. When seats are oriented to face each other, it can lead to anxiety and behavioral issues, and sometimes even physical contact between passengers, which risks safety for both pupils and assistants. A clear physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety goes beyond just seatbelts and vehicle condition; it also relies on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are significantly more appropriate. The current restrictions and layout requirements do not reflect the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet the necessary safety and support standards instead of enforcing unsuitable designs.	787	35

10/24/2025 - 3:36pm	As a driver in school transport, I've found that the "facing each other" seating configuration is not effective for SEND transport. Many of the children we transport need clear boundaries and personal space for their safety and comfort. When seats face one another, it can lead to anxiety and behavioral challenges, sometimes resulting in physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also involves having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to help children are much more appropriate. The current restrictions and layout requirements do not reflect the genuine needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that adhere to proper safety and support standards instead of enforcing unsuitable designs.	788	35
10/27/2025 - 3:28pm	Through my work as a school transport driver, I have learned that the "facing each other" seating arrangement is not appropriate for SEND pupils. Children with special educational needs often rely on having their own space and a clear sense of physical boundaries. When seats face one another, it can heighten anxiety and trigger behavioural issues, sometimes leading to unwanted contact between passengers. This puts both pupils and assistants at risk. True safety in SEND transport involves not only well-maintained vehicles and proper seatbelts but also the right internal configuration. Smaller MPVs with forward-facing seats create a calmer, more predictable setting and allow assistants to support children effectively. I strongly encourage the Council to review its current layout policies and take into account the practical realities faced by drivers and passengers.	789	35
10/24/2025 - 1:49pm	As a school transport driver, I've also found that the "facing each other" seating layout simply doesn't work for SEND transport. Many of the children we carry need clear boundaries and space for their own safety and comfort. When seats face each other, it can cause anxiety or behavioural issues, and in some cases, physical contact between passengers — which puts both the pupils and assistants at risk. A clear physical separation between seats is often needed to maintain calm and ensure everyone stays safe during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition — it's also about the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are far more suitable. The current restrictions and layout requirements don't reflect the real needs of SEND passengers. The Council should take practical experience into account and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.	790	35
10/24/2025 - 2:14pm	As a part-time school transport driver, I've seen that the "face-to-face" seating layout doesn't suit SEND pupils. Many need clear boundaries and personal space for comfort and safety. Facing seats often increase anxiety, trigger behavioural issues, or cause unwanted contact, risking everyone's safety. Safety	791	35

	isn't just seatbelts and maintenance — it's also the right layout. If a manufacturer has tested and approved a vehicle's seating for safety, extra licensing restrictions are unnecessary and unfair. Drivers who've invested in compliant vehicles will face being left out of pocket, carrying extra financial burden without any support from the licensing authority or council.		
10/24/2025 - 12:18pm	As a private hire driver who also does school transport, I want to highlight how important it is to have the right type of vehicle for our passengers. Many of the pupils I transport, especially SEND children, need smaller MPVs because they are safer and easier to access. These vehicles have lower steps, space for assistants, and can be fitted properly with booster seats, harnesses, and wheelchair support. Bigger MPVs or minibuses often cause problems – the steps are too high, and the layout doesn't work well for special seating or secure restraints. For many of my passengers, small MPVs are simply the best and safest option. The current Council rule limiting small MPVs to four passengers doesn't make sense. If a vehicle is built and approved by the manufacturer and DVLA as a six-seater, with six fitted seatbelts, then reducing it to four is unfair and not based on safety evidence. Drivers like me have already invested a lot of money in these vehicles, expecting to use them for school and community contracts. This policy cuts our income and increases costs, forcing us to use bigger, less efficient vehicles. The Council should follow national standards and license vehicles according to their certified seating capacity.	792	35
10/15/2025 - 1:19pm	It is crucial to recognise that both school and community transport services depend on vehicles that are appropriately sized and configured for the needs of their passengers. For many SEND pupils and adult community users, smaller MPVs are the safest and most practical option. These passengers often have limited mobility, require support with wheelchair transfers, or rely on specialist seating such as high-backed booster seats and harnesses. Larger MPVs and minibuses, by comparison, can present significant access challenges due to their higher step-in height and restrictive seating layouts, which frequently prevent the correct fitting or adjustment of restraints and securement systems. In contrast, small MPVs provide lower entry steps, easier access for assistants and carers, and greater flexibility for drivers who must manage passenger support and safety. These vehicles are, in many cases, the most appropriate and secure option for transporting passengers with specific mobility and safeguarding requirements. Despite this, the Council's current policy restricts the licensing of small MPVs to a maximum of four passengers. This rule is both arbitrary and inconsistent with the vehicle's certified design and manufacturer approval. If a vehicle is built, tested, and certified by the manufacturer and DVLA as a six-seater — with six factory-fitted seatbelts and six designated seating positions recorded on the V5C	793	35

	registration — then there is no reasonable or evidence-based justification for reducing its licensed capacity to four. Such vehicles have already met stringent national safety and roadworthiness standards, and further local restrictions serve no practical safety purpose unless supported by verifiable data. The situation is comparable to the treatment of Category S/N vehicles, where, once a vehicle has been properly repaired, inspected, MOT-tested, and deemed roadworthy, it should not face additional local barriers unless clear evidence of danger exists. This policy is not only disproportionate but also unfair to the already struggling local transport market. Many local operators have made significant financial investments to upgrade their fleets with compliant six-seater MPVs, anticipating long-term service use and renewal. To now be informed that these vehicles can no longer be licensed for their intended capacity is unjust and financially damaging. Operators face substantial losses in asset value, reduced income potential, and the prospect of having to purchase new vehicles unnecessarily. This raises a critical question: what compensation or support scheme has the Council put in place for those affected? It is unreasonable to expect small businesses — already under financial strain — to absorb the costs of a policy shift that lacks evidential grounding or fairness. The consequences of maintaining this restriction are extensive. It forces operators to use larger, less fuel-efficient vehicles, leading to higher purchase, insurance, and maintenance costs. These increased expenses will inevitably impact contract pricing and passenger fares. The restriction also reduces the number of suitable vehicles available for pre-booked groups, families, and SEND passengers, resulting in logistical inefficiencies and higher operational demands. In some cases, additional vehicles and drivers will be needed to transport the same number of passengers, increasing congestion, emissions, and overall costs to the Council and community. Moreover, there is no evidence to suggest that a manufacturer-certified six-seater MPV poses any greater safety risk than a larger vehicle carrying the same number of passengers. To restore fairness and consistency, the Council should revise this policy in line with national safety standards and evidence-based practice. Passenger capacity should be determined solely by the number of factory-fitted seats with seatbelts, as certified by the manufacturer and recorded on the V5C registration document. The policy should therefore read: “The licensed passenger capacity of a vehicle will be determined by the number of full, factory-fitted passenger seats with seatbelts, as certified by the manufacturer and recorded on the V5C registration document, applicable to all vehicle classifications.” Adopting this approach would align licensing decisions with nationally verified standards, safeguard operator investments, and promote a fair, transparent, and legally defensible system. It would also help		

	reduce unnecessary costs and emissions while ensuring that local operators — many of whom are small, independent businesses — are treated with the fairness and respect they deserve.		
10/27/2025 - 1:13pm	As a driver for school transport, I've discovered that the "facing each other" seating arrangement is not suitable for SEND transport. Many children need clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can cause anxiety and behavioral problems, leading to physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often crucial for maintaining calm and ensuring safety throughout the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also requires the right layout inside the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to aid children are much more effective. The current restrictions and layout requirements do not reflect the actual needs of SEND passengers. The Council should take practical experience into consideration and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.	794	35
10/27/2025 - 10:48am	As a school transport driver, I've also found that the "facing each other" seating layout simply doesn't work for SEND transport. Many of the children we carry need clear boundaries and space for their own safety and comfort. When seats face each other, it can cause anxiety or behavioural issues, and in some cases, physical contact between passengers — which puts both the pupils and assistants at risk. A clear physical separation between seats is often needed to maintain calm and ensure everyone stays safe during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition — it's also about the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are far more suitable. The current restrictions and layout requirements don't reflect the real needs of SEND passengers. The Council should take practical experience into account and allow vehicles that meet proper safety and support standards rather than enforcing unsuitable designs.	795	35
10/24/2025 - 2:28pm	As a driver in school transport, I've found that the "facing each other" seating configuration simply doesn't work for SEND transport. Many of the children need clear boundaries and personal space for their safety and comfort. When seats face one another, it can create anxiety or behavioral challenges, and may even lead to physical contact between passengers, putting both pupils and assistants at risk. A distinct separation between seats is often essential to maintain calm and ensure everyone's safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition; it also involves having an appropriate layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are far more suitable. The existing layout requirements do not reflect the genuine needs	796	35

	of SEND passengers. The Council should take practical experience into account and permit vehicles that adhere to proper safety and support standards rather than enforcing unsuitable designs.		
10/19/2025 - 4:59pm	Appendix c Vehicle conditions 6. No law specifically requires every passenger in an 8-seater private hire vehicle (PHV) to have direct access to a door without folding a seat. The applicable standards come from: The Road Vehicles (Construction and Use) Regulations 1986, and The Road Vehicles (Approval) Regulations 2020 (which replaced EU Whole Vehicle Type Approval rules). These set out safety and access standards for vehicles with up to eight passenger seats (i.e. M1 category vehicles). The law allows for tip-up or folding seats, provided they are properly anchored, safe, and meet seat-belt and exit requirements. Buses and minibuses (9–16 seaters) fall under M2 vehicle category, and those vehicles are legally allowed to have folding or aisle-access seats — passengers do not have direct access to a door in those either. In other words, if this requirement were imposed on 8-seater PHVs, then most minibuses, MPVs, and even public buses would also be non-compliant — which they are not. Local councils do not have legal authority to redefine vehicle construction standards that already comply with national type approval or MOT requirements. If a vehicle meets DVSA, MOT, and type-approval standards, the council cannot impose stricter construction conditions unless there is a clear and evidence-based safety reason (see R v Hyndburn Borough Council ex parte Rauf [1998]). Many standard 8-seat vehicles — such as the Ford Tourneo Custom, VW Transporter Shuttle, or Mercedes Vito — are designed with rear seats that fold or tilt for access to the back row. These vehicles are fully legal, approved by the DVSA, and commonly licensed nationwide for private hire and taxi use. So, a blanket rule saying “each passenger must have direct door access without folding a seat” would be unrealistic, unnecessary, and legally questionable.	797	36
10/24/2025 - 11:13am	I strongly object to the proposed list of vehicles eligible for an Executive Private Hire Licence. This list is unrealistic, economically unsustainable, and demonstrates the councils complete disconnect from the local market and the actual needs of the travelling public.	798	37

	Disproportionate to Local Economic Reality, the listed vehicles (e.g., Rolls-Royce, Bentley, Mercedes S-Class, BMW 7 Series) are ultra-luxury vehicles with purchase prices typically exceeding £150,000 - £200,000. This policy is tailored for a major global city like London or Dubai, not for our local area. local operators cannot feasibly operate such vehicles, making the executive licence tier inaccessible and effectively pointless. This policy effectively reserves the executive market for a tiny, wealthy elite. Our primary customer base consists of business people travelling to airports and train stations. Their needs are for professional, comfortable, and reliable transport—needs that are perfectly met by premium executive vehicles like the The Mercedes E-Class: The industry standard for executive travel, renowned for its perfect balance of comfort, size, prestige, and running costs. The Audi A6: A direct competitor to the E-Class and a favourite for executive hire. The BMW 5 Series: Another cornerstone model for business travel Forcing operators to purchase a larger, more expensive, and less fuel-efficient vehicle (like an S-Class or GLS (the GLS contradicts condition 18) to qualify for an executive licence is environmentally irresponsible and financially punitive. It contradicts the Council's own emissions goals. The most cost-effective and environmentally sensible vehicle for the job is being excluded by an arbitrary and elitist list. The policy admits the list is "not exhaustive," yet provides no clear, objective criteria for what other vehicles might be considered. This grants Council officers unchecked subjective power and creates uncertainty for operators wishing to propose a suitable alternative. This list must be scrapped and replaced with objective criteria based on vehicle specifications and market segment, not a prescriptive list of premium brands. Eligibility should be based on a points system or clear benchmarks, such as: Vehicle segment (e.g., Executive E-Segment / Full-Size Luxury Saloon). This would allow professional and appropriate vehicles like the Mercedes E-Class, BMW 5 Series, Audi A6, and Jaguar XF to qualify, creating a viable executive tier that reflects the actual local business demand and economic environment. The current list is unworkable and unrealistic must be revised		
10/22/2025 - 1:06pm	17. I would like to express my concern regarding the recent suggestion that the Mercedes E-Class may no longer be accepted as an executive vehicle under the council's licensing policy. The Mercedes E-Class has long been recognised throughout the UK as a leading executive vehicle. It is widely used by chauffeur companies, airport transfer services, and corporate travel providers because of	799	37

	its comfort, safety, and professional appearance. The E-Class has set the industry standard for executive transport for many years and should continue to be regarded as such. In terms of quality, size, and comfort, the E-Class is directly comparable to other vehicles already accepted for executive use, such as the Volvo S90, V90, and XC90. Its specifications are as follows: Length: approximately 4.9 metres Width: around 1.85 metres Boot capacity: about 540 litres Price range: typically between £50,000 and £65,000, depending on model and trim Furthermore, many local authorities across the UK — including London (TfL), Birmingham, Manchester, Leeds, and Milton Keynes Councils — continue to approve the Mercedes E-Class for executive private hire licensing. This demonstrates its ongoing recognition nationwide as a suitable and reputable executive vehicle. To remove the E-Class from Reading's approved executive list would serve no practical benefit. Instead, it would cause unnecessary disruption to the current fleet, impacting drivers and operators who have already made significant investments in these vehicles to meet council standards. Such a decision would create confusion, financial strain, and could ultimately drive professional operators away from the borough. The Mercedes E-Class remains a premium, well-regarded, and industry-standard executive vehicle. I strongly urge the council to maintain its inclusion on the approved list for executive private hire work.		
10/27/2025 - 10:53am	As a school transport driver, I've realized that the "facing each other" seating arrangement simply isn't effective for SEND transport. Many of the children we transport require clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can create anxiety, behavioral issues, and sometimes even lead to physical contact between passengers, which poses risks for both pupils and assistants. A distinct physical separation between seats is often necessary to maintain calm and ensure safety throughout the journey. For SEND transport, safety goes beyond seatbelts and vehicle	800	38

	condition; it also involves having an appropriate layout inside the vehicle. Smaller MPVs with forward-facing seats and room for assistants to aid children are far more effective. The current restrictions and layout requirements do not reflect the true needs of SEND passengers. The Council should consider practical experiences and permit vehicles that meet adequate safety and support standards instead of enforcing unsuitable designs.		
10/24/2025 - 2:06pm	As a school transport driver, I've realized that the "facing each other" seating arrangement simply isn't effective for SEND transport. Many of the children we transport require clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can create anxiety, behavioral issues, and sometimes even lead to physical contact between passengers, which poses risks for both pupils and assistants. A distinct physical separation between seats is often necessary to maintain calm and ensure safety throughout the journey. For SEND transport, safety goes beyond seatbelts and vehicle condition; it also involves having an appropriate layout inside the vehicle. Smaller MPVs with forward-facing seats and room for assistants to aid children are far more effective. The current restrictions and layout requirements do not reflect the true needs of SEND passengers. The Council should consider practical experiences and permit vehicles that meet adequate safety and support standards instead of enforcing unsuitable designs.	801	38
10/26/2025 - 3:51pm	As a driver for school transport, I have found that the "facing each other" seating layout is not effective for SEND transport. Many of the children we carry need clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can lead to anxiety and behavioral issues, and may even result in physical contact between passengers, which poses risks for both pupils and assistants. A clear physical separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety encompasses more than just seatbelts and vehicle condition; it also relies on the right layout within the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to support children are significantly more suitable. The current restrictions and layout requirements do not meet the genuine needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that adhere to proper safety and support standards instead of imposing unsuitable designs.	802	38
10/27/2025 - 2:01pm	As a driver for school transport, I've found that the "facing each other" seating layout is not suitable for SEND transport. Many of the children we transport need clear boundaries and personal space for their safety and comfort. When seats face each other, it can cause anxiety and behavioral issues, and may result in physical contact between passengers, which puts both pupils and assistants at risk. A clear physical separation between seats is often necessary to maintain calm and ensure everyone stays safe during the journey. For SEND transport, safety includes not only seatbelts and vehicle condition but also	803	38

	the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are much more appropriate. The current restrictions and layout requirements do not reflect the true needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet adequate safety and support standards rather than enforcing unsuitable designs.		
10/27/2025 - 2:39pm	As a driver for school transport, I have found that the "facing each other" seating layout is not effective for SEND transport. Many of the children we carry need clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can lead to anxiety and behavioral issues, and may even result in physical contact between passengers, which poses risks for both pupils and assistants. A clear physical separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety encompasses more than just seatbelts and vehicle condition; it also relies on the right layout within the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to support children are significantly more suitable. The current restrictions and layout requirements do not meet the genuine needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that adhere to proper safety and support standards instead of imposing unsuitable designs.	804	38
10/27/2025 - 12:51pm	As a school transport driver, I've realized that the "facing each other" seating arrangement simply isn't effective for SEND transport. Many of the children we transport require clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can create anxiety, behavioral issues, and sometimes even lead to physical contact between passengers, which poses risks for both pupils and assistants. A distinct physical separation between seats is often necessary to maintain calm and ensure safety throughout the journey. For SEND transport, safety goes beyond seatbelts and vehicle condition; it also involves having an appropriate layout inside the vehicle. Smaller MPVs with forward-facing seats and room for assistants to aid children are far more effective. The current restrictions and layout requirements do not reflect the true needs of SEND passengers. The Council should consider practical experiences and permit vehicles that meet adequate safety and support standards instead of enforcing unsuitable designs.	805	38
10/27/2025 - 1:10pm	As a school transport driver, I've observed that the "facing each other" seating arrangement is ineffective for SEND transport. Many children we transport require clear boundaries and personal space for their safety and comfort. When seats face each other, it can create anxiety, behavioral issues, and even result in physical contact between passengers, which puts both pupils and assistants at risk. A distinct separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition—it also involves having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help	806	38

	children are far more suitable. The current restrictions and layout requirements do not reflect the actual needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet appropriate safety and support standards instead of enforcing unsuitable designs.		
10/24/2025 - 2:05pm	I express my objection to the age restriction that limits vehicles to under four years at first licensing and enforces de-licensing at eight years. This rule is excessively stringent and does not accurately represent vehicle condition or safety standards. Many modern vehicles can remain in great condition well beyond eight years if well maintained. The existing DVSA inspection and compliance testing system already ensures ongoing roadworthiness. A condition-based policy would be fairer and more sustainable than the current age-based restriction.	807	38
10/26/2025 - 5:29pm	As a school transport driver, I've observed that the "facing each other" seating arrangement is ineffective for SEND transport. Many children we transport require clear boundaries and personal space for their safety and comfort. When seats face each other, it can create anxiety, behavioral issues, and even result in physical contact between passengers, which puts both pupils and assistants at risk. A distinct separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition—it also involves having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are far more suitable. The current restrictions and layout requirements do not reflect the actual needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet appropriate safety and support standards instead of enforcing unsuitable designs.	808	38
10/27/2025 - 1:34pm	As a school transport driver, I've realized that the "facing each other" seating configuration is ineffective for SEND transport. Many of the children we carry need clear boundaries and personal space for their safety and comfort. When seats face each other, it can lead to anxiety or behavioral issues and may even cause physical contact between passengers, which poses risks for both pupils and assistants. A distinct physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety isn't just about seatbelts and vehicle condition—it also involves the appropriate layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are far more suitable. The current restrictions and layout requirements do not adequately address the real needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that meet proper safety and support standards instead of enforcing unsuitable designs.	809	38
10/27/2025 - 1:30pm	As a driver for school transport, I have found that the "facing each other" seating layout is not suitable for SEND transport. Many of the children we carry need clear boundaries and personal space for their safety and comfort. When seats face each other, it can lead to anxiety or behavioral issues, and may cause	810	38

	physical contact between passengers, which puts both pupils and assistants at risk. A clear separation between seats is often necessary to maintain calm and ensure everyone's safety during the journey. For SEND transport, safety is not solely about seatbelts and vehicle condition; it also involves the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are much more appropriate. The current restrictions and layout requirements do not accurately reflect the real needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that meet proper safety and support standards, rather than enforcing unsuitable designs.		
10/24/2025 - 11:14am	Objection: I strongly object to the disproportionate age limit applied to Executive Private Hire Vehicles, which mandates removal from the fleet at 8 years old. This is illogical, wasteful, and fails to recognise the engineering quality and longevity of the vehicles in this category. The vehicles listed for executive licences (e.g., Mercedes E-Class, BMW 5 Series) are premium models engineered to the highest standards for durability, comfort, and high-mileage use. Their build quality, materials, and engineering are superior to standard vehicles, giving them a significantly longer operational lifespan. An 8-year cap is arbitrary and forces the premature scrappage of a vehicle that is often at the peak of its reliability and comfort. The financial investment in an executive vehicle is substantially higher than in a standard car. A mandatory 8-year lifespan makes it impossible for an operator to realise the long-term value of this investment. Depreciating the cost of a vehicle like a Mercedes e-Class over just 8 years, as opposed to the 12 years allowed for standard vehicles, and 15 Years for Hackney Carriage Vehicle imposes a crippling financial model There is no logical or safety-based reason for executive vehicles to have a stricter age limit than the general fleet. If a vehicle is maintained to the "very highest quality" standard and passes all mechanical inspections (MOT, RBC test), its age is irrelevant. Applying a different, harsher rule to this category is inconsistent and suggests the policy is based on perception rather than practical or safety grounds. Applying a punitive 8-year lifespan to vehicles designed to last 15-20 years is poor economics, environmentally unsound, and will prevent the development of a viable executive vehicle sector for local operators.	811	38
10/27/2025 - 2:39pm	I oppose the age restriction that limits vehicles to four years or younger at first licensing and requires de-licensing at eight years. This rule is excessively stringent and does not accurately reflect vehicle	812	38

	conditions or safety. Many modern vehicles can remain in excellent shape well beyond eight years if they are properly maintained. The DVSA's inspection and compliance testing system ensures ongoing roadworthiness. A condition-based policy would be more equitable and sustainable		
10/24/2025 - 1:22pm	Certainly! Here's a more detailed and refined version of your objection, incorporating additional reasoning while keeping the message clear and persuasive: I strongly object to the age-based restriction that limits vehicles to under four years at first licensing and mandates de-licensing at eight years. This policy is unnecessarily rigid and fails to reflect the actual condition, safety, and environmental performance of modern vehicles. With proper maintenance, many vehicles remain in excellent mechanical and cosmetic condition well beyond eight years, meeting all DVSA safety and emissions standards. The current inspection and compliance system already ensures that only roadworthy vehicles remain licensed, making age an arbitrary and outdated metric. This rule penalises responsible operators who invest in high-quality vehicles and maintain them diligently. It also increases financial pressure on drivers and operators by forcing premature replacement, despite the vehicle's continued reliability and safety. Furthermore, this policy contributes to unnecessary waste and environmental impact, as well-maintained vehicles are taken off the road solely due to age rather than performance. A more balanced, condition-based approach would promote sustainability, reduce costs, and better reflect real-world vehicle standards—without compromising passenger safety or service quality. I urge decision-makers to reconsider this blanket age restriction and adopt a fairer, evidence-based policy.	813	38
10/27/2025 - 2:30pm	: As a private hire driver, I understand the Council wants to improve safety and protect the environment, but this new vehicle age policy feels unfair and too harsh on drivers. Many newer cars, if looked after properly, can stay in great condition well after eight years, both mechanically and environmentally. Forcing us to change vehicles just because of age brings huge costs, especially when fuel, insurance and repair prices keep going up. The trade is still trying to recover, and this makes it even harder.	814	38
10/27/2025 - 10:45am	As a private hire driver, I understand the Council wants to improve safety and protect the environment, but this new vehicle age policy feels unfair and too harsh on drivers. Many newer cars, if looked after properly, can stay in great condition well after eight years, both mechanically and environmentally. Forcing us to change vehicles just because of age brings huge costs, especially when fuel, insurance and repair prices keep going up. The trade is still trying to recover, and this makes it even harder.	815	38

	A fairer idea would be to let cars stay licensed as long as they pass strong yearly tests, including emission and safety checks. That keeps standards high without punishing good drivers. The Council doesn't offer any help or grants for switching to low or zero-emission vehicles, so putting strict age rules is not right. Drivers need support, not more financial pressure, to meet these goals.		
10/24/2025 - 3:37pm	I object to the current age restriction that limits vehicles to under four years at first licensing and mandates de-licensing at eight years. This rule is unreasonably strict and does not take into account the actual condition or safety of the vehicles. Many modern vehicles are capable of remaining in excellent condition beyond eight years with proper maintenance. The DVSA inspection and compliance testing system already ensures that vehicles are roadworthy. A condition-based approach would provide a fairer and more sustainable solution.	816	38
10/15/2025 - 12:35pm	While I appreciate the Council's commitment to maintaining a modern and safe licensed fleet, this rule is overly restrictive and fails to account for the true condition of vehicles that are properly maintained. Many vehicles today are engineered for longevity and can remain reliable, safe, and environmentally compliant well beyond eight years when serviced regularly and inspected thoroughly. Instead of imposing a strict age limit, the Council could implement an enhanced inspection process for older vehicles, with a particular focus on fuel emissions and environmental performance to ensure that only vehicles meeting high standards remain licensed. This approach would achieve the same safety and environmental objectives without creating unnecessary financial hardship for drivers. Furthermore, as the Council currently offers no fair subsidy or incentive scheme to support private hire operators in upgrading to low-emission or electric vehicles, it is unreasonable to enforce such rigid age restrictions. A fairer and more sustainable policy would be to introduce incentives or a phased compliance plan to encourage greener fleet upgrades, rather than penalising drivers who cannot afford premature vehicle replacement.	817	38
10/24/2025 - 12:18pm	As a private hire driver, I understand the Council wants to improve safety and protect the environment, but this new vehicle age policy feels unfair and too harsh on drivers. Many newer cars, if looked after properly, can stay in great condition well after eight years, both mechanically and environmentally. Forcing us to change vehicles just because of age brings huge costs, especially when fuel, insurance and repair prices keep going up. The trade is still trying to recover, and this makes it even harder. A fairer idea would be to let cars stay licensed as long as they pass strong yearly tests, including emission and safety checks. That keeps standards high without punishing good drivers. The Council doesn't offer any help or grants for switching to low or zero-emission vehicles, so putting strict age rules is not right. Drivers need support, not more financial pressure, to meet these goals.	818	38

10/24/2025 - 2:27pm	I express my objection to the age restriction that limits vehicles to under four years at first licensing and enforces de-licensing at eight years. This rule is excessively stringent and does not accurately represent vehicle condition or safety standards. Many modern vehicles can remain in great condition well beyond eight years if well maintained. The existing DVSA inspection and compliance testing system already ensures ongoing roadworthiness. A condition-based policy would be fairer and more sustainable than the current age-based restriction.	819	38
10/15/2025 - 1:21pm	While I understand the Council's intention to promote safety and environmental responsibility, this policy is unfair, disproportionate, and economically damaging to drivers and operators. Many modern vehicles, when properly maintained, remain in excellent mechanical and environmental condition well beyond eight years. Imposing strict age limits forces unnecessary vehicle replacement costs onto drivers who are already struggling with rising fuel, insurance, and maintenance expenses — particularly at a time when the trade continues to recover from financial hardship and increased operating costs. A more balanced and practical approach would be to allow vehicles to remain licensed provided they continue to pass enhanced annual inspections. These should incorporate fuel emission and environmental performance checks to ensure that only safe and efficient vehicles remain in service. This method safeguards public safety and environmental standards without penalising responsible operators. Moreover, given that the Council currently offers no fair subsidy or incentive scheme to help private hire drivers transition to low-emission or electric vehicles, it is unreasonable to impose such a restrictive age policy. Supporting drivers through grants, subsidies, or phased compliance schemes would be a fairer, more sustainable way to achieve the Council's environmental goals while maintaining a viable local trade.	820	38
10/24/2025 - 3:47pm	As a school transport driver, I've realized that the "facing each other" seating layout is ineffective for SEND transport. Many of the children require clear boundaries and adequate space for their safety and comfort. When seats are oriented to face each other, it can lead to anxiety and behavioral issues, and sometimes even physical contact between passengers, which risks safety for both pupils and assistants. A clear physical separation between seats is often needed to maintain calm and ensure safety during the journey. For SEND transport, safety goes beyond just seatbelts and vehicle condition; it also relies on having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to support children are significantly more appropriate. The current restrictions and layout requirements do not reflect the real needs of SEND passengers. The Council should consider practical experiences and allow vehicles that meet the necessary safety and support standards instead of enforcing unsuitable designs.	821	38

10/19/2025 - 11:31pm	from 7 years onwards you can still acquire good vehicle with less mileage	822	38
10/24/2025 - 2:16pm	I understand the Council's aim to improve safety and protect the environment, but the new vehicle age policy feels unfair and overly harsh on drivers. Well-maintained cars often remain safe and efficient long after eight years. Forcing replacements based only on age adds major costs, especially with rising fuel, insurance, and repair prices. A fairer approach would allow vehicles to stay licensed if they pass strict annual safety and emissions tests. Without grants or support for switching to low or zero-emission vehicles, these rules place unnecessary financial pressure on drivers instead of helping them meet environmental goals.	823	38
10/27/2025 - 2:14pm	I oppose the age restriction that limits vehicles to four years or younger at first licensing and requires de-licensing at eight years. This rule is excessively stringent and does not accurately reflect vehicle conditions or safety. Many modern vehicles can remain in excellent shape well beyond eight years if they are properly maintained. The DVSA's inspection and compliance testing system ensures ongoing road worthiness. A condition-based policy would be more equitable and sustainable.	824	38
10/24/2025 - 3:27pm	I strongly oppose the age restriction that confines vehicles to less than four years old at first licensing and requires de-licensing after eight years. This regulation is too strict and does not reflect the actual condition or safety of the vehicles. Many modern vehicles continue to be in excellent condition well past the eight-year mark if they are properly maintained. The DVSA's inspection and compliance testing already guarantee roadworthiness. Implementing a condition-based policy would be more just and sustainable.	825	38
10/24/2025 - 3:58pm	I express my opposition to the age restriction limiting vehicles to under four years at first licensing and requiring de-licensing at eight years. This regulation is overly strict and does not reflect the true condition or safety of vehicles. Many modern vehicles stay in excellent shape well beyond eight years if maintained properly. The DVSA's inspection and compliance testing already guarantee ongoing roadworthiness. A condition-based policy would be a more just and sustainable solution.	826	38
10/24/2025 - 1:37pm	As a school transport driver, I have observed that the "facing each other" seating arrangement is ineffective for SEND transport. Many of the children we transport require clear boundaries and personal space for their safety and comfort. When seats face each other, it can lead to anxiety, behavioral issues, and even physical contact between passengers, which puts both the students and assistants at risk. A distinct physical separation between seats is often essential to maintain calm and ensure safety during the journey. For SEND transport, safety extends beyond seatbelts and vehicle condition—it also involves the appropriate layout within the vehicle. Smaller MPVs with forward-facing seats and space for assistants to assist children are far more effective. The current restrictions and layout requirements do	827	38

	not adequately address the real needs of SEND passengers. The Council should consider practical experiences and permit vehicles that meet proper safety and support standards instead of enforcing inappropriate designs.		
10/24/2025 - 2:45pm	As a school transport driver, I have found that the "facing each other" seating layout is inadequate for SEND transport. Many children we carry need defined boundaries and personal space for their safety and comfort. When seats face each other, it can lead to anxiety and behavioral issues, and may result in physical contact between passengers, endangering both pupils and assistants. A clear physical separation between seats is often necessary to maintain calm and ensure safety during the ride. For SEND transport, safety encompasses more than just seatbelts and vehicle condition; it also relies on the correct layout within the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to support children are significantly more suitable. The current restrictions and layout requirements do not meet the genuine needs of SEND passengers. The Council should consider practical experiences and allow vehicles that adhere to proper safety and support standards rather than enforcing unsuitable designs.	828	38
10/27/2025 - 2:35pm	I strongly oppose the age restriction that confines vehicles to less than four years old at first licensing and requires de-licensing after eight years. This regulation is too strict and does not reflect the actual condition or safety of the vehicles. Many modern vehicles continue to be in excellent condition well past the eight-year mark if they are properly maintained. The DVSA's inspection and compliance testing already guarantee roadworthiness. Implementing a condition-based policy would be more just and sustainable.	829	38
10/27/2025 - 2:48pm	I object to the age restriction that confines vehicles to under four years at first licensing and forces de-licensing at eight years. This rule is unnecessarily strict and fails to accurately represent vehicle condition or safety. Many modern vehicles can remain in excellent condition well beyond eight years with proper maintenance. The DVSA inspection and compliance testing already ensure roadworthiness. A condition-based policy would be a fairer and more sustainable approach.	830	38
10/24/2025 - 1:46pm	As a driver for school transport, I've noticed that the "facing each other" seating configuration simply does not work for SEND transport. Many children require clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can induce anxiety and behavioral issues, and can even result in physical contact between passengers, putting both pupils and assistants at risk. A clear physical separation between seats is often necessary to maintain calm and ensure everyone's safety during the journey. In SEND transport, safety is not just about seatbelts and vehicle condition; it also involves having the right layout inside the vehicle. Smaller MPVs with forward-facing seats and space for assistants to help children are much more appropriate. The existing restrictions and layout requirements	831	38

	fail to reflect the actual needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that meet appropriate safety and support standards instead of imposing unsuitable designs.		
10/27/2025 - 3:15pm	I wish to raise an objection to the age restriction policy that only allows vehicles under four years old at first licensing and mandates de-licensing at eight years. This approach is too narrow and does not reflect real-world conditions. Advances in vehicle technology mean that many cars and minibuses remain safe, efficient, and presentable well beyond eight years when maintained to proper standards. The DVSA's inspection regime already provides a robust assessment of roadworthiness and safety. A fairer and more environmentally responsible policy would base licensing on vehicle condition and compliance standards rather than age alone.	832	38
10/27/2025 - 3:27pm	I wish to raise an objection to the existing vehicle age restriction policy, which confines vehicles to under four years at first licensing and mandates their de-licensing at eight years. This approach is unnecessarily stringent and does not accurately reflect a vehicle's condition or roadworthiness. Advances in manufacturing mean that modern vehicles can perform safely and efficiently beyond the current limits. The DVSA's inspection regime already provides a reliable measure of safety. A shift toward a condition-based policy would better balance safety, sustainability, and fairness.	833	38
10/27/2025 - 2:26pm	As a driver for school transport, I have found that the "facing each other" seating layout is not effective for SEND transport. Many of the children we carry need clear boundaries and personal space to ensure their safety and comfort. When seats face each other, it can lead to anxiety and behavioral issues, and may even result in physical contact between passengers, which poses risks for both pupils and assistants. A clear physical separation between seats is often necessary to maintain calm and ensure safety during the journey. For SEND transport, safety encompasses more than just seatbelts and vehicle condition; it also relies on the right layout within the vehicle. Smaller MPVs with forward-facing seats and adequate space for assistants to support children are significantly more suitable. The current restrictions and layout requirements do not meet the genuine needs of SEND passengers. The Council should take practical experiences into account and allow vehicles that adhere to proper safety and support standards instead of imposing unsuitable designs.	834	38

