



# Join the Conversation



## Review of the Joint Taxi Licensing Policy 2026

### APPENDIX TO SUPPORT THE SUMMARY REPORT

MAY 2026

If you require this report in an alternative format (for example large print, Braille, audio, Easy Read and alternative languages) please email [jointheconversation@southandvale.gov.uk](mailto:jointheconversation@southandvale.gov.uk) or call 01235 422425.



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# SURVEY AND QUANTATIVE AND QUALITATIVE DATA

A copy of the paper comment form is provided below alongside the quantitative and qualitative data.



Listening Learning Leading



## Taxi Licensing Act Policy Consultation

Please return this comment form by **11.59pm on Tuesday 10 March 2026 to Freepost SOUTH AND VALE CONSULTATIONS (no other address information or stamp is needed).**

**The summary of proposed changes document and proposed Licensing Act Policy is available to view alongside this comment form.**

We are currently reviewing the Joint Taxi Licensing Policy for South Oxfordshire and Vale of White Horse. The Councils have a responsibility to ensure the policy remains current and compliant with legislation, and we aim to review the policy at least every five years.

As part of this review, amendments have been proposed to various sections, including minor clarifications and updates to reflect recent changes in guidance from central government.

This consultation has been divided into the following sections:

- Proposed changes on a local level that affect South Oxfordshire and Vale of White Horse
- Changes from the Department for Transport (DfT) Best Practice Guidance, which is supplementary to the DfT Statutory Standards
- Policy amendments which relate to changes we have already made to how we work and guidance on existing legislation

We are asking for your comments from Tuesday 20 January until 11:59pm Tuesday 10 March 2026.

### What happens next?

Once the consultation period ends, we will collate and review all the responses. A report on the responses will be provided to the licensing committees with a final version of the policy for consideration of adoption. We will then publish the revised policy along with a consultation summary report on our engagement platform.

If you have any questions about this project or require this survey in an alternative format (for example large print, Braille, audio, Easy Read and alternative languages) please email [jointheconversation@southandvale.gov.uk](mailto:jointheconversation@southandvale.gov.uk) or call 01235 422425.

## Personal details?

If you are responding as a driver or proprietor, we ask you to provide either your business/organisation or trade name and which district you operate in.

If you are responding as a **district, county or town/parish councillor or officer**, we ask you to provide the name of the town/parish you're representing.

If you are responding as an **individual/member of the public, or other** you do not need to provide this information but can do so if you wish. Any personal information you provide to the council within your comments that could identify you will not be published in the consultation report. Further information on data protection is available in our privacy policy.

## About you

### Q1. Are you responding as:

Most respondents were individuals/members of the public (46 per cent), followed by drivers or proprietors (43 per cent).

Option	Total	Percent
a driver or proprietor	56	43%
an operator	6	4%
an individual/member of the public	61	46%
a business or organisation	4	3%
a district, county or town/parish councillor	1	0%
a district, county or town/parish officer	1	0%
other (please specify):	2	1%
<ul style="list-style-type: none"><li>• A driver, an operator, an individual and a business.</li><li>• Prospective driver with South Ox</li><li>• REDACTED</li></ul>		

### Q2. How did you hear about this consultation? Tick all that apply.

Almost half of respondents (48 per cent) heard about the consultation via email. 17 per cent heard about it via word of mouth, whilst others heard about it via the district council social media accounts (e.g. Facebook and Instagram) (12 per cent).

Option	Total	Percent
District council social media accounts (e.g. Facebook and Instagram)	16	12%
Other social media accounts	7	5%
Email	63	48%
Letter	4	3%
District council website	10	8%
Another website	9	7%
Word of mouth	22	17%

Parish/Town council/meeting	2	1%
Other (please specify below):	3	2%
Not Answered	2	1%

### Q3. What is the name of the business/organisation you represent or your trading name?

48 per cent of respondents provided the name of their business, organisation or trade name.

### Which district does your business operate in?

Of the drivers, proprietors and businesses that answered this question (50 per cent), 38 per cent operate in South Oxfordshire, whilst 6 per cent operate in Vale of White Horse.

Option	Total	Percent
South Oxfordshire	50	38%
Vale of White Horse	8	6%
Both	7	5%
Other (please specify below):	0	0%

## Proposed changes that affect South Oxfordshire and Vale of White Horse

The following changes are specific to South Oxfordshire and Vale of White Horse, and we welcomed any comments.

Policy section	Change	Reason for change
4.5	Added section to confirm that drivers with six DVLA points will be subject to more regular checks	Added due to multiple instances of drivers failing to notify DVLA points
7.16	Revised target for zero emission vehicles to 2045	Recommendation from the councils' Climate Team to align with district target
7.26	Removed exemption for brand new vehicles to undergo a compliance test	This is due to the requirement for authorised garages to assess all vehicles to ensure they are suitable for licensing and meet the policy criteria

7.29-7.30 and Appendices A.6 and B.7	Added mandatory acceptance of card/mobile payments by all licensed vehicles from 1 January 2027	<p>This change aims to make travel safer and more accessible, particularly for those without cash on hand. As well as convenience for customers, it reduces the risk of theft for both driver and passenger.</p> <p>NB Any passengers wishing to pay by cash will still be able to do so where a driver accepts cash payments.</p> <p>Guidance will be added separately that licence holders may not levy a charge for persons paying by personal debit/credit card and mobile wallets as this is Prohibited under the Consumer Rights (Payment Surcharges) Regulations 2012</p>
8.27	Added a validity period of 12 months for the knowledge test for the application process	To ensure applicants for licences have been recently assessed on their knowledge of the policy, Highway Code and other matters
Appendix E.5	Added requirement for drivers to report suspensions, revocations and refusals of any licences issued by other local authorities	This is so officers can review the circumstances and consider if the driver remains fit and proper
Appendix E.8	Added driver 'working time' guidance	Added for driver and public safety
Appendix E.24	Added condition to report any safeguarding concerns	This ensures that drivers are aware they need to report any such concerns within 24 hours
Appendix F	Updated suitability guidance	Updated to the most recent version, published 2024
Appendix G	Penalty points table updated to reflect above changes, and to include other hand-held devices such as PDAs in the same section as mobile phone use	To ensure clarity and consistency of enforcement

Q8. If you have any comments on the proposed policy amendments, please provide them below. ***Please make it clear within your comments which section of the policy you're referring to e.g. 5.15, 5.16.***