Private Hire Vehicles - Legislation and Conditions

Date posted	Comment	Bubble location number	Page
10/19/2025 - 11:32pm	within 14 days	835	41
10/19/2025 - 11:33pm	within 14 days	836	41
10/20/2025 - 12:13pm	This should not be in addition to an MOT and or Compliance tests I don't see why this is being proposed	837	42
10/20/2025 - 12:15pm	This should be inline with 1974 Act which is 14 days	838	43
10/20/2025 - 12:18pm	Any door signs should only include Company logo, Phone Number Private Hire and or Advance bookings only. Since the plate is attached at the back should not be requirement	839	43
10/24/2025 - 11:15am	I object to the condition requiring "written records" of maintenance checks. This policy is outdated and creates unnecessary duplication, as the Council already conducts its own comprehensive safety verification. The vehicle is subjected to a full mechanical inspection every six months by council-approved testing centres. This official inspection is far more thorough and objective than any proprietor's written log, as it: Is conducted by an independent, certified professional Tests the actual roadworthiness of the vehicle against strict standards Results in an official pass/fail certificate that is already held by the Council If a vehicle passes this rigorous twice-yearly inspection, it has already been professionally certified as safe and roadworthy. Maintaining a parallel paper trail of basic maintenance adds no safety value while creating an unnecessary administrative burden.	840	44
10/20/2025 - 12:21pm	This should not be anything to do with the council, going overboard in their powers. Stop trying to imitate the [REDACTED]	841	44
10/20/2025 - 12:27pm	When there are 3 special needs children and all are similar age the escort will need to sit at the back with 2 and one will definitely need to be sitting in front. This is practicable in view of the fact that RBC is trying to cutback on school contracts. What is your thinking and point on this?	843	44

Approval of advertising/livery on licensed vehicles:

Date posted	Comment	Bubble location number	Page
10/03/2025 - 5:01pm	Why not? Why the double standard?	844	47

Private Hire Operator Licence Conditions

Date posted	Comment	Bubble location number	Page
10/20/2025 - 12:34pm	this bit should not be part of Operator returns since dates they started and ceased work are emailed anyway.	845	50
10/20/2025 - 12:37pm	These bookings either go into our taxi software and or via email which can be logged into via cloud and the base. These days base only serves as registered office with technology many operators can work from home or remotely via cloud. this is not tenable..	846	50
10/24/2025 - 10:34pm	Most taxi software providers use cloud based software the bookings the dispatchers and bookings staff log on via cloud via a server which is for ICabbi is either in Nottingham and or Ireland in some cases abroad. Whilst you can live records however all bookings are via servers. So this condition go against todays technology.	847	50
10/24/2025 - 11:15am	I object to the requirement for an operator to "evidence that safeguarding protections are applied which are equivalent to those of Reading Borough Council" when sub-contracting to another operator or driver who is already licensed by a Council. This requirement is illogical, bureaucratic, and creates a completely redundant administrative loop. The Council's licensing process is the ultimate safeguard.	848	50

	The fundamental principle of licensing is that the Council has already vetted and approved all licensed operators and drivers. By granting a licence, certifies that the holder has met its required standards, which explicitly includes safeguarding protocols. It is pointless and inefficient to require one licensee to prove the compliance of another licensee. This rule forces operators to create a parallel paper trail to prove something the Council already knows and certifies.		
10/20/2025 - 12:39pm	No access to software, we can provide bookings records on request and or officers can visit the base via appointment to check records via the software	849	50
10/24/2025 - 10:36pm	Provided it is requested by either email and or by an appointment for visit at the office of the Operator concerned.	850	50
10/24/2025 - 11:16am	I object to the clause stating the operator "shall be totally responsible for the conduct and actions of controllers" on the grounds that it is unreasonably broad and vague While it is right and proper that an operator bears responsibility for the professional performance and training of their staff, the phrase "totally responsible for the conduct and actions" is dangerously final. This phrasing could be interpreted to make the operator liable for any action a controller takes, including, Personal Conduct: Actions completely unrelated to their work (e.g., a personal argument away from the workplace). Criminal Acts: Intentional, illegal acts undertaken by the controller without the operator's knowledge or consent. Holding an operator "totally responsible" for every facet of an employee's "conduct" is this standard applied in other sectors? The operator's responsibility should be to ensure that robust systems, clear procedures, and proper training are in place. They cannot be inside the mind of an employee at all times to control their every action. This clause suggests a level of direct, absolute control that is not possible in practice. The term "totally responsible" It creates significant uncertainty for operators about the exact nature and limits of their liability, potentially exposing them to unfair disciplinary action for events they could not realistically prevent. The clause must be refined to reflect a more precise and reasonable standard of responsibility, focusing on the operator's duty to manage their business properly. "The operator shall be responsible for ensuring that all controllers are adequately trained and supervised, and that they adhere to the conditions of the operator's licence and all relevant council policies in the course of their work."	851	50

10/20/2025 - 12:41pm	Again with Cloud calls are answered remotely and the office, maybe the council should apply the same rule to their staff and we may once have someone dealing with our issues which are many. please move with the technology just as your staff is working from home	852	50
10/24/2025 - 10:38pm	All systems are via cloud based software the council use cloud base software for officers to work from far away so we also have staff working from distances even abroad. not possible with todays technology..	853	50
10/20/2025 - 12:43pm	what is it in one place you say 6 months and in a another your asking for 12 months. The software companies we use allow us 6 months so this needs rethinking to 6 months	854	50
10/24/2025 - 10:41pm	In one of the clauses before it was 6 months, which is better suited for the software provider i.e. ICabbi taxi software providers.	855	50
10/24/2025 - 11:16am	mandatory requirement for operators to report all complaints to the council within 72 hours. This policy is inefficient, undermines the operator's primary role, and will create an unnecessarily workload. The operator is the direct point of contact for the customer and is in the best position to conduct a swift, initial investigation and resolution. For minor complaints (e.g., about driving style, vehicle cleanliness, route taken), a direct apology, a partial refund, or other immediate redress from the operator is often all the customer seeks. Forcing every single complaint to be escalated to the council within 72 hours: This condition Prevents operators from resolving issues directly and building customer trust. Infantilises the operator by not allowing them to manage their own customer service. This policy will flood the Council's licensing officers with minor complaints, diverting their limited resources from genuine safety issues. A recent example: I received over 10 complaints in 1 morning after drivers were delayed by four separate, council-authorised roadworks on major routes in and out of Caversham during the same week. Journeys that normally take 10 minutes took over 60 minutes, leading to complaints about lateness and, subsequently, drivers' attitudes as frustration grew. Under this policy, I would be forced to report all 10 of these traffic-related / driver's behaviour complaints to the Council within 72 hours. This raises a serious question: does the Council plan to install an officer in my office to process this sort of administrative noise that they themselves created? This example perfectly illustrates how this rule mandates the reporting of trivial, unactionable matters that makes the council our primary customer service provider, a role for which it is not resourced for, and which should sit with the business, burying officers in paperwork while doing nothing to improve public safety A sensible complaints procedure should have two tiers:	856	50

	Tier 1: Operator-Level Resolution: The operator is required to have a transparent complaints procedure, to investigate all complaints, and to attempt to resolve them directly with the customer. Tier 2: Council Escalation: If the complainant is unsatisfied with the operator's response, or if the complaint is of a serious nature (e.g., involving safety, safeguarding, or criminal activity), then it must be reported to the council for formal investigation. The policy should be amended to create a logical, two-stage process that empowers operators to fulfil their customer service role while ensuring serious matters are escalated. This should be "Operators are required to have a clear and transparent complaints procedure and must conduct a proper investigation of all complaints received. Operators must attempt to resolve complaints directly with the complainant. If the complainant is not satisfied with the outcome, or if the complaint is of a serious nature (including but not limited to those involving safety, safeguarding, or potential criminality), the operator must report it to the council within 5 working days of the operator's final response to the complainant." This approach is more efficient, empowers responsible businesses, and ensures the Council's enforcement resources are focused where they are most needed.		
10/20/2025 - 12:45pm	No to [REDACTED] if complaint comes in the company deal with it as a first port of call, if the customer is not happy we can then refer them to RBC as a adjudicator..	857	50
10/24/2025 - 10:43pm	We are a Private LTD Company who should deal with complaints ourselves, unless its a criminal activity in which case police should be involved and thereafter RBC.	858	50
10/20/2025 - 12:51pm	Whilst I would go ballistic if anyone refuses a Guide Dog passenger and or charges extra, however the extra charge should apply if its a dog which leaves excessive hair on the seats or within the vehicle. Someone needs to pay to clean the vehicle for the next passenger.	859	50
10/24/2025 - 11:16am	I object to the requirement for an operator—who does not act as a driver—to report all driving convictions and fixed penalties within 48 hours. While supporting the need to report serious criminal conduct, this clause is disproportionate, and dose not pick between relevance and irrelevance to the function of running a transport business. The core function of an operator is to manage bookings, dispatch vehicles, and run a business. A minor motoring conviction (e.g., a speeding fixed penalty received in a personal vehicle) has no bearing on an individual's fitness to perform these administrative and managerial tasks. Applying the same strict reporting standard as for a driver, whose primary tool is a vehicle, is ridiculous A 48-hour reporting window for any minor offence is unrealistic. It does not account for an individual receiving the official paperwork, seeking legal advice, or simply being on holiday. This creates a	860	50

	procedural trap where an otherwise fit and proper person could lose their operator's licence for a minor, irrelevant administrative delay. The principle should be whether a conviction impacts a person's status as a "fit and proper" person to hold an operator's licence. The policy should reflect this by distinguishing between: Relevant Offences: Serious criminality, dishonesty, violence, and sexual offences that clearly call into question an individual's integrity and fitness to run a business, especially one with safeguarding responsibilities. Less Relevant Offences: Minor traffic offences that have no demonstrable connection to their ability to manage a private hire office.		
10/20/2025 - 12:53pm	Criminal offences yes, 14 days for any driving offences, however driving offences only when driver reaches 6 points on his/her license..	861	50
10/20/2025 - 12:54pm	14 days after moving	862	50
10/20/2025 - 12:55pm	14 days and or as soon is practically possible	863	51
10/20/2025 - 1:00pm	Office should be exempt as they don't deal physically with passengers many of our operations can be done via cloud and abroad, not practicable. Operators should be responsible for running the office. Sorry [REDACTED] are you actioning the same rules for your staff at RBC and the bus company...	864	51

Hackney Carriage Driver's Bylaws, Conditions and Penalty Points Scheme:

Date posted	Comment	Bubble location number	Page
10/06/2025 - 5:35pm	52 Appendix G 2.2 Penalty points 28days to respond Q what happens if a person is sent a letter, but does not receive it? Or a letter is sent but driver is away for period of 3 months before receiving letter? 53 5.1 Second accumulation of 12 points Should be 2 years not 4 53 6.1 Third accumulation of 12 points Should be 2 years not 4 54 8.0 Previous suspension It's a new system, we should have a fresh start 56 HCD conditions 2.1 No badge 4 points Should be 2 points 56 2.2 Customer badge display 4 points Should be 2 points 56 3.1 Hackney plate display New to fleet HCVL take up to 2 weeks for plate to be posted, should not apply for them 56 4.1 Produce HCB 5 days 3 points Should be within 7 days 2 points 56 5.1 Suspension 4 points Medical examination We recommend suspension 3 points	10	1

	57 5.2 Suspension 4 points Suffering from any disease We recommend suspension 3 points 57 5.3 Suspension 4 points Eyesight We recommend suspension 3 points 57 6.2 Documents 4 points Requested documents We recommend suspension 2 points 57 6.3 Dbs certificate 6 points Random enhance dbs Dbs certificate takes more than 14 days to arrive 4 points 57 BYLAW 5 a Key Flag 4 points We recommend 3 points 57 b Hired 6 points We recommend 3 points 57 c Illuminated 4 points We recommend 3 points 58 BYLAW 7 a Reasonable speed 4 points We recommend 2 points 58 B Over ranking 4 points We recommend 2 points 58 C Direction 4 points We recommend 2 points 58 D Gap on rank 4 points		

	We recommend 2 points 58 7.1 Unattended vehicle 6 points We recommend 4 points 58 7.2 Idling 6 points We recommend 3 points, as sometimes customers take over a minute to agree a fare 58 8.1 Pro long distance 4 points We recommend 3 points 58 8.2 Outside license area 6 points We recommend 4 points 58 8.3 Use as private hire 6 points We recommend 4 points 58 8.4 Card surcharge 6 points We recommend 4 points 58 9.1 Obstruct officer 6 points We recommend 4 points 59 11.1 Report loss of hackney badge 6 points Within 7 days 3 points 59 BYLAW 9 Conduct of driver 6 points We recommend 4 points 59 BYLAW 10 bBooking commitment 6 points We recommend 4 points 59 12.1 Reasonable requirements 4 points We recommend 3 points 59		

	12.2 Eat or drink 3 points Whilst passengers on board. Should not eat but should be allowed to drink 60 14.1 Refuse to Carry guide dogs 12 points We recommend 6 points same as private hire drivers 60 14.4 Restraining wheelchair 6 points We recommend 4 points 60 14.5 Refusing wheelchair 12 points We recommend 9 points 61 16.1 Receipts 4 points No points. As customers also insist on blank receipts, Aswell as putting in a higher amount than the fare price 61 BYLAW 17 Lost property 4 points We recommend 3 points 61 BYLAW 18 A Lost property 48 hours 12 points Q Does RBC accept lost property. We recommend 3 points and 72 hours 61 B Lost property return to customer Charge full fare to drop off location. 61 18.3 Tinted windows 6 points We recommend 4 points 61 19.1 Report change of address 4 points We recommend 3 points, 14 days 61 19.2 Report new convictions 6 points We recommend 4 points, 72 hours		

	62 19.3 Report arrest and release We recommend 4 points, 72 hours 62 20.2 Insurance 4 points We recommend 3 points 62 21.1 Away from address 3 points We recommend 2 points 62 21.2 Away from address 28 days 3 points We recommend 2 points 62 22.2 Accident 3 points Within 48 hours 63 BYLAW 8 Touting 12 points We recommend 6 points 63 25.1 Bus stop 4 points We recommend 2 points 63 25.2 Bus lane 4 points We recommend 2 points 63 26.1 Disable bay 4 points We recommend 3 points 63 27.1 Double park 4 points We recommend 3 points 63 27.2 Footway 4 points We recommend 3 points 63 28.1 Red route		

	We recommend 3 points 63 28.2 Single yellow 4 points We recommend 3 points 63 28.3 Highway code 4 points We recommend 3 points 63 28.4 Alarm and distress 4 points We recommend 3 points 63 29.1 Horn 4 points We recommend 3 points 64 30.1 Permission 4 points We recommend 3 points 64 31.1 License 6 points We recommend 4 points 64 32.1 Play radio 4 points We recommend 4 points 65 35.1 Seat belts home to school 6 points We recommend 4 points		
10/27/2025 - 11:00pm	52 Appendix G 2.2 Penalty points 28 days to respond Q what happens if a person is sent a letter, but does not receive it? Or a letter is sent but driver is away for period of 3 months before receiving letter? 53 5.1 Second accumulation of 12 points Should be 2 years not 4 53 6.1 Third accumulation of 12 points Should be 2 years not 4 PAGE SECTION RBC PROPOSAL GUIDE RESPONSE 54 8.0 Previous suspension It's a new system, we should have a fresh start 56 HCD conditions 2.1 No badge 4 points Should be 2 points 56 2.2 Customer badge display 4 points Should be 2 points 56 3.1 Hackney plate display New to fleet HCVL take up to 2 weeks for plate to be posted, should not apply	12	1

	for them 56 4.1 Produce HCB 5 days 3 points Should be within 7 days 2 points 56 5.1 Suspension 4 points Medical examination We recommend suspension 3 points 57 5.2 Suspension 4 points Suffering from any disease We recommend suspension 3 points 57 5.3 Suspension 4 points Eyesight We recommend suspension 3 points 57 6.2 Documents 4 points Requested documents We recommend suspension 2 points 57 6.3 Dbs certificate 6 points Random enhance dbs Dbs certificate takes more than 14 days to arrive 4 points 57 BYLAW 5 a Key Flag 4 points We recommend 3 points 57 b Hired 6 points We recommend 3 points 57 c Illuminated 4 points We recommend 3 points 58 BYLAW 7 a Reasonable speed 4 points We recommend 2 points 58 B Over ranking 4 points We recommend 2 points 58 C Direction 4 points We recommend 2 points 58 D Gap on rank 4 points We recommend 2 points 58 7.1 Unattended vehicle 6 points We recommend 4 points 58 7.2 Idling 6 points We recommend 3 points, as sometimes customers take over a minute to agree a fare 58 8.1 Pro long distance 4 points We recommend 3 points 58 8.2 Outside license area 6 points We recommend 4 points 58 8.3 Use as private hire 6 points We recommend 4 points 58 8.4 Card surcharge 6 points We recommend 4 points 58 9.1 Obstruct officer 6 points We recommend 4 points 59 11.1 Report loss of hackney badge 6 points With in 7 days 3 points 59 BYLAW 9 Conduct of driver 6 points We recommend 4 points 59 BYLAW 10 Booking commitment 6 points We recommend 4 points 59 12.1 Reasonable requirements 4 points We recommend 3 points 59 12.2 Eat or drink 3 points Whilst passengers on board. Should not eat but should be allowed to drink PAGE SECTION RBC PROPOSAL GUIDE RESPONSE 60 14.1 Refuse to Carry guide dogs 12 points We recommend 6 points same as private hire drivers 60 14.4 Restraining wheelchair 6 points We recommend 4 points		

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10/23/2025 - 2:52pm	Disagree The points should be less	16	2
10/27/2025 - 8:49am	As others have commented, all points here see too high. Most need revisions or just first time warnings for some of these.	865	52

10/26/2025 - 6:04pm	What happens if a person is sent a letter but does not receive it or a letter is sent but driver is away for period of 3 months before receiving letter?	866	52
10/27/2025 - 10:33pm	what happens if someone is sent a letter but doesnt recieve it? or a letter is sent but the driver is away for a period of three months before recieving letter?	867	52
10/26/2025 - 7:19pm	What happens if a person is sent a letter but doesn't receive it? Or a letter is sent but the driver is away for a period of 3 months before receiving the letter itself?	868	52
10/09/2025 - 12:13pm	52 Appendix G 2.2 Penalty points 28days to respond Q what happens if a person is sent a letter, but does not receive it? Or a letter is sent but driver is away for period of 3 months before receiving letter?	869	52
10/27/2025 - 11:46pm	What happens if you driver does not receive?	870	52
10/23/2025 - 3:27pm	what happens if a person is sent a letter but does not receive it? or a letter is sent but the driver is away for a period of 3 months before receiving the letter?	871	52
10/12/2025 - 10:40pm	what happens if a person is sent a letter, but does not receive it? Or a letter is sent but driver is away for period of 3 months before receiving letter?	872	52
10/26/2025 - 11:30am	What will be happen if person sent a letter but does not receive it? Or letter is sent but drive is away for period of 3 months before receiving the letter?	873	52
10/27/2025 - 11:23pm	Q what happens if a person is sent a letter, but does not receive it? Or a letter is sent but driver is away for period of 3 months before receiving letter?	874	52
10/24/2025 - 6:30pm	Have factors such as a driver being away on leave and not accessing the letter, or a driver not receiving the letter because of a wrong address, been considered?	875	52
10/27/2025 - 1:22am	What happens if that person doesn't receive the letter or if driver is away for period of 3 months before he can receive it?	876	52
10/26/2025 - 8:39pm	What if the driver is not present for 3 months and has not received the letter	877	52
10/26/2025 - 5:42pm	some drivers are away for longer periods.this should be considered	878	52
10/26/2025 - 1:13pm	What happens if s person is sent a letter but does not receive it? Or a letter is sent but driver is away for a period of 3 months before receiving the letter	879	52
10/20/2025 - 3:30pm	What happens if a person is sent a letter but does not receive it? Or a letter is sent but the driver is away for a period of 3 months before receiving it?	880	52

10/27/2025 - 11:46pm	what happens if person doesnt recieve letter	881	52
10/27/2025 - 6:30pm	Why happens if a person is sent a letter.but does not receive it or driver is away for holidays for 3 months or more some people family not in UK?	882	52
10/11/2025 - 8:31pm	What happens if someone is sent a letter, but does not receive it? What happens if the driver is away for a period of 3 months before receiving this letter?	883	52
10/19/2025 - 4:19pm	Q what happens if the person is sent a letter but does not receive it, or a letter is sent but driver is away for period of 3 months before receiving a letter?	884	52
10/26/2025 - 11:16am	How will situations be handled where a letter is sent but not received by the individual, or where a driver is absent for an extended period, such as three months, before the letter is received?	885	52
10/25/2025 - 9:55pm	What happens if a person is sent a letter, but does not receive it? Or a letter is sent, but the driver is away for a period of 3 months before receiving the letter?	886	52
10/09/2025 - 12:36pm	52 Appendix G 2.2 Penalty points 28days to respond Q what happens if a person is sent a letter, but does not receive it? Or a letter is sent but driver is away for period of 3 months before receiving letter?	887	52
10/26/2025 - 8:45pm	The old system is fine. If we need to proceed i agree with RTA suggestion for the points sytem	888	52
10/27/2025 - 3:00pm	page 52 G 2.2 what happens if a persons is sent a letter, but does not receive it? or a letter is sent but driver is away for period of 3 months before receiving letter?	889	52
10/09/2025 - 12:14pm	53 5.1Second accumulation of 12 points Should be 2 years not 4 536.1 Third accumulation of 12 points Should be 2 years not 4	890	53
10/26/2025 - 6:05pm	Should be 2 years not 4 years	891	53
10/09/2025 - 12:36pm	53 5.1Second accumulation of 12 points	892	53

	Should be 2 years not 4 53 6.1Third accumulation of 12 points Should be 2 years not 4		
10/26/2025 - 11:33am	It should be 2 years not years	893	53
10/24/2025 - 6:30pm	I disagree, this should be 2 years, not 4 years.	894	53
10/26/2025 - 5:43pm	should be 2 years	895	53
10/12/2025 - 10:41pm	This should be 2 years not 4	896	53
10/26/2025 - 8:39pm	2 years not 4	897	53
10/27/2025 - 11:47pm	2 years	898	53
10/20/2025 - 3:31pm	This should be 2 years not 4 years	899	53
10/23/2025 - 3:27pm	should be 2 years not 4	900	53
10/27/2025 - 6:32pm	Should be 2year	901	53
10/26/2025 - 7:20pm	Should be 2 years and not 4.	902	53
10/26/2025 - 1:13pm	Should be 2 years not 4	903	53
10/27/2025 - 1:23am	Not agree. Should be 2 years instead of 4	904	53
10/27/2025 - 10:34pm	should be 2 years and not 4	905	53
10/27/2025 - 11:47pm	2 years	906	53
10/11/2025 - 8:32pm	This should be reduced to 2 years, not 4 years as this seems too harsh.	907	53

10/19/2025 - 4:19pm	should be 2 years not 4 years	908	53
10/26/2025 - 11:16am	should be 2 years not 4 years	909	53
10/25/2025 - 9:56pm	Should be 2 years not 4.	910	53
10/26/2025 - 6:05pm	Should be 2 years not 4	911	53
10/27/2025 - 6:33pm	Should be 2year not 4	912	53
10/26/2025 - 11:34am	It should be 2 years not 4 years	913	53
10/24/2025 - 6:31pm	I disagree, this should be 2 years rather than 4 years.	914	53
10/26/2025 - 5:43pm	should be 2 years	915	53
10/26/2025 - 7:20pm	Should be 2 years and not 4.	916	53
10/27/2025 - 11:47pm	2 years	917	53
10/27/2025 - 10:34pm	should be 2 years and not 4	918	53
10/12/2025 - 10:41pm	This should be 2 years not 4	919	53
10/27/2025 - 1:24am	Not agreeing. Should be 2 years not 4 years.	920	53
10/26/2025 - 8:40pm	Should be 2 years not 4	921	53
10/20/2025 - 3:31pm	This should be 2 years not 4 years	922	53
10/26/2025 - 1:14pm	Should be 2 years not 4	923	53
10/23/2025 - 3:28pm	should be 2 years not 4	924	53

10/27/2025 - 11:47pm	2 years	925	53
10/11/2025 - 8:33pm	This should be 2 years not 4 as this also seems too harsh.	926	53
10/26/2025 - 11:17am	should be 2 years not 4 years	927	53
10/19/2025 - 4:19pm	should be 2 years not 4 years	928	53
10/25/2025 - 9:56pm	Should be 2 years not 4.	929	53
10/27/2025 - 3:03pm	page 53 6.1 should be 2 years not 4 years	930	53
10/27/2025 - 3:02pm	page 53 5.1 should 2 years not 4 years	931	53
10/09/2025 - 12:36pm	54 8.0Previous suspension It's a new system, we should have a fresh start	932	54
10/24/2025 - 6:32pm	As it is a new system, I suggest it is better to a new and fresh start.	933	54
10/26/2025 - 6:05pm	It is a new system, we should have a fresh start	934	54
10/26/2025 - 11:35am	We should have new start because it's new system	935	54
10/23/2025 - 3:30pm	its a new system we should have a fresh start	936	54
10/12/2025 - 10:45pm	As this is a new system we should start fresh to adopt	937	54
10/26/2025 - 5:44pm	it should start fresh	938	54
10/26/2025 - 7:21pm	It is a new system we should have a fresh start.	939	54
10/26/2025 - 8:41pm	Start fresh all previous should be finished	940	54

10/27/2025 - 11:25pm	It's a new system should have new start	941	54
10/20/2025 - 3:32pm	Its a new sysytem, we should have a fresh start	942	54
10/27/2025 - 1:28am	It's a new system, we should have a fresh start.	943	54
10/27/2025 - 6:35pm	It's a new system.we should have a fresh start	944	54
10/27/2025 - 10:35pm	as its a new system we should have a fresh start	945	54
10/11/2025 - 8:34pm	As this is a new system, we should have a fresh start.	946	54
10/19/2025 - 5:31pm	As this is a new system being put into place it should be a clean slate for everyone, unless there are serious offenders	947	54
10/26/2025 - 1:14pm	It's a new system we should have a fresh start	948	54
10/19/2025 - 4:20pm	its a new system we should have a fresh start	949	54
10/26/2025 - 8:49pm	RBC are introducing a new system this should be fair and anything previous should be a clean slate going forward, so basically a fresh start when the policy is introduced	950	54
10/27/2025 - 11:48pm	New system clean slate	951	54
10/26/2025 - 11:20am	With the new system in place, it's best to begin with a clean slate	952	54
10/27/2025 - 11:48pm	new system, start fresh	953	54
10/25/2025 - 9:57pm	It's a new system, we should have a fresh start	954	54
10/24/2025 - 10:54pm	Why is RBC raising the stakes when previously it was 3 suspensions before you got 28 days and then a revocation. This harsh approach will drive many drivers to other councils which is not good for our industry. 1st suspension at 12 points for 1 week and 2nd suspension for 2 weeks on another 12 points and then 28 days for 3rd suspension and Then a case should be made for revocation on 36 points. If driver does not incur points for the next term, this should be wiped off his record as spent. Where as points are brought up committee reports after even 20 years which is really unfair when driving offences are wiped off after 4 years.	955	54

10/09/2025 - 12:14pm	54 8.0 Previous suspension It's a new system, we should have a fresh start	956	54
10/27/2025 - 3:06pm	page 54 8.0 it is new system, we should have a fresh start	957	54
10/26/2025 - 7:21pm	Should be 2 points.	958	56
10/27/2025 - 3:44pm	3 points	959	56
10/26/2025 - 6:06pm	Should be 2 points	960	56
10/26/2025 - 6:07pm	ignore	960	56
10/27/2025 - 3:43pm	4 points	961	56
10/24/2025 - 6:33pm	I disagree; this should be 2 points.	962	56
10/27/2025 - 3:45pm	3points	963	56
10/26/2025 - 6:07pm	should be 2 points	964	56
10/23/2025 - 3:31pm	should be 2 points	965	56
10/27/2025 - 11:26pm	This should be 2 points	966	56
10/20/2025 - 3:33pm	Should be 2 points, first time should have a verbal warning	967	56
10/27/2025 - 1:29am	Should be 2 points	968	56
10/12/2025 - 10:46pm	This should be 2 points	969	56
10/27/2025 - 10:36pm	should be 2 points	970	56

10/19/2025 - 4:20pm	should be 2 points not 4	971	56
10/26/2025 - 11:22am	should be 2 points not 4 points	972	56
10/26/2025 - 5:45pm	should be 2 points	973	56
10/26/2025 - 8:50pm	Should be 2 points not 4	974	56
10/26/2025 - 11:37am	It should be 2 points	975	56
10/25/2025 - 9:57pm	Should be 2 points	976	56
10/27/2025 - 11:49pm	2 points	977	56
10/27/2025 - 3:46pm	2 points	978	56
10/26/2025 - 1:15pm	Should be 2 points	979	56
10/27/2025 - 6:36pm	Should be not point just warning	980	56
10/27/2025 - 11:49pm	2	981	56
10/11/2025 - 8:34pm	This is too harsh and I suggest 2 points.	982	56
10/26/2025 - 6:07pm	should be 2 points	983	56
10/26/2025 - 7:22pm	Should be 2 points.	984	56
10/12/2025 - 10:47pm	This should be 2 points	985	56
10/23/2025 - 3:32pm	should be 2 points	986	56
10/27/2025 - 10:36pm	should be 2 points	987	56

10/19/2025 - 5:33pm	minor issue 2pts	988	56
10/27/2025 - 11:27pm	This should be 2 points	989	56
10/25/2025 - 9:57pm	Should be 2 points	990	56
10/27/2025 - 1:42am	Should be 2 points	991	56
10/26/2025 - 11:22am	Should be two points, not four points	992	56
10/19/2025 - 4:20pm	should be 2 points	993	56
10/20/2025 - 3:33pm	Should be 2 points, first time should have a verbal warning	994	56
10/26/2025 - 1:15pm	Should be 2 points	995	56
10/27/2025 - 11:49pm	2 points	996	56
10/24/2025 - 6:34pm	I disagree this should be 2 points instead of 4.	997	56
10/26/2025 - 5:45pm	should be 2 points	998	56
10/11/2025 - 8:35pm	This is too harsh and I suggest 2 points.	999	56
10/26/2025 - 8:51pm	2 points not 4	1000	56
10/27/2025 - 11:49pm	2 points	1001	56
10/27/2025 - 3:46pm	2 points	1002	56
10/27/2025 - 6:37pm	Just warning not point	1003	56
10/26/2025 - 6:08pm	New to fleet HCVL take up to 2 weeks for plate to be posted, should not apply to them	1004	56