Policy ref	Comments	Officer response
4.5	Since it is known that drivers fail to notify DVLA penalty points, how effective will the provision for more regular check be? Will you be carrying out regular checks to see if licensed drivers have been given penalty points?	This requirement will usually be reserved for drivers who are found to have six or more points on their DVLA licence, irrespective of the way this is identified (for example on receipt of an application, driver notification or information sharing from the Police). We do a DVLA check at each application so most drivers are checked every three years. We have amended the draft policy to make it clear that this applies to existing licence holders and applicants.
4.5	This is a radical policy change in my opinion. You could look at creating a driver portal app, where at any time driver can log in and notify licensing team of any accidents, points or any change to circumstances. The drivers will also be able to view their history, council penalty points and when renewals are due and also report any Safeguarding concerns on the go while details are still fresh in their minds.	Officers are not of a view that this is radical. We already have online forms to report matters such as accidents and any criminal matters. The driver can identify when their licence expires by looking at their plate or badge. Safeguarding matters should be reported to the appropriate channels, not the Licensing Team.
4.5	4.5 is "inappropriate" because that will make more pressure on driver's which will not be suitable for driver or passengers. As we all doing these changes to make taxi industry better & safer for public but I think more pressure on drivers will make driving task more difficult & risky!	Officers are unclear why more regular checks on DVLA licences will put pressure on drivers. The provision of a DVLA check code to officers is a very simple online process which should take no more than five minutes.
7.16	Don't think of electric vehicle yet.	This comment is noted.
7.16	Revised target for zero emission vehicles to 2045: I think it would be wiser to stick to the earlier target of 2030. I know it's not going to be easy for small businesses (sorry), but the greater priority must be to take more ambitious steps to reduce our currently appalling climate impact.	Comment to be added  The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.

7.16	There is no excuse for this. Electric vehicles have a long enough range now to be suitable for all taxis. The target should be 2030. Taxis cause so much local pollution with idling engines, and EV taxis are far more pleasant for passengers	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	<p>I would like to strongly object to 7.16 moving back the zero emission target. Electric vehicles are win-win for both drivers, people and the environment.</p> <p>I use an electric vehicle for my business and the fuel costs are a fraction of paying for diesel as well as the environmental benefits.</p> <p>That should be communicated to drivers along with highlighting EV leasing deals which will work out cheaper per month than using an old diesel car.</p> <p>In addition to this high quality private providers should be encouraged to create rapid chargers in areas identified with high demand. E.g. Didcot currently only has four rapid chargers at Milton Interchange, Wallingford only one at Lidl.</p> <p>Carrot Vs stick should be prioritised but bearing in mind the human resistance to change zero emission changes should be enforced on those who do not want an electric vehicle simply because they are resistant to change.</p>	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	Revised target for zero emission vehicles to 2045 - Recommendation from the councils' Climate Team to align with district target. Strongly agree. We are not ready in so many ways.	This comment is noted.
7.16	7.16 is disappointing	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.

7.16	This date should be brought forward and effort put into ensuring it happens. The visibility and perception of zero emissions vehicles is critical to adoption, and assisting with public services such as taxis moving to them can help massively with this, as well as the benefits of less emissions in the towns and villages where they operate.	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	Do not extend the zero-emission period beyond 2030, but instead shorten it	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	So diesel taxis can continue to sit in Wallingford town centre with their engines running for another 20 years! Pathetic. EVs are well established, clean reliable and easy to charge. Frequent drivers like taxis and delivery vehicles should be first to switch as they do so many more miles and cause more pollution than your average commuter. 2030 seems reasonable to me.	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	To mitigate the health risks from emissions (for e.g. Wantage in the enclosed area of the square especially but not exclusively) prevention of idling should be stepped up. At bust times especially school end of day and pub/club closing times/market days the air can become noticeably toxic. If taxis are to keep their taxi rank areas in centre of the towns can we monitor their compliance with the law so they do not leave their engines on? Cameras in the vicinity or some kind of neighbourhood watch, reminder signs - this last suggestion would also be good for stopping other drivers from leaving their engines on - as taxis aren't the only problem. Also if there are signs to say it is against the law and switching off can save lives then the general public would be able to gently remind drivers who have	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.

	forgotten to switch their engine off by point to a sign.	
7.16	It is reasonable to refuse to register new non-electric taxis by 2030, but existing ICE taxis should not be forced off the roads before 2035 (replacing a car early generates more emissions than keeping it going)	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	Opposed to section 7.16 change which postpones zero emissions target to 2045. Taxis are high mileage vehicles and consequently contribute more to daily emissions. They are also often in traffic with stop-start driving in which internal combustion engines are less efficient and contributing to local pollution in urban areas	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	Why are taxis being penalised for emissions when anyone else can drive these cars around.	This comment is noted.
7.16	Weakening a move to zero emission vehicles will not reflect the urgency of the climate crisis and will show a failure of leadership. It is not "more affordable" for drivers to use a car where the fuel costs are higher than leasing an EV, its a false economy that will worsen air quality around key transport hubs with idling vehicles.	The target of 2045 aligns with the net zero target for the districts. We will continue to work to encourage the trade to switch to electric vehicles and will maintain the lower licence fee for such vehicles.
7.16	Oxfordshire doesn't have the facilities to provide mainstream electric vehicle charge. Use your thick loaf.	This comment is noted.
7.26	There should be a reduced chargeable fee for any new vehicle as there is no MOT required. <b><i>(comment received 45 times)</i></b>	The fees charged for compliance tests are a matter for the authorised garages; there is a cap set for test fees and we are aware that garages charge a reduced fee where they are only checking the meter. We will investigate whether it is viable to create a different type of compliance test for brand new vehicles.
7.26	New cars are not even subject to DVLA MOT which is the national standards this	As explained during the consultation, this is due to the

	<p>should remain the same as the market is already so competitive this will be another cost that a driver won't be able to sustain. There are no breach of any safety concern here other than more cost for the driver and profit for the system</p>	<p>requirement for authorised garages to assess all vehicles to ensure they are suitable for licensing and meet the policy criteria – rather than assessing them for mechanical safety. The licensing authority is not involved in payments from either drivers or authorised garages for compliance testing.</p>
<p>7.29-7.30 and Appendices A.6 and B.7</p>	<p>We object to this as it is up to the individual operator to install this. For an example if the private hire vehicle does only school transport there is no need for this facility. In line with section 7.33 and 7.37</p> <p><b>(comment received 45 times)</b></p>	<p>This comment is a little unclear as 7.33 refers to plates on vehicles and 7.37 to plate exemptions.</p> <p>Where a vehicle is able to evidence that they only carry out school transport, officers are happy that they would be exempt from this requirement in accordance with the proposed 7.29 which states “The only exceptions to this provision are private hire vehicles which only conduct journeys where the customer pays the operator directly, for example via an account”. It is expected that in all other cases the proprietor would be responsible for this but it will be a matter for the operator if they wish to provide the facility for the vehicles that they operate.</p>
<p>7.29-7.30 and Appendices A.6 and B.7</p>	<p>7.29 &amp; 7.30 etc are welcome</p>	<p>This comment is noted.</p>
<p>7.29-7.30 and Appendices A.6 and B.7</p>	<p>Drivers who feel safer accepting less cash can already request card/mobile payment (thus one of the reasons given for the change is invalid). However, if this amendment is accepted, drivers who are not earning well will have to give up more of their fare to pay the card charge, so the change will be detrimental to them. If there is evidence of a genuine threat to passengers using/needing to withdraw cash, then I see the point of the change,</p>	<p>On balance, officers remain of the view that mandatory acceptance of card payments is an appropriate way to safeguard both driver and passenger.</p> <p>Charges range from 1% - 2.5% per transaction, plus a per-transaction charge around 10p.</p>

	but I hope that policymakers balance these considerations.	
7.29-7.30 and Appendices A.6 and B.7	Added mandatory acceptance of card/mobile payments by all licensed vehicles from 1 January 2027 depends on where the journey end and the mobile signal at that area where it end.	7.29 includes a proviso that this will only be a requirement where network coverage allows.
7.29-7.30 and Appendices A.6 and B.7	All drivers must accept cash as quite a few people only pay cash - particularly the elderly and those who are vulnerable. I know many elderly who only pay by cash but need taxis weekly as they are unable to walk to town and are not on the bus route.	Drivers will remain able to take cash payments.
7.29-7.30 and Appendices A.6 and B.7	Make acceptance of cash mandatory	Drivers will remain able to take cash payments.
7.29-7.30 and Appendices A.6 and B.7	I hope that this doesn't mean that any drivers will be able to refuse cash payments.	Drivers will remain able to take cash payments.
7.29-7.30 and Appendices A.6 and B.7	We all take payments in the car already! Isn't rules... take it or lose customers	This comment is noted.
7.29-7.30 and Appendices A.6 and B.7	I feel the drivers should have a choice whether to accept cash or card. Even though we are moving into a cashless society, the taxi driver shouldn't have to lose out fees on their own payment just for convenience. A driver should be the only one to make that choice (which most will anyways)	On balance, officers remain of the view that mandatory acceptance of card payments is an appropriate way to safeguard both driver and passenger.
7.29-7.30 and Appendices A.6 and B.7	Accepting card payments should not be a regulatory requirement. It is a service and will differentiate providers.	On balance, officers remain of the view that mandatory acceptance of card payments is an appropriate way to safeguard both driver and passenger.
7.29-7.30 and Appendices A.6 and B.7	Our cars are driven by multiple drivers, and each driver has their own card reader. Even though we accept card payments,	The card reader will not be a matter covered by the compliance test, but will instead be checked by

	the card reader won't be in the car at time of testing.	officers when they carry out vehicle and driver checks.
7.29-7.30 and Appendices A.6 and B.7	In line with national standard some credit card should pay a processing fee for minimum charge. American Express can charge up to £2:50 to process a payment plus the card reader takes there fee, then you have to pay your account fee. By the time you take a fare of £6 on a credit card you going home with £2:50 and all these processing fee on card payment that the driver bear is just set to go up.	Licence holders may not levy a charge for persons paying by personal debit/credit card and mobile wallets as this is prohibited under the Consumer Rights (Payment Surcharges) Regulations 2012.
7.29-7.30 and Appendices A.6 and B.7	Card/mobile payments does not mean that the driver won't take cash.	Drivers will remain able to take cash payments.
8.27	Local Knowledge. I have noted that the last 3 taxis I have taken from Didcot Rail Station, both private hire and flag down, the drivers were not aware of my location and had to tap in the address on their phone. They also took the longest charge route according to their phone map, not the most direct as per my instructions to suit the road conditions on the time of day. I had to remind a pre-booked taxi of the Highway code and speed limits and also noted they were not wearing a seatbelt. The same driver was also using his phone, on hands free to take calls with a passenger on board. Did report to the taxi firm.	Any incidents of this nature should be reported to Licensing for investigation.
8.27	Highway Code do not change every 12 months and it is easily access via online at anytime, again I am sure that there is going to be another charge on drivers again, remember drivers already have a DVLA licence and a taxi badge does not replace national standard of driving so if no need for regular driver to do Highway Code test every 12 months taxi drivers should not be required to keep doing this again more cost on drivers and more revenue for the system.	The proposal will not require all licence holders to take a knowledge test every 12 months, but will instead require any new applicants to apply for their licence within 12 months of passing the test.

8.27	Knowledge test is a must - I get fed up directing the driver where to go.	This is already a requirement for all new applicants.
Appendix E.5	The addition to E.5 is important. How will compliance be monitored?	This can be monitored across Oxfordshire using our existing information sharing process. In addition there is now a national register which can notify any other LAs who license the same driver of any new suspension, refusal or revocation.
Appendix E.8	The wording should be "Working Time Directive" <b><i>(comment received 45 times)</i></b>	The Working Time Regulations 1998 is the legal requirement; this is a simple to understand condition for drivers to not work if they feel too tired.
Appendix E.8	Working time - this should include an indication of the maximum hours worked in a day	Officers would not suggest a specific amount of hours in a day; this is more intended to ensure drivers use common sense and do not work where they are too tired to drive safely.
Appendix E.8	Working hours it's very every day. As Self-employed. Hard to keep on track! I do work in broken hours. To commit how is that bring money a peak times! Only	Officers would not suggest a specific amount of hours in a day; this is more intended to ensure drivers use common sense and do not work where they are too tired to drive safely.
Appendix E.24	Are these new conditions to the policy? <b><i>(comment received 45 times)</i></b>	This is a new proposed condition which seeks to guide drivers on how quickly to report safeguarding concerns.
Appendix E.24	What safeguarding training do they do? Is it a compulsory annual update as health care workers have to do and is it checked?	Drivers attend disability awareness and safeguarding training every three years. This is run by an external provider on behalf of Oxfordshire County Council and OCC monitor to ensure the content and delivery is appropriate. The training is in-person with a short test of understanding at the end.
Appendix F	<b><i>(specifically para 3.13)</i></b> These people will be driving professionally on UK roads, carrying passengers who reasonably expect drivers to be well qualified. Drivers	The legal requirement is for a DVLA/EU/EEA licence as specified in policy 8.18