10/27/2025 - 11:27pm	New to fleet HCVL take up to 2 weeks for plate to be posted, should not apply for them	1005	56
10/12/2025 - 10:51pm	What about the delay of plate delivery from council?? Why always council try to make it harder for us even sometimes issue happens to be under your control?? Be fair!! So this should be considered	1006	56
10/20/2025 - 3:36pm	Need to have some flexibility here, as new to fleet plates take up to 2 weeks to be posted, this should not apply to them. I suggest bringing printing of these plate back to office, including admin staff.	1007	56
10/23/2025 - 3:33pm	new to fleet HCVL take up to 2 weeks for plate to be posted should not apply for them	1008	56
10/27/2025 - 11:51pm	new HCVL 2 to 4 weeks until physical plate applied	1009	56
10/27/2025 - 10:37pm	new to fleet HCVL take upto 2 weeks for plate to be posted. should not apply to them	1010	56
10/27/2025 - 11:50pm	new hcvl take 2-4 weeks for plate to arrive, should not apply	1011	56
10/27/2025 - 1:45am	New to fleet HCV license take up to 2 weeks for plate to be posted, so should not apply to them	1012	56
10/26/2025 - 5:47pm	at times it take more time for plate to come through post,we should be allowed to stick paper licenced which we get on emails through licensing .	1013	56
10/26/2025 - 7:22pm	New to fleet HCVL take up 2 weeks for plate to be posted, it shouldn't apply for them.	1014	56
10/27/2025 - 3:47pm	4 points	1015	56
10/27/2025 - 6:40pm	New to fleet HCVL take 2week to get so not apply for them	1016	56
10/11/2025 - 8:37pm	The new to fleet HCVL take up to 2 weeks for the plate to be posted. This rule should not apply for them. This should also only be 2 points.	1017	56
10/19/2025 - 4:21pm	new to fleet HCVL takes up to 2 weeks for plate to be posted should not apply for them	1018	56
10/26/2025 - 11:23am	New HCVL fleet vehicles can take up to 2 weeks for plates to appear, so don't apply for them until then.	1019	56
10/25/2025 - 9:58pm	New to fleet HCVL take up to 2 weeks for plate to be posted should nto apply for them.	1020	56

10/09/2025 - 12:15pm	56 HCD conditions 2.1 No badge 4 points Should be 2 points	1021	56
10/26/2025 - 6:08pm	should be within 7 days 2 points	1022	56
10/23/2025 - 3:33pm	should be within 7 days 2 points	1023	56
10/26/2025 - 7:23pm	Should be within 7 days, 2 points	1024	56
10/09/2025 - 12:36pm	56 HCD conditions 2.1 No badge 4 points Should be 2 points 56 2.2 Customer badge display 4 points Should be 2 points 56 3.1 Hackney plate display New to fleet HCVL take up to 2 weeks for plate to be posted, should not apply for them 56 4.1 Produce HCB 5 days 3 points Should be within 7 days 2 points 56 5.1 Suspension 4 points Medical examination We recommend suspension 3 points	1025	56
10/20/2025 - 3:37pm	Should be within 7 days and maximum 2 points	1026	56
10/27/2025 - 1:48am	Should be within 7 days and 2 points.	1027	56

10/27/2025 - 11:51pm	7 days, 2 points	1028	56
10/27/2025 - 10:37pm	should be within 7 days. 2 points	1029	56
10/26/2025 - 1:16pm	Should be within 7 days 2 points	1030	56
10/27/2025 - 11:28pm	Should be 7 days and 2 points	1031	56
10/27/2025 - 6:41pm	7 days no point	1032	56
10/27/2025 - 11:51pm	7 days 2 points	1033	56
10/11/2025 - 8:37pm	This should be within 7 days and only be 2 points.	1034	56
10/09/2025 - 12:16pm	56 2.2 Customer badge display 4 points Should be 2 points 56 3.1 Hackney plate display New to fleet HCVL take up to 2 weeks for plate to be posted, should not apply for them 56 4.1 Produce HCB 5 days 3 points Should be within 7 days 2 points 56 5.1 Suspension 4 points Medical examination We recommend suspension 3 points	1035	56
10/26/2025 - 5:48pm	should be 7 days and 2 points.	1036	56
10/19/2025 - 4:22pm	should be within 7 days, 2 points	1037	56
10/26/2025 - 8:52pm	Should be 7 working days not just 5 days, also 2 points	1038	56
10/26/2025 - 11:23am	Should be within seven days and two points	1039	56
10/25/2025 - 9:59pm	Should be within 7 days 2 points	1040	56
10/24/2025 - 6:35pm	I disagree; it should be within 7 days and 2 points.	1041	56

10/27/2025 - 3:20pm	page 56 2.1 should be 2 points	1042	56
10/26/2025 - 6:08pm	We recommend 3 points	1043	56
10/26/2025 - 6:09pm	We recommend suspension 3 points	1043	56
10/23/2025 - 3:34pm	we recommend suspension 3 points	1044	56
10/26/2025 - 11:24am	Recommended three points and suspension	1045	56
10/12/2025 - 10:54pm	You are already suspending the driver, why 4 points on the top of that?? Should be 2-3 points	1046	56
10/27/2025 - 6:44pm	We recommend suspension 3 point	1047	56
10/26/2025 - 7:23pm	We recommend a suspension of 3 points	1048	56
10/20/2025 - 3:37pm	I recommend suspension and 2 points	1049	56
10/27/2025 - 1:52am	3 points	1050	56
10/27/2025 - 11:30pm	Should be 2 points	1051	56
10/26/2025 - 1:16pm	We recommend suspension 3 points	1052	56
10/11/2025 - 8:38pm	We recommend 3 points.	1053	56
10/25/2025 - 10:00pm	We recommend suspension 3 points	1054	56
10/27/2025 - 3:29pm	page 56 5.1 we recommends suspension 2 points	1055	56
10/27/2025 - 3:24pm	page 56 3.1 new to fleet HCVL take up to 2 weeks for plate to be posted, should apply for them	1056	56

10/27/2025 - 3:26pm	page 56 4.1 should be within 7 days 2 points	1057	56
10/27/2025 - 3:21pm	page 56 2.2 should be 2 points	1058	56
10/27/2025 - 11:51pm	3 points	1059	57
10/26/2025 - 6:09pm	Should be 3 points	1060	57
10/26/2025 - 6:10pm	We recommend suspension 3 points	1060	57
10/19/2025 - 5:36pm	no suspension 4pts	1061	57
10/27/2025 - 10:38pm	we recommended suspension 3 points	1062	57
10/26/2025 - 5:49pm	should be 2 points.	1063	57
10/24/2025 - 6:36pm	I suggest 3 points.	1064	57
10/26/2025 - 11:38am	It should be 2 points	1065	57
10/19/2025 - 4:22pm	we recommend suspension, 3 points	1066	57
10/12/2025 - 10:55pm	3 points	1067	57
10/27/2025 - 6:45pm	I recommend 3 point	1068	57
10/23/2025 - 3:34pm	we recommend suspension 3 points	1069	57
10/27/2025 - 11:51pm	3 points	1070	57
10/20/2025 - 3:38pm	I recommend suspension and 3 points	1071	57
10/26/2025 - 11:25am	Recommended three points and suspension	1072	57

10/26/2025 - 7:24pm	We recommend a suspension of 3 points	1073	57
10/27/2025 - 10:38pm	we recommended suspension 3 points	1074	57
10/27/2025 - 1:53am	Suspension, 3 points	1075	57
10/24/2025 - 6:36pm	I suggest 3 points.	1076	57
10/26/2025 - 5:50pm	should be 2 points	1077	57
10/19/2025 - 4:22pm	we recommend suspension 3 points	1078	57
10/26/2025 - 1:17pm	We recommend suspension 3 points	1079	57
10/25/2025 - 10:00pm	We recommend suspension 3 points	1080	57
10/11/2025 - 8:39pm	Again, recommend 3 points.	1081	57
10/26/2025 - 6:10pm	We recommend suspension 3 points	1082	57
10/26/2025 - 11:26am	Recommended three points and suspension	1083	57
10/26/2025 - 7:24pm	We recommend suspension 3 points	1084	57
10/27/2025 - 1:54am	Suspension, 3 points	1085	57
10/12/2025 - 10:55pm	3 points	1086	57
10/27/2025 - 10:38pm	we recommended suspension 3 points	1087	57
10/20/2025 - 3:40pm	I recommend 3 points and suspension	1088	57
10/27/2025 - 6:46pm	I recommend 3 point	1089	57

10/27/2025 - 11:52pm	3 points	1090	57
10/23/2025 - 3:35pm	we recommend suspension 3 points	1091	57
10/27/2025 - 11:52pm	3 points	1092	57
10/26/2025 - 1:17pm	We recommend suspension 3 points	1093	57
10/26/2025 - 5:50pm	should be 2 points	1094	57
10/19/2025 - 4:23pm	we recommend suspension 3 points	1095	57
10/27/2025 - 3:50pm	2points	1096	57
10/26/2025 - 11:39am	It should be 3 points	1097	57
10/25/2025 - 10:00pm	We recommend suspension 3 points	1098	57
10/23/2025 - 3:35pm	we recommend suspension 2 points	1099	57
10/27/2025 - 10:39pm	we recommended suspension 2 points	1100	57
10/26/2025 - 6:10pm	We recommend suspension 2 points	1101	57
10/27/2025 - 11:52pm	2 points	1102	57
10/26/2025 - 7:25pm	We recommend suspension 2 points.	1103	57
10/26/2025 - 5:51pm	should be 2 points	1104	57
10/26/2025 - 11:40am	We suggest 2 points	1105	57
10/20/2025 - 3:41pm	I recommend 2 points	1106	57

10/26/2025 - 11:26am	er reccoment suspension n 2 points	1107	57
10/25/2025 - 10:01pm	We recommend suspension 2 points	1108	57
10/27/2025 - 11:52pm	2 points	1109	57
10/19/2025 - 4:23pm	we recommend suspension, 2 points	1110	57
10/26/2025 - 11:27am	recommend suspension on two points	1111	57
10/24/2025 - 6:37pm	I suggest 2 points.	1112	57
10/26/2025 - 1:18pm	We recommend suspension 2 points	1113	57
10/27/2025 - 3:51pm	2 points	1114	57
10/27/2025 - 2:00am	2 points	1115	57
10/11/2025 - 8:39pm	We recommend 2 points.	1116	57
10/26/2025 - 6:11pm	DBS certificate takes more than 14 days to arrive 4 points	1117	57
10/24/2025 - 6:38pm	A DBS certificate can take more than 14 days to arrive. Additionally, I propose a maximum of 4 points.	1118	57
10/23/2025 - 3:36pm	DBS certificate takes more than 14 days to arrive 4 points	1119	57
10/27/2025 - 2:02am	It should be 1 month as dbs certificate usually takes more than 14 days to arrive. 4 points.	1120	57
10/27/2025 - 11:31pm	Dbs certificate takes more than 14 days to arrive 4 points	1121	57
10/27/2025 - 11:53pm	dbs takes more than 14 days, review timing, 4 points	1122	57

10/26/2025 - 7:25pm	DBS certificate takes more than 2 weeks to arrive, this should be 4 points	1123	57
10/12/2025 - 11:00pm	So I'm getting punished because of another government organisation is unable get the required information for me provide it to local authorities!! Just wondering if this policy happens to be written in somewhere dreamland..... there should be only 2 points and just for the person who doesn't send it within 48 hours after receiving the the document	1124	57
10/19/2025 - 5:45pm	no suspension and no points 28 days. The driver would have notified you with regards to conviction within 72hrs as required to do so	1125	57
10/20/2025 - 3:42pm	A dbs certificate takes more than 14 days to arrive, Should be 4 points	1126	57
10/27/2025 - 6:50pm	I recommend 2 point suspension	1127	57
10/26/2025 - 5:52pm	it takes over 2 weeks to arrive and should be 2 points	1128	57
10/27/2025 - 6:51pm	Only 2 point	1129	57
10/27/2025 - 10:39pm	DBS certificate takes more than 14 days to arrive. 4 points	1130	57
10/27/2025 - 11:53pm	This process takes more than 14 days requires review 3 points	1131	57
10/26/2025 - 1:18pm	Dbs certificate takes more than 14 days to arrive 4 points	1132	57
10/26/2025 - 11:42am	DBS certificate take more than 14 days to arrive 4 points	1133	57
10/26/2025 - 11:28am	The DBS certificate takes more than 14 days to arrive, so it should be four points, not six points	1134	57
10/19/2025 - 4:23pm	DBS certificate takes more than 14 days to arrive, 4 points	1135	57
10/26/2025 - 8:54pm	My DBS has taken 6 months in the past and most recent was over 3 months, should be 3 points	1136	57
10/11/2025 - 8:41pm	DBS certificates take more than 14 days to arrive. This should also be 3 points.	1137	57
10/25/2025 - 10:01pm	DBS certificate takes more than 14 days to arrive 4 points	1138	57

10/09/2025 - 12:16pm	57 5.2 Suspension 4 points Suffering from any disease We recommend suspension 3 points 57 5.3 Suspension 4 points Eyesight We recommend suspension 3 points 57 6.2 Documents 4 points Requested documents We recommend suspension 2 points 57 6.3 Dbs certificate 6 points Random enhance dbs Dbs certificate takes more than 14 days to arrive 4 point 57 BYLAW 5 a Key Flag 4 points We recommend 3 points 57 b Hired 6 points We recommend 3 points 57 c Illuminated 4 points We recommend 3 points	1139	57
10/27/2025 - 3:51pm	3 points	1140	57
10/27/2025 - 3:42pm	page 57 Bylaw 5a we recommends 2 points	1141	57
10/26/2025 - 7:26pm	We recommend 3 points only.	1142	57
10/27/2025 - 3:45pm	page 57 B we recommend 2 points	1143	57

10/27/2025 - 6:53pm	2 point only	1144	57
10/26/2025 - 6:11pm	We recommend 3 points	1145	57
10/12/2025 - 11:02pm	3 points	1146	57
10/27/2025 - 10:40pm	we recommend 3 points	1147	57
10/27/2025 - 2:04am	3 points recommendation	1148	57
10/27/2025 - 11:54pm	3 points	1149	57
10/20/2025 - 3:43pm	I recommend 3 points	1150	57
10/11/2025 - 8:41pm	I recommend 2 points.	1151	57
10/19/2025 - 4:24pm	we recommend 3 points	1152	57
10/27/2025 - 11:54pm	3 points	1153	57
10/26/2025 - 5:52pm	should be 2 points	1154	57
10/25/2025 - 10:02pm	We recommend 3 points	1155	57
10/23/2025 - 3:37pm	we recommend 3 points	1156	57
10/26/2025 - 11:28am	Recommend three points	1157	57
10/26/2025 - 1:21pm	We recommend 3 points	1158	57
10/26/2025 - 11:44am	We recommend 3 points	1159	57
10/27/2025 - 3:52pm	2 points	1160	57

10/27/2025 - 4:04pm	page 57 C we recommends 2 points	1161	57
10/26/2025 - 6:11pm	We recommend 3 points	1162	57
10/27/2025 - 11:54pm	3 points	1163	57
10/26/2025 - 7:26pm	We recommend 3 points.	1164	57
10/27/2025 - 6:54pm	2 point only	1165	57
10/23/2025 - 3:37pm	we recommend 3 points	1166	57
10/12/2025 - 11:02pm	3 points	1167	57
10/20/2025 - 3:43pm	I recommend 3 points	1168	57
10/27/2025 - 2:06am	3 points	1169	57
10/27/2025 - 11:54pm	3 points	1170	57
10/27/2025 - 10:40pm	we recommend 3 points	1171	57
10/11/2025 - 8:42pm	I recommend 3 points here.	1172	57
10/26/2025 - 1:21pm	We recommend 3 points	1173	57
10/26/2025 - 11:29am	Recommend three point	1174	57
10/26/2025 - 11:45am	We suggest 3 points	1175	57
10/19/2025 - 4:24pm	we recommend 3 points	1176	57
10/26/2025 - 5:53pm	should be 2 points	1177	57

10/27/2025 - 3:53pm	3 points	1178	57
10/25/2025 - 10:02pm	We recommend 3 points	1179	57
10/26/2025 - 6:11pm	We recommend 3 points	1180	57
10/23/2025 - 3:38pm	we recommend 3 points	1181	57
10/20/2025 - 3:43pm	I recommend 3 points	1182	57
10/27/2025 - 7:00pm	2 point only	1183	57
10/26/2025 - 7:27pm	We recommend 3 points	1184	57
10/27/2025 - 11:54pm	3 points	1185	57
10/27/2025 - 11:54pm	3 points	1186	57
10/27/2025 - 2:07am	3 points	1187	57
10/11/2025 - 8:42pm	I recommend 2 points here.	1188	57
10/12/2025 - 11:03pm	3 points	1189	57
10/27/2025 - 6:55pm	2 point only	1190	57
10/26/2025 - 11:46am	We suggest 3 points	1191	57
10/26/2025 - 1:22pm	We recommend 3 points	1192	57
10/26/2025 - 5:53pm	should be 2 points	1193	57
10/26/2025 - 11:29am	Three points recommend	1194	57

10/27/2025 - 3:53pm	2 points	1195	57
10/19/2025 - 4:24pm	3 points	1196	57
10/25/2025 - 10:02pm	We recommend 3 points	1197	57
10/27/2025 - 3:31pm	page 57 5.3 we recommend suspension 2 points	1198	57
10/09/2025 - 12:37pm	57 5.2 Suspension 4 points Suffering from any disease We recommend suspension 3 points 57 5.3 Suspension 4 points Eyesight We recommend suspension 3 points 57 6.2 Documents 4 points Requested documents We recommend suspension 2 points 57 6.3 Dbs certificate 6 points Random enhance dbs Dbs certificate takes more than 14 days to arrive 4 points 57 BYLAW 5 a Key Flag 4 points We recommend 3 points 57 b Hired 6 points We recommend 3 points 57 c Illuminated 4 points We recommend 3 points	1199	57
10/27/2025 - 3:54pm	6 Points	1200	57
10/27/2025 - 3:33pm	page 57 6.2 we recommends suspension 2 points	1201	57
10/27/2025 - 3:35pm	page 57 6.3 DBS certificate takes mor than 14 days to arrive 2 points	1202	57
10/26/2025 - 7:27pm	We recommend 2 points.	1203	57

10/27/2025 - 6:58pm	2 point only	1204	57
10/27/2025 - 4:18pm	p58 8.4 we recommend 3 points	1205	57
10/27/2025 - 4:14pm	58 8.1 we recommend 2 points	1206	57
10/27/2025 - 4:17pm	p58 8.2 we recommend 3 points	1207	58
10/27/2025 - 4:12pm	58 7.2 we recommend 3 points, as sometime customers take over a minute agree a fare	1208	58
10/27/2025 - 4:19pm	p58 9.1 we recommend 3 points	1209	58
10/27/2025 - 4:09pm	58 7.1 we recommend 3 points	1210	58
10/27/2025 - 4:08pm	58 D we recommend 2 points	1211	58
10/27/2025 - 4:14pm	58 8.3 we recommend 3 points	1212	58
10/27/2025 - 4:06pm	58 B we recommend 2 points	1213	58
10/27/2025 - 4:07pm	58 C we recommend 2 points	1214	58
10/27/2025 - 4:06pm	58 BYLAW 7 a we recommend 2 points	1215	58
10/26/2025 - 6:12pm	We recommend 2 points	1216	58
10/26/2025 - 11:30am	Recommended two point	1217	58
10/27/2025 - 2:08am	2 points	1218	58
10/23/2025 - 3:38pm	we recommend 2 points	1219	58

10/12/2025 - 11:04pm	What is reasonable?? Should be 2-3 points	1220	58
10/20/2025 - 3:44pm	I recommend 2 points	1221	58
10/27/2025 - 11:55pm	2 points - correction	1222	58
10/26/2025 - 11:48am	We suggest 2 points	1223	58
10/11/2025 - 8:43pm	I recommend 2 points here.	1224	58
10/19/2025 - 4:24pm	2 points	1225	58
10/26/2025 - 5:53pm	should be 2 points	1226	58
10/27/2025 - 11:54pm	3 points	1227	58
10/25/2025 - 10:04pm	We recommend 2 points	1228	58
10/27/2025 - 3:55pm	2 points	1229	58
10/26/2025 - 1:22pm	We recommend 2 points	1230	58
10/27/2025 - 11:54pm	3 points	1231	58
10/26/2025 - 6:12pm	We recommend 2 points	1232	58
10/20/2025 - 3:44pm	I recommend 2 points	1233	58
10/26/2025 - 7:27pm	We recommend 2 points	1234	58
10/27/2025 - 11:55pm	2 points - correction	1235	58
10/12/2025 - 11:07pm	What about the visibility issues that we have on our taxi ranks which you have not solved yet?? Just trying to harden it doesn't make things better, 2-3 points	1236	58

10/27/2025 - 2:09am	2 points	1237	58
10/27/2025 - 7:04pm	No point	1238	58
10/27/2025 - 10:44pm	we recommend 3 points	1239	58
10/27/2025 - 11:55pm	2 points	1240	58
10/19/2025 - 4:24pm	we recommend 2 points	1241	58
10/27/2025 - 7:02pm	2 point only	1242	58
10/26/2025 - 11:31am	We recommend two points in respect of leniency due to being a Hackney carriage driver for reading borough council.	1243	58
10/27/2025 - 7:01pm	2 point only	1244	58
10/26/2025 - 11:48am	We suggest 2 points	1245	58
10/26/2025 - 5:54pm	2 points	1246	58
10/27/2025 - 11:54pm	3 points	1247	58
10/27/2025 - 3:55pm	2 points	1248	58
10/25/2025 - 10:04pm	We recommend 2 points	1249	58
10/23/2025 - 3:39pm	we recommend 2 points	1250	58
10/26/2025 - 1:23pm	We recommend 2 points	1251	58
10/11/2025 - 8:43pm	I recommend 2 points.	1252	58
10/26/2025 - 6:12pm	We recommend 2 points	1253	58

10/26/2025 - 7:28pm	We recommend 2 points	1254	58
10/23/2025 - 3:39pm	we recommend 2 points	1255	58
10/12/2025 - 11:07pm	2-3 points	1256	58
10/27/2025 - 7:03pm	2 point only	1257	58
10/27/2025 - 10:44pm	we recommend 3 points	1258	58
10/20/2025 - 3:45pm	I recommend 2 points	1259	58
10/27/2025 - 11:55pm	2 points	1260	58
10/25/2025 - 10:05pm	We recommend 2 points	1261	58
10/27/2025 - 2:10am	2 points	1262	58
10/27/2025 - 11:55pm	2 points	1263	58
10/26/2025 - 11:50am	We suggest 2 points	1264	58
10/26/2025 - 11:49am	We suggest 2 points	1265	58
10/19/2025 - 4:25pm	2 points	1266	58
10/26/2025 - 11:32am	We recommend two points in respect of leniency due to being a Hackney carriage driver for reading borough council.	1267	58
10/26/2025 - 5:54pm	2 points	1268	58
10/27/2025 - 3:55pm	2 points	1269	58
10/11/2025 - 8:44pm	I recommend 2 points.	1270	58

10/26/2025 - 1:23pm	We recommend 2 points	1271	58
10/26/2025 - 6:12pm	We recommend 2 points	1272	58
10/12/2025 - 11:08pm	2-3 points	1273	58
10/27/2025 - 7:04pm	No point	1274	58
10/20/2025 - 3:45pm	I recommend 2 points	1275	58
10/27/2025 - 2:11am	2 points	1276	58
10/27/2025 - 11:55pm	2 points	1277	58
10/27/2025 - 10:45pm	we recommend 3 points	1278	58
10/26/2025 - 7:28pm	We recommend 2 points.	1279	58
10/23/2025 - 3:39pm	we recommend 2 points	1280	58
10/19/2025 - 4:25pm	2 points	1281	58
10/26/2025 - 5:54pm	2 points	1282	58
10/26/2025 - 11:50am	We suggest 2 points	1283	58
10/26/2025 - 11:32am	We recommend two points in respect of leniency due to being a Hackney carriage driver for reading borough council.	1284	58
10/25/2025 - 10:05pm	We recommend 2 points	1285	58
10/27/2025 - 11:55pm	2 points	1286	58
10/11/2025 - 8:44pm	I recommend 2 points.	1287	58

10/26/2025 - 1:23pm	We recommend 2 points	1288	58
10/27/2025 - 3:56pm	2 points	1289	58
10/27/2025 - 11:56pm	3 points	1290	58
10/26/2025 - 7:28pm	We recommend 4 points only.	1291	58
10/26/2025 - 6:12pm	We recommend 4 points	1292	58
10/12/2025 - 11:10pm	Right, do we look like dog? Are we not allowed to walk around? Or breath outside?? 2 points	1293	58
10/27/2025 - 10:45pm	we recommend 4 points	1294	58
10/20/2025 - 3:45pm	I recommend 4 points	1295	58
10/27/2025 - 11:35pm	Should be 2 points	1296	58
10/27/2025 - 11:31pm	Should be 2 points	1297	58
10/27/2025 - 2:12am	3 points	1298	58
10/26/2025 - 11:51am	We suggest 4 points	1299	58
10/19/2025 - 4:25pm	4 points	1300	58
10/26/2025 - 5:54pm	3 points	1301	58
10/26/2025 - 11:34am	We recommend four points	1302	58
10/23/2025 - 3:40pm	we recommend 4 points	1303	58
10/25/2025 - 10:05pm	We recommend 4 points	1304	58

10/26/2025 - 1:23pm	We recommend 4 points	1305	58
10/27/2025 - 11:56pm	4 points	1306	58
10/27/2025 - 3:57pm	3 Points	1307	58
10/27/2025 - 7:05pm	2 point	1308	58
10/11/2025 - 8:45pm	I recommend 4 points.	1309	58
10/26/2025 - 7:29pm	We recommend 3 points as sometimes customers can take a long time to agree a fare.	1310	58
10/26/2025 - 6:13pm	We recommend 3 points as sometimes customers take over a minute to agree a fare	1311	58
10/23/2025 - 3:41pm	we recommend 3 points as sometimes customers takes over a minute to agree a fare	1312	58
10/27/2025 - 11:56pm	3	1313	58
10/19/2025 - 5:50pm	2pts. Some customers take longer to agree a fare and get into the taxi. It's more cost affective to run the vehicle for a minute than it is to stop and restart the engine	1314	58
10/27/2025 - 2:14am	We recommend 3 points as sometimes customers take over a minute.	1315	58
10/26/2025 - 11:52am	We suggest 3 points some time Coustomer take time to talk about destinations and price	1316	58
10/27/2025 - 10:46pm	we recommend 3 points as sometimes customers take more than aminute to agree a fare	1317	58
10/26/2025 - 5:56pm	sometimes customers are inside and can take time for fare agree or payments	1318	58
10/20/2025 - 3:46pm	I recommend 3 points, as sometimes customers take over a minute to agree a fare	1319	58
10/27/2025 - 11:34pm	Should be 2 points	1320	58
10/27/2025 - 11:56pm	3 points	1321	58

10/27/2025 - 3:57pm	3 Points	1322	58
10/12/2025 - 11:11pm	3 points	1323	58
10/26/2025 - 1:24pm	We recommend 3 points as sometimes customers take over a minute to agree a fare	1324	58
10/26/2025 - 11:35am	We recommend three points as sometimes customers take a while agreeing fares and sorting out the route and destination	1325	58
10/25/2025 - 10:06pm	We recommend 3 points, as sometimes customers take over a minute to agree a fare.	1326	58
10/19/2025 - 4:26pm	we recommend 3 points as sometimes customers take over a minute to agree on a fare and next cab takes customer and has to move	1327	58
10/27/2025 - 7:07pm	Its depends on whether so No point just kind warning	1328	58
10/11/2025 - 8:45pm	I recommend 3 points.	1329	58
10/09/2025 - 12:16pm	58 BYLAW 7 a Reasonable speed 4 points We recommend 2 points 58 B Over ranking 4 points We recommend 2 points 58 C Direction 4 points We recommend 2 points 58 D Gap on rank 4 points We recommend 2 points 58 7.1 Unattended vehicle 6 points We recommend 4 points 58 7.2 Idling 6 points We recommend 3 points, as sometimes customers take over a minute to agree a fare	1330	58

	58 8.1 Pro long distance 4 points We recommend 3 points 58 8.2 Outside license area 6 points We recommend 4 points 58 8.3 Use as private hire 6 points We recommend 4 points 58 8.4 Card surcharge 6 points We recommend 4 points 58 9.1 Obstruct officer 6 points We recommend 4 points		
10/12/2025 - 11:14pm	What about airport and the other charges ??? So 2-3 points	1331	58
10/27/2025 - 3:58pm	3 points	1332	58
10/09/2025 - 12:37pm	58 BYLAW 7 a Reasonable speed 4 points We recommend 2 points 58 B Over ranking 4 points We recommend 2 points 58 C Direction 4 points We recommend 2 points 58 D Gap on rank 4 points We recommend 2 points 58 7.1 Unattended vehicle 6 points We recommend 4 points	1333	58

	58 7.2 Idling 6 points We recommend 3 points, as sometimes customers take over a minute to agree a fare 58 8.1 Pro long distance 4 points We recommend 3 points 58 8.2 Outside license area 6 points We recommend 4 points 58 8.3 Use as private hire 6 points We recommend 4 points 58 8.4Card surcharge 6 points We recommend 4 points 58 9.1Obstruct officer 6 points We recommend 4 points		
10/27/2025 - 3:58pm	2 Points	1334	58
10/26/2025 - 7:29pm	We recommend 3 points.	1335	58
10/26/2025 - 6:13pm	We recommend 3 points	1336	58
10/27/2025 - 2:15am	3 points	1337	58
10/23/2025 - 3:41pm	we recommend 3 points	1338	58
10/27/2025 - 10:46pm	3 points	1339	58
10/20/2025 - 3:47pm	I recommend 3 points	1340	58
10/19/2025 - 4:26pm	3 points	1341	58

10/26/2025 - 11:53am	We suggest 3 points	1342	58
10/26/2025 - 5:57pm	2 points	1343	58
10/25/2025 - 10:06pm	We recommend 3 points	1344	58
10/27/2025 - 11:32pm	Should be 2 points	1345	58
10/26/2025 - 1:25pm	We recommend 3 points	1346	58
10/26/2025 - 11:35am	We recommend three points	1347	58
10/27/2025 - 11:56pm	3	1348	58
10/27/2025 - 3:59pm	2 points	1349	58
10/11/2025 - 8:46pm	I recommend 3 points.	1350	58
10/27/2025 - 7:09pm	What about if customers want to fast way but long way Keep cool life	1351	58
10/26/2025 - 6:13pm	We recommend 4 points	1352	58
10/27/2025 - 2:16am	3 points	1353	58
10/26/2025 - 7:30pm	We recommend 4 points	1354	58
10/12/2025 - 11:17pm	Again if this is the case we should be able refuse the journey. Best example the bridge on Whitchurch on Thames.. 2-3 points	1355	58
10/23/2025 - 3:42pm	we recommend 4 points	1356	58
10/27/2025 - 11:57pm	4	1357	58
10/11/2025 - 8:46pm	I recommend 4 points.	1358	58

10/27/2025 - 7:12pm	Only 2 point	1359	58
10/20/2025 - 3:47pm	I recommend 4 points	1360	58
10/27/2025 - 10:47pm	4 points	1361	58
10/27/2025 - 11:57pm	4	1362	58
10/26/2025 - 11:36am	We recommend three point	1363	58
10/26/2025 - 1:25pm	We recommend 4 points	1364	58
10/19/2025 - 4:27pm	4 points	1365	58
10/26/2025 - 11:54am	We suggest 4 points	1366	58
10/27/2025 - 11:33pm	Should be 3 points	1367	58
10/25/2025 - 10:06pm	We recommend 4 points	1368	58
10/26/2025 - 5:57pm	3 points	1369	58
10/27/2025 - 3:59pm	3 points	1370	58
10/26/2025 - 6:13pm	We recommend 4 points	1371	58
10/27/2025 - 11:57pm	4	1372	58
10/26/2025 - 1:25pm	We recommend 4 points	1373	58
10/27/2025 - 2:20am	3 points	1374	58
10/27/2025 - 10:47pm	4 points	1375	58

10/23/2025 - 3:43pm	we recommend 4 points	1376	58
10/26/2025 - 7:30pm	We recommend 4 points	1377	58
10/27/2025 - 7:12pm	Only 2 point	1378	58
10/27/2025 - 11:57pm	4	1379	58
10/20/2025 - 3:48pm	I recommend 4 points	1380	58
10/11/2025 - 8:47pm	I recommend 4 points.	1381	58
10/26/2025 - 11:54am	We suggest 4 points	1382	58
10/19/2025 - 4:27pm	we recommend 4 points	1383	58
10/26/2025 - 11:36am	We recommend three point	1384	58
10/25/2025 - 10:07pm	We recommend 4 points	1385	58
10/27/2025 - 4:00pm	3 Points	1386	58
10/27/2025 - 2:20am	3 points	1387	58
10/26/2025 - 6:14pm	We recommend 4 points	1388	58
10/27/2025 - 11:57pm	4	1389	58
10/26/2025 - 11:36am	I recommend three points	1390	58
10/27/2025 - 7:13pm	Only 2 point	1391	58
10/23/2025 - 3:43pm	we recommend 4 points	1392	58