	<p>must have a DVLA issued licence as a minimum to be permitted to drive professionally on UK roads. It is a fact that UK road rules and norms differ substantially from other countries. Driving tests in other countries are often very basic checks on familiarity with vehicle controls - there is no acceptable 'equivalent licence' to a UK issued DVLA driving licence.</p>	
Appendix G	<p>Appendix G Desperately needs to be overhauled. Given the direct link between Appendix G and suspension or revocation thresholds, the penalty point's scheme should be subject to a separate, dedicated consultation with licensing to ensure transparency, consistency, and confidence in enforcement.</p> <p><b><i>(comment received 45 times)</i></b></p>	<p>There are no proposed changes to Appendix G other than updating the table to reflect the changes listed separately in the consultation, and to include other hand-held devices such as PDAs in the same section as mobile phone use.</p> <p>Officers are of the view that the penalty points system is transparent and consistent and that the points thresholds are reasonable.</p>
Appendix G	<p>the points system is unfair, how can the council issue double points for certain endorsements over what the police or DVLA give</p>	<p>The councils' penalty points system does not impose endorsements on the DVLA licence and is a very different system. There is also no associated financial penalty as would be the case with police or DVLA matters.</p>

## Proposed changes from the Department for Transport (DfT) Best Practice Guidance

We have made the following changes based on a document called the Taxi and Private Hire Vehicle Licensing: Best Practice, which the government's Department for Transport (DfT) published in November 2023. This document is complementary to the DfT's Statutory taxi and private hire vehicle standards which we are expected to implement unless there is what the government calls "a compelling local reason not to."

Please read through the changes below and consider if there are reasons that are specific to our districts that mean these changes should not be made.

Policy section	Detail of change	Best Practice Guidance (BPG) section
3.13	Added section on intended use	6.12
7.37	Amended so vehicles exempt from display of plate are to be used solely for contract work (was previously 75%) and exceptional circumstances are required to be proven in order for exemption to be granted	8.12
7.40 and 7.41	Added guidance on partitions and driver safety/security measures	8.15 and 8.16
9.3 - 9.4 and Appendix D.18	Added requirements for operators	7.4 and 7.5
9.27	Added guidance for private hire operators in respect of trading names	8.12
9.30 - 9.32	Added operator booking system requirements	4.2
Appendices A.2 and B.2	Amended tinted windows – increase level of permitted tint to 30% of light transmission (was 70%)	8.8
Appendices A.6 and B.7	Removal of requirement for fire extinguisher	8.18
Appendices A.8, A.9, B.9 B.10 and E.10	Added vehicle daily condition checks	6.13
Appendices A.19 and B.20	Added requirement for hearing loop where partition fitted	8.11

**Q9. If you believe there is a ‘compelling local reason’ we should not make any of the changes above, please provide your comments below. Please make it clear within your comments which section of the policy you’re referring to e.g. 5.15, 5.16.**

Policy ref	Comments	Officer response
3.13	Appears to introduce new policy provisions, rather than clarification. It introduces additional discretion relating to intended use, surrender, and re-licensing which may materially affect licence holders. As this represents a substantive policy change, it should be clearly identified as	There is no provision in law for a taxi or private hire licence to be surrendered.  As detailed in the policy, this has been in practice since 2017 with 461 HC licences across South Oxfordshire and Vale of White Horse already having a condition

	<p>such and subject to appropriate consultation, including clear guidance on how discretion will be exercised consistently and proportionately.</p> <p><b><i>(comment received 45 times)</i></b></p>	<p>requiring the vehicle to be predominantly used in the relevant district. This practice is therefore proposed to continue, and at this time we are not seeking to retrospectively add it to licences first issued prior to 2017.</p> <p>It is unclear from the comment what discretion would be required or proposed.</p> <p>This amendment simply ensures the current practice is detailed in the policy so that prospective applicants are aware, rather than only being detailed within the application form as it is at the present time.</p>
3.13	<p>The whole working for a company out the area needs to be addressed too, and so many cars have been seen driving around displaying a vale or south Oxford plate, but no roof light</p>	<p>This response appears to agree with the intended use policy.</p> <p>On the second point, if a hackney carriage is seen driving around without its roof sign, this should be reported to Licensing for investigation.</p>
7.37	<p>Consideration should be made whereby clients who would normally use for contract work may occasionally wish to have a personal/private journey that is provable to be paid by cash</p>	<p>The DfT Best Practice Guidance is clear that plate-exempt vehicles should not be used for 'normal' private hire work.</p>
7.37	<p>We are plate exempt at the moment and are mainly corporate as 75%. If this increases to 100% this gives an unfair advantage to other districts. We have lots and lots of clients that want to be chauffeured and not seen in a car with plates on. Already we are having to put stickers in the car on licence renewal instead of the discreet no smoking sign.</p> <p>Making it 100% means turning down work, that is not creating a fair operating environment.</p>	<p>The DfT Best Practice Guidance is clear that plate-exempt vehicles should not be used for 'normal' private hire work.</p>

<p>Appendices A.2 and B.2</p>	<p>The window tint rules needs to be more relaxed as 90% of modern cars have tinted windows</p>	<p>This comment appears to support the proposal to relax the tinted windows requirement.</p>
<p>Appendices A.2 and B.2</p>	<p>The council’s proposal to reduce the light transmission threshold from 70% is very welcome. However, the 30% will still leave operators with significant challenges when procuring new vehicles for their fleets. As you will be aware, COMPANY NAME REDACTED specialises in an executive Mercedes fleet. Our research indicates that REDACTED—and indeed all leading vehicle manufacturers—fit standard glass with visibility levels ranging from 15% to 25%. No viable manufacturer option currently meets the proposed standard. In practical terms, this means it is virtually impossible to purchase a new vehicle that can be licensed without incurring substantial additional cost.</p> <p>Compounding this issue is the inconsistency in testing equipment. We recently presented the same vehicle at two approved testing stations and received different readings—10% and 15%—on a car that Mercedes represents as having 20% tint. Such variation undermines fairness and confidence in the inspection process.</p> <p>We understand the council’s suggestion to install in-vehicle cameras as a mitigation measure. However, the most cost-effective options we have identified are in excess of £800 per vehicle, excluding installation. Beyond the financial impact, fitting cameras requires removal of internal panels and linings on new £50,000 vehicles—an intrusive and potentially warranty-voiding process. Furthermore, our clients are high-level executives who expect a degree of privacy that cameras would compromise.</p> <p>The Government’s Best Practice</p>	<p>The comment that the council is not willing to offer exemptions is incorrect; vehicles with an exemption from the requirement to display the plate are already exempt from the tinted windows requirement as per B.2, and this is not proposed to change. We have added some additional words to B.2 to ensure the exemption is clear.</p> <p>Details have been requested of the testing stations mentioned in this comment and these are awaited so the concerns can be investigated.</p>