10/27/2025 - 7:13pm	Not point	1393	58
10/26/2025 - 1:26pm	We recommend 4 points	1394	58
10/26/2025 - 7:30pm	We recommend 4 points.	1395	58
10/12/2025 - 11:18pm	This is against the law if it's being dictated by council if the payment is provided by us and used for business purposes. 2-3 points	1396	58
10/19/2025 - 4:27pm	we recommend 4 points	1397	58
10/20/2025 - 3:48pm	I recommend 4 points	1398	58
10/27/2025 - 10:47pm	4 points	1399	58
10/26/2025 - 11:54am	We suggest 4 points	1400	58
10/25/2025 - 10:07pm	We recommend 4 points	1401	58
10/27/2025 - 4:00pm	3 points	1402	58
10/27/2025 - 11:57pm	4	1403	58
10/11/2025 - 8:47pm	I recommend 4 points.	1404	58
10/27/2025 - 4:25pm	p59 12.2 should not eat but should be allowed to drink	1405	59
10/27/2025 - 4:23pm	P59 12.1 we recommend 2 points	1406	59
10/27/2025 - 4:22pm	p59 BYLAW 10 WE RECOMMEND 3 POINTS	1407	59

10/27/2025 - 4:21pm	p59 BYLAW 9 we recommend 3 points	1408	59
10/27/2025 - 4:20pm	p59 11.1 with in 7 days 2 points	1409	59
10/26/2025 - 6:14pm	We recommend 4 points	1410	59
10/27/2025 - 2:21am	3 points	1411	59
10/27/2025 - 10:47pm	4 points	1412	59
10/23/2025 - 3:44pm	we recommend 4 points	1413	59
10/26/2025 - 7:31pm	We recommend 4 points	1414	59
10/12/2025 - 11:21pm	4 points	1415	59
10/20/2025 - 3:48pm	I recommend 4 points	1416	59
10/27/2025 - 7:14pm	Only 2 point	1417	59
10/27/2025 - 11:57pm	4	1418	59
10/11/2025 - 8:47pm	I recommend 4 points.	1419	59
10/26/2025 - 11:36am	Recommend four points	1420	59
10/19/2025 - 4:27pm	4 points	1421	59
10/26/2025 - 11:56am	We suggest 4 points	1422	59
10/25/2025 - 10:07pm	We recommend 4 points	1423	59

10/27/2025 - 11:57pm	4	1424	59
10/27/2025 - 4:01pm	3 points	1425	59
10/26/2025 - 6:14pm	We recommend 4 points	1426	59
10/26/2025 - 6:16pm	ignore	1426	59
10/09/2025 - 12:17pm	59 11.1 Report loss of hackney badge 6 points With in 7 days 3 points 59 BYLAW 9 Conduct of driver 6 points We recommend 4 points 59 BYLAW 10 Booking commitment 6 points We recommend 4 points 59 12.1 Reasonable requirements 4 points We recommend 3 points 59 12.2 Eat or drink 3 points Whilst passengers on board. Should not eat but should be allowed to drink	1427	59
10/27/2025 - 4:01pm	4 points	1428	59
10/27/2025 - 4:02pm	6 points	1429	59
10/23/2025 - 3:44pm	within 7 days 3 points	1430	59

10/26/2025 - 11:58am	We suggest within 7 days and 3 points	1431	59
10/26/2025 - 7:31pm	Within 1 week and 3 points	1432	59
10/27/2025 - 10:48pm	within 7 days 3 points	1433	59
10/27/2025 - 7:17pm	Within 7 days2 point	1434	59
10/20/2025 - 3:49pm	Sould be within 7 days, with 3 points	1435	59
10/27/2025 - 2:24am	2 points, 7 days	1436	59
10/26/2025 - 5:59pm	7 days and 2 points	1437	59
10/12/2025 - 11:22pm	Within 7 days, 3 points	1438	59
10/25/2025 - 10:08pm	Within 7 days 3 points	1439	59
10/19/2025 - 4:27pm	within 3 days, 3 points	1440	59
10/26/2025 - 11:37am	There should be three points and within seven days of losing it	1441	59
10/27/2025 - 11:58pm	7 days 3 points	1442	59
10/27/2025 - 4:02pm	2 points	1443	59
10/27/2025 - 11:58pm	within 7 days, 3 points	1444	59
10/11/2025 - 8:48pm	This should be within 7 days and should be 3 points.	1445	59
10/26/2025 - 1:26pm	With in 7 days 3 points	1446	59
10/26/2025 - 6:16pm	We recommend 4 points	1447	59

10/27/2025 - 10:48pm	4 points	1448	59
10/27/2025 - 7:18pm	2 point only	1449	59
10/26/2025 - 7:31pm	We recommend 4 points.	1450	59
10/23/2025 - 3:45pm	we recommend 4 points	1451	59
10/27/2025 - 2:25am	3 points	1452	59
10/20/2025 - 3:50pm	I recommend 4 points	1453	59
10/27/2025 - 11:35pm	Should be 3 points	1454	59
10/12/2025 - 11:23pm	4 points	1455	59
10/26/2025 - 1:26pm	We recommend 4 points	1456	59
10/26/2025 - 11:59am	We suggest 4 points	1457	59
10/26/2025 - 6:00pm	2 points	1458	59
10/26/2025 - 11:37am	Recommend four points	1459	59
10/19/2025 - 4:28pm	4 points	1460	59
10/25/2025 - 10:08pm	We recommend 4 points	1461	59
10/11/2025 - 8:48pm	I recommend 4 points.	1462	59
10/27/2025 - 4:03pm	3 points	1463	59
10/26/2025 - 6:17pm	We recommend 4 points	1464	59

10/27/2025 - 7:19pm	2 point only	1465	59
10/20/2025 - 3:50pm	I recommend 4 points	1466	59
10/26/2025 - 7:32pm	We recommend 4 points.	1467	59
10/26/2025 - 1:26pm	We recommend 4 points	1468	59
10/27/2025 - 10:48pm	4 points	1469	59
10/23/2025 - 3:45pm	we recommend 4 points	1470	59
10/12/2025 - 11:23pm	3 points	1471	59
10/27/2025 - 2:25am	3 points	1472	59
10/26/2025 - 6:00pm	2 points	1473	59
10/26/2025 - 11:59am	We suggest 4 points	1474	59
10/27/2025 - 11:58pm	4	1475	59
10/27/2025 - 11:36pm	Should be 3 points	1476	59
10/26/2025 - 11:38am	We recommend four point	1477	59
10/27/2025 - 11:58pm	4	1478	59
10/19/2025 - 4:28pm	4 points	1479	59
10/25/2025 - 10:08pm	We recommend 4 points	1480	59
10/27/2025 - 4:03pm	3 points	1481	59

10/11/2025 - 8:49pm	I recommend 4 points.	1482	59
10/12/2025 - 11:25pm	Compared to whose appearance or tidiness ?? 2-3 points	1483	59
10/27/2025 - 4:04pm	1 points	1484	59
10/26/2025 - 6:17pm	We recommend 3 points	1485	59
10/23/2025 - 3:46pm	we recommend 3 points	1486	59
10/27/2025 - 4:04pm	2 points	1487	59
10/12/2025 - 11:26pm	2-3 points	1488	59
10/19/2025 - 4:28pm	2 points	1489	59
10/26/2025 - 7:32pm	We recommend 3 points	1490	59
10/27/2025 - 2:26am	2 points	1491	59
10/27/2025 - 7:20pm	No point	1492	59
10/20/2025 - 3:51pm	I recommend 3 points	1493	59
10/27/2025 - 11:58pm	3	1494	59
10/26/2025 - 1:27pm	We recommend 3 points	1495	59
10/27/2025 - 10:49pm	3 points	1496	59
10/09/2025 - 12:38pm	59 11.1Report loss of hackney badge 6 points With in 7 days 3 points 59	1497	59

	BYLAW 9 Conduct of driver 6 points We recommend 4 points 59 BYLAW 10 Booking commitment 6 points We recommend 4 points 59 12.1 Reasonable requirements 4 points We recommend 3 points 59 12.2 Eat or drink 3 points Whilst passengers on board. Should not eat but should be allowed to drink		
10/27/2025 - 11:58pm	3	1498	59
10/26/2025 - 12:01pm	We suggest 3 points	1499	59
10/25/2025 - 10:09pm	We recommend 3 points	1500	59
10/11/2025 - 8:49pm	I recommend 3 points.	1501	59
10/26/2025 - 11:38am	We recommend three point	1502	59
10/26/2025 - 6:17pm	should not eat but be allowed to drink	1503	59
10/23/2025 - 3:46pm	should not eat but should be allowed to drink	1504	59
10/27/2025 - 10:49pm	should not eat but should be allowed to drink	1505	59
10/24/2025 - 6:46pm	I suggest we should be allowed to drink. Water is a basic necessity.	1506	59

10/26/2025 - 12:02pm	Should not eat but should be allowed to drink as in extreme hot conditions we don't want to be hydrated	1507	59
10/26/2025 - 6:01pm	drink should be allowed	1508	59
10/27/2025 - 7:22pm	Drink should be allowed but not food eating Crisps should be allowed As I always drink tea while I working	1509	59
10/26/2025 - 7:33pm	We shouldn't eat but we should be allowed to drink	1510	59
10/27/2025 - 2:28am	No eating but drinking Should be allowed.	1511	59
10/26/2025 - 11:39am	We should not eat I agree with that but we should be allowed to drink water or anything else whilst driving as it is not against the law to drink water whilst driving if you're thirsty	1512	59
10/19/2025 - 4:28pm	should be allowed to drink, but not eat	1513	59
10/27/2025 - 11:58pm	Disagree completely	1514	59
10/27/2025 - 11:37pm	Drinking should be allowed not eating	1515	59
10/20/2025 - 3:53pm	Should not eat, but should be allowed to drink due to distance travelling and weather etc	1516	59
10/27/2025 - 11:58pm	no eating but drinking allowed	1517	59
10/25/2025 - 10:10pm	Should not eat but should be allowed to drink	1518	59
10/12/2025 - 11:27pm	Not food but drink should be consumable. 2 points	1519	59
10/26/2025 - 1:27pm	Should not eat but Should be allowed to drink	1520	59
10/27/2025 - 4:05pm	1 point	1521	59
10/11/2025 - 8:50pm	I agree that we should not be able to eat, but we should be able to drink.	1522	59

10/27/2025 - 4:07pm	1 point	1523	60
10/27/2025 - 4:28pm	p60 14.5 we recommend 6 points	1524	60
10/27/2025 - 4:28pm	p60 14.4 we recommend 3 points	1525	60
10/27/2025 - 4:26pm	p60 14.1 we recommend 6 points same as private hire	1526	60
10/27/2025 - 4:08pm	1 point	1527	60
10/27/2025 - 4:09pm	1 point	1528	60
10/27/2025 - 4:09pm	1 point	1529	60
10/26/2025 - 6:18pm	We recommend 6 points	1530	60
10/27/2025 - 7:28pm	4 point only	1531	60
10/20/2025 - 3:54pm	I agree its wrong to refuse, but I recommend 6 points, which is same a private hire conditions	1532	60
10/27/2025 - 2:31am	6 points, same as private hire drivers.	1533	60
10/19/2025 - 5:55pm	6pts and a warning	1534	60
10/23/2025 - 3:47pm	we recommend 6 points same as private hire driver	1535	60
10/27/2025 - 7:31pm	4 point	1536	60
10/27/2025 - 10:50pm	6 points recommended same as private hire drivers	1537	60
10/26/2025 - 7:33pm	We recommend 6 points, which is the same as private hire drivers.	1538	60

10/27/2025 - 7:25pm	4 point	1539	60
10/26/2025 - 6:02pm	6 points	1540	60
10/12/2025 - 11:28pm	6 points	1541	60
10/11/2025 - 8:50pm	We recommend 6 points, the same as private hire drivers.	1542	60
10/19/2025 - 4:29pm	we recommend 6 points same as a private hire driver	1543	60
10/25/2025 - 10:11pm	We recommend 6 points the same as private hire drivers	1544	60
10/26/2025 - 12:04pm	We suggest 6 points	1545	60
10/26/2025 - 11:40am	Recommend six points	1546	60
10/27/2025 - 4:10pm	4 pointn	1547	60
10/26/2025 - 1:28pm	We recommend 6 points same as private hire drivers	1548	60
10/09/2025 - 12:17pm	60 14.1Refuse to Carry guide dogs 12 points We recommend 6 points same as private hire drivers 60 14.4Restraining wheelchair 6 points We recommend 4 points 60 14.5 Refusing wheelchair 12 points We recommend 9 points	1549	60
10/27/2025 - 4:10pm	3 point	1550	60
10/27/2025 - 11:59pm	6	1551	60

10/27/2025 - 4:10pm	3 points	1552	60
10/26/2025 - 6:18pm	We recommend 4 points	1553	60
10/09/2025 - 12:38pm	60 14.1Refuse to Carry guide dogs 12 points We recommend 6 points same as private hire drivers	1554	60
10/27/2025 - 2:32am	3 points	1555	60
10/27/2025 - 7:29pm	2 point	1556	60
10/20/2025 - 3:55pm	I recommend 4 points	1557	60
10/23/2025 - 3:48pm	we recommend 4 points	1558	60
10/27/2025 - 7:27pm	2 point	1559	60
10/27/2025 - 10:50pm	4 points	1560	60
10/12/2025 - 11:32pm	Some wheelchairs are not suitable to be faced front or back facing and it's not customer's choice. Why do we need to be punished?? 3-4 points	1561	60
10/26/2025 - 7:34pm	We recommend 4 points.	1562	60
10/27/2025 - 7:26pm	2 point	1563	60
10/27/2025 - 7:31pm	2 point	1564	60
10/26/2025 - 1:28pm	We recommend 4 points	1565	60
10/11/2025 - 8:51pm	We recommend 4 points.	1566	60
10/27/2025 - 11:59pm	4	1567	60

10/26/2025 - 6:03pm	4 points	1568	60
10/26/2025 - 12:05pm	We suggest 4 points	1569	60
10/26/2025 - 11:40am	We recommend four point	1570	60
10/19/2025 - 4:29pm	we think 4 points	1571	60
10/27/2025 - 4:11pm	3 points	1572	60
10/25/2025 - 10:12pm	We recommend 4 points	1573	60
10/26/2025 - 6:18pm	We recommend 9 points	1574	60
10/23/2025 - 3:48pm	we recommend 9 points	1575	60
10/27/2025 - 10:50pm	9 points recommended	1576	60
10/19/2025 - 5:56pm	6 pts and a warning	1577	60
10/27/2025 - 7:30pm	4 point also depends on wheelchair size as well	1578	60
10/27/2025 - 7:32pm	6 point sometimes it's depends on wheelchair size as well	1579	60
10/26/2025 - 1:28pm	We recommend 9 points	1580	60
10/27/2025 - 2:33am	6 points	1581	60
10/27/2025 - 7:27pm	4 point	1582	60
10/26/2025 - 7:34pm	We recommend 9 points.	1583	60
10/12/2025 - 11:39pm	So you are saying that if I can't fit that wheelchair into my car, I have to wait until I found suitable vehicle for the wheelchair?? In This case we better license at least one cat d lorry for a definite yes. 3-4 points	1584	60

10/27/2025 - 11:59pm	9	1585	60
10/20/2025 - 3:56pm	Should be 9 points,	1586	60
10/11/2025 - 8:51pm	We recommend 9 points.	1587	60
10/26/2025 - 11:41am	I agree as it is humanly unfair for wheelchair users to not be a part of public transport in Reading	1588	60
10/26/2025 - 6:03pm	6 points	1589	60
10/26/2025 - 12:05pm	We suggest 9 points	1590	60
10/19/2025 - 4:29pm	we recommend 4 points	1591	60
10/19/2025 - 4:30pm	i mean 9 points	1591	60
10/25/2025 - 10:12pm	We recommend 9 points	1592	60
10/27/2025 - 4:11pm	6points	1593	60
10/09/2025 - 12:39pm	60 14.4 Restraining wheelchair 6 points We recommend 4 points 60 14.5 Refusing wheelchair 12 points We recommend 9 points	1594	60
10/27/2025 - 4:11pm	3 points	1595	60
10/27/2025 - 4:12pm	3 points	1596	60
10/27/2025 - 4:44pm	61 BYLAW 18b charge full fare to drop off location	1597	61

10/27/2025 - 4:37pm	p61 BYLAW 18 Does RBC accept lost property? we recommend 2 points and 72 hours	1598	61
10/27/2025 - 4:45pm	p61 18.3 we recommend 3 points	1599	61
10/27/2025 - 4:47pm	p61 19.1 we recommend 2 points 14 days	1600	61
10/27/2025 - 4:48pm	p61 19.2 we recommend 3 points 72 hours	1601	61
10/27/2025 - 4:33pm	p61 BYLAW 17 we recommend 2 points	1602	61
10/27/2025 - 4:33pm	p61 16.1 no points as customers also insist on blank receipts, as putting in hire amount than the fare	1603	61
10/26/2025 - 6:19pm	no points, as customers also insist on blank receipts as well as putting in a higher amount than the fare price.	1604	61
10/23/2025 - 3:49pm	no points. As customer also insists on blank receipts as well as putting in a higher amount than the fare price	1605	61
10/28/2025 - 12:00am	none	1606	61
10/26/2025 - 7:35pm	No points. As customers also insist on blank receipts. As well as putting in a higher amount than the fare price.	1607	61
10/27/2025 - 10:51pm	no points as customers also insist on a blank receipts as well as putting in a higher amount than the fair price	1608	61
10/27/2025 - 7:33pm	No point	1609	61
10/20/2025 - 3:57pm	This should not have any points, as some customers insist on blank receipts, aswel as putting in a higher amount than the fare	1610	61
10/27/2025 - 2:36am	No points. As some customers also insist on blank receipts. Also insist to write higher amount than the actual fare paid.	1611	61
10/12/2025 - 11:43pm	This is not clear!! What if I don't provide paper receipts anymore!!! 2 points	1612	61

10/27/2025 - 4:12pm	2 points	1613	61
10/19/2025 - 4:30pm	no points as customer also insist on blank receipts as well as putting in a higher amount than fare price	1614	61
10/25/2025 - 10:13pm	No points. As customers also insist on blank receipts, aswell as putting in a higher amount than the fare price.	1615	61
10/26/2025 - 11:43am	i agree	1616	61
10/26/2025 - 1:29pm	No points. As customer also insist, aswell as putting in a higher amount than the fare price	1617	61
10/26/2025 - 12:07pm	No points sometimes Coustomer demand written fare	1618	61
10/11/2025 - 8:52pm	No points should be given for this - some customers insist on blank receipts.	1619	61
10/27/2025 - 10:52pm	3 points	1620	61
10/26/2025 - 6:19pm	We recommend 3 points	1621	61
10/27/2025 - 7:33pm	No point	1622	61
10/26/2025 - 7:35pm	We recommend 3 points.	1623	61
10/27/2025 - 2:37am	3 points	1624	61
10/20/2025 - 3:58pm	I recommend 3 points	1625	61
10/23/2025 - 3:50pm	we recommend 3 points	1626	61
10/12/2025 - 11:45pm	2-3 points	1627	61
10/26/2025 - 6:04pm	2 points	1628	61
10/19/2025 - 4:30pm	we recommend 3 points	1629	61

10/26/2025 - 12:07pm	We suggest 3 points	1630	61
10/26/2025 - 11:44am	Recommend three points	1631	61
10/26/2025 - 1:29pm	We recommend 3 points	1632	61
10/25/2025 - 10:14pm	We recommend 3 points	1633	61
10/11/2025 - 8:53pm	We recommend 3 points.	1634	61
10/27/2025 - 4:12pm	2 points	1635	61
10/26/2025 - 6:20pm	We recommend 3 points and 72 hours. Does RBC accept lost property	1636	61
10/26/2025 - 7:36pm	Does Reading Borough Council accept lost property?	1637	61
10/28/2025 - 12:00am	Disagree	1638	61
10/23/2025 - 3:51pm	Does RBC accept lost property. We recommend 3 points and 72 hours	1639	61
10/27/2025 - 7:35pm	Does RBC accept lost property 72 hours no point	1640	61
10/27/2025 - 2:41am	Is RBC accepts lost property? We recommend 3 points and 72 hours.	1641	61
10/26/2025 - 11:44am	Does Reading borough Council accept lost property and also we recommend three points and within 72 hours	1642	61
10/27/2025 - 10:53pm	we recommend 3 points and 72 hrs	1643	61
10/20/2025 - 3:58pm	Does RBC accept lost property? I recommend 3 points and 72 hours	1644	61
10/12/2025 - 11:47pm	Does RBC accept lost property? We recommend 3 points and 72 hours	1645	61

10/27/2025 - 10:52pm	does RBC accept lost property	1646	61
10/26/2025 - 12:10pm	Does Reading Brough council accept lost property? ans time frame should be 72 hours, we suggest 3 points	1647	61
10/19/2025 - 6:00pm	0 pts and 72hrs. most customer get there lost property back via RTA whatsapp messages going out to all the drivers	1648	61
10/11/2025 - 8:54pm	Does RBC accept lost property? We recommend 3 points and 72 hours.	1649	61
10/26/2025 - 1:30pm	Does RBC accept lost property. We recommend 3 points and 72 hours	1650	61
10/19/2025 - 4:31pm	Q does RBC accept lost property? we recommend 3 points and 72 hours	1651	61
10/24/2025 - 6:44pm	Can a contact method be proposed, as it is always hard to reach the council? All the correspondence is dealt with via email, and this is never done in a timely manner. Who do we contact, and where is the drop-off point?	1652	61
10/25/2025 - 10:15pm	Does RBC accept lost property. We recommend 3 points and 72 hours	1653	61
10/27/2025 - 4:13pm	6 points	1654	61
10/26/2025 - 6:21pm	Charge full fare to drop off location	1655	61
10/27/2025 - 10:53pm	charge full fare to drop of location	1656	61
10/20/2025 - 3:59pm	We should be allowed to charge full fare to the drop of location, unless they come to us	1657	61
10/23/2025 - 3:51pm	charge full fare to drop off at location	1658	61
10/26/2025 - 7:36pm	Charge the exact fare to the drop-off location.	1659	61
10/19/2025 - 6:01pm	full charge of the original fare	1660	61
10/27/2025 - 2:43am	Charge full fare to drop off location.	1661	61

10/12/2025 - 11:50pm	Why am I supposed to have responsibilities for the lost property plus make a financial loss on the top of it?? I rather drop it of the civic centre or police station if I'm not getting full fare to drop off location..	1662	61
10/11/2025 - 8:55pm	We should be able to charge the full fare for going to the drop off location.	1663	61
10/26/2025 - 1:31pm	Charge full fare to drop off location	1664	61
10/19/2025 - 4:32pm	charge full fare to drop off location	1665	61
10/25/2025 - 10:16pm	Charge full fare to drop off location	1666	61
10/26/2025 - 12:12pm	Charge full fare at dropped off place	1667	61
10/24/2025 - 6:40pm	I suggest that the full fare should be charged depending on the drop off location.	1668	61
10/09/2025 - 12:17pm	61 16.1Receipts 4 points No points. As customers also insist on blank receipts, Aswell as putting in a higher amount than the fare price 61 BYLAW 17 Lost property 4 points We recommend 3 points 61 BYLAW 18 A Lost property 48 hours 12 points Q Does RBC accept lost property. We recommend 3 points and 72 hours 61 B Lost property return to customer Charge full fare to drop off location. 61 18.3 Tinted windows 6 points We recommend 4 points 61	1669	61

	19.1 Report change of address 4 points We recommend 3 points, 14 days 61 19.2 Report new convictions 6 points We recommend 4 points, 72 hours		
10/24/2025 - 6:41pm	If no charge is to be made, I suggest we drop the property off at the nearest council office, and they should be responsible for returning the lost property to the customer.	1670	61
10/27/2025 - 4:15pm	2 points	1671	61
10/09/2025 - 12:41pm	61 16.1 Receipts 4 points No points. If customer is paying with bank card should receive a digital receipt as customers insist on blank receipts, Aswell as putting in a higher amount than the fare price	1672	61
10/26/2025 - 6:21pm	We recommend 4 points	1673	61
10/27/2025 - 11:40pm	Legal limit of tinted windows should be allowed as sometimes at weekends people get over excited and see friends in cab and throw stuff or food towards the cab which can cause damage	1674	61
10/27/2025 - 10:54pm	4 points	1675	61
10/27/2025 - 7:36pm	2 point only	1676	61
10/20/2025 - 4:00pm	I recommend 4 points	1677	61
10/27/2025 - 2:44am	3 points	1678	61
10/12/2025 - 11:51pm	4 points	1679	61
10/23/2025 - 3:52pm	we recommend 4 points	1680	61
10/27/2025 - 11:39pm	Should be 3 points	1681	61

10/27/2025 - 3:31am	3 points	1682	61
10/26/2025 - 7:36pm	We recommend 4 points	1683	61
10/11/2025 - 8:55pm	I recommend 4 points.	1684	61
10/26/2025 - 1:31pm	We recommend 4 points	1685	61
10/25/2025 - 10:17pm	We recommend 4 points	1686	61
10/26/2025 - 11:45am	Four points would be recommended	1687	61
10/09/2025 - 12:41pm	61 BYLAW 17 Lost property 4 points We recommend 3 points 61 BYLAW 18 A Lost property 48 hours 12 points Q Does RBC accept lost property. We recommend 3 points and 72 hours 61 B Lost property return to customer Charge full fare to drop off location. 61 18.3 Tinted windows 6 points We recommend 4 points 61 19.1 Report change of address 4 points We recommend 3 points, 14 days 61	1688	61

	19.2 Report new convictions 6 points We recommend 4 points, 72 hours		
10/19/2025 - 4:32pm	we recommend 4 points	1689	61
10/26/2025 - 12:12pm	We suggest 4 points	1690	61
10/27/2025 - 10:54pm	3 points, 14 days	1691	61
10/26/2025 - 6:22pm	We recommend 3 points 14 days	1692	61
10/27/2025 - 7:36pm	14 days and no point	1693	61
10/23/2025 - 3:52pm	we recommend 3 points 14 days	1694	61
10/12/2025 - 11:51pm	2-3 points	1695	61
10/27/2025 - 2:45am	3 points, 14 days.	1696	61
10/26/2025 - 7:37pm	We recommend 3 points over the course of 14 days.	1697	61
10/26/2025 - 1:31pm	We recommend 3 points 14 days	1698	61
10/20/2025 - 4:01pm	I recommend 3 points 14 days	1699	61
10/19/2025 - 4:32pm	we recommend 3 points, 14 days	1700	61
10/26/2025 - 6:06pm	14 days	1701	61
10/27/2025 - 11:41pm	Should be 14 days and 3 point s	1702	61
10/26/2025 - 11:46am	Personally, recommend 14 days	1703	61
10/25/2025 - 10:17pm	We recommend 3 points, 14 days	1704	61

10/26/2025 - 12:14pm	We suggest 4 points and 14 days	1705	61
10/11/2025 - 8:55pm	We recommend 3 points and 14 days to notify.	1706	61
10/27/2025 - 4:15pm	2 points	1707	61
10/26/2025 - 6:22pm	We recommend 4 points and 72 hours	1708	61
10/26/2025 - 12:15pm	We suggest 72 hours	1709	61
10/26/2025 - 6:06pm	72 hours 4 points	1710	61
10/26/2025 - 7:37pm	I recommend 4 points over the course of 72 hours.	1711	61
10/23/2025 - 3:53pm	we recommend 4 points 72 hours	1712	61
10/20/2025 - 4:01pm	I recommend 4 points 72 hours	1713	61
10/27/2025 - 10:55pm	4 points, 72 hrs	1714	61
10/27/2025 - 7:38pm	72 hours and 2 point	1715	61
10/26/2025 - 1:32pm	We recommend 4 points 72 hour	1716	61
10/27/2025 - 7:37pm	72 hours and 2 point	1717	61
10/27/2025 - 4:51pm	p62 19.3 we recommend 3 points 72 hours	1718	62
10/27/2025 - 4:52pm	p62 20.2 we recommend 2 points	1719	62
10/26/2025 - 11:46am	It should be under 72 hours and recommend four points	1720	62
10/27/2025 - 2:47am	3 points, 72 hours	1721	62

10/12/2025 - 11:54pm	We recommend 4 points, 72 hours	1722	62
10/27/2025 - 4:55pm	p62 21.1 we recommend 2 points	1723	62
10/11/2025 - 8:56pm	We recommend 4 points and 72 hours.	1724	62
10/25/2025 - 10:19pm	We recommend 4 points, 72 hours	1725	62
10/19/2025 - 4:32pm	we recommend 4 points, 72 hours	1726	62
10/26/2025 - 6:23pm	We recommend 4 points and 72 hours	1727	62
10/23/2025 - 3:54pm	we recommend 4 points 72 hours	1728	62
10/26/2025 - 7:38pm	I recommend 4 points over the course of 72 hours.	1729	62
10/26/2025 - 1:32pm	We recommend 4 points 72 hours	1730	62
10/27/2025 - 10:55pm	4 points, 72 hrs	1731	62
10/26/2025 - 11:47am	Recommend four points and it should be done within 72 hours	1732	62
10/20/2025 - 4:02pm	I recommend 4 points 72 hours	1733	62
10/27/2025 - 7:39pm	72 hours and 2 point	1734	62
10/12/2025 - 11:54pm	We recommend 4 points, 72 hours	1735	62
10/26/2025 - 6:07pm	72 hours and 4 points	1736	62
10/27/2025 - 2:48am	3 points, 72 hours	1737	62
10/27/2025 - 7:39pm	72 hours and 2 point	1738	62

10/26/2025 - 12:15pm	We suggest 4 points and 72 hours	1739	62
10/19/2025 - 4:33pm	we recommend 4 points and 72 hours	1740	62
10/25/2025 - 10:19pm	We recommend 4 points, 72 hours	1741	62
10/11/2025 - 8:56pm	We recommend 4 points and 72 hours.	1742	62
10/26/2025 - 6:23pm	We recommend 3 points	1743	62
10/23/2025 - 3:54pm	we recommend 3 points	1744	62
10/20/2025 - 4:03pm	I recommend 3 points	1745	62
10/27/2025 - 5:04pm	p62 22.2 with in 48 hours	1746	62
10/27/2025 - 10:55pm	3 points	1747	62
10/27/2025 - 2:50am	3 points	1748	62
10/27/2025 - 7:40pm	2 point only	1749	62
10/26/2025 - 7:38pm	I recommend 3 points.	1750	62
10/26/2025 - 12:17pm	We suggest 3 points	1751	62
10/13/2025 - 12:02am	3 points	1752	62
10/26/2025 - 11:47am	We recommend three points	1753	62
10/19/2025 - 4:33pm	we recommend 3 points	1754	62
10/25/2025 - 10:20pm	We recommend 3 points	1755	62

10/11/2025 - 8:57pm	I recommend 3 points.	1756	62
10/26/2025 - 1:32pm	We recommend 3 points	1757	62
10/27/2025 - 4:57pm	p62 21.2 we recommend 2 points	1758	62
10/26/2025 - 6:24pm	We recommend 2 points	1759	62
10/23/2025 - 3:55pm	we recommend 2 points	1760	62
10/20/2025 - 4:03pm	I recommend 2 points	1761	62
10/26/2025 - 7:38pm	I recommend 2 points.	1762	62
10/27/2025 - 7:41pm	Not point	1763	62
10/26/2025 - 12:18pm	We suggest 2 points	1764	62
10/11/2025 - 8:57pm	We recommend 2 points.	1765	62
10/27/2025 - 2:55am	No points	1766	62
10/13/2025 - 12:02am	2 points	1767	62
10/27/2025 - 10:55pm	2 points	1768	62
10/26/2025 - 1:33pm	We recommend 2 points	1769	62
10/26/2025 - 11:47am	Recommend two point	1770	62
10/19/2025 - 4:34pm	we recommend 2 points	1771	62
10/25/2025 - 10:20pm	We recommend 2 points	1772	62

10/26/2025 - 6:24pm	We recommend 2 points	1773	62
10/09/2025 - 12:42pm	62 19.3 Report arrest and release We recommend 4 points, 72 hours 62 20.2 Insurance 4 points We recommend 3 points 62 21.1 Away from address 3 points We recommend 2 points 62 21.2 Away from address 28 days 3 points We recommend 2 points 62 22.2 Accident 3 points Within 48 hours	1774	62
10/23/2025 - 3:55pm	we recommend 2 points	1775	62
10/27/2025 - 7:42pm	No point	1776	62
10/20/2025 - 4:03pm	I recommend 2 points	1777	62
10/13/2025 - 12:03am	2 points	1778	62
10/27/2025 - 2:56am	2 points	1779	62
10/26/2025 - 1:33pm	We recommend 2 points	1780	62
10/27/2025 - 10:56pm	2 points	1781	62

10/26/2025 - 12:19pm	We suggest 2 points	1782	62
10/11/2025 - 8:57pm	I recommend 2 points.	1783	62
10/26/2025 - 11:48am	Recommend two points	1784	62
10/19/2025 - 4:34pm	we recommend 2 points	1785	62
10/25/2025 - 10:20pm	We recommend 2 points	1786	62
10/09/2025 - 12:18pm	62 19.3 Report arrest and release We recommend 4 points, 72 hours 62 20.2 Insurance 4 points We recommend 3 points 62 21.1 Away from address 3 points We recommend 2 points 62 21.2 Away from address 28 days 3 points We recommend 2 points 62 22.2 Accident 3 points Within 48 hours	1787	62
10/26/2025 - 6:24pm	within 48 hours	1788	62
10/26/2025 - 7:39pm	Within 48 hours.	1789	62
10/20/2025 - 4:05pm	should be with 48 hours	1790	62