	<p>Guidance acknowledges these specific challenges, stating:</p> <p>“The department recognises that a minimum light transmission of 30% for windows rear of the B-pillar might impact on executive hire vehicles, where passengers demand a higher degree of privacy. Some licensing authorities already grant executive hire vehicles plate exemptions, and they could determine that an exemption from the 30% minimum light transmission level for these vehicles is appropriate. Authorities should be assured that those vehicles are not used for ‘normal fares.’”</p> <p>We have recently been advised that South Oxfordshire District Council is not currently willing to offer such exemptions.</p> <p>It may also be relevant to note the published findings of David Wilson of A to Z Licensing, whose extensive research across 44% of police forces in England and Wales—including the Metropolitan Police—found no identifiable evidence suggesting that antiglare or tinted glass has ever contributed to the commission of an offence involving a taxi or private hire vehicle.</p> <p>In light of these points, we respectfully request that the Committee give serious consideration to this section of the policy during the review process, particularly with regard to executive hire vehicles and possible exemptions.</p>	
<p>Appendices A.2 and B.2</p>	<p>Subject: Response to Proposed Operator Licence Amendment – Window Tinting Requirement</p> <p>I would like to provide feedback regarding the proposed amendment to the operator licence conditions relating to vehicle window tinting, specifically the requirement for a minimum of 70% light</p>	<p>NB the proposed requirement from the DfT Best Practice Guidance is 30% of light transmission, not 70% (which is the existing requirement). This comment seems to propose very similar to the existing policy, for example tinted films are already prohibited. It may be that the</p>

<p>transmission.</p> <p>While we understand the intention behind ensuring passenger safety and visibility, it is important to recognise that many modern executive and higher-specification vehicles are supplied by manufacturers with factory-installed tinted glass as standard equipment. These vehicles are designed and certified to comply with UK road safety regulations at the point of manufacture.</p> <p>For example, executive models such as the Lexus ES 300h are supplied with factory privacy glass on rear windows as part of their standard or higher trim specifications. Similar factory tinting is also common across many premium vehicles from manufacturers such as Mercedes-Benz, BMW, Audi, and Volvo. This tinting is integrated into the glass during manufacturing rather than applied as an aftermarket film and is widely accepted as compliant with national vehicle regulations.</p> <p>Requiring all licensed vehicles to meet a strict 70% transparency threshold without accounting for factory-installed glazing could unintentionally restrict the use of executive vehicles that are otherwise fully compliant with UK law and commonly used in professional chauffeur and private hire services. This may place operators at a disadvantage when attempting to provide higher-end or executive transport services, where such vehicles are typically expected by customers.</p> <p>In light of this, we respectfully suggest that the policy wording be amended to clarify that manufacturer factory-installed window tinting is permissible, provided the vehicle remains compliant with UK road traffic legislation and has not been modified with additional aftermarket tinting that would reduce visibility beyond legal limits.</p>	<p>respondent has misunderstood the proposal.</p> <p>It should be noted that vehicles with an exemption from the requirement to display the plate are already exempt from the tinted windows requirement as per B.2. We have added some additional words to B.2 to ensure the exemption is clear.</p>
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	<p>A possible wording amendment could be: “Vehicles must allow a minimum of 70% light transmission through the front side windows unless the glazing is factory-installed by the manufacturer as part of the original vehicle specification. Aftermarket tint films that reduce light transmission below this level will not be permitted.”</p> <p>Such an amendment would maintain safety standards while allowing operators to utilise executive-class vehicles supplied with manufacturer-approved glazing.</p>	
Appendices A.2 and B.2	<p>Amended tinted windows – increase level of permitted tint to 30% of light transmission (was 70%)</p> <p>I feel more comfortable in a taxi if I can be seen through a window, for safety reasons.</p>	This comment is noted.
Appendices A.2 and B.2	<p>Tinted windows should not be allowed at all. The ability of potential customers to see inside taxis is a useful security feature and the ability of passers-by to see inside occupied taxis will discourage the occupants from bad behaviour.</p>	This comment is noted.
Appendices A.2 and B.2	<p>Amended tinted windows – increase level of permitted tint to 30% of light transmission (was 70%) some cars especially German made are manufactured at 70% tinted windows.</p>	A level of 70% tint (i.e. 30% light transmission) will be compliant with the proposed new policy.
Appendices A.2 and B.2	<p>Appendices A.2 and B.2 We offer an executive service, and ALL premium manufacturers models that we use have a level of tint that allows 10 to 20% of light through. Even though the threshold will be changed to 30%, cars that we will purchase going forward won't be compliant. In my view, if the tint is from manufacturers factory, it should be allowed.</p>	<p>Officers would be of the view that the increased level of window tint permitted strikes a reasonable balance. It should be noted that vehicles with an exemption from the requirement to display the plate are already exempt from the tinted windows requirement as per B.2. We have added some additional words to B.2 to ensure the exemption is clear.</p>

<p>Appendices A.2 and B.2</p>	<p>more cost again to a driver vehicles are now being manufactured with privacy glass at 70% of light passing in to change this policy is more cost on driver to change a used car windows is in the hundreds of pounds. Tinted windows already had CCVT as standard. There are no breach of safety here. Some customers Especially contracted work value the tinted windows for their own privacy. So Long as the driver and front windows are clear there is no need for rears to be less than 70%.</p>	<p>NB the proposed requirement from the DfT Best Practice Guidance is 30% of light transmission, not 70% (that is the existing requirement). It may be that the respondent has misunderstood the proposal.</p>
<p>Appendices A2 and B2</p>	<p>If windows only emitted 30% of light I would feel claustrophobic, also I like to see where I'm being taken - my eye condition needs good lighting.</p>	<p>This comment is noted.</p>
<p>Appendices A.6 and B.7</p>	<p>Removal of requirement for fire extinguisher: surprising, but I can't think of any local difference that would affect this so I can only assume the gov't has evidence to back this decision.</p>	<p>The Highway Code advises that should a vehicle catch fire, the occupants should get out of the vehicle quickly and to a safe place and not to attempt to extinguish a fire in the engine compartment, as opening the bonnet will make the fire flare.</p> <p>The National Fire Chief Council (NFCC) recommends that if a licensing authority elects not to require drivers to undertake training on the safe way to tackle a vehicle fire, vehicles should not be required to carry fire extinguishers and drivers advised to get out and stay out of the vehicle and call 999, rather than attempting to firefight. Drivers will still be able to have a fire extinguisher if they wish, it will just not be a mandatory requirement.</p>
<p>Appendices A.6 and B.7</p>	<p>Removal of requirement for fire extinguisher - I think this should remain for customer peace of mind and safety</p>	<p>See previous response above.</p>

Appendices A.6 and B.7	I do not agree with the removal of a requirement for a fire extinguisher. Although not likely to be used very often, the presence of a fire extinguisher adds confidence that a fire situation could potentially be managed.	See previous response above.
Appendices A.6 and B.7	DO NOT remove fire extinguishers, you never know when they are needed	See previous response above.
Appendices A6 and B7	removal of requirement for a fire extinguisher - WHY? This is a basic safety precaution, absolutely ridiculous to remove it!	See previous response above.
Appendices A6 and B7	I find it surprising that these vehicles are no longer required to carry a fire extinguisher, considering the increased risk of fire posed by electric vehicles.	See previous response above.
Appendices A6 and B7	Removal of requirement for fire extinguisher - this should remain as a minimum safety requirement, in the event of a fire and a passenger being unable to exit, it can provide life saving time required.	See previous response above.
Appendices A.8, A.9, B.9 B.10 and E.10	<p>Amendments and clarification are as followed:-</p> <p>We are writing regarding the new requirement for mandatory daily vehicle checks expected to come into effect in 2026.</p> <p>As a private hire operator, we recognise the importance of ensuring that vehicles used on our platform are safe and roadworthy. However, as an operator we are not physically able to inspect each vehicle every day, as drivers operate independently and vehicles are not based at a central depot.</p> <p>To address this requirement, we are considering implementing a digital daily vehicle check form for drivers to complete before commencing work. This would allow drivers to confirm that key safety checks have been carried out (for example tyres, lights, brakes and</p>	The proposal is for these to be vehicle and driver licence conditions, so a requirement for the vehicle proprietors and drivers rather than the operator. If any proprietor wishes to formally transfer responsibility to the driver, it is recommended they lease the vehicle to the driver to enable the driver to hold the vehicle licence in their own name.

	<p>seatbelts) and that the vehicle is safe to be used for bookings.</p> <p>While we can introduce such a system, it would ultimately rely on the accuracy and honesty of the information provided by the driver. If a driver does not answer truthfully or fails to identify an issue with their vehicle, it would be difficult for the operator to detect this in real time.</p> <p>Implementing a fully integrated system that prevents drivers from receiving bookings unless a daily check has been completed and stores this information electronically would require significant technical development and investment. In addition, reviewing and verifying daily declarations for every driver would also require a significant level of manpower and administrative resource for the operator.</p> <p>For these reasons, we would propose that the primary responsibility for conducting and confirming daily vehicle safety checks remains with the driver.</p> <p>As an operator, we would be willing to support this by:</p> <ul style="list-style-type: none"> <li>• Providing drivers with a digital self-declaration form for daily vehicle checks</li> <li>• Keeping records of completed declarations where possible</li> <li>• Carrying out periodic oversight, such as a quarterly compliance report or review</li> </ul> <p>This approach would ensure that drivers remain responsible for the roadworthiness of the vehicles they operate, while also allowing the operator to demonstrate reasonable oversight and record keeping.</p> <p>We would appreciate clarification on whether this approach would satisfy the requirements of the new daily vehicle check expectations.</p>	
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Appendices A.8, A.9, B.9 B.10 and E.10	Added vehicle daily condition checks - I strongly feel that this should be left down to company policy. The council do their bit by asking for MOT, Insurance and Certificate of compliance. What will happen if a driver has not been doing their daily checks should be left down to company to deal with that.	We would agree that companies should also be monitoring the checks, but maintain that the proposed conditions are reasonable. A number of vehicles fail compliance tests due to issues that would likely be identified from a daily check, so this will help maintain vehicle safety as well as reduce the number of vehicle suspensions which prevent drivers from working.
Appendices A.8, A.9, B.9 B.10 and E.10	Most is common sense But checking horn on daily basis in residential area	We would suggest drivers use common sense and carry out the horn check at an appropriate time and location.
No specific section	All good	This comment is noted.
No specific section	Every section NO!	This comment is noted.
No specific section	I agree to them all. But want you to address the 20mph issue I have raised.	This comment is noted.
No specific section	I have reviewed these and do not consider that there to be a compelling local reason not to include any of them.	This comment is noted.
No specific section	N/A	This comment is noted.
No specific section	N/A	This comment is noted.
No specific section	No	This comment is noted.
No specific section	no comment	This comment is noted.
No specific section	No comment	This comment is noted.
No specific section	No comments	This comment is noted.
No specific section	No compelling local reason	This comment is noted

## Policy amendments which relate to changes already made to how we work and guidance on existing legislation

The following changes are for guidance only and reflect current practice or legislation. If you feel the policy requires additional information on any of the below points, please make this clear in your comments below.