10/23/2025 - 3:56pm	within 48 hours	1791	62
10/26/2025 - 11:48am	It should be within 48 hours	1792	62
10/26/2025 - 1:33pm	Within 48 hours	1793	62
10/13/2025 - 12:04am	Within 48 hours	1794	62
10/27/2025 - 7:43pm	48 hours	1795	62
10/27/2025 - 2:58am	Within 48 hours	1796	62
10/27/2025 - 10:56pm	within 48 hrs	1797	62
10/26/2025 - 12:21pm	We suggest 48 hours	1798	62
10/19/2025 - 4:34pm	within 48 hours	1799	62
10/25/2025 - 10:21pm	Within 48 hours	1800	62
10/27/2025 - 5:19pm	p63 30.1 we recommend 2 points	1801	63
10/27/2025 - 5:15pm	p63 28.2 we recommend 2 points	1802	63
10/27/2025 - 5:08pm	p63 25.1 we recommend 2 points	1803	63
10/27/2025 - 5:12pm	p62 27.2 we recommend 2 points	1804	63
10/27/2025 - 5:06pm	p63 BYLAW 8 we recommend 6 points	1805	63
10/27/2025 - 5:13pm	p63 27.2 we recommend 2 points	1806	63

10/27/2025 - 5:08pm	p63 25.2 we recommend 2 points	1807	63
10/27/2025 - 5:11pm	63p 27.1 we recommend 2 points	1808	63
10/27/2025 - 5:14pm	p63 28.1 we recommend 2 points	1809	63
10/27/2025 - 5:18pm	p63 29.1 we recommend 2 points	1810	63
10/27/2025 - 5:11pm	p63 26.1 we recommend 2 points	1811	63
10/27/2025 - 5:16pm	p63 28.3 we recommend 2 points	1812	63
10/27/2025 - 5:17pm	p63 28.4 we recommend 2 points	1813	63
10/26/2025 - 6:24pm	We recommend 6 points	1814	63
10/26/2025 - 7:39pm	I recommend 6 points.	1815	63
10/23/2025 - 3:56pm	we recommend 6 points	1816	63
10/27/2025 - 7:45pm	4 point	1817	63
10/27/2025 - 10:56pm	6 points	1818	63
10/20/2025 - 4:05pm	I recommend 6 points	1819	63
10/27/2025 - 2:59am	6 points	1820	63
10/26/2025 - 12:22pm	We suggest 6 points	1821	63
10/28/2025 - 12:01am	Should b 3 points	1822	63

10/19/2025 - 4:34pm	we recommend 6 points	1823	63
10/25/2025 - 10:21pm	We recommend 6 points	1824	63
10/26/2025 - 11:48am	Recommend six points	1825	63
10/26/2025 - 1:34pm	We recommend 6 points	1826	63
10/27/2025 - 4:16pm	6 points	1827	63
10/09/2025 - 12:42pm	63 BYLAW 8 Touting 12 points We recommend 6 points 63 25.1 Bus stop 4 points We recommend 2 points 63 25.2 Bus lane 4 points We recommend 2 points 63 26.1 Disable bay 4 points We recommend 3 points 63 27.1 Double park 4 points We recommend 3 points 63 27.2 Footway 4 points We recommend 3 points 63 28.1 Red route We recommend 3 points	1828	63

	63 28.2 Single yellow 4 points We recommend 3 points 63 28.3 Highway code 4 points We recommend 3 points 63 28.4 Alarm and distress 4 points We recommend 3 points 63 29.1 Horn 4 points We recommend 3 points		
10/11/2025 - 9:00pm	I recommend 6 points.	1829	63
10/26/2025 - 6:25pm	We recommend 2 points	1830	63
10/23/2025 - 3:56pm	we recommend 2 points	1831	63
10/20/2025 - 4:06pm	I recommend 2 points	1832	63
10/26/2025 - 7:39pm	I recommend 2 points.	1833	63
10/26/2025 - 1:34pm	We recommend 2 points	1834	63
10/13/2025 - 12:06am	2 points	1835	63
10/27/2025 - 10:56pm	2 points	1836	63
10/27/2025 - 3:02am	No points while picking or dropping off passengers	1837	63
10/27/2025 - 7:45pm	No point	1838	63

10/11/2025 - 9:00pm	I recommend 2 points.	1839	63
10/26/2025 - 11:49am	Recommendthree points	1840	63
10/19/2025 - 4:34pm	we recommend 2 points	1841	63
10/26/2025 - 12:22pm	We suggest 2 points	1842	63
10/25/2025 - 10:22pm	We recommend 2 points	1843	63
10/27/2025 - 4:17pm	3 points	1844	63
10/26/2025 - 6:25pm	We recommend 2 points	1845	63
10/23/2025 - 3:57pm	we recommend 2 points	1846	63
10/26/2025 - 1:34pm	We recommend 2 points	1847	63
10/13/2025 - 12:06am	2 points	1848	63
10/27/2025 - 7:46pm	No point	1849	63
10/20/2025 - 4:06pm	I recommend 2 points	1850	63
10/27/2025 - 10:56pm	2 points	1851	63
10/26/2025 - 7:40pm	I recommend 2 points.	1852	63
10/27/2025 - 3:03am	2 points	1853	63
10/19/2025 - 4:35pm	we recommend 2 points	1854	63
10/11/2025 - 9:01pm	I recommend 2 points.	1855	63

10/26/2025 - 12:23pm	We suggest 2 points	1856	63
10/25/2025 - 10:23pm	We recommend 2 points	1857	63
10/27/2025 - 4:18pm	3 points	1858	63
10/26/2025 - 6:25pm	We recommend 3 points	1859	63
10/23/2025 - 3:57pm	we recommend 3 points	1860	63
10/26/2025 - 7:40pm	I recommend 3 points.	1861	63
10/26/2025 - 1:35pm	We recommend 3 points	1862	63
10/20/2025 - 4:07pm	I recommend 3 points	1863	63
10/27/2025 - 3:05am	No points while picking/ dropping off passengers	1864	63
10/26/2025 - 12:24pm	We suggest 3 points	1865	63
10/13/2025 - 12:07am	2 points	1866	63
10/27/2025 - 10:56pm	3 points	1867	63
10/19/2025 - 4:35pm	we recommend 3points	1868	63
10/26/2025 - 11:49am	I agree with this statement	1869	63
10/27/2025 - 7:47pm	No point	1870	63
10/25/2025 - 10:23pm	We recommend 3 points	1871	63
10/11/2025 - 9:01pm	I recommend 3 points.	1872	63

10/27/2025 - 4:18pm	3 points	1873	63
10/09/2025 - 12:18pm	63 BYLAW 8 Touting 12 points We recommend 6 points 63 25.1Bus stop 4 points We recommend 2 points 63 25.2 Bus lane 4 points We recommend 2 points 63 26.1Disable bay 4 points We recommend 3 points 63 27.1Double park 4 points We recommend 3 points 63 27.2 Footway 4 points We recommend 3 points 63 28.1Red route We recommend 3 points 63 28.2 Single yellow 4 points We recommend 3 points 63	1874	63

	28.3 Highway code 4 points We recommend 3 points 63 28.4 Alarm and distress 4 points We recommend 3 points 63 29.1Horn 4 points We recommend 3 points		
10/26/2025 - 6:25pm	We recommend 3 points	1875	63
10/23/2025 - 3:58pm	we recommend 3 points	1876	63
10/27/2025 - 10:57pm	3 points	1877	63
10/13/2025 - 12:07am	2-3 points	1878	63
10/27/2025 - 7:48pm	No point	1879	63
10/26/2025 - 1:35pm	We recommend 3 points	1880	63
10/20/2025 - 4:07pm	I recommend 3 points	1881	63
10/27/2025 - 7:47pm	No point	1882	63
10/26/2025 - 7:40pm	I recommend 3 points.	1883	63
10/27/2025 - 3:06am	2 points	1884	63
10/26/2025 - 11:49am	Recommended three point	1885	63
10/26/2025 - 12:25pm	We suggest 3 points	1886	63
10/11/2025 - 9:01pm	I recommend 3 points.	1887	63

10/19/2025 - 4:35pm	we recommend 3 points	1888	63
10/25/2025 - 10:23pm	We recommend 3 points	1889	63
10/23/2025 - 3:58pm	we recommend 3 points	1890	63
10/26/2025 - 6:25pm	We recommend 3 points	1891	63
10/13/2025 - 12:08am	2 points	1892	63
10/26/2025 - 1:35pm	We recommend 2 points	1893	63
10/20/2025 - 4:07pm	I recommend 3 points	1894	63
10/27/2025 - 7:49pm	No point	1895	63
10/27/2025 - 3:07am	2 points	1896	63
10/26/2025 - 12:25pm	We suggest 3 points	1897	63
10/27/2025 - 10:57pm	3 points	1898	63
10/19/2025 - 4:35pm	we recommend 3 points	1899	63
10/26/2025 - 7:41pm	I recommend 3 points.	1900	63
10/26/2025 - 11:50am	We recommend three points	1901	63
10/25/2025 - 10:24pm	We recommend 3 points	1902	63
10/27/2025 - 7:48pm	No point	1903	63
10/11/2025 - 9:02pm	I recommend 3 points.	1904	63

10/26/2025 - 6:26pm	We recommend 3 points	1905	63
10/26/2025 - 1:35pm	We recommend 3 points	1906	63
10/23/2025 - 3:59pm	we recommend 3 points	1907	63
10/20/2025 - 4:08pm	I recommend 3 points	1908	63
10/26/2025 - 7:41pm	I recommend 3 points.	1909	63
10/27/2025 - 3:07am	2 points	1910	63
10/26/2025 - 11:50am	I agree with a statement as it is a red root for a reason and there should not be no stationary vehicles	1911	63
10/27/2025 - 7:50pm	No point	1912	63
10/13/2025 - 12:08am	2 points	1913	63
10/27/2025 - 10:57pm	3 points	1914	63
10/19/2025 - 4:35pm	we recommend 3 points	1915	63
10/25/2025 - 10:24pm	We recommend 3 points	1916	63
10/26/2025 - 12:26pm	We suggest 3 points	1917	63
10/11/2025 - 9:02pm	I recommend 3 points.	1918	63
10/26/2025 - 6:26pm	We recommend 3 points	1919	63
10/23/2025 - 3:59pm	we recommend 3 points	1920	63
10/27/2025 - 11:58pm	Should be 2 points	1921	63

10/13/2025 - 12:08am	2 points	1922	63
10/20/2025 - 4:08pm	I recommend 3 points	1923	63
10/27/2025 - 10:57pm	3 points	1924	63
10/27/2025 - 7:50pm	No point	1925	63
10/26/2025 - 7:41pm	I recommend 3 points.	1926	63
10/26/2025 - 11:50am	Recommend three point	1927	63
10/26/2025 - 1:36pm	We recommend 3 points	1928	63
10/27/2025 - 3:08am	2 points	1929	63
10/19/2025 - 4:36pm	3 points	1930	63
10/25/2025 - 10:24pm	We recommend 3 points	1931	63
10/26/2025 - 12:27pm	We suggest 3 points	1932	63
10/11/2025 - 9:02pm	I recommend 3 points.	1933	63
10/26/2025 - 6:26pm	We recommend 3 points	1934	63
10/27/2025 - 10:57pm	3 points	1935	63
10/26/2025 - 1:36pm	We recommend 3 points	1936	63
10/26/2025 - 12:27pm	We suggest 3 points	1937	63
10/23/2025 - 3:59pm	we recommend 3 points	1938	63

10/20/2025 - 4:08pm	I recommend 3 points	1939	63
10/27/2025 - 7:50pm	No point	1940	63
10/27/2025 - 3:09am	2 points	1941	63
10/26/2025 - 7:41pm	I recommend 3 points.	1942	63
10/26/2025 - 11:51am	I agree with the statement as it is the highway code and law for a reason	1943	63
10/19/2025 - 4:36pm	recommend 3 points	1944	63
10/25/2025 - 10:24pm	We recommend 3 points	1945	63
10/26/2025 - 6:26pm	We recommend 3 points	1946	63
10/26/2025 - 1:36pm	We recommend 3 points	1947	63
10/23/2025 - 4:00pm	we recommend 3 points	1948	63
10/27/2025 - 11:59pm	Should be 2 points	1949	63
10/26/2025 - 7:42pm	I recommend 3 points.	1950	63
10/20/2025 - 4:08pm	I recommend 3 points	1951	63
10/27/2025 - 10:57pm	3 points	1952	63
10/19/2025 - 4:36pm	recommend 3 points	1953	63
10/27/2025 - 3:09am	2 points	1954	63
10/25/2025 - 10:25pm	We recommend 3 points	1955	63

10/13/2025 - 12:09am	2-3 points	1956	63
10/26/2025 - 12:27pm	We suggest 3 points	1957	63
10/26/2025 - 11:51am	Agree, as we should respect our customers and drive in a safe and calm manner	1958	63
10/27/2025 - 7:51pm	No point	1959	63
10/11/2025 - 9:03pm	I recommend 3 points.	1960	63
10/23/2025 - 4:00pm	we recommend 3 points	1961	63
10/26/2025 - 7:42pm	I recommend 3 points.	1962	63
10/28/2025 - 12:00am	Should be 2 points	1963	63
10/26/2025 - 6:26pm	We recommend 3 points	1964	63
10/26/2025 - 1:36pm	We recommend 3 points	1965	63
10/20/2025 - 4:09pm	I recommend 3 points	1966	63
10/13/2025 - 12:10am	2-3 points	1967	63
10/27/2025 - 7:53pm	No point	1968	63
10/27/2025 - 7:51pm	No point	1969	63
10/27/2025 - 5:20pm	p64 31.1 we recommend 2 points	1970	64
10/27/2025 - 5:22pm	p64 32.1 we recommend 2 points	1971	64

10/27/2025 - 5:20pm	p64 30.1 we recommend 2 points	1972	64
10/27/2025 - 3:10am	2 points	1973	64
10/19/2025 - 4:36pm	we recommend 3 points	1974	64
10/25/2025 - 10:25pm	We recommend 3 points	1975	64
10/27/2025 - 10:58pm	3 points	1976	64
10/26/2025 - 12:28pm	We suggest 3 points	1977	64
10/26/2025 - 11:52am	Recommend three points	1978	64
10/11/2025 - 9:03pm	I recommend 3 points.	1979	64
10/27/2025 - 4:19pm	2 points	1980	64
10/13/2025 - 12:11am	3 points	1981	64
10/23/2025 - 4:00pm	we recommend 3 points	1982	64
10/09/2025 - 12:43pm	64 30.1 Permission 4 points We recommend 3 points 64 31.1 License 6 points We recommend 4 points 64 32.1 Play radio 4 points We recommend 4 points	1983	64

10/26/2025 - 1:37pm	We recommend 3 points	1984	64
10/26/2025 - 6:27pm	We recommend 3 points	1985	64
10/27/2025 - 3:11am	2 points	1986	64
10/13/2025 - 12:11am	3 points	1987	64
10/26/2025 - 11:52am	Recommend three point	1988	64
10/20/2025 - 4:09pm	I recommend 3 points	1989	64
10/27/2025 - 10:58pm	3 points	1990	64
10/19/2025 - 4:36pm	we recommend 3 points	1991	64
10/26/2025 - 7:42pm	I recommend 3 points.	1992	64
10/25/2025 - 10:25pm	We recommend 3 points	1993	64
10/27/2025 - 7:52pm	2 point only	1994	64
10/26/2025 - 12:28pm	We suggest 3 points	1995	64
10/11/2025 - 9:03pm	I recommend 3 points.	1996	64
10/26/2025 - 6:27pm	We recommend 3 points	1997	64
10/26/2025 - 6:27pm	4 points	1997	64
10/20/2025 - 4:10pm	I recommend 4 points	1998	64
10/27/2025 - 3:12am	3 points	1999	64

10/23/2025 - 4:01pm	we recommend 4 points	2000	64
10/27/2025 - 3:24am	3 points	2001	64
10/26/2025 - 12:31pm	We suggest 4 points	2002	64
10/13/2025 - 12:12am	3 points	2003	64
10/26/2025 - 7:42pm	I recommend 4 points.	2004	64
10/26/2025 - 1:37pm	We recommend 4 points	2005	64
10/27/2025 - 7:56pm	3 point	2006	64
10/27/2025 - 7:56pm	3 point	2007	64
10/27/2025 - 10:58pm	4 points	2008	64
10/19/2025 - 4:37pm	we recommend 4 points	2009	64
10/25/2025 - 10:26pm	We recommend 4 points	2010	64
10/26/2025 - 11:52am	Recommend four points	2011	64
10/11/2025 - 9:04pm	I recommend 4 points.	2012	64
10/27/2025 - 11:56pm	Should be 3 points	2013	64
10/13/2025 - 12:12am	3 points	2014	64
10/26/2025 - 1:37pm	We recommend 4 points	2015	64

10/09/2025 - 12:18pm	64 30.1 Permission 4 points We recommend 3 points 64 31.1 License 6 points We recommend 4 points 64 32.1 Play radio 4 points We recommend 4 points	2016	64
10/26/2025 - 6:28pm	We recommend 4 points	2017	64
10/23/2025 - 4:01pm	we recommend 4 points	2018	64
10/13/2025 - 12:12am	2 points	2019	64
10/26/2025 - 7:43pm	I recommend 4 points.	2020	64
10/27/2025 - 10:58pm	4 points	2021	64
10/26/2025 - 11:53am	I agree as it is up to the customer as you are taking them to their destination and at the end of the day it's about making the customer happy	2022	64
10/20/2025 - 4:11pm	Agree	2023	64
10/27/2025 - 11:55pm	Should be 2 points	2024	64
10/27/2025 - 3:12am	3 points	2025	64
10/19/2025 - 4:37pm	recommend 4 points	2026	64
10/27/2025 - 8:00pm	Not point	2027	64
10/25/2025 - 10:26pm	We recommend 4 points	2028	64
10/27/2025 - 7:58pm	No point sometimes it's giving you updates about traffic and train breaks down	2029	64
10/26/2025 - 12:30pm	We suggest 6 points	2030	64
10/26/2025 - 1:37pm	We recommend 4 points	2031	64

10/11/2025 - 9:05pm	I recommend 2 points.	2032	64
10/13/2025 - 12:13am	3 points	2033	64
10/27/2025 - 11:57pm	Should be 3 points	2034	64
10/27/2025 - 11:58pm	Should be 2 points	2035	64
10/26/2025 - 6:28pm	We recommend 4 points	2036	65
10/27/2025 - 5:23pm	p65 35.1 we recommend 3 points	2037	65
10/13/2025 - 12:14am	3 points	2038	65
10/26/2025 - 7:43pm	I recommend 4 points.	2039	65
10/27/2025 - 10:58pm	4 points	2040	65
10/20/2025 - 4:14pm	I recommend 4 points	2041	65
10/27/2025 - 3:14am	3 points	2042	65
10/27/2025 - 8:00pm	No point	2043	65
10/23/2025 - 4:02pm	we recommend 4 points	2044	65
10/26/2025 - 1:38pm	We recommend 4 points	2045	65
10/11/2025 - 9:06pm	I recommend 4 points.	2046	65
10/26/2025 - 11:54am	I agree, as this is a law and it is very important for customers to be safe inside a Hackney carriage	2047	65

10/19/2025 - 4:38pm	recommend 4 points	2048	65
10/26/2025 - 12:32pm	We suggest 4 points	2049	65
10/25/2025 - 10:26pm	We recommend 4 points	2050	65
10/27/2025 - 4:21pm	3 points	2051	65
10/09/2025 - 12:19pm	65 35.1 Seat belts home to school 6 points We recommend 4 points	2052	65
10/09/2025 - 12:43pm	65 35.1Seat belts home to school 6 points We recommend 4 points	2053	65

Private Hire Driver's Conditions and Penalty Points Scheme:

Date posted	Comment	Bubble location number	Page
10/19/2025 - 4:03pm	Has anyone made an impact assessment on the objectives, considering the previous set of points systems conditions had on the trade in terms of losing drivers to other boroughs. How will the new draconian conditions of increasing the points for minor offences from 3 to 4 will impact in terms of losing yet more drivers, which will then impact on enforcement?	27	5
10/24/2025 - 11:02am	penalty points scheme as an operator I would like to submit these comments regarding the current Penalty Points Scheme. While I fully support high standards, public safety, and robust enforcement, I have significant concerns that the system is being applied unfairly, counter-productively, and disproportionately against Reading-licensed drivers. As demonstrated from our Freedom of Information request (August 2024-August 2025) reveals a deeply unbalanced enforcement regime. All penalty points were issued exclusively to Reading-	81	9

	licensed drivers, with zero points, warnings, or reports recorded for out-of-town operators. To make matters worse, the approach appears excessively strict towards local drivers. The fact that only one Reading driver received a verbal warning in the entire 12-month period suggests a system that skips straight to punitive measures, denying drivers the opportunity for corrective feedback. This stands in stark contrast to the complete absence of any enforcement against out-of-town vehicles. This data confirms that enforcement is not being applied equally. With a significant proportion of journeys completed by vehicles licensed outside Reading—which operate with no effective local control—this two-tiered system creates a significant safety gap and unfairly penalizes the very drivers the Council is meant to regulate. We seek consistent enforcement across all operators, not lower standards for ourselves. The increase of certain offences from 3 to 4 points significantly lowers the suspension threshold without evidence-based justification. We request the Council publish: Data demonstrating the necessity of this escalation Analysis of whether previous penalties were ineffective Rationale for this specific increase in severity Without transparency, these changes appear arbitrary and punitive rather than safety focused. Fundamentally Flawed Appeal Process The initial appeal to a 'Senior Officer' lacks independence and objectivity. Having one council employee review another's decision cannot be considered a fair process. A system where the prosecutor also acts as judge undermines confidence in the entire scheme. Independent First-Stage Appeal: Establish an appeals panel including trade representatives and neutral council members from different departments Moratorium and Review: Pause increased points penalties pending full consultation with driver representatives Equitable Enforcement: Demonstrate commitment to fairness by applying enforcement equally to all vehicles operating in Reading, regardless of licensing authority Benchmarking Exercise: Review systems used by other local authorities to identify best practices We seek to collaborate with the Council to ensure both safety and fairness. The current application creates resentment and undermines trust. We urge reconsideration of these points to create a system that is both effective and just for all operators serving the Reading public.		

10/27/2025 - 4:51pm	Licensing policies have a direct and significant impact on the people who invest in, operate, and deliver essential school and community transport within Reading. We respectfully urge the Licensing Team to reconsider the proposed changes and to engage meaningfully with local operators and drivers to develop a balanced, inclusive, and practical policy that safeguards the local workforce and ensures uninterrupted service to the community.	2054	66
10/24/2025 - 11:13pm	1st suspension should be 7 days	2055	67
10/24/2025 - 11:13pm	2nd suspension 14 days	2056	67
10/24/2025 - 11:14pm	3rd suspension should be 28 days and no reveocation	2057	67
10/27/2025 - 11:49pm	I don't agree with many of these changes. just an example, No eat no drink No eating is understandable but how come No drinking? Many of penalty points are very heavy.	2058	67
10/25/2025 - 11:41am	propose 3 suspensions after reaching 12 points and 4th suspension should consider revocation	2059	67
10/25/2025 - 11:42am	2 days is too short for review within within 21 days	2060	67
10/24/2025 - 11:18pm	Only when working you must wear a badge and reduce the points when working to 2 points.	2061	70
10/24/2025 - 11:19pm	2 points only as drivers sometime swap cars and forget to take out the other badge	2062	70
10/24/2025 - 11:19pm	2 points	2063	70
10/24/2025 - 11:19pm	2 points	2064	70
10/24/2025 - 11:20pm	2 points as it could have been lost without driver being aware	2065	70
10/24/2025 - 11:21pm	suspension only	2066	70

10/24/2025 - 11:22pm	4 points as a driver may have overlooked	2067	71
10/03/2025 - 5:07pm	The points penalty on this is outrageous.	2068	71
10/24/2025 - 11:22pm	2 points only	2069	71
10/24/2025 - 11:23pm	2 points as drivers could be dropping off	2070	71
10/24/2025 - 11:24pm	2 points as that could be due to traffic and driver taking a different route due to traffic	2071	71
10/03/2025 - 5:09pm	Most authorities allow PHV drivers to work with more than 1 company. Since i'm getting a feeling that most of this is copy/pasted from South Oxfordshires' licensing, can this antiquated and obstructionist rule be removed?	2072	71
10/24/2025 - 11:25pm	6 points only	2073	71
10/24/2025 - 11:26pm	6 points or get drivers licensed by other authority to give their license just like Wokingham has done..	2074	72
10/24/2025 - 11:27pm	14 days	2075	72
10/24/2025 - 11:29pm	This should be dealt by the operator and not the council	2076	72
10/03/2025 - 5:11pm	This goes against any DoT guidelines for professional drivers. Pretty sure it's being taught to drivers to always have water on hand to not become dehydrated.	2077	72
10/03/2025 - 5:13pm	Too vague. Customers ask and push for drivers to put luggage inside the vehicle not caring about any danger in a bad situation.	2078	73
10/03/2025 - 5:15pm	A bit vague. A driver should not be forced to go up flights of stairs with heavy luggage. Reasonable to the entrance of the building, sure, but the moment the car is out of view, it's too far and passengers should have made different arrangements.	2079	73
10/24/2025 - 11:33pm	whilst its good practice to do this, however I would take anyone's luggage to the station form a drop off point as your likely to be slapped £35 parking fine..	2080	73

10/03/2025 - 5:16pm	12 points and immediate suspension.	2081	73
10/24/2025 - 11:36pm	I would go ballistic if anyone did that however its provided the dog does not leave loads of hair, whereby the vehicle has loads of hair not clean to be used by next fare paying passenger, alternatively drivers should be allowed to charge for cleaning the vehicle.	2082	73
10/03/2025 - 5:16pm	Too lenient, 12 points and suspension. This is dishonesty.	2083	73
10/24/2025 - 11:38pm	This is subject to the vehicle being used i.e. wheelchair if it goes into the boot then yes, vehicles which are MPV/Minibus wheelchair then the fare will be of that type of vehicle.	2084	73
10/24/2025 - 11:39pm	2 points as receipts can be provided electronically via email	2085	73
10/24/2025 - 11:40pm	after 7 days as the Police generally refuse to take lost property	2086	73
10/24/2025 - 11:42pm	2 points also provided the driver gets paid for the delivery of such and or alternatively customer collects it in person	2087	73
10/24/2025 - 11:45pm	If the passengers does not want to collect and or posted and wants it delivered to his home, then he/he should pay the taxi fare	2088	74
10/24/2025 - 11:46pm	14 days as is in the 1976 act	2089	74
10/24/2025 - 11:47pm	24 days and in terms of driving offences only when a driver reached 6 points	2090	74
10/24/2025 - 11:47pm	fixed penalties only after reaching 6 points	2091	74
10/24/2025 - 11:48pm	6 points	2092	74
10/24/2025 - 11:48pm	it should be over 3 months	2093	75
10/24/2025 - 11:51pm	unfair it should be 5 minutes and 2 points if anything	2094	75
10/24/2025 - 11:52pm	6 points	2095	75

10/27/2025 - 10:49am	As a private hire driver, I think the new four-point penalties for things like stopping on yellow lines, small traffic mistakes, or causing “discomfort or distress” are too harsh and not fair. These kind of offences are already dealt with by the police, so adding more punishment from the licensing side just feels like double penalty. In real life driving, sometimes we have to stop for short time to keep passengers safe, and that can’t always be avoided. Also, the word “distress” is very unclear and could be taken in many different ways, which makes it easy for unfair decisions. I believe licensing should focus on serious or repeated bad behavior, not on minor things that happen because of real traffic situations. A better way would be to help drivers with proper training and advice, instead of giving more points and making our job even harder.	2096	76
10/24/2025 - 11:52pm	6 points	2097	76
10/24/2025 - 2:08pm	Limiting private hire vehicles from accessing bus lanes and lay-bys creates significant safety, accessibility, and operational challenges. These areas often provide the only safe opportunities to stop without obstructing traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, seniors, and disabled individuals. This restriction is also at odds with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive behavior. A more balanced, risk-based policy would serve public safety and accessibility better without penalizing responsible drivers.	2098	76
10/27/2025 - 2:31pm	I think the new four-point penalties for things like stopping on yellow lines, small traffic mistakes, or causing “discomfort or distress” are too harsh and not fair. These kind of offences are already dealt with by the police, so adding more punishment from the licensing side just feels like double penalty. In real life driving, sometimes we have to stop for short time to keep passengers safe, and that can’t always be avoided. Also, the word “distress” is very unclear and could be taken in many different ways, which makes it easy for unfair decisions. I believe licensing should focus on serious or repeated bad behaviour, not on minor things that happen because of real traffic situations. A better way would be to help drivers with proper training and advice, instead of giving more points and making our job even harder.	2099	76
10/24/2025 - 12:17pm	As a private hire driver, I think the new four-point penalties for things like stopping on yellow lines, small traffic mistakes, or causing “discomfort or distress” are too harsh and not fair. These kind of offences are already dealt with by the police, so adding more punishment from the licensing side just feels like double penalty. In real life driving, sometimes we have to stop for short time to keep	2100	76

	passengers safe, and that can't always be avoided. Also, the word "distress" is very unclear and could be taken in many different ways, which makes it easy for unfair decisions. I believe licensing should focus on serious or repeated bad behaviour, not on minor things that happen because of real traffic situations. A better way would be to help drivers with proper training and advice, instead of giving more points and making our job even harder.		
10/27/2025 - 2:02pm	Restricting private hire vehicles from utilizing bus lanes and lay-bys results in serious safety, accessibility, and operational challenges. These areas are often the only safe spots to stop without obstructing traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, seniors, and disabled individuals. This restriction also conflicts with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would enhance public safety and accessibility while not penalizing responsible drivers.	2101	76
10/27/2025 - 2:49pm	Prohibiting private hire vehicles from using bus lanes and lay-bys creates serious challenges regarding safety, accessibility, and operations. These locations often represent the only safe places to stop without impeding traffic, especially near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, putting vulnerable passengers—like children, the elderly, and disabled users—at risk. Furthermore, this policy contradicts existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would better serve public safety and accessibility while supporting responsible drivers.	2102	76
10/24/2025 - 1:23pm	Restricting private hire vehicles from accessing bus lanes and lay-bys poses significant risks to safety, accessibility, and operational efficiency. In many busy areas—such as hospitals, schools, and town centres—these are often the only safe and practical places for drivers to stop without causing obstruction. Prohibiting their use forces drivers into unsafe roadside stops, putting vulnerable passengers, including children, elderly, and disabled individuals, at greater risk. It also contradicts existing traffic regulations, leads to increased fuel consumption, and unfairly penalises drivers for responsible, non-disruptive actions. A more sensible, risk-based approach would better protect public safety and support inclusive, efficient transport.	2103	76
10/24/2025 - 3:27pm	Restricting private hire vehicles from using bus lanes and lay-bys creates significant challenges related to safety, accessibility, and operations. These locations are often the only safe places to stop without blocking traffic, particularly near hospitals, schools, and town centres. Banning their	2104	76

	use forces drivers into unsafe roadside stops, jeopardizing vulnerable passengers like children, seniors, and disabled users. This policy also contradicts existing traffic regulations, raises fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based approach would better serve public safety and accessibility without penalizing responsible drivers.		
10/27/2025 - 3:16pm	Restricting private hire vehicles from using bus lanes and lay-bys creates serious safety, accessibility, and operational problems. These areas are often the only safe and practical locations for drivers to stop without obstructing traffic, especially near hospitals, schools, and busy town centres. Preventing access forces drivers into unsafe roadside positions, putting vulnerable passengers—such as children, elderly, and disabled users—at risk. This restriction also increases congestion and fuel use, while penalising drivers who act responsibly and safely. A balanced, risk-based approach would better promote public safety, accessibility, and fairness without compromising traffic flow.	2105	76
10/27/2025 - 2:12pm	Restricting private hire vehicles from accessing bus lanes and lay-bys creates critical safety, accessibility, and operational issues. These areas are often the only safe places to stop without blocking traffic, particularly near hospitals, schools, and town centres. This ban forces drivers into unsafe roadside stops, placing vulnerable passengers—such as children, elderly, and disabled users—at risk. Additionally, it conflicts with current traffic regulations, increases fuel consumption, and results in unfair penalties for practical, non-disruptive actions. A more balanced, risk-based approach would better support public safety and accessibility while not penalizing responsible drivers.	2106	76
10/27/2025 - 3:30pm	From practical experience, the restriction preventing private hire vehicles from using bus lanes and lay-bys causes serious safety issues. These spaces are often the only safe places for picking up or dropping off passengers, especially in busy areas near hospitals and schools. Forcing drivers to stop at the roadside increases danger for vulnerable passengers, including children, elderly, and disabled users. It also adds unnecessary stress for drivers trying to act responsibly while avoiding penalties. A more flexible, risk-based approach would help maintain safety, support accessibility, and recognise the realities of operating in busy urban environments.	2107	76
10/26/2025 - 3:50pm	Limiting private hire vehicles from accessing bus lanes and lay-bys creates significant safety, accessibility, and operational challenges. These areas often provide the only safe opportunities to stop without obstructing traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as	2108	76

	children, seniors, and disabled individuals. This restriction is also at odds with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive behavior. A more balanced, risk-based policy would serve public safety and accessibility better without penalizing responsible drivers.		
10/24/2025 - 2:29pm	The restriction on private hire vehicles from using bus lanes and lay-bys poses serious safety, accessibility, and operational challenges. These areas often provide the only safe spots to stop without obstructing traffic, especially near hospitals, schools, and town centres. By banning their use, drivers are forced into unsafe roadside stops, putting vulnerable passengers—like children, the elderly, and disabled individuals—at risk. This policy also conflicts with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical and non-disruptive actions. A more balanced, risk-based policy would enhance public safety and accessibility without punishing responsible drivers.	2109	76
10/24/2025 - 1:46pm	The restriction on private hire vehicles using bus lanes and lay-bys creates serious challenges related to safety, accessibility, and operations. These locations are often the only safe places to stop without impeding traffic, especially near hospitals, schools, and town centres. Preventing their use forces drivers to make unsafe roadside stops, putting vulnerable passengers—like children, elderly individuals, and those with disabilities—at risk. This policy also conflicts with current traffic regulations, increases fuel consumption, and levies unfair penalties for actions that are practical and non-disruptive. A more balanced, risk-based approach would better support public safety and accessibility without punishing responsible drivers.	2110	76
10/27/2025 - 2:36pm	The restriction on private hire vehicles from using bus lanes and lay-bys poses serious safety, accessibility, and operational challenges. These areas often provide the only safe spots to stop without obstructing traffic, especially near hospitals, schools, and town centres. By banning their use, drivers are forced into unsafe roadside stops, putting vulnerable passengers—like children, the elderly, and disabled individuals—at risk. This policy also conflicts with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical and non-disruptive actions. A more balanced, risk-based policy would enhance public safety and accessibility without punishing responsible drivers.	2111	76
10/24/2025 - 1:39pm	Restricting private hire vehicles from using bus lanes and lay-bys leads to significant safety, accessibility, and operational issues. These areas often serve as the only safe spots to stop without blocking traffic, particularly near hospitals, schools, and town centres. Prohibiting their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, the	2112	76

	elderly, and disabled users. This restriction also contradicts existing traffic regulations, raises fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would better promote public safety and accessibility while not penalizing responsible drivers.		
10/24/2025 - 4:00pm	The restriction on private hire vehicles from using bus lanes and lay-bys poses serious safety, accessibility, and operational challenges. These areas often provide the only safe spots to stop without obstructing traffic, especially near hospitals, schools, and town centres. By banning their use, drivers are forced into unsafe roadside stops, putting vulnerable passengers—like children, the elderly, and disabled individuals—at risk. This policy also conflicts with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical and non-disruptive actions. A more balanced, risk-based policy would enhance public safety and accessibility without punishing responsible drivers.	2113	76
10/27/2025 - 2:38pm	Prohibiting private hire vehicles from using bus lanes and lay-bys creates serious challenges regarding safety, accessibility, and operations. These locations often represent the only safe places to stop without impeding traffic, especially near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, putting vulnerable passengers—like children, the elderly, and disabled users—at risk. Furthermore, this policy contradicts existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would better serve public safety and accessibility while supporting responsible drivers.	2114	76
10/24/2025 - 3:39pm	I object to the age restriction that confines vehicles to under four years at first licensing and forces de-licensing at eight years. This rule is unnecessarily strict and fails to accurately represent vehicle condition or safety. Many modern vehicles can remain in excellent condition well beyond eight years with proper maintenance. The DVSA inspection and compliance testing already ensure roadworthiness. A condition-based policy would be a fairer and more sustainable approach.	2115	76
09/02/2025 - 5:08pm	When are we getting access to the bus lanes As an integral part of the RBC transport policy and a vital transport link to the community Reading PH should have full access to all the lanes that Hackney carriages do I can't give reasonable assistance to customers with luggage at Friar St hotels	2116	76
10/27/2025 - 2:40pm	Prohibiting private hire vehicles from using bus lanes and lay-bys creates serious challenges regarding safety, accessibility, and operations. These locations often represent the only safe places to stop without impeding traffic, especially near hospitals, schools, and town centres. Banning their	2117	76

	use forces drivers into unsafe roadside stops, putting vulnerable passengers—like children, the elderly, and disabled users—at risk. Furthermore, this policy contradicts existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would better serve public safety and accessibility while supporting responsible drivers.		
10/26/2025 - 4:25pm	Prohibiting private hire vehicles from utilizing bus lanes and lay-bys presents serious safety, accessibility, and operational challenges. These areas are often the only safe places to stop without disrupting traffic, especially near hospitals, schools, and town centres. This ban forces drivers into unsafe roadside stops, putting vulnerable passengers—such as children, the elderly, and disabled individuals—at risk. Additionally, it conflicts with existing traffic regulations, increases fuel consumption, and results in unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would enhance public safety and accessibility while supporting responsible drivers.	2118	76
10/26/2025 - 5:28pm	Restricting private hire vehicles from accessing bus lanes and lay-bys creates critical safety, accessibility, and operational issues. These areas are often the only safe places to stop without blocking traffic, particularly near hospitals, schools, and town centres. This ban forces drivers into unsafe roadside stops, placing vulnerable passengers—such as children, elderly, and disabled users—at risk. Additionally, it conflicts with current traffic regulations, increases fuel consumption, and results in unfair penalties for practical, non-disruptive actions. A more balanced, risk-based approach would better support public safety and accessibility while not penalizing responsible drivers	2119	76
10/27/2025 - 10:51am	Limiting private hire vehicles from accessing bus lanes and lay-bys creates significant safety, accessibility, and operational challenges. These areas often provide the only safe opportunities to stop without obstructing traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, seniors, and disabled individuals. This restriction is also at odds with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive behavior. A more balanced, risk-based policy would serve public safety and accessibility better without penalizing responsible drivers.	2120	76
10/03/2025 - 5:19pm	Should be allowed when carrying disabled passengers.	2121	76

10/24/2025 - 11:54pm	except when picking up disabled passengers	2122	76
10/15/2025 - 1:21pm	The proposed system gives private hire drivers four penalty points for stopping on double or single yellow lines, breaking traffic rules, or driving in a way that causes passengers discomfort, alarm, or distress. While the goal of promoting safety and professionalism is understandable, this policy feels overly harsh, disproportionate, and duplicates penalties that already exist. Offences like stopping on yellow lines or breaking traffic laws are already handled by the police and traffic wardens. Adding extra licensing penalties for the same actions risks punishing drivers twice and unfairly targeting them for matters already covered by national law. The policy also overlooks the realities of everyday driving. Private hire drivers often have to stop briefly to pick up or drop off passengers safely, especially in busy city areas, and sometimes this can't be avoided. In addition, the rule about driving in a way that causes "discomfort, alarm, or distress" is vague and subjective—it could lead to penalties based on perception rather than clear evidence. A fairer system would reserve penalty points for serious, repeated, or deliberate breaches of conduct. Minor or situational issues could instead be managed with refresher training, warnings, or guidance. Traffic enforcement should remain the responsibility of the appropriate authorities, while licensing should focus on areas that truly relate to passenger safety, driver professionalism, and compliance with licensing standards. Ultimately, licensing should work with drivers—not against them. The aim should be to support and improve working conditions, not make them harsher or more unfair. A collaborative approach between licensing authorities and drivers would help maintain high standards while ensuring that those who work hard to provide a safe and reliable service are treated fairly and with respect.	2123	76
10/27/2025 - 1:13pm	Restricting private hire vehicles from using bus lanes and lay-bys creates significant challenges related to safety, accessibility, and operations. These locations are often the only safe places to stop without blocking traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, jeopardizing vulnerable passengers like children, seniors, and disabled users. This policy also contradicts existing traffic regulations, raises fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based approach would better serve public safety and accessibility without penalizing responsible drivers.	2124	76

10/24/2025 - 2:44pm	Limiting private hire vehicles from accessing bus lanes and lay-bys creates significant safety, accessibility, and operational challenges. These areas often provide the only safe opportunities to stop without obstructing traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, seniors, and disabled individuals. This restriction is also at odds with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive behavior. A more balanced, risk-based policy would serve public safety and accessibility better without penalizing responsible drivers.	2125	76
10/24/2025 - 2:07pm	Prohibiting private hire vehicles from utilizing bus lanes and lay-bys presents serious safety, accessibility, and operational challenges. These areas are often the only safe places to stop without disrupting traffic, especially near hospitals, schools, and town centres. This ban forces drivers into unsafe roadside stops, putting vulnerable passengers—such as children, the elderly, and disabled individuals—at risk. Additionally, it conflicts with existing traffic regulations, increases fuel consumption, and results in unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would enhance public safety and accessibility while supporting responsible drivers.	2126	76
10/24/2025 - 3:48pm	Restricting private hire vehicles from utilizing bus lanes and lay-bys results in serious safety, accessibility, and operational challenges. These areas are often the only safe spots to stop without obstructing traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, seniors, and disabled individuals. This restriction also conflicts with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would enhance public safety and accessibility while not penalizing responsible drivers.	2127	76
10/27/2025 - 12:51pm	Limiting private hire vehicles from accessing bus lanes and lay-bys creates significant safety, accessibility, and operational challenges. These areas often provide the only safe opportunities to stop without obstructing traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, seniors, and disabled individuals. This restriction is also at odds with existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive	2128	76

	behavior. A more balanced, risk-based policy would serve public safety and accessibility better without penalizing responsible drivers.		
10/27/2025 - 1:30pm	Restricting private hire vehicles from using bus lanes and lay-bys creates significant challenges related to safety, accessibility, and operations. These locations are often the only safe places to stop without blocking traffic, particularly near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, jeopardizing vulnerable passengers like children, seniors, and disabled users. This policy also contradicts existing traffic regulations, raises fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based approach would better serve public safety and accessibility without penalizing responsible drivers.	2129	76
10/24/2025 - 11:55pm	this should be left to parking enforcement and some of these rules will not apply to out of town licensed vehicles	2130	76
10/15/2025 - 12:41pm	While I understand and support the need for safe, responsible driving and public confidence in the trade, the penalties proposed are excessive, unclear, and duplicative of enforcement powers that already belong to traffic wardens and the police. Matters such as stopping on restricted lines or contravening traffic laws are already regulated under existing road traffic legislation, with penalties issued by trained enforcement officers. Imposing additional licensing penalties on top of legal sanctions creates a double punishment system that unfairly targets private hire drivers for infractions already dealt with under national law. Moreover, issuing four penalty points for relatively minor or often unavoidable situations, such as briefly stopping to assist a passenger or to ensure safety, fails to reflect the real-world challenges of operating in busy urban areas. Drivers frequently face circumstances where stopping momentarily on a marked line is necessary to drop off or pick up passengers safely, and such actions should be judged within context, not penalised automatically. Similarly, the clause relating to driving in a way that causes “discomfort, alarm or distress” is vague and subjective, leaving too much room for interpretation or misuse. I would urge the Council to adopt a more proportionate, evidence-based approach, reserving penalty points for clear, repeated, or serious breaches of conduct rather than isolated or minor traffic incidents. Traffic violations should continue to be handled by the appropriate enforcement authorities, while the Council’s focus should remain on matters directly related to licensing	2131	76

	behaviour and passenger safety. In addition, the Council could introduce education or refresher training for drivers involved in such incidents rather than immediately imposing harsh penalties. This approach would maintain high standards without unfairly punishing compliant drivers who are simply doing their jobs under difficult conditions.		
10/24/2025 - 11:55pm	This should be left to parking enforcement and some of these rules will not apply to out of town licensed vehicles	2132	76
10/27/2025 - 1:33pm	Prohibiting private hire vehicles from using bus lanes and lay-bys creates serious challenges regarding safety, accessibility, and operations. These locations often represent the only safe places to stop without impeding traffic, especially near hospitals, schools, and town centres. Banning their use forces drivers into unsafe roadside stops, putting vulnerable passengers—like children, the elderly, and disabled users—at risk. Furthermore, this policy contradicts existing traffic regulations, increases fuel consumption, and imposes unfair penalties for practical, non-disruptive actions. A more balanced, risk-based policy would better serve public safety and accessibility while supporting responsible drivers.	2133	76
10/27/2025 - 2:25pm	Limiting private hire vehicles from using bus lanes and lay-bys results in significant safety, accessibility, and operational challenges. These areas frequently serve as the only safe stopping points without obstructing traffic, especially near hospitals, schools, and town centres. Prohibiting their use forces drivers into unsafe roadside stops, endangering vulnerable passengers such as children, seniors, and disabled individuals. This restriction also conflicts with existing traffic regulations, raises fuel consumption, and imposes unfair penalties for practical actions. A more balanced, risk-based policy would enhance public safety and accessibility without penalizing responsible drivers.	2134	76
10/24/2025 - 11:56pm	2 points and also it could be to indicate to his passengers that he has arrived	2135	76
10/24/2025 - 11:58pm	2 points as it should be the responsibility of the guardian	2136	77
10/08/2025 - 8:14pm	My vehicle is license to 5 passengers and my insurance is licensed to 5 passengers if I am put more than five passengers including children will that revoke my insurance and if there was an accident who is liable for the cost? Is it reading Council or my insurance?	2137	77
10/25/2025 - 12:00am	3 points as was before	2138	78

10/26/2025 - 10:40pm	I recommend 4 points	2139	78
10/24/2025 - 11:17am	I strongly object to this condition prohibits drivers from accepting any form of payment from a passenger at the point of service. This policy is archaic, commercially unviable, and prevent Executive Private Hire Vehicles operators from serving the entire business and corporate travel market. The majority of business travellers use payment methods provided by their company, primarily corporate credit cards. They are required to use these for all business expenses to simplify their accounting and reimbursement process. This policy makes it illegal for a businessperson to pay for their journey with their corporate card in the vehicle. It is completely unrealistic to expect a business traveller, especially one from out of town, to pre-pay an unknown operator's office or to remember to pay an invoice after their journey. This is not how modern business expenses work. In the 21st century, payment is conducted instantly and electronically. This condition forces a return to a pre-digital era, creating massive paperwork and inconvenience for the public and a significant competitive disadvantage for Reading Executive Private Hire Vehicles operators against unregulated or out of town licenced services that offer in-car card payments. The policy actively discourages people from using Reading licensed services. A customer who can seamlessly pay by card in an Executive service from another licenced authority will be frustrated and inconvenienced by the requirement to pre-pay or invoice in Reading, making them less likely to use a Reading licensed service again. This condition must be urgently updated to reflect standard commercial practice. The ability to accept secure, electronic payments is a fundamental requirement for any modern transport service. Maintaining the current prohibition on in-vehicle card payments is cripple the Executive Private Hire industry, drive business to out-of-town operators or unlicensed services, and severely inconvenience the public. This policy is not fit for purpose.	2140	79
10/27/2025 - 2:07pm	Under the existing arrangement, any payment made by card is classified as an "account payment." These transactions are processed directly into the licensed operator's business bank account and are not received by the driver. As such, they are consistent with the principles and safeguards of account-based payments. Permitting card payments for executive vehicle services would enhance convenience and security for clients, while maintaining full compliance with Council regulations. The current restriction	2141	79

	creates unnecessary limitations for both operators and passengers, particularly in a service sector where cashless transactions are now the industry standard.		
10/27/2025 - 1:41pm	Under the existing arrangement, any payment made by card is classified as an “account payment.” These transactions are processed directly into the licensed operator’s business bank account and are not received by the driver. As such, they are consistent with the principles and safeguards of account-based payments. Permitting card payments for executive vehicle services would enhance convenience and security for clients, while maintaining full compliance with Council regulations. The current restriction creates unnecessary limitations for both operators and passengers, particularly in a service sector where cashless transactions are now the industry standard.	2142	79
09/02/2025 - 5:13pm	Not many companies use account services like they used to Lots use company credit cards My work pick up at home or office and take to the airport and vice versa Not interested in doing shopping trips to Asda or school runs In car card payments should be allowed for certain jobs	2143	79

Hackney Carriage & Private Hire Convictions Policy

Date posted	Comment	Bubble location number	Page
10/06/2025 - 5:35pm	80+ Appendix's I Criminal conviction policy All agreed several years ago with licensing committee and there are no changes to this policy	10	1
10/27/2025 - 11:00pm	80+ Appendix's I Criminal conviction policy All agreed several years ago with licensing committee and there are no changes to this policy	12	1
10/26/2025 - 12:36pm	All agreed many years ago with licensing committee, there is no change this this time	2144	80
10/27/2025 - 10:59pm	all agreed several years ago with licensing committee and there are no changes to this policy	2145	80

10/26/2025 - 6:29pm	All agreed, several years ago with licencing committee and there are no charges to this policy	2146	80
10/19/2025 - 4:38pm	all agreed several years ago with licensing committee and there are no changes to this policy	2147	80
10/27/2025 - 3:17am	All agreed many years ago with licensing committee and there are no changes to this policy.	2148	80
10/26/2025 - 11:55am	This was all agreed several years ago with a license committee and there have been no changes to this policy	2149	80
10/19/2025 - 4:43pm	all agreed several years ago with licensing committee and there are no changes to this policy	2150	80
10/26/2025 - 1:38pm	All agreed several years ago with licensing committee and there are no changes to this policy	2151	80
10/25/2025 - 10:28pm	All agreed several years ago with licensing committee and there are no changes to this policy	2152	80
10/11/2025 - 9:07pm	This was all agreed with the the Licencing Committee several years ago. There are no changes to this policy.	2153	80
10/25/2025 - 10:33pm	All agreed several years ago with licensing committee and there are no changes to this policy.	2154	80
10/23/2025 - 4:04pm	All agreed several years ago with licensing committee and their are no changes to this policy	2155	80
10/26/2025 - 7:44pm	Everything was agreed ages ago with licensing committees and there are no changes to this policy.	2156	80
10/20/2025 - 4:17pm	All agreed several years ago with licensing committee and there are no changes to this policy	2157	80
10/13/2025 - 12:15am	All agreed several years ago with licensing committee and there are no changes to this policy	2158	80
10/27/2025 - 5:28pm	p80 APPENDIX' 1 All agreed several years ago with licensing committee and there are no changes to this policy	2159	80
10/09/2025 - 12:43pm	80+ Appendix's I Criminal conviction policy All agreed several years ago with licensing committee and there are no changes to this policy	2160	80
10/09/2025 - 12:19pm	80+ Appendix's I	2161	80

	Criminal conviction policy All agreed several years ago with licensing committee and there are no changes to this policy		

General comments:

Date posted	Comment	Bubble location number	Page
09/02/2025 - 4:11pm	The Council will need to work in partnership with the Taxi and PHV trade to support the transition to cleaner, low-emission vehicles. This may include exploring funding opportunities, providing clear guidance on licensing requirements, offering incentives for greener vehicles, and ensuring that charging infrastructure is accessible and sufficient. Supporting drivers and operators through this transition will help maintain service quality while contributing to the Council's environmental and economic goals.	#021	5
09/02/2025 - 4:18pm	To strengthen this contribution, the Council will: Provide fair and consistent licensing policies that encourage the use of cleaner vehicles. Engage with the trade to ensure services remain accessible and affordable across the Borough. Promote the role of taxis and PHVs in connecting communities, particularly in areas not well served by public transport.	#025	5
09/02/2025 - 4:22pm	To maintain and enhance this role, the Council will: Partner with the Taxi and PHV trade to ensure policies support both economic growth and community needs. Promote the sector as a safe, inclusive, and reliable transport option. Ensure they sort out the issues with Uber operating in Reading without any policing Ensure that licensing and regulation remain proportionate, transparent, and supportive of service quality	#030	5
10/21/2025 - 10:34am	Dear I would to comments in few things which does effect over trade and delay the process of working as a taxi driver which is 3) we should have more ranks and more spaces at the rank like hospital is very busy and there is no spaces to park and the patient also park in over rank so we having alot difficulties to work and also at frier street also the rank behind is a loading bay and we having problems there also that every day there is no parking because loading bay trucks block us. [REDACTED] Badge [REDACTED] Hackney Carriage Driver	1	1

	Badge [REDACTED] Hackney Carriage Driver We both have a same advice to the consultation.		
09/02/2025 - 5:17pm	Are RBC going to enforce these measures on all PH drivers and vehicles working in Reading or just the Reading licensed ones To me it looks like you won't be happy until everyone has left and the town is full of Fareham and New Forest cars and drivers that you won't have a clue about	9	1
10/03/2025 - 12:04pm	There is no mention of School Transport Licensing within the document, I can only assume that the Council is intending to discontinue these? If this is the case, I for one will not be renewing my School Transport Drivers License and I suspect that many other School Transport Drivers will not renew/upgrade to Private Hire Licences either. Reading Borough Council will end up with a shortage of drivers for School Runs, which was why the council introduced the school transport scheme in the first place.	11	1
10/27/2025 - 8:32am	This appears to be an exact copy of West Berkshire consultation. Appears no thoughts were put in for Reading.	13	1
10/09/2025 - 5:55pm	No, do not charge more. This is an unacceptable way to increase prices on permits again. We see no useful change in our areas apart from high prices on council tax and permits on an annual basis. Unacceptable that you even considered bringing such proposal to the table.!	14	1
10/25/2025 - 2:18pm	we didn't agree with this policy	18	5
10/25/2025 - 11:26am	These conditions are not good for drivers & operators, its damaging the whole industry. How will these objectives be met and what support will you be offering the industry and bussiness to retain potential drivers or bring back reading resident drivers to come back to be licenced in reading, when they can work legally with other boroughs with less stringent byelaws. Have officers made an assessment on these proposals on revenue loss to both reading taxi bussiness & RBC	22	5
10/19/2025 - 5:37pm	How have you measured the impact the new conditions will have on the trade both economically and the retention of drivers to work as Reading licensed drivers? Or will there be more drivers leaving Reading and then come back to work legally in Reading under Fareham Council and so forth.	26	5
10/27/2025 - 10:54am	I would like to take this opportunity to share some suggestions that could help strengthen the relationship between the Council and the licensed driver community. Firstly, it would be highly beneficial if the Council could introduce an automatic reminder system to notify drivers when their licences are due for renewal or about to expire. This small but meaningful step would help	33	7

	prevent unnecessary lapses, reduce administrative delays, and support compliance among drivers and operators. Secondly, I believe the Council should view and treat its relationship with Private Hire Drivers, Operators, and Hackney Carriage Drivers as a partnership rather than a purely regulatory one. By fostering a more collaborative and transparent approach, we can work together towards shared goals—improving service quality, safety, and efficiency for both drivers and the public. Ultimately, the aim should be to create a seamless and supportive system where communication is open, processes are clear, and everyone feels valued as part of the same community serving the people of Reading. Thank you for considering these suggestions. I hope they can contribute to a more positive and productive working relationship between the Council and the driving community.		
10/27/2025 - 11:03am	The relationship between the Council and the drivers and operators' trade needs to evolve towards one based on mutual respect and collaboration. The Council should move away from a culture of blame or demonisation and instead adopt a supportive, learning-oriented approach. By working in partnership, the Council can help drivers and operators improve standards, enhance public confidence, and create a fair and transparent system that benefits both the trade and the community.	43	8
10/24/2025 - 12:32pm	As a female driver involved in school transport, I am extremely concerned about the proposed removal of the school transport badge and the introduction of a requirement for a private hire badge instead. This change would disproportionately affect women, particularly those from communities where cultural or religious expectations limit the type of work they can undertake. School transport provides a safe, structured, and community-focused role that supports family life and local engagement. Requiring a private hire badge and full knowledge test—designed for city-wide operations—is unnecessary for fixed, GPS-supported school routes. If implemented, this policy risks excluding many skilled and dedicated women from the workforce. I urge decision-makers to retain a fair, accessible system that enables women to continue providing trusted school transport services.	86	10
10/04/2025 - 1:35pm	Reading Borough Council – Licensing Department Formal Objection and Request for Clarity – Proposed Licensing Condition Changes Dear Ms. Catherine Lewis, I am writing as Mr. Mohammad Iftikhar, Manager of Capital Cars Reading, on behalf of my company and all	2162	81

	the drivers working under our fleet, to raise serious and urgent concerns regarding the ongoing consultation and the proposed changes to the current licensing conditions. We wish to make it absolutely clear that we strongly disagree with both the consultation process and several of the proposed changes being put forward at this stage. The process, as it currently stands, lacks transparency and clarity, leaving operators and drivers uncertain about the actual amendments being suggested. This has caused considerable confusion and concern within our trade. Before we can provide a fair and informed response, we require complete clarity and a full, side-by-side breakdown of all existing and proposed conditions. This comparison is essential to help all stakeholders fully understand what is changing and how those changes will impact them. It is equally important that all conditions relating to different trade parties and stakeholders are clearly separated. Grouping every condition into a single document is impractical and makes it extremely difficult for each party to focus on the areas relevant to them. Furthermore, we firmly believe that the consultation period should be extended to a minimum of 3–4 months. This additional time is necessary to allow us to return to our drivers, review the proposals carefully, and collect their feedback in an informed and organised way. Attempting to carry out such a significant review in a shorter timeframe is neither reasonable nor fair to those directly affected. This submission is being made on behalf of Capital Cars Reading and all drivers operating under our company. A list of our drivers and their licence numbers can be provided upon request. However, we would like to note that the Council already holds this information, as all our drivers are licensed through your department. We also wish to highlight that introducing major changes without clear explanation or proper consultation undermines the trust and cooperation between the licensing authority and the trade. We support improvements that enhance standards and safety, but such changes must be reasonable, transparent, and developed through meaningful consultation with all stakeholders. Accordingly, we respectfully urge Ms. Catherine Lewis, Mr. Rob Abell, and Mr. Clyde Masson, along with the wider licensing team, to: 1. Provide a detailed, side-by-side comparison of all current and proposed licensing conditions.		

	2. Separate the conditions according to trade category and stakeholder group. 3. Extend the consultation period to a minimum of 3–4 months. 4. Pause the current process until full clarity, transparency, and engagement have been achieved. Only through these steps can operators and drivers fairly review, understand, and respond to the proposals. We trust that our collective concerns will be given full consideration and handled with fairness, openness, and transparency. Kind regards, Mr. Mohammad Iftikhar Manager – Capital Cars Reading [Contact Details]		
10/08/2025 - 8:54pm	Dear Reading Borough Council, I am writing to express my concern regarding the proposal to remove school transport badges. These badges play an essential role in identifying legitimate school transport vehicles. They help ensure the safety of children, provide clarity for schools and parents, and allow enforcement officers and the public to easily recognise authorised vehicles. Removing the badges could create confusion, increase the risk of unauthorised or unsafe vehicles operating near schools, and make it harder for drivers and schools to demonstrate compliance with regulations. The current system is simple, effective, and offers reassurance to parents and the community. I strongly recommend that the Council reconsiders the proposal and maintains a visible identification system for school transport vehicles. Thank you for considering my comments. Kind regards,	2163	82

	School Transport Driver		
10/27/2025 - 9:44am	test as I cannot tell if my submission has been made	522	21
10/24/2025 - 11:19am	Not found I am writing to formally object to the complete and unexplained removal of the 'School Badge' requirement from the proposed policy. This significant change was made without prior notice or justification in the consultation documents, which is a profound failure of transparency. The removal of this badge has severe implications for driver livelihoods, child safety, and council finances, and demands an explanation. The school badge was a clear, visual identifier for a specific and sensitive licensing function. Its removal is a major policy shift. Why was this change made? The consultation document provides no rationale, impact assessment, or explanation for removing this crucial safety and compliance measure. Why were consultees not explicitly informed of this major change to allow for a proper response? This omission undermines the entire consultation process. Devastating Impact on Livelihoods, Particularly Female Drivers: The school run provides essential, stable income for many drivers, a significant proportion of whom are women for whom the fixed hours fit around family commitments, with no interest in doing normal private hire work. Removing the badge without a clear alternative mechanism will effectively prevent these drivers from undertaking this work, causing severe financial hardship and disproportionately impacting female licensees. What is the Council's plan to mitigate this disproportionate impact on a protected group under the Equality Act? The school badge was a vital safeguard. Its removal creates dangerous ambiguity and risk. This ambiguity creates a significant child protection gap. Does this mean the Council will now relying on out-of-borough licenced driver and vehicles, which may operate to lower safety and inspection standards, to undertake Reading's school contracts? If so, is this an acceptable dilution of child safety standards The removal of the badge seems ill-considered from a financial perspective. Has an equalities impact assessment or a financial impact assessment been conducted? If so, it must be published please. Immediate Clarification and Action: Given the severe implications, the consultation on this specific part is invalid as the full impact of the proposal was not disclosed.	842	44

	I demand that the Council: Immediately pause any change regarding school transport. Publish a full and detailed explanation for the removal of the school badge, including the problem it was meant to solve. Publish all associated impact assessments (Safeguarding, Equality, Financial). Re-consult properly on this specific, major change with a clear proposal and justification. Proceeding without answering these critical questions would be a gross dereliction of the Council's duty of care to both children and its licensed drivers.		

RESPONSE FROM READING TAXI ASSOCIATION

From: [RTA](#)
To: [Masson, Clyde](#)
Subject: Hackney Carriage and Private Hire Licensing Policy
Date: 27 October 2025 18:15:20
Attachments: [Hackney Carriage and Private Hire Licensing Policy RTA.docx](#)

Warning!
For the attention of
RBC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear Clyde,

We write to you regarding the Hackney Carriage and Private Hire Licensing Policy currently under consultation.

While we welcome the introduction of this policy, as it will bring greater clarity to licensing conditions for both vehicles and drivers, there are several areas within the policy that we strongly disagree with. Our main points are outlined below.

1. Section 7.2.2 – Certificate of Good Conduct

The current proposal requires drivers who have been outside the UK for more than three months to provide a Certificate of Good Conduct. As you are aware, Hackney Carriage drivers are from many different countries. In the event of a death or for other religious and cultural reasons, it is common for drivers to travel to their country of origin for extended periods – often exceeding three months. We therefore believe that the threshold should be a minimum of six months, not three months.

2. Section 7.4.5 – Category N and S Vehicles

We strongly disagree with the proposal not to license Category N and S vehicles.

It is unfair and unjust to exclude these categories entirely. We believe:

- Category N vehicles should continue to be licensed.
- Category S vehicles should be assessed on a case-by-case basis.

At present, insurance companies are quick to write off vehicles even for minor damage. Considering that since 1 October 2026 only the LEVC model can be licensed, the cost implications for drivers are already significant. We therefore request that this policy does not apply to the current licensed fleet.

For new to fleet, vehicles must not be insurance write offs.

We agree, however, that Categories A and B vehicles should not be licensed under any circumstances.

3. Section 7.10.3 – Alternative Vehicle Testing Arrangements

We do not support making the current alternative testing arrangements permanent. This system was originally introduced as a temporary, two-year trial to resolve issues between Licensing and the two testing stations – not to penalise drivers.

Drivers and owners should have the freedom to choose where they take their vehicles for testing. As an alternative, the Council could consider increasing the number of approved testing garages from two to four.

We would also like to clarify that the absence of complaints from drivers is largely due to the RTA advising drivers not to complain during the trial period, in good faith.

4. Section 7.21.7 – Wheelchair Accessibility

We request that the Council reconsider the requirement that wheelchairs must always be front- or rear-facing. Due to the size and design of some wheelchairs, this is not always possible. In certain cases, side-facing positioning is the only practical and safe option.

5. Section 8.4.2 – Medical Examinations

The requirement for drivers to undergo their medical with their own GP is unreasonable. Not all GPs offer this service, and many charge excessive fees. We propose that any GP authorised to carry out Group 2 medicals should be permitted to complete the medical examination form, provided the driver supplies a copy of their medical history at the appointment.

6. Section 8.7.1 – Retesting Requirements for Existing Drivers

We agree that new applicants must undertake all the required tests. However, we disagree with the requirement for existing drivers to retake these tests after three years if their licence lapses. We propose extending this period to a minimum of five years, which we feel is fairer and more practical.

7. Section 8.8.1 – English Language Tests

We seek clarification on whether this requirement will apply only to new applicants, or if it will also extend to existing licensed drivers.

8. Penalty Point System

We understand and broadly support the move towards a penalty point system to replace warning letters. However, we believe that the allocation of points needs to be reviewed to ensure fairness.

For example, a private hire driver receives six points for refusing a guide dog, whereas a Hackney Carriage driver receives twelve. This lack of parity is unfair and disproportionate. We have set out a separate table below outlining our suggested revisions to the proposed points system.

School Transport:

Whilst the decision on whether to continue with school transport rests with Licensing, we feel that the cost implications need to be properly reviewed. School transport should no longer be subsidised by either Hackney Carriage or Private Hire licensing fees.

From our perspective, the Council should consider one of two options:

1. Bring the costs for driver/escort licences and school transport vehicle licences in line with Hackney Carriage and Private Hire fees; or
2. Reclassify school transport drivers as Private Hire drivers.

We are in full agreement that school transport should no longer be subsidised by the wider taxi trade's licensing costs.

We have also attached a table summarising all the above points, with our proposed alternatives and amendments.

We hope that, once you have reviewed our response, we can arrange further meetings with you and your colleagues to discuss these matters in more detail and agree on a balanced policy before it goes to the Licensing Committee in February.

Thank you for your time and consideration. We look forward to your response.