Policy section	Change
3.9 and 3.10	Added sections on re-licensing and 'surrender' of licences
7.10	Added advice on what vehicle proprietors should do when allowing another licensed driver to drive their vehicle.
7.15 and 7.19	Clarified that where a licence holder has benefitted from the reduced fee for a wheelchair accessible or zero emission vehicle, any replacement vehicle must meet the same specification, and added that the councils will consider departing from usual policy requirements where a vehicle is wheelchair accessible
7.28	Added that fares for private hire journeys should be agreed at the time of booking
7.35	Added guidance in respect of signage on licensed vehicles
7.38	Added advice to contact council prior to purchasing a new executive vehicle to check it will be acceptable
7.39	Added reference to new guidance document on CCTV systems
8.2	Added drivers must have held a DVLA licence for at least 12 months to commence the application process
8.8	Amended to confirm medicals can be completed by any registered doctor with access to the full medical records
8.9	Added examples of medical conditions to be reported
8.13 and 9.7	Added guidance on the provision of certificates of good conduct by asylum seekers/refugees
8.15	Added details of provider of enhanced DBS disclosures and Update Service checks for the councils
9.2 and Appendix D.2	Added guidance for operators in respect of the provision of a driver and vehicle to fulfil a booking at the requested time
9.14 and 9.17	Clarified the requirement for company applicants for operator licences to pass disability awareness and safeguarding training
Appendix B.16	Added clarification on prohibition of word 'taxi' or 'cab' on private hire vehicles
Appendix C.4	Added that taxis must not illuminate hire signs outside of district

Appendix D.17	Added condition for operator booking staff to have passed the relevant disability awareness and safeguarding training
Appendix E.23	Clarified drivers are not to call out to persons to ask if they want a taxi in any location, not just on the rank

**Q10. If you have any comments on the proposed policy amendments, please provide them below.**

*Please make it clear within your comments which section of the policy you're referring to e.g. 5.15, 5.16.*

Policy ref	Comments	Officer response
7.15 and 7.19	If driver acquires non wheelchair accessible vehicle as replacement should not benefit from reduced fee.	This comment appears to support the proposal to add guidance on this point.
7.28	More visibility to publish fares.	Hackney carriages are already required to display their fare chart (7.27). Fares for private hire journeys should be agreed with the customer at the time of booking.
7.28	Ensure fees quoted are in line with local area policy. COMPANY NAME REDACTED for example, their quotes exceed the council rates and are vastly inflated.	As explained in 7.28, fares for private hire journeys should be agreed between customer and operator at the time of booking and these are not subject to control by the councils. If the company is advertising false rates, this could be reported to Trading Standards.
7.38	One of the main issues with executive vehicles is that they all come with tinted windows from manufacturer's factory that does not meet the new policy proposal (typically executive cars allow light transmission between 10-20%). Car dealerships don't usually know the percentage of light transmission, so this will be a problem. We understand the council's suggestion to install in-vehicle CCTV cameras as a mitigation measure. However, the most cost-effective options we have identified are in excess of £800 per vehicle, excluding installation. Beyond the financial impact, fitting cameras requires removal of internal panels and linings on	Vehicles with an exemption from the requirement to display the plate are already exempt from the tinted windows requirement as per B.2.

	new £50,000+ vehicles—an intrusive and potentially warranty-voiding process. Furthermore, our clients are high-level executives who expect a degree of privacy that cameras would compromise.	
8.2	DfT guidance advises against unnecessary barriers to entry where applicants can be assessed on merit.  An applicant should be permitted to apply for his taxi license before holding his driving licence for 12 months so when he has held it for the required 12 months then his taxi licence can be issued immediately.  <b>(comment received 45 times)</b>	Officers remain of the view that a person should be required to hold a DVLA or EEA licence for at least 12 months prior to commencing the application process to ensure they have a suitable amount of driving experience.
8.8	yes medical should be able to be done by your GP or any doctor that has full access no need to pay high fees on consultant	This comment appears to support the proposal to add guidance on this point.
8.15	your national DBS should be enough no need for no additional local DBS check Especially when applying for school badge	The council is not able to accept the DBS carried out by other bodies as they will be unable to share any 'soft information' provided under separate cover to the original countersignatory. In addition we cannot accept the OCC School Transport DBS as it is not carried out under the required category. Once completed, both DBS disclosures can be subscribed to one Update Service with just one annual charge.
9.2	customers also should be charge a minimum fee if they fail to show when a booking has been make and the car arrived	This would be a contractual matter between the operator and customer, not a matter for the licensing authority.
9.14 and 9.17 and Appendix D.17	As long as the operator holds the relevant qualifications then a telephonist would be required to have a DBS check but not be required to undertake safeguarding and disability training as they can refer to the operator for guidance.  <b>(comment received 45 times)</b>	Officers remain of a view that booking staff should take and pass the approved disability awareness and safeguarding training every three years to ensure they are able to assist any customers with specific needs or safeguarding concerns, whether or not the licensed operator is on duty.

Appendix E.23	Are these new conditions to the policy? <i>(comment received 45 times)</i>	This is a new proposed condition which details an existing legal requirement of which many drivers seem unaware. In the previous policy, this was mentioned within another condition which was with reference to ranks. It has therefore been separated to make it clear that touting is not permitted at any location.
Appendix E.23	Touting needs to be stamped out, so many “weekend drivers” from out the area are constantly calling out to customers	This comment appears to support the proposal to add the new condition.

## GENERAL COMMENTS ON THE PROPOSED POLICY

We received a number of comments which did not relate to any specific policy references, or which could not be split as they refer to a number of points. These are included below and have all been noted by officers.

Comments	Officer response
I agree with the suggestions and appreciate the transparency	Comment has been noted.
Agree	
Updates all seem clear and reasonable. It is worrying as a member of the public, that some drivers might have a lot of points on their driving licence.	
All seem reasonable.	
Majority Works within council are thick. Implements stupid ideas which wouldn't work.	
Look fair and sensible.	
Agree with more visibility of points on licence and safeguarding issues to ensure the customer is protected.	
All sound very sensible to me	
Happy with all the proposed policy amendments.	
Is there anything to help the drivers, owners, operators or its just changing policies that you think is worth?	
Agree All	
they seem sensible, provided they don't incur undue additional costs for the users. does this apply to Ubers as much as licensed taxis? in which case they should	

seem sensible
Agree to all
All changes are welcome
Supportive of all proposed changes - particularly the need for cashless payments and checks on vehicles and drivers - 4.5, 7.29 7.30, 8.27 Appendix E.5, E.24,F, G
All other changes you are making I think is good.
All of it council has made up its mind already just wasting our time like always thankyou will push through all changes it wants
Everything propose here are just design to increase drivers/owners operating cost with no way of getting it back. We should not be penalise for carrying out essential service.
too much to get through for a purpose of a survey
Every section NO!
No change is taking the driver into consideration every change is to make the life a taxi driver more difficult. Why not put the driver into consideration as people doing a very difficult job and earnings very little and getting abused from every one?

## OTHER COMMENTS

We received 510 qualitative comments which did not relate to any policy changes and are provided below alongside an officer response. The feedback ranges from comments on the existing policy to comments about licensing in general, to some proposed changes such as private hire vehicle signage and mandatory GPS and CCTV in all licensed vehicles which will be picked up when the policy is next reviewed to ensure all those potentially affected by the proposals are able to have their say.

Policy ref (if applicable)	Comment	Response
3.3	<p>An application should not be withdrawn without agreement from the applicant due to costs already incurred.</p> <p>In accordance to section 8.23 and your proposed amendment to 8.27</p> <p><b><i>(comment received 45 times)</i></b></p>	<p>8.23 and 8.27 refer to the periods of validity of a knowledge test and practical driving assessment for the application process.</p> <p>It is important that officers are able to make decisions using documents which are up to date to avoid the need to obtain newer versions.</p>

		Any applicant will be contacted prior to withdrawal of their application and any mitigating circumstances for the delay will be taken into account prior to the decision being made to deem the application withdrawn.
4.3	<p>This needs to be reviewed as it is punitive and draconian. As, if a driver has collected 12 points and has received a one year DVLA ban then to ban him for a further 4 years is unacceptable as this is contrary to section 8.22</p> <p>As per the DFT guidance. New evidence may be produced at an appeal hearing that may result in the court reaching a different decision to that reached by the council or an appeal may be settled by agreement between the licensing authority and the driver on terms which, in the light of new evidence, becomes the appropriate course. If, for example, the allegations against a driver were now, on the balance of probability, considered to be unfounded, a suspension could be lifted or, if the licence was revoked, an expedited re-licensing process used.</p> <p><b>(comment received 45 times)</b></p>	<p>Officers are of the view that this policy point is appropriate to deter those refused and revoked elsewhere from applying to the councils.</p> <p>The policy is not a 'ban' but states the view that anyone recently refused or revoked is likely not going to comply with the policy on suitability, hence the reference to Appendix F in point 8.22.</p> <p>As always, the council is able to depart from policy where there are exceptional circumstances which an applicant is welcome to present as part of their application.</p>
4.4	<p>Drivers should not be penalised where they have already declared convictions, cautions, or DVLA points on a previous application or renewal, but inadvertently fail to repeat the same information on a subsequent renewal where there has been no change in circumstances. Where information has already been disclosed to, and accepted by, the council, this should not be treated as non-disclosure or misconduct. Any such omissions should be addressed as administrative matters, unless there is evidence of deliberate concealment. The requirement to report a wide range of matters within 48 hours is unrealistic for many drivers, particularly those working long hours or awaiting formal written</p>	<p>This comment is not relevant to point 4.4 which states: "Where an applicant has 7 or more points on their DVLA licence for minor traffic or similar offences, a licence will not be granted until at least 5 years have elapsed since the completion of any sentence imposed."</p> <p>The requirement to provide full information on application forms comes from the relevant legislation. The form is clear as to what should be included and provides advice on what drivers should do if they cannot remember all the details. Officers</p>

	<p>confirmation. A 7 working day reporting period would remain robust, enforceable, and fair, while better reflecting real-world working conditions. In line with section 5.1 <b>(comment received 45 times)</b></p>	<p>believe there is a risk to requiring provision of only new information, as drivers may not recall what has and has not previously been notified or declared.  Deliberate concealment in order to obtain a licence would be dealt with more severely than a driver omitting details previously provided.  If the reference is to section 4.7 which requires licence holder to notify all new criminal matters within 48 hours, this comes from the DfT Statutory Standards which the council is expected to maintain unless there is a compelling local reason not to do so. Drivers are able to report matters at the appropriate time using our online form.</p>
Section 6	<p>In Section 6 Enforcement, I have considered the provisions and they seem to me to provide sufficient assurance the license holder will catch any situation in which the license holder has, or may have, breached the conditions of their license. I am therefore reassured that the council has done all that it can to ensure that license holders will notify the council when a holder breaches a condition, including where the holder has received penalty points.</p>	<p>This comment is noted.</p>
6.3	<p>This needs to be reviewed as it is punitive and draconian. As we do not believe that this applies to a Bus/Coach driver carrying over fifty passengers. <b>(comment received 45 times)</b></p>	<p>Licensing are not responsible for the licensing of bus drivers, so we cannot comment on this other than to state that the policy point refers to the enforcement system which ranges with actions for minor breaches through to more serious matters.</p>
7.17	<p>7.17 is overly burdensome and should be deleted.</p>	<p>This requirement was introduced in the current 2021 policy and came into effect from 1 April 2026. Euro 6 vehicles can be over 11</p>

		years old so it is not felt that the policy is overly burdensome.
7.27	All licensed vehicles with a meter should read the same. At the end of the journey if the driver wants to discount the fare for the customer fare enough. Over this Christmas period (2025) I had an incident with a passenger with him telling me I was ripping him off. He told me that COMPANY NAME REDACTED tariff 3 was far cheaper than me. I think whatever the present tariff is all metered vehicles should read that tariff to stop any confusion. This should be part of the compliance test. COMPANY NAME REDACTED appear to be running the meters on the old tariff so I'm not even sure its calendar compliant.	It is not possible for authorities to prevent companies from using a meter with a tariff set lower than the council's maximum fares.
7.27	Amendments ignore the issue of Hackney drivers charging off meter and turning down long trips	Any incidents of this nature should be reported to Licensing for investigation.
8.7	Drivers must be required to take a regular eye test, had some very bad experiences recently	An eye test is a requirement of the standard DVLA medical.  Consideration will be given to frequency of medicals at the next consultation.
8.23-8.24	I see no mention of driver skill. I am a member of the Institute of Advanced Motoring which means I have passed their advanced driving test. When using a taxi, I am always appalled by the driver's slap-dash style of driving. Drivers should have mandatory skills training.	All new applicants (including any drivers whose licences have lapsed) must pass the appropriate practical driving assessment(s) from a list of approved providers, as per 8.23. Where there are concerns as to the standard of driving, we can require an existing licence holder to take an assessment as per 8.24.
8.29	Limiting the number of test attempts within a fixed period is unnecessary. Provided the appropriate fee is paid for each attempt, there is no safety or operational justification for a numerical cap.  <b>(comment received 45 times)</b>	Officers are of the view that setting a limit within a 12 month period is appropriate to ensure spaces are not blocked for other potential new applicants, to allow fair access.

9.13	There is a disparity for the knowledge test between 12 months and 6 months for Hackney and Private Hire  <b>(comment received 45 times)</b>	This comment is unclear as there is no disparity. 9.13 refers operator licence applicants back to the driver's section for details on the test, as operators take the same test as drivers.
Appendix B.3, B.14	The vehicle must display the wording Private Hire Pre-Booked Only on both sides of the vehicle. The signs should measure at least 460 x 150mm