Kind regards,

Asif Rashid

Reading Taxi Association (RTA)

PAGE	SECTION	RBC PROPOSAL	GUIDE RESPONSE
8	4.3	Reporting Procedures	72 hours not 48 hours
10	7.1.5	Application 6 weeks advance	Q When should the mot be done in advance? Test 3 weeks in advance?
10	7.2.2	Certificate of good conduct	Q how long out of UK for one to be required
11	7.4.5	Category S & N not permitted	We do not agree with this, as both Category N & S can be given a marker due to age of vehicle Should only apply to new to fleet vehicles.
12	7.7.1	Reporting to council 48 hours	This should be within 72 hours
12	7.7.2	Reporting to council 48 hours	This should be within 72 hours
13	7.10.3	Alternating mot tests every 6 months	This was for a trial period, to allow testing centres to improve, this should not be made permanent. We suggest more testing station. We should have a choice of where we want to take our vehicle
13	7.10.4	Mot Advisory, 2 nd mot should not have same advisory	This should be only on mechanical advisories
14	7.12.2	Private hire no roof sign	Agree as private hire use their roof signs to attract customers to them.
15	7.12.10	Stickers permitted in vehicles	Add card payments stickers?
PAGE	SECTION	RBC PROPOSAL	GUIDE RESPONSE
16	7.16.3	CCTV	Q Do we need permission to install dash cams?
17	7.21.7	Wheelchair transporting	Due to changes in size of wheelchairs, we can't always transport them front and back facing, at times it has to be side facing.
21	8.4.2	Medical examination	Should be any GP who provides group 2 medicals

23	8.7.1	Driving test	New application from now yes, previous license holders 5 years.(this is for drivers who do not renew their badges)
24	8.8.1	English language	Q Is this for new applicants or includes existing drivers, if includes existing drivers than we disagree
28	Appendix A	Hackney Carriage vehicle specification	This is incorrect, it is agreed as follows *1st Oct 2023 Maximum age limit 15 years or 1 oct 2028 *1st Oct 2025 replacement vehicles less than 8 years old 1st Oct 2028 replacement vehicles less than 7 years old, max age limit up to 18 years. Fully electric vehicles max age limit 20 years
52	Appendix G 2.2	Penalty points 28days to respond	Q what happens if a person is sent a letter, but does not receive it? Or a letter is sent but driver is away for period of 3 months before receiving letter?
53	5.1	Second accumulation of 12 points	Should be 2 years not 4
53	6.1	Third accumulation of 12 points	Should be 2 years not 4
PAGE	SECTION	RBC PROPOSAL	GUIDE RESPONSE
54	8.0	Previous suspension	It's a new system, we should have a fresh start
56	HCD conditions 2.1	No badge 4 points	Should be 2 points
56	2.2	Customer badge display 4 points	Should be 2 points
56	3.1	Hackney plate display	New to fleet HCVL take up to 2 weeks for plate to be posted, should not apply for them
56	4.1	Produce HCB 5 days 3 points	Should be within 7 days 2 points

56	5.1	Suspension 4 points Medical examination	We recommend suspension 3 points
57	5.2	Suspension 4 points Suffering from any disease	We recommend suspension 3 points
57	5.3	Suspension 4 points Eyesight	We recommend suspension 3 points
57	6.2	Documents 4 points Requested documents	We recommend suspension 2 points
57	6.3	Db's certificate 6 points Random enhance db's	Db's certificate takes more than 14 days to arrive 4 points
57	BYLAW 5 a	Key Flag 4 points	We recommend 3 points
57	b	Hired 6 points	We recommend 3 points
57	c	Illuminated 4 points	We recommend 3 points
58	BYLAW 7 a	Reasonable speed 4 points	We recommend 2 points
58	B	Over ranking 4 points	We recommend 2 points
58	C	Direction 4 points	We recommend 2 points
58	D	Gap on rank 4 points	We recommend 2 points
58	7.1	Unattended vehicle 6 points	We recommend 4 points
58	7.2	Idling 6 points	We recommend 3 points, as sometimes customers take over a minute to agree a fare
58	8.1	Pro long distance 4 points	We recommend 3 points
58	8.2	Outside license area 6 points	We recommend 4 points
58	8.3	Use as private hire 6 points	We recommend 4 points
58	8.4	Card surcharge 6 points	We recommend 4 points
58	9.1	Obstruct officer 6 points	We recommend 4 points
59	11.1	Report loss of hackney badge 6 points	With in 7 days 3 points
59	BYLAW 9	Conduct of driver 6 points	We recommend 4 points
59	BYLAW 10	Booking commitment 6 points	We recommend 4 points
59	12.1	Reasonable requirements 4 points	We recommend 3 points
59	12.2	Eat or drink 3 points Whilst passengers on board.	Should not eat but should be allowed to drink
PAGE	SECTION	RBC PROPOSAL	GUIDE RESPONSE
60	14.1	Refuse to Carry guide dogs 12 points	We recommend 6 points same as private hire drivers
60	14.4	Restraining wheelchair 6 points	We recommend 4 points
60	14.5	Refusing wheelchair 12 points	We recommend 9 points
61	16.1	Receipts 4 points	No points. As customers also insist on blank receipts, Aswell as putting in a higher amount than the fare price

61	BYLAW 17	Lost property 4 points	We recommend 3 points
61	BYLAW 18 A	Lost property 48 hours 12 points	Q Does RBC accept lost property. We recommend 3 points and 72 hours
61	B	Lost property return to customer	Charge full fare to drop off location.
61	18.3	Tinted windows 6 points	We recommend 4 points
61	19.1	Report change of address 4 points	We recommend 3 points, 14 days
61	19.2	Report new convictions 6 points	We recommend 4 points, 72 hours
62	19.3	Report arrest and release	We recommend 4 points, 72 hours
62	20.2	Insurance 4 points	We recommend 3 points
62	21.1	Away from address 3 points	We recommend 2 points
62	21.2	Away from address 28 days 3 points	We recommend 2 points
62	22.2	Accident 3 points	Within 48 hours
63	BYLAW 8	Touting 12 points	We recommend 6 points
63	25.1	Bus stop 4 points	We recommend 2 points
63	25.2	Bus lane 4 points	We recommend 2 points
63	26.1	Disable bay 4 points	We recommend 3 points
63	27.1	Double park 4 points	We recommend 3 points
63	27.2	Footway 4 points	We recommend 3 points
63	28.1	Red route	We recommend 3 points
63	28.2	Single yellow 4 points	We recommend 3 points
63	28.3	Highway code 4 points	We recommend 3 points
63	28.4	Alarm and distress 4 points	We recommend 3 points
63	29.1	Horn 4 points	We recommend 3 points
64	30.1	Permission 4 points	We recommend 3 points
64	31.1	License 6 points	We recommend 4 points
64	32.1	Play radio 4 points	We recommend 4 points
65	35.1	Seat belts home to school 6 points	We recommend 4 points
80+	Appendix's I	Criminal conviction policy	All agreed several years ago with licensing committee and there are no changes to this policy

CONSULTATION RESPONSES FROM OPERATORS AND DRIVER

From: Info <[REDACTED]>

Sent: 27 October 2025 11:45

To: Licensing [REDACTED]
<[REDACTED]>

Subject: Proposed Hackney Carriage and Private Hire Licensing Policy

Importance: High

Dear Licensing Team,

I am writing in response to the recent proposal regarding changes to driver licensing within Reading Borough Council. While we appreciate the Council's intent to review and modernise its licensing policies, we would like to express several concerns and observations from the perspective of local operators and licensed drivers.

1. Impact on School Transport Drivers

Neighbouring authorities such as Wokingham and Bracknell currently operate a **School Transport Driver Badge**, which allows them to retain experienced drivers dedicated solely to school and community transport. Requiring Reading's school transport drivers to transition to a Private Hire Badge would only encourage further migration to neighbouring authorities — a trend we have already witnessed repeatedly.

We currently employ **over 50 dedicated school transport drivers** who work exclusively within school and community services. The majority are long-serving, experienced professionals — many of them women — who have clearly stated that they do not wish to apply for a Private Hire Badge. Their reasons are both **practical and justified**:

- They wish to undertake only school and community transport, not general private hire work.
- The **Private Hire Knowledge Test** is complex and unrelated to the fixed routes and safeguarding responsibilities involved in school transport. Many fear they would struggle with the test despite having decades of safe, incident-free driving experience.
- Approximately **90% of our school transport drivers** fall within this group, some with over **20 years of service**, balancing their roles with family and personal commitments.

Importantly, **many women have gained financial independence through their roles as School Transport Drivers**. If this opportunity were to be discontinued, they would lose that independence, as the majority have stated they would not apply for a Private Hire Licence. To add additional burdens to staff who effectively carry out a part-time role — **190 days per year** — would be both unjustified and an injustice to those involved. School Transport Drivers perform a **vital and regulated role**, and maintaining

their specific licence category ensures consistency, safety, and professionalism within this sector.

Furthermore, **Hackney, Private Hire, and School Driver Badges each have their own clear limitations and purposes.** Reading Borough Council should maintain all three categories, as both **Wokingham and Bracknell Councils** continue to do successfully. Reducing the framework to only two options would result in a **loss of both drivers and licensing income** to neighbouring authorities.

Following internal discussions, these drivers have expressed their willingness to **pay the full Private Hire licence fee** (without subsidy) if they can retain their current School and Community Driver status. This model has been implemented successfully in **Wokingham Borough Council and Bracknell Forest Council**, where this category continues to operate effectively and supports local service continuity.

2. Driver Migration and Competitiveness

The example of **Wolverhampton Council** demonstrates how a balanced and efficient licensing system can attract and retain drivers. Their simplified and flexible approach — supported by appropriate deregulation — has resulted in a substantial increase in licensed drivers.

Conversely, Reading Borough Council’s policies have often lacked consistency and have not fully reflected the realities faced by fee-paying licensees and service operators. This has already driven many Reading-based drivers to migrate to **Oxfordshire and West Berkshire**. Implementing further restrictive or impractical measures will only intensify this trend, diminishing Reading’s driver base and threatening the stability of its **school transport services**.

3. Recommendations for Policy Review

To ensure Reading remains competitive, fair, and supportive of its local workforce, we recommend the following:

- **Retain a School Driver Licence Category:** Maintain a dedicated category for school and community drivers to reflect the specialised, safeguarding-focused nature of their work.
- **Vehicle Plates:** Instead of abolishing school plates, consider converting them to Private Hire plates for administrative consistency while maintaining their “school service” designation.
- **Vehicle Age Policy:** Apply consistent age limits across all vehicle categories. Currently, Private Hire vehicles must be under five years old upon entry, whereas

Hackney Carriages may be older. This inconsistency is unfair and discourages investment.

- **Encouragement of Greener Vehicles:** Allow Electric and Hybrid vehicles a **10-year age limit** upon entry, aligning with national sustainability policies and supporting investment in environmentally friendly transport.
 - **MOT Testing Efficiency:** The requirement to use two MOT garages is not working in practice. Booking delays at UCV are lengthy, and the lack of weekend availability further disrupts operations.
-

4. Need for Consistency and Long-Term Vision

The government continues to emphasise sustainability and environmental responsibility in local transport. These goals can only be achieved through **consistent and supportive local licensing frameworks**. We therefore urge Reading Borough Council to align its policies with both national priorities and regional best practices, ensuring fairness, sustainability, and continuity of school and community transport services.

Licensing policies have a direct and significant impact on the people who invest in, operate, and deliver essential school and community transport within Reading. We respectfully urge the Licensing Team to **reconsider the proposed changes** and to engage meaningfully with local operators and drivers to develop a **balanced, inclusive, and practical policy** that safeguards the local workforce and ensures uninterrupted service to the community.

Yours sincerely,

Roxy Dragana

ABC Travel | Regus House | 400 Thames Valley Park Drive | Reading | RG6 1PT



0 [REDACTED]
M [REDACTED]
62 Portman Road, Room 36 Reading RG30 1EA
[REDACTED]

Operator Licence Number: [REDACTED]

24 October 2025

The Licensing Committee
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Subject: Formal Submission – Concerns and Objections to Taxi Licensing Policy 2025 Consultation

Dear Members of the Licensing Committee and Licensing Officers,

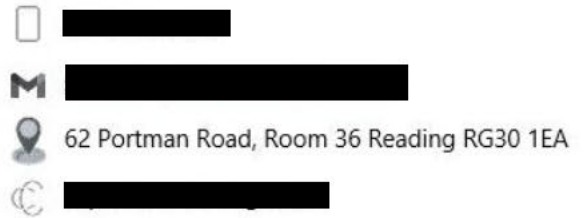
I am writing on behalf of Capital Cars Reading to formally submit our detailed objections to the proposed Taxi Licensing Policy.

As a long-standing local operator serving Reading for over two decades, we have always prided ourselves on maintaining the highest standards of safety, professionalism, and service. It is therefore disheartening and counterproductive to once again face a policy drafted without any meaningful input from those most affected—the licensed trade itself.

This concern was reinforced by the Council's own correspondence. An email from Rob Abell stated that raising legitimate issues was “only delaying the inevitable.” Such a dismissive stance undermines confidence in the consultation process and reduces it to a formality rather than a genuine dialogue.

The same mistakes occurred during previous policy reviews. It is regrettable that, when work on these new conditions began two years ago, the Council did not form a small working group comprising representatives from the trade—a driver, an operator, a member of the Reading Taxi Association, and council officers. Such collaboration would have identified practical flaws before publication, saving significant time and demonstrating a real commitment to partnership, public safety, and effective regulation.

Instead, operators have been presented with a complex 90-page document, issued without version control or redlining to show changes, and only four weeks to review and respond. The accompanying workshops offered no clarity on policy evolution and no meaningful opportunity to influence the outcome.



Furthermore, the online consultation platform is not fit for purpose. Despite submitting several comments, none are visible under our user profile, and there is no ability to review or amend submissions—rendering the process opaque and unreliable. The document itself contains numerous outdated, impractical, commercially unviable, and, in some cases, potentially unlawful conditions. Our attached submission details these specific concerns.

These procedural shortcomings reflect a deeper issue with the Council’s current licensing approach. While perhaps well-intentioned, the existing systems for licensing vehicles and drivers are slow, costly, and inefficient—actively hindering local businesses and ultimately failing to serve the public interest.

For example, the current six-week delay to plate a vehicle leaves operators bearing thousands of pounds in costs for non-revenue-generating assets. This 42-day processing time contrasts sharply with the Council’s own 48-hour deadline for licensees to meet reporting requirements. By comparison, neighbouring authorities provide same-day plating and much faster driver licensing, placing Reading operators at a clear competitive disadvantage.

This inefficiency directly undermines the Council’s claim of being the “safest borough.” With only around 450 vehicles licensed locally, a significant proportion of taxi journeys within Reading are undertaken by out-of-town vehicles over which the Council has no effective control or enforcement capability. Freedom of Information data (copy attached) reveals that between August last year and August this year, all penalty points were issued solely to Reading-licensed drivers. Only one driver received a verbal warning, suggesting a system that defaults to punishment rather than engagement, while no out-of-town drivers faced any action whatsoever.

Capital Cars Reading is not asking for lower safety standards. We are asking for a fair, efficient, and balanced regulatory environment—one that supports compliance, promotes local businesses, and ensures genuine passenger safety. The proposed policy, in its current form, will further disadvantage Reading-based operators, reduce consumer choice, and push more passengers to use out-of-town firms beyond the Council’s control.



62 Portman Road, Room 36 Reading RG30 1EA



The objective should not be to maintain theoretical perfection on paper but to implement practical, effective, and enforceable rules that protect the public while allowing local operators to thrive.

Our specific objections and supporting evidence are attached for your consideration. We urge the Committee to review them carefully and welcome the opportunity to work collaboratively toward a policy that serves the interests of passengers, licensees, and Reading Borough Council alike.

Yours sincerely,

Shahid Ahmed

Capital Cars Reading
(Trading name of A1 Cars Reading Ltd)

To the Licensing Committee, Reading Borough Council

FAO: Mr Clyde and Licensing Team

Dear Committee Members,

I am writing as **Muhammad Iftikhar, representing Capital Cars Reading**, a long-established private hire operator in our town. Our company has served Reading residents, schools, businesses, and visitors for many years, and I would like to share some observations about how current and proposed licensing policies are affecting both the trade and the wider community.

The private hire industry is not just about moving people from A to B — it underpins school transport, provides safe travel at unsociable hours, and supports local commerce. For it to remain viable, licensing must balance regulation with practicality. At present, that balance has been lost.

Challenges We Face

- **Driver Retention and Recruitment**
Reading is losing drivers to other boroughs where licensing is faster, simpler, and cheaper. These drivers still operate here, but without contributing to Reading's licensing income or coming under its enforcement. The longer our licensing timescales remain out of step with other authorities, the harder it becomes to bring new people into the trade.
- **Cost Pressures Without Clarity**
Operators and drivers here pay some of the highest fees in the country, yet we lack clear information about how these charges are calculated. This undermines confidence and makes it harder for small businesses like ours to grow.
- **Slow Licensing Process**
Waiting three to six months for a licence is not sustainable. In other areas, drivers are on the road within weeks. The knock-on effect in Reading is fewer cars available, longer waiting times for passengers, and lost business for local firms.
- **Vehicle Licensing Rules**
Vehicle standards should absolutely protect public safety, but they also need to reflect modern realities. A sensible policy would allow slightly older, cleaner Euro 6 cars onto the fleet, extend the maximum age for well-maintained vehicles, and widen access to MOT centres. This would keep standards high while easing unnecessary costs.
- **School Transport Licensing**
Removing the dedicated school transport category risks cutting off a valuable entry route into the trade, especially for women and part-time workers. It has worked effectively for years and should be retained.
- **Outdated Operator Base Requirements**
The requirement for a fully staffed physical office feels out of touch with how modern businesses operate. Remote systems, cloud-based platforms, and flexible staffing models are already the norm in many industries. Operators should be trusted to manage their own systems responsibly.

- **Customer Experience**

Passengers increasingly expect the ability to pay by card in-vehicle. Allowing this across the fleet would improve safety and convenience for both passengers and drivers.

- **Complaint Handling and Reporting**

Operators already hold full booking records and should be the first port of call for complaints. The rule requiring every minor driving offence to be reported within 48 hours, regardless of conviction, feels disproportionate. A more balanced approach would maintain public confidence without unfairly penalising drivers.

Moving Forward

The trade in Reading is ready and willing to work with the Council on sensible reforms. However, the current draft proposals risk accelerating the decline in driver numbers, reducing choice for passengers, and diverting income away from Reading.

We therefore ask that:

- The consultation period be extended to allow for meaningful engagement,
- Trade representatives be properly involved in shaping future policies, and
- Proposed conditions be reviewed to ensure they are proportionate, transparent, and fit for purpose.

Reading deserves a private hire sector that is safe, professional, and sustainable. With fairer and more practical licensing policies, we can continue to provide exactly that.

Yours faithfully,

Muhammad Iftikhar

Capital Cars Reading

From: [REDACTED]
To: [REDACTED]
Subject: TVT EXECUTIVE CARS License number 11
Date: 27 October 2025 20:41:56
Attachments: [Licenses of applications.odt](#)

Warning!
For the attention of
RBC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Hi Clyde

Please accept this email as my formal submission to the consultation on the Hackney Carriage & Private Hire Licensing Policy 2025.

I formally request that these documents be acknowledged and included in the official consultation records and public record.

Thank you for your attention to this matter.

Yours sincerely,
Nasir Bashir

Top [REDACTED]
[REDACTED]
Whatsapp: [REDACTED]
[REDACTED] book online through our website, or download our App on (top cars Reading)

Licenses of applications

Page 7

3.9. If an application to renew a licence is received late (less than 6 weeks), the licence may expire before a new one can be issued. For operators, this will mean they are no longer permitted to take bookings until a new licence has been granted. For vehicles, the vehicle must not be used for the carriage of passengers for hire and reward until a new licence has been granted. For drivers, they will not be permitted to drive any vehicles licensed by the relevant council until a new licence has been granted.

I formally object to the proposed requirements regarding the renewal and application process for operator, vehicle, and driver licences — in particular, the rule that applications submitted less than six weeks before expiry may result in a lapse of licence and suspension of operations.

This new condition is unreasonable and very unjustified, and will effect significant and unnecessary burden.

While I understand and support the need for effective administration and public safety, I believe this policy is unnecessarily restrictive and could have serious operational and financial consequences for compliant licence holders. There are often legitimate reasons why a renewal might be submitted closer to the expiry date — such as delays in documentation, medical checks, or other unforeseen circumstances — and it would be disproportionate to penalise operators, drivers, and vehicle owners by suspending their ability to work during this period.

I respectfully urge the council to reconsider this approach and to explore more balanced alternatives, such as:

- Allowing a grace period where an existing licence remains valid while a renewal is being processed, provided the application was submitted before expiry; or
- Streamlining the renewal process to ensure timely decisions without penalising applicants for administrative delays.

I appreciate the council's efforts to maintain high standards within the licensing system, but I believe these proposed measures would create unnecessary hardship for responsible operators and drivers. I therefore request that the council review this policy in consultation with affected stakeholders before implementation.

Guidance on the suitability to hold a licence

Page 8 .

A licence may also be revoked with immediate effect where information received raises grave doubts as to the fitness and propriety of a driver, regardless of whether criminal charges are

brought. In all cases the licence holder will be given an opportunity to make representations and these will be taken into account by the decision maker/s.

I raise my objection to the proposed provision allowing for the immediate revocation of a driver's licence where information raises grave doubts as to the driver's fitness and propriety, even in the absence of any criminal charges.

While I fully appreciate the council's responsibility to protect public safety and maintain high professional standards, this policy gives rise to serious concerns about fairness, due process, and the potential for misuse. The ability to revoke a licence "with immediate effect" based solely on untested information, without a completed investigation or formal findings, could result in severe hardship to drivers who depend on their licences for their livelihood.

A more balanced approach would be to allow for **temporary suspension pending investigation**, rather than outright revocation, ensuring that both public safety and natural justice are protected. Drivers should be given a genuine opportunity to respond to any allegations before such a serious and career-impacting decision is made.

I therefore respectfully request that the council reconsider this provision and adopt a fairer process that:

- Ensures all information used to question a driver's fitness is credible and properly verified;
- Provides drivers with the opportunity to make representations **before** any immediate action is taken, except in the most extreme and evidenced cases; and
- Includes a clear right of appeal and prompt review to prevent undue financial and personal hardship.

I trust the council will give careful consideration to these concerns and work with the licensed trade to maintain a system that upholds both **public protection and procedural fairness**.

Hackney carriage and private hire vehicles

Page 11/12

formally object to the proposed policy in section 7.4.5, which prevents the licensing of any vehicle that has previously been classified as a write-off under categories A, B, S, or N.

While I fully understand and support the council's intention to maintain high safety standards, I believe the blanket ban on all vehicles previously recorded as "Category N" is unnecessarily restrictive and does not reflect current industry practices or safety testing standards.

Many Category N vehicles are professionally repaired to manufacturer or insurance-approved standards, inspected, MOT-tested, and declared fully roadworthy. Excluding them outright—regardless of their actual condition—places an unfair burden on vehicle owners and operators who may have invested in safe, well-maintained vehicles that meet all legal and mechanical requirements.

A more balanced and fair approach would be to:

- Allow Category N vehicles to be considered for licensing following a comprehensive independent inspection and evidence of professional repair; and

This approach would maintain public safety while also recognising the realities of the used-vehicle market and preventing unnecessary financial hardship for responsible drivers and operators.

I therefore respectfully request that the council reconsider this proposed policy and adopt a system based on individual vehicle assessment and verified roadworthiness, rather than an automatic ban.

Reporting to the Council

The 48- hour requirement in clauses and more should be replaced with 7 working days reporting window.

This would create a fair and practical standard across the policy.

Page 13

Vehicle MOT and compliance tests must be conducted at alternate testing centres on a rolling basis. For example, if the annual MOT/compliance is carried out at Test Centre A the next test must be done at test Centre B, and so on.

I strongly object to the proposed requirement that vehicle MOT and compliance tests must be carried out at **alternate testing centres on a rolling basis**.

While I appreciate the council's intention to ensure fairness and consistency in vehicle testing, this policy would place an unnecessary administrative and logistical burden on licence holders. Many drivers and operators have established trusted relationships with particular testing centres that are familiar with their vehicles and maintenance history. Requiring them to alternate between centres removes that consistency and could lead to confusion, scheduling difficulties, and additional travel time or costs.

There is currently no evidence to suggest that using the same test centre repeatedly compromises the integrity of the testing process. All approved MOT and compliance testing stations are already subject to strict government and council oversight, ensuring standards remain consistent across all centres.

A more reasonable approach would be to:

- Allow drivers to continue using their preferred testing centre, provided it remains fully approved and compliant; or

- Conduct **random audits or spot checks** of testing centres to ensure fairness, rather than mandating alternating use.
- Or have more MOT centres to create more options.

This would maintain transparency and public confidence without penalising responsible operators who have built reliable and professional relationships with local test centres.

I therefore respectfully request that the council reconsider this proposed rule and consult further with the trade to find a more practical and proportionate solution.

Page 13

If a hackney carriage/private hire vehicle receives minor defects/advisories as part of an MOT test, these must be repaired before the next test. If the same minor defects/advisories appear again as part of the following MOT test, the vehicle licence may be subject to suspension or revocation.

I raise an objection to the proposed policy stating that if a hackney carriage or private hire vehicle receives minor defects or advisories on an MOT test, these must be repaired before the next test, and that if the same advisories appear again, the vehicle licence may be suspended or revoked.

While I understand and fully support the council's commitment to maintaining high vehicle safety and quality standards, this policy appears **disproportionate and potentially unfair** to licence holders. MOT advisories are not legal fail items — they are recommendations for monitoring or future repair. Advisories can reappear for various technical or environmental reasons that do not necessarily indicate negligence or poor vehicle maintenance.

For example, issues such as minor corrosion, slight tyre wear, or suspension advisories can recur even after proper repair or replacement, depending on driving conditions and mileage. Penalising drivers or operators with possible suspension or revocation under these circumstances would be **unjust and excessive**, particularly given that all licensed vehicles already undergo rigorous testing and compliance checks.

A fairer and more balanced approach would be to:

- Require evidence that the advisories have been appropriately addressed, such as repair invoices or photographic proof, rather than threatening suspension or revocation;
- Distinguish between **persistent neglect of serious safety issues** and the recurrence of minor advisories that pose no immediate risk.

This would ensure that the focus remains on genuine safety concerns while avoiding undue hardship for responsible drivers and operators who take proper care of their vehicles.

I therefore respectfully request that the council reconsider or amend this proposed rule to allow for a more practical and proportionate enforcement approach.

Plate exemption for private hire vehicles

Page 15

Private hire vehicles which are used for contract work may be exempted from displaying a plate. The operator's records for these vehicles must prove that the required amount of contract work is being carried out and the council will require written evidence as to why plate exemption is required. Where an exemption is granted, the internal exemption card/disc issued by the Council must be placed in the bottom corner of the front windscreen on the passenger side and must be clearly visible from both inside and outside of the vehicle. The rear licence plate must be always carried in the vehicle.

I object to the proposed policy regarding plate exemptions for private hire vehicles used for contract work, as outlined in section.

While I understand the council's intention to ensure proper regulation and transparency, I believe the proposed conditions are overly strict and administratively burdensome for legitimate operators who provide long-term or corporate contract services.

Requiring operators to continually prove the "required amount of contract work" and provide detailed written justifications for plate exemption places unnecessary strain on both the operator and the licensing department. Many reputable companies operate almost exclusively under pre-booked contracts and should not have to repeatedly justify their eligibility for exemption once this has been established.

Requesting copies of client contracts as "evidence" raises significant data protection and privacy issues under the UK GDPR. These contracts are commercially sensitive and contain confidential information about our clients and their business. We cannot, in good faith or legally, share this private third-party information with the Council without explicit consent, which would be impractical to obtain for every application. The policy as stated creates a direct conflict between licensing rules and data protection law.

Private hire operators

Page 26

The operator shall ensure that all staff involved in bookings and dispatching work are given appropriate safeguarding training prior to commencing work for the operator. The training must be refreshed every three years and documented by the operator. StaA training records should be kept for the duration of the licence and be available for inspection by any authorised officers.

I Strongly object to the mandatory requirement that all staff involved in bookings undergo formal safeguarding training. This blanket obligation is unwarranted, disproportionate, and operationally impractical, given that many booking roles involve no direct interaction with vulnerable individuals. Imposing such a requirement places an unnecessary administrative and financial burden on operators without delivering meaningful safeguarding benefits.

We urge that safeguarding training be proportionate and role-specific, limited to staff who have direct responsibility for vulnerable persons or handle sensitive situations, thereby ensuring that safeguarding measures remain effective while avoiding unnecessary obligations on staff whose roles do not present safeguarding risks.

Executive private hire vehicles

Page 37 16. & 17. 16

The vehicle shall be of a make and model which the Council considers appropriate for an Exemption Notification. The Council may consult any person or organisation as it considers appropriate before deciding whether an Exemption Notification shall be granted in respect of any vehicle. 17 The makes and models of vehicle which may be considered for licensing as an executive vehicle are as follows. This is not an exhaustive list.

MERCEDES S CLASS

MERCEDES V CLASS (MPV)

MERCEDES GLS

BMW 7 SERIES

BMW X7

I strongly object to the proposed list of vehicles eligible for an Executive Private Hire Licence. This list is unrealistic, economically unsustainable, and This list does not reflect the economic realities of the local market and the actual needs of the travelling public. Disproportionate to Local Economic Reality, the listed vehicles (e.g., Rolls-Royce, Bentley, Mercedes S-Class, BMW 7 Series) are ultra-luxury vehicles with purchase prices typically exceeding £150,000 - £200,000. This policy is tailored for a major global city like London or Dubai, not for our local area. local operators cannot feasibly operate such vehicles, making the executive licence tier inaccessible and effectively pointless. This policy effectively reserves the executive market for a tiny, wealthy elite. 24 Our primary customer base consists of business people travelling to airports and train stations. Their needs are for professional, comfortable, and reliable transport—needs that are perfectly met by premium executive vehicles like the The Mercedes E-Class: The industry standard for executive travel, renowned for its perfect balance of comfort, size, prestige, and running costs. The Audi A6: A direct competitor to the E-Class and a favourite for executive hire. The BMW 5 Series: Another cornerstone model for business travel Forcing operators to purchase a larger, more expensive, and less fuel-efficient vehicle (like an S-Class or GLS (the GLS contradicts condition 18) to qualify for an executive licence is environmentally irresponsible and financially punitive. It contradicts the Council's own emissions goals. The most cost-effective and environmentally sensible vehicle for the job is being excluded by an arbitrary and elitist list. The policy admits the list is "not exhaustive," yet provides no clear, objective criteria for what other vehicles might be considered. This grants Council officers unchecked subjective power and creates uncertainty for operators wishing to propose a suitable alternative. This list must be scrapped and replaced with objective criteria based on vehicle specifications and market segment, not a prescriptive list of premium brands. Eligibility should be based on a points system or clear benchmarks, such as: Vehicle segment (e.g.,

Executive E-Segment / Full-Size Luxury Saloon). This would allow professional and appropriate vehicles like the Mercedes E-Class, BMW 5 Series, Audi A6, and Jaguar XF to qualify, creating a viable executive tier that reflects the actual local business demand and economic environment. The current list is unworkable and unrealistic must be revised.

Page 38

Any vehicle presented for licensing for the first time shall not be older than four years on the day that the fully and correctly completed application is received with the appropriate fee and will cease to be licensed once it reaches eight years old.

We strongly object to the policy restricting vehicles presented for licensing to those no older than four years and requiring them to be de-licensed at eight years. This policy is arbitrary and unnecessarily restrictive, placing a significant financial burden on operators without clear evidence that vehicles over four years old are unsafe or unsuitable for service.

A more practical and proportionate approach would be to establish licensing criteria based on vehicle condition, maintenance history, and roadworthiness, rather than imposing strict age limits. Such an approach would maintain safety standards while allowing operators flexibility and cost-effective management of their fleets.

Page 50

A private hire operator may sub-contract a booking to another licensed operator or hackney carriage driver. A record of whom the booking was sub-contracted to and when must be kept. Operators are required to evidence that safeguarding protections are applied which are equivalent to those of Reading Borough Council by the company to which they sub-contract any bookings. If a PSV with PCV driver is used, the hirer must be informed of this and notified that the driver is not required to have an enhanced DBS check.

I object to the requirement for an operator to "evidence that safeguarding protections are applied which are equivalent to those of Reading Borough Council" when sub-contracting to another operator or driver who is already licensed by a Council. This requirement is illogical, bureaucratic, and creates a completely redundant administrative loop. The Council's licensing process is the ultimate safeguard. The fundamental principle of licensing is that the Council has already vetted and approved all licensed operators and drivers. By granting a licence, certifies that the holder has met its required standards, which explicitly includes safeguarding protocols. It is pointless and inefficient to require one licensee to prove the compliance of another licensee. This rule forces operators to create a parallel paper trail to prove something the Council already knows and certifies.

Page 79

You must not settle accounts and/or tender direct payment by any method, including, credit card, debit card, cheque, cash, online or via any Apps from passengers. Payment may only be made to the operator's office either before or after the journey. To do so – 4 penalty points.

I strongly object to this condition which prohibits drivers from accepting any form of payment from a passenger at the point of service. This policy is archaic, commercially unviable, and ignores the reality of modern commerce, where no one uses cash. This blanket prohibition prevents Executive Private Hire operators from serving the entire business and corporate travel market and actively harms the competitiveness of Reading's licensed trade. Exclusion of the Corporate and Business Market: This condition renders our service unusable for the corporate market. Business travellers are required to use company credit cards for all expenses to simplify accounting. This policy makes it illegal for a businessperson to pay for their journey with their corporate card in the vehicle. It is completely unrealistic to expect a traveller, especially from out of town, to pre pay an unknown operator or remember to pay an invoice later. This is not how modern business works. Against Modern Consumer Expectation: In the 21st century, payment is instant and electronic. This condition forces a return to a pre digital era, creating significant inconvenience and a major competitive disadvantage against operators from other authorities who offer seamless in-car card payments. A customer who can pay effortlessly elsewhere will be frustrated by Reading's outdated rules and unlikely to use a Reading licensed service again. The condition groups modern methods like credit cards and apps with obsolete ones like cheques and cash. With cheques and cash transactions now being a rarity, the core justification for this restrictive rule has vanished. The policy fails to distinguish between secure, electronic transactions and the historical risks it was designed to address. This condition must be urgently updated to reflect standard commercial practice. The ability to accept secure, electronic payments is a fundamental requirement for any modern transport service. Maintaining this prohibition will cripple the executive private hire industry in Reading, drive business to out-of-town operators, and severely inconvenience the public. This policy is not fit for purpose.

From: [Yell Cars Bookings](#)
To: [REDACTED]
Subject: New Conditions summary Objections
Date: 27 October 2025 15:08:35
Attachments: [New Conditions proposed.pdf](#)

Warning!
For the attention of
RBC Staff and Councillors

This mail is from an external sender - please do not click any links or open any attachments unless you trust this sender, and know the content is safe

Dear Clyde,

Along with my comments on the new conditions' portal, please find a summary letter of our concerns.

Regards

Manzoor

Download our app for bookings on [REDACTED]

Yellow Cars Limited | 21-23 Boulton Road, Reading, Berkshire, RG2 0NH
Tel: + [REDACTED] | email: [REDACTED]

To the Licensing Committee, Reading Borough Council

FAO: Mr Clyde and Licensing Team

Dear Mr Clyde and Committee Members,

In addition to the response on the new conditions on the portal, please find some of our concerns, if you can pass it on to the relevant people.

RBC objectives 1.2

- Thriving Communities – by ensuring the Taxi and PHV sector remains integrated into our sustainable transport network to continue to move passengers to destinations safely, contributing to the economy with low impact on the environment through cleaner vehicles.
- Inclusive Economy - Taxis and PHVs are one of the most flexible elements of the transport system operating 24/7 on a commercial basis. They are integral to support local businesses to thrive by transporting residents and visitors around the Borough. The services are a primary mode of passenger transport for many people for whom mainstream public transport is not an option or suitable. Taxis and PHVs help support many disabled and vulnerable people to live more independent lives. They also play an important part in supporting the night-time economy, providing a safe and secure mode of transport for many people to get home.

Comment: If the above is a meaningless statement by RBC, however there was no engagement undertaken by RBC in the developing stage of the policy. Nor an impact assessment has been made on how the new the proposals will affect our trade in terms of retaining drivers and any economic impact. The new conditions being proposed are somewhat draconian and will drive even more licensed drivers and future potential drivers to out of town councils.

1. Loss of Drivers to Other Boroughs

The previous conditions impacted on the private hire trade and the new conditions are even more draconian and will be hindrance on the objectives of RBC under 1.2

There was no engagement with the trade to learn best practice and nor has there been any impact assessment of what is being proposed as it is.

For instance, several hundred drivers have left Reading to be licensed by other councils such as South Oxfordshire, Fareham, Portsmouth and Wolverhampton — where licensing is faster, cheaper, and less bureaucratic. Other councils' requirement for age of vehicles and driver tests is less stringent than is by RBC. This has caused immense

loss of revenue for both RBC and the taxi trade, what you are now proposing is as if Reading wants to run when it can barely walk.

Many of the new conditions being proposed will create enforcement challenges along with financial losses for both our trade and RBC, as more and drivers will leave, and present RBC licensed drivers will start being badged by other councils to still operate in Reading. A primary example of this is that over 800 hundred drivers are licensed RBC and yet in comparison the licensed vehicles are half of that figure. Our estimation is that over 300 drivers are now licensed by other councils and working legally here in Reading, which does not bode well FINANCIALLY for RBC and the Industry.

2. High Costs and Lack of Transparency

Reading's driver and operator licence fees are among the highest in the country. Despite multiple Freedom of Information requests, we have not received a clear breakdown of how these fees are spent.

3. Delays and Bureaucracy in Licensing

It currently takes 3–6 months to obtain a licence in Reading, while other councils complete the process within 2 weeks. This delay has significantly impacted recruitment, causing a shortage of drivers and reduced service availability. My company, for example, has gone from 40 drivers and 120,000 journeys per year, to just 20 drivers and 30,000 journeys — a 75% drop.

Loss of drivers and work impact also highlighted at a recent meeting by Reading Operators. Delays in licensing applications also highlighted and a sore point. Trade is of the view that staff should be brought back to work at the Civic Offices. Staff should answer phones and emails promptly.

4. Licensing Conditions and Enforcement

Current licensing conditions are overly strict and punitive, particularly compared with neighbouring boroughs. For example:

- Over-enforcement on minor infractions
- Unreasonable drop-off/pick-up and parking penalties
- Unclear points system (why officers are proposing increase from 3 points to 4?)
- Old minor offences are still cited in committee reports even when spent, which unfairly stigmatises drivers.

Once minor offences under the point system are spent should be removed from the Committee reports.

5. Vehicle Licensing and MOT Testing

The MOT and compliance process is slow and restrictive. We request:

- Option to choose, which MOT centre to use, alternatively RBC should increase the approved MOT centres (not limited to two)
- Reduce vehicle renewal application requirement from 6 weeks to 1-2 weeks.
- Once MOT inspections are done issuance of plates within 5 working days if not before (it was done within 1 working day when staff worked at the Civic offices.)
- Licensing of 1st time vehicle licenses application from 1-5 years should increase to 8 years old, this will the transition to change to Euro 6 vehicles and reduce emissions. These vehicles should then be licensed up to 15 years (and or 20 years for larger WAVs) in line with the Hackney trade.
- WAV ratio requirements of (1 in very 10 for operators) should be scrapped due to limited demand since we have many companies offering this service already. The demand for WAVS does not meet the high cost of buying WAVS

6. School Transport Proposal

We strongly oppose the proposal to remove school transport as a separate licensing category. This route has provided employment — especially for economically disadvantaged women — in a safe and flexible way. Requiring full private hire licensing (including outdated theory/map reading tests) will deter new applicants and increase costs for RBC. At a 2024 Civic event hosted by Anne Tarrant and Brighter Futures for Children (BFFC), these proposals were widely opposed — including by BFFC themselves. It is unclear when their position changed, and we urge a full impact assessment before proceeding.

7. Operator Base Requirements

Requiring of call taking and app bookings at a physical office, along with planning permission for offices is outdated. At present most Operators using Taxi Software work of a cloud-based server and log on to the main server based elsewhere.

Many other councils now allow cloud-based operator bases and PO Box. Given that widespread use of remote working and overseas staff call handlers are used by many companies, your expectations are not viable both economically and financially. Also you have staff working remotely and no one to man the phones at the civic anymore, yet why is your expectations for the trade are different?

DBS and safeguarding checks on when we visit abroad over 3 months and dispatch staff are impractical as well, since most of the offices don't have walk in customers anymore

and could be based abroad, therefore Licensed operators should remain responsible for employment of staff conduct.

8. In-Car Card Payments

We have repeatedly requested permission to use in-car card payment machines for executive vehicles. We strongly urge the council to approve this option ASAP.

9. Complaints and Offence Reporting

Private Hire is not like the Hackney trade who don't work from base office, since Private Hire Operators have booking records users book through apps and via phone calls. Hence, we should be the first point of contact for complaints unless the issue is a criminal offence and serious, which cannot be dealt by the company. The 48-hour rule to report driving offences — even before conviction — is unreasonably and harsh. We propose 14-day reporting requirements only driving offences when a driver reaches 6 points on their DVLA license.

Final Request

This draft policy has serious implications for our trade, and the consultation period is unreasonably short given its complexity. The Portal for comments does not show our comments once log off and on again, we are unable to edit them, therefore we request:

- A meaningful extension to the consultation period
- Inclusion of trade representatives in the drafting process
- Reconsideration and reduction of punitive points system proposals
- A full impact assessment on the financially impact on the trade including driver recruitment, service levels, and community impact.

Our concern is more drivers will leave Reading and operate under external licences, weakening enforcement, reducing revenue, and putting passenger safety at greater risk. It would be more appropriate to work collaboratively in the design of new conditions with the Council to create fair, efficient, and future-facing policies for the benefit of all.

Yours sincerely,



Manzoor Hussain
Yellow Cars Ltd

WRITTEN REPRESENTATIONS ON BEHALF OF MR [REDACTED]

IN RESPECT OF THE READING BOROUGH COUNCIL HACKNEY CARRIAGE & PRIVATE HIRE LICENSING POLICY 2025

Dated: 27 October 2025

1. Introduction and Overarching Objections

These written representations are submitted on behalf of Mr [REDACTED] in response to the proposed Hackney Carriage & Private Hire Licensing Policy 2025 (“the Policy”) issued by Reading Borough Council (“RBC”). They are addressed to the Licensing Applications Committee or Sub-Committee (“the Committee”) for its statutory consideration.

These representations highlight multiple areas of the Policy which, in their proposed or continued form, are oppressive, arbitrary, unnecessary, and unreasonable, and lack an adequate evidential or proportionate foundation. Several provisions appear to exceed statutory requirements, impose unjustified burdens on licence holders, or fail to observe the law and best practice guidance, particularly as set out by the Department for Transport (“DfT”).

The Policy does not clearly state why it has not adopted or addressed the [Taxi and Private Hire Vehicle Licensing Best Practice Guidance for Licensing Authorities in England \(2022\)](#) and its recommendations, notably at paragraph 1.6, which provides that the 2022 guidance replaces all previous versions and will be revised when necessary. This lack of clarity should be remedied, specifying which version is being applied to the current Policy and why.

A pattern emerges throughout the Policy of selecting the most restrictive options available, contrary to the DfT’s requirement that local authorities balance public protection with a need to avoid unnecessary or unjustified burdens on the trade. These representations challenge the rationale and proportionality of such proposals and, where appropriate, invite the Committee to resist their adoption.

2. Formal Points of Objection and Supporting Representations

2.1 Reporting Procedures — Unreasonable Reduction to 48 Hours

Relevant Policy Reference: Page 8, Sections 4.3 & 4.4; Page 12, 7.7.1 & 7.7.2; Appendix G and H

Objection:

Requiring all new convictions, cautions, penalty orders, and other relevant matters to be reported to the Council within 48 hours is both arbitrary and disproportionate. Notifications and administrative processes often take longer than 48 hours for the driver to be informed.

Legal and Practical Basis:

There is no statutory requirement for a 48-hour reporting period.

The Local Government (Miscellaneous Provisions) Act 1976, s.50(3), provides for notification “as soon as reasonably practicable,” commonly interpreted as within 72 hours.

The Policy’s 48-hour requirement is inconsistent with the 72-hour period specified elsewhere (e.g., for accident notifications).

An inflexible 48-hour window increases the risk of inadvertent breaches and unjust sanctions.

Recommendation:

The reporting deadline should be a minimum of 72 hours, aligning with legal norms and established industry practice.

2.2 Application Deadlines and Associated Vehicle Testing

Relevant Policy Reference: Page 10, 7.1.5

Objection:

Mandating renewal applications six weeks prior to expiry, without clarity on the timing of MOT/compliance certificates, leaves applicants uncertain as to accepted timeframes for testing and certificate currency.

Legal and Practical Basis:

Legislation does not prescribe a six-week advance submission requirement.

Applicants require certainty as to how recent an MOT must be at renewal submission.

Recommendation:

The Policy should specify that renewal MOTs may be conducted within three weeks prior to submission, reflecting industry practice and supporting procedural fairness.

2.3 Certificate of Good Conduct — Undefined Threshold Period

Relevant Policy Reference: Page 10, 7.2.2; Page 22, 8.5.4; Page 25, 9.3.3

Objection:

Criteria for requiring a Certificate of Good Conduct (CGC) are not defined, resulting in uncertainty and inconsistency.

Legal and Practical Basis:

DfT guidance and industry practice stipulate a minimum period of absence from the UK (commonly 12 months) to trigger the requirement for a CGC.

Recommendation:

The Policy should make explicit that a CGC is only necessary after an absence from the UK exceeding twelve months.

2.4 Prohibition of Category S & N Vehicles — Disproportionality

Relevant Policy Reference: Page 11, 7.4.5

Objection:

A blanket prohibition of vehicles with prior Category S (structurally damaged, repairable) or N (non-structurally damaged) write-off status is unwarranted and arbitrary.

Legal and Practical Basis:

MOT standards and DVLA guidance permit such vehicles if satisfactorily repaired and certified.

No specific evidence is provided by RBC to support the blanket prohibition on safety grounds.

The Policy should clarify whether this restriction applies only to new licences or is also retrospective.

Recommendation:

Category S and N vehicles professionally repaired and meeting all compliance standards should be eligible for licensing.

2.5 Alternating MOT Testing Centres — Unjustified Departure from Practice

Relevant Policy Reference: Page 13, 7.10.3

Objection:

Requiring vehicles to alternate between approved testing centres every six months is unreasonable and unsupported by evidence of necessity.

Legal and Practical Basis:

DfT Best Practice Guidance (para 8.36) favours driver choice and market competition.

The rationale for permanent alternation following a trial period is not evidenced.

Recommendation:

Replace mandatory alternation with driver choice of any approved centre and ensure compliance through robust monitoring.

2.6 MOT “Advisory” Defects — Disproportionate Sanctions

Relevant Policy Reference: Page 13, para 7.10.4

Objection:

Automatic suspension or revocation of vehicles for repeated “advisory” defects unduly duplicates the well-established MOT process and overreaches Council authority.

Recommendation:

RBC enforcement action should only be considered where advisory defects constitute ongoing risk, and in circumstances where DVSA sanctions are inadequate.

2.7 Penalty Points System — Unfairness and Proportionality

Relevant Policy Reference: Appendix G, Page 52

Objection:

The Policy escalates penalty points for minor or single administrative breaches in a manner that is punitive and disproportionate.

Legal and Practical Basis:

Excessive penalty points (often 4–6 per breach) risk suspension or revocation for ordinary administrative errors.

Penalty points should serve as an incrementally escalatory tool for deliberate or repeated non-compliance, with recognition of English language barriers and administrative difficulties for drivers.

Recommendation:

The points system should focus on persistent or substantial breaches and provide for reasonable adjustments.

2.8 Points Accumulation Timeframes — Excessive Retrospective Discipline

Relevant Policy Reference: Page 53, Sections 5.1 & 6.1

Objection:

Considering points accrued up to four years previously is excessive and contrary to the principle of rehabilitation.

Legal and Practical Basis:

Most authorities use a two-year period; the DfT does not recommend longer.

Recommendation:

Reduce the relevant period to two years.

2.9 Enforcement on Eating/Drinking and Lost Property — Disproportionate Measures

Relevant Policy Reference: Page 59, Section 12.2

Objection:

Absolute bans on eating and drinking whilst carrying passengers, and strict 48-hour reporting for lost property, are overly prescriptive.

Legal and Practical Basis:

Reasonable exceptions are required for health and safety (e.g., water consumption).

Strict lost property deadlines fail to accommodate circumstances outside the driver's control.

Recommendation:

Permit reasonable exceptions and apply discretion where drivers have acted in good faith.

2.10 Penalty Points for Refusal to Carry Guide Dogs — Inconsistent and Discriminatory

Relevant Policy Reference: Page 60, Section 14.1

Objection:

Awarding twice as many penalty points to hackney carriage drivers for refusal to carry guide dogs, compared to private hire drivers, is unjustified.

Legal and Practical Basis:

Statutory obligations are equal under the Equality Act 2010.

Recommendation:

Penalty points should be harmonised for both categories.

2.11 Vehicle Age Limits — Unjustified Departure from Agreed Standards

Relevant Policy Reference: Page 28, Appendix A

Objection:

More restrictive maximum age limits conflict with prior agreements and lack evidence of necessity.

Legal and Practical Basis:

Such changes must not be imposed retrospectively and should be supported by evidence.

Recommendation:

Uphold agreed standards and introduce adequate transitional provisions for any changes.

2.12 CCTV and Audio Equipment — Driver Autonomy and Data Protection

Relevant Policy Reference: Page 16, Section 7.16.3

Objection:

Mandating prior written notification for installation of recording systems, without allowing driver refusal, fails to observe privacy and data protection rights.

Legal and Practical Basis:

DfT guidance and the Data Protection Act 2018 require proportionality and privacy.

Recommendation:

CCTV should be discretionary unless a specific risk assessment justifies its necessity.

2.13 Wheelchair Transport Position — Inflexibility

Relevant Policy Reference: Page 17, Section 7.21.7

Objection:

A rigid requirement for only front or rear-facing carriage of wheelchairs is impractical; exceptions may be necessary.

Recommendation:

Policy should allow for side-facing carriage where approved by manufacturer or relevant guidance.

2.14 Group 2 Medicals — Need for Greater Flexibility

Relevant Policy Reference: Page 21, Section 8.4.2

Objection:

Requiring the driver's own GP to undertake Group 2 medicals is unnecessarily burdensome.

Legal and Practical Basis:

Any GP with adequate knowledge and suitable guidance should be permitted to conduct the examination.

Recommendation:

Permit any qualified GP to undertake Group 2 medical assessments.

2.15 Other Disproportionate or Opaque Requirements

Numerous other requirements concerning penalty points, conduct, and administrative obligations lack evidential justification and should be reviewed for proportionality and clarity. Where the Council relies on “discretion,” it should be exercised in line with public law principles and DfT guidance.

3. Legal and Policy Context — Regard to Statutory Guidance and Best Practice

The Policy is obliged to align with statutory requirements and best practice, ensuring that every provision is necessary, proportionate, and evidence-based (see Policy paragraphs 1.6, 2.2–2.4).

The DfT guidance requires that local policies are reasonable and not unduly burdensome.

All decisions should be underpinned by justification and subject to ongoing review, especially where objections are raised and supported by evidence.

4. Summary of Proposals and Amendments

1. Adjust all reporting, lost property, and document submission deadlines to 72 hours unless statute provides otherwise.
2. Remove requirement for alternating MOT test centres; permit driver choice.
3. Allow MOTs within three weeks of renewal application submission.
4. Accept professionally repaired and certified Cat S/N vehicles for licensing.
5. Apply penalty points only proportionately; abandon blanket escalation for minor infractions.
6. Prevent duplicate or excessive sanctioning for MOT advisories where regulatory action is adequate.
7. Respect prior agreements and transition periods reached with the trade.
8. State that DfT guidance is discretionary and local policy retains flexibility unless mandated.
9. Ensure all disciplinary actions are subject to full appeal and review with clearly documented procedures.

Conclusion

For the reasons set out above, it is submitted that the proposed Policy, in numerous respects, is oppressive, arbitrary, unnecessary, and fails to strike the proper balance between public protection and the rights, livelihoods, and operational realities of licence holders. The Policy inappropriately elevates non-binding guidance above statute, fails to exercise the required discretion, and imposes onerous, and, at times, discriminatory conditions not supported by evidence or meaningful trade consultation.

The Committee is respectfully urged to:

- Substantively amend the Policy as proposed;
- Engage collaboratively with the trade on future rule changes;
- Specify the evidential basis for each new or ongoing restriction;
- Reaffirm the Council's commitment to proportionate, fair, and evidence-led regulation in support of the local taxi and private hire sector.

Failure to address the above risks perpetuating a regime unsupportable by best practice or fairness and exposes the Council to the possibility of legal challenge.

Respectfully submitted by:

Mr [REDACTED]

(A Taxi Driver)

Dated: 27 October 2025

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Appendix 3

HACKNEY CARRIAGE DRIVER'S CONDITIONS AND PENALTY POINTS SCHEME (see APPENDIX G)

CHANGES TO BE MADE TO THE PENALTY POINTS SCHEME

Section 7 disputes – keep changes proposed in 7.2 – appeal only to committee if suspension/revocation will result.

Section 8 – remove this section, drivers will start with clean slate.

Penalty point values to remain the same apart from:

BYELAWS all 3 points apart from the following (this is to make them the same as comparable conditions for private hire):

Byelaw 5

The driver of a hackney carriage provided with a taximeter shall: -

- (b) before beginning a journey for which a fare is charged for distance and time, bring the machinery of the taximeter into action by moving the said key, flag or other device, so that the word "HIRED" is legible on the face of the taximeter to indicate that the hackney carriage is hired or that a fare is being charged and keep the machinery of the taximeter in action until termination of hiring; **Failure to do so - 6 penalty points**

Byelaw 6

The driver of a hackney carriage shall not tamper with or permit any person to tamper with any taximeter with which the carriage is provided, with the fittings thereof, or with the seals affixed thereto. **To do so - 12 penalty points.**

Byelaw 8

The driver of a hackney carriage, when standing or plying for hire, shall not, by calling out or otherwise, importune any person to hire such carriage and shall not make use of the services of any other person for the purpose. **To do so – 12 penalty points**

Byelaw 11

The driver of a hackney carriage shall not convey or permit to be conveyed in such carriage any greater number of persons than the number of persons specified on the plate affixed to the outside of the carriage provided that for the purpose of this byelaw two children under the age of twelve years shall be regarded as one person and children under the age of three years shall not be reckoned subject to the limitation that no hackney carriage licensed to carry three, four or five persons shall carry more than five, six or seven adults and children respectively. **To do so – 6 penalty points**

Byelaw 15

The driver of a hackney carriage shall be entitled to demand and take for the hire of the carriage the rate of fare prescribed by the Table of fares the of fare being calculated by distance unless the hirer expresses at the commencement of the hiring his desire to engage

by time.

Provided always that where a hackney carriage furnished with a taximeter shall be hired by distance the driver thereof shall not be entitled to demand and take a fare greater than that recorded on the face of the taximeter, save for any extra charges authorised by the Table of Fares which it may not be possible to record on the face of the taximeter. **To do so – 6 penalty points**

Penalty points to remain the same as for current private hire conditions apart from:

- 1.2 You must not drive a private hire vehicle if you no longer hold, have had suspended or are disqualified from holding a DVLA, European Economic Area or Northern Ireland driving licence for that type of vehicle. To do so – 12 penalty points. **Up from 6 points.**
- 6.2. You must provide any relevant document or information requested within the specified timescale – failure to do so – 3 penalty points. **New condition.**
- 6.3 Drivers must sign up to the DBS update service and maintain their annual payments. Failure to do so - 6 penalty points. **New condition.**
- 6.4 If a driver is given notice to take an enhanced DBS check/DVLA check they must provide all information or documentation within 14 days in order to carry out the check – failure to do so – 6 penalty points. **New condition.**
- 11.1 When working as a hackney carriage driver, you must not use an unlicensed vehicle, this includes any vehicle where the hackney carriage vehicle licence has been suspended for any reason. To do so – 12 penalty points. **New condition.**
- 11.2 When licensed as a driver of hackney carriage vehicles by the Council you must only use a hackney carriage vehicle licensed by Reading Borough Council, unless you are appropriately licensed to use a vehicle licensed by another authority. Failure to do so – 12 penalty points. **Up from 6 points.**
- 13.2 You must not eat in your vehicle whilst you have a passenger or passengers on board. To do so – 3 penalty points. **Amended to remove eating.**
- 13.3 You must not smoke, vape or use any kind of electronic cigarette in a hackney carriage vehicle at any time. To do so – 3 penalty points. **Wording changed to include vaping and e-cigarettes.**
- 13.7 Without prejudice to the generality of condition 12.4, you must not engage in any discussion or dialogue, including by telephone contact, social media, email or any other form of communication, of a sexual nature or about a sexual relationship with a passenger (be it a past, present or future relationship). To do so – 12 penalty points. **Wording amended.**
- 15.1 You must not refuse to carry a guide dog, or assistance dog accompanying a passenger unless you have a proven medical condition that would preclude

such action. Failure to do so – 12 penalty points. **Wording amended and points increase.**

- 15.6 You must not charge a higher price for any journey, for a person with a disability than would otherwise be charged for a person without such a disability for the same journey. Failure to do so – 6 penalty points. **New condition.**
- 15.7 You must provide reasonable assistance to any passengers with a disability, or those with reduced mobility, including providing reasonable assistance to safely load/unload wheelchairs or mobility aids. Unless you have a medical exemption certificate that allows you not to assist on medical grounds. Failure to do so – 6 penalty points. **New condition.**
- 18.2 You must, before commencing work each day, ensure that the vehicle is maintained in a clean, comfortable, safe, watertight and mechanically sound condition and is in all other respects suitable for the purpose for which it is intended. Failure to do so – 3 penalty points for each breach found. **Amended to add 'for each breach found'.**
- 19.1 You must notify the Council Licensing Section within 7 days in writing of any change of address, contact number and email address. Failure to do so – 3 penalty points. **Amended.**
- 19.2 You must notify the Council in writing of all new convictions and cautions within 48 hours from the date of formal notification. Failure to do so - 6 penalty points. **Amended**

This includes, but is not limited to, warnings, reprimands, anti-social behaviour orders, community protection notices, criminal behaviour orders, community service orders, restraining orders, fixed penalties (including traffic offences), driver education courses and any disqualifications from driving.

- 19.3 You must notify the council within 48 hours of any arrest and release, charge, caution or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, this includes fixed penalties (FPN). Failure to do so – 6 penalty points. **New condition.**
- 20.1 You must not drive a hackney carriage vehicle if you are not insured to do so. To do so – 12 penalty points. **Points increase from 6.**
- 27.1 At any time when driving a hackney carriage vehicle, you must not cause or permit the vehicle to be parked, or stop, in such a position to cause an unnecessary obstruction or be in a dangerous position (e.g. double parked, parked/stopped at or close to a road junction, zigzags, any 'keep clear' markings or in the middle of the road, etc). To do so – 3 penalty points. **Wording amended points 3 not 4.**
- 28.4 At any time when driving a hackney carriage vehicle, you must not drive in a manner that causes your passengers discomfort, alarm or distress. To do so – 3 penalty points. **New condition.**

- 33.1 You must not use a mobile phone, communications/navigation device or similar when driving if it is not connected to a 'handsfree' system (Bluetooth earpiece or an inbuilt car system). **To do so - 12 penalty points.**

Devices include, but are not limited to, mobile telephones, tablets, a two-way radio, satellite navigation device or personal digital assistant.

'Use' of the device includes, but is not limited to, making a call (voice or video), texting, watching videos, making videos, searching on the device or interacting with it in anyway which may cause your attention to become distracted. **Amended condition and points increase**

- 35.** Home to School transport contract journeys – conditions 35.1 to 35.5 are new conditions with the points for 35.2 to 35.5 to be reduced to 3.

Conditions specific to HCD:

- 8.1. You must not leave your hackney carriage vehicle unattended on a hackney carriage stand at any time unless it is a designated rest rank. To do so - 6 penalty points. **To remain the same as PH parking on a rank.**
- 8.2 Drivers shall switch off the vehicle engine if waiting for more than one minute when picking up or dropping off passengers or whilst waiting on a rank. Failure to do so – 3 penalty points. **New condition.**
- 9.2 When undertaking a journey which ends outside the licensed area (the Borough of Reading) you must not charge more than the fare shown on the taximeter unless a fare was agreed before commencement of the journey. To do so – 6 penalty points. **New condition.**
- 9.3 When used as a private hire vehicle, i.e., when not plying for hire or standing on a taxi rank or accepting bookings through a third person, you must only charge the fare shown on the taximeter from where the hirer commenced the journey. To do so – 6 penalty points. **New condition.**
- 9.4 On payment of a fare by card, no extra or minimum charge shall be imposed on the hirer. To do so - 6 penalty points. **New condition.**
- 25.2 At any time when driving a hackney carriage vehicle, you must not permit the vehicle to be driven in any bus lane, except for bus lanes that specifically permit use by hackney carriage vehicles. To do so – 3 penalty points. **Points reduced to 3.**
- 34.2 You must not permit any hackney carriage vehicle you are driving to display any signs or advertisements of any nature apart from Council approved livery designs/advertisements in accordance with the Council's hackney carriage vehicle licence conditions. To do so – 3 penalty points. **Reduced from 4 points.**

Appendix 4

Private hire driver's conditions and penalty points scheme (see Appendix H)

Changes to be made to the penalty points scheme

Section 7 disputes – keep changes proposed in 7.2 - appeal only to committee if suspension/revocation will result.

Penalty points values to remain the same apart from:

- 1.2 You must not drive a private hire vehicle if you no longer hold, have had suspended or are disqualified from holding a DVLA, European Economic Area or Northern Ireland driving licence for that type of vehicle. To do so – 12 penalty points. **Up from 6 points**
- 6.2. You must provide any relevant document or information requested within the specified timescale. Failure to do so – 3 penalty points. **New condition**
- 6.3 Drivers must sign up to the DBS update service and maintain their annual payments – failure to do so - 6 penalty points. **New condition**
- 6.4 If a driver is given notice to take an enhanced DBS check/DVLA check they must provide all information or documentation within 14 days in order to carry out the check – failure to do so – 6 penalty points. **New condition**
- 11.1. When working as a private hire driver, you must not use an unlicensed vehicle, this includes any vehicle where the private hire vehicle licence has been suspended for any reason. To do so – 12 penalty points. **New condition**
- 11.2. When licensed as a driver of private hire vehicles by the Council you must only use a private hire vehicle licensed by Reading Borough Council, unless you are appropriately licensed to use a vehicle licensed by another authority. Failure to do so – 12 penalty points. **Up from 6 points**
- 13.2. You must always present a clean and tidy appearance and wear appropriate clothing and footwear. Failure to do so – 3 penalty points. **New condition**
- 13.4. You must not eat in your vehicle whilst you have a passenger or passengers on board. To do so – 3 penalty points. **Amended to remove eating**
- 13.5. You must not smoke, vape or use any kind of electronic cigarette in a private hire vehicle at any time. To do so – 3 penalty points. **Wording changed to include vaping and e-cigarettes**
- 13.9. Without prejudice to the generality of condition 13.6, you must not engage in any discussion or dialogue, including by telephone contact, social media, email or any other form of communication, of a sexual nature or about a sexual relationship with a passenger (be it a past, present or future relationship). To do so – 12 penalty points. **.Wording amended.**
- 15.1. You must not refuse to carry a guide dog, or assistance dog accompanying a passenger unless you have a proven medical condition that would preclude such action. Failure to do so – 12 penalty points. **Wording amended and points increase**
- 15.5. You must not charge a higher price for any journey, for a person with a disability than would otherwise be charged for a person without such a disability for the same journey. Failure to do so – 6 penalty points. **New condition**

- 15.6. You must provide reasonable assistance to any passengers with a disability, or those with reduced mobility, including providing reasonable assistance to safely load/unload wheelchairs or mobility aids. Unless you have a medical exemption certificate that allows you not to assist on medical grounds. Failure to do so – 6 penalty points. **New condition.**
- 18.2. You must, before commencing work each day, ensure that the vehicle is maintained in a clean, comfortable, safe, watertight and mechanically sound condition and is in all other respects suitable for the purpose for which it is intended. Failure to do so – 3 penalty points for each breach found. **Amended to add 'for each breach found'.**
- 19.1. You must notify the Council Licensing Section within 7 days in writing of any change of address, contact number and email address. Failure to do so – 3 penalty points. **Amended.**
- 19.2. You must notify the Council in writing of all new convictions and cautions within 48 hours from the date of formal notification. Failure to do so - 6 penalty points. **Amended.**

This includes, but is not limited to, warnings, reprimands, anti-social behaviour orders, community protection notices, criminal behaviour orders, community service orders, restraining orders, fixed penalties (including traffic offences), driver education courses and any disqualifications from driving.
- 19.3. You must notify the council within 48 hours of any arrest and release, charge, caution or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, this includes fixed penalties (FPN). Failure to do so – 6 penalty points. **New condition.**
- 20.1. You must not drive a private hire vehicle if you are not insured to do so. To do so – 12 penalty points. **Points increase from 6.**
- 24.2. Drivers shall switch off the vehicle engine if waiting for more than one minute when picking up or dropping off passengers or whilst waiting. Failure to do so – 3 penalty points. **New condition**
- 25.1. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to stand or ply for hire or otherwise be used so as to suggest that it is a hackney carriage vehicle. Contravention during a test purchase operation by Reading Borough Council when a prosecution has not been undertaken - 12 penalty points, all other cases - 6 penalty points. **Amended to include 'when prosecution not undertaken.**
- 28.1. At any time when driving a private hire vehicle, you must not cause or permit the vehicle to be parked, or stop, in such a position to cause an unnecessary obstruction or be in a dangerous position (e.g. double parked, parked/stopped at or close to a road junction, zigzags, any 'keep clear' markings or in the middle of the road, etc). To do so - 3 penalty points. **Wording amended.**
- 29.4. At any time when driving a private hire vehicle, you must not drive in a manner that causes your passengers discomfort, alarm or distress. To do so – 3 penalty points **New condition.**
- 34.1. You must not use a mobile phone, communications/navigation device or similar when driving if it is not connected to a 'handsfree' system (Bluetooth earpiece or an inbuilt car system). To do so - 12 penalty points.

Devices include, but are not limited to, mobile telephones, tablets, a two-way radio, satellite navigation device or personal digital assistant.

'Use' of the device includes, but is not limited to, making a call (voice or video), texting, watching videos, making videos, searching on the device or interacting with it in anyway which may cause your attention to become distracted. **Amended condition and points increase.**

36. Home to School transport contract journeys – conditions 36.1 to 36.5 new conditions, points for 36.2 to 36.5 to be reduced to 3.

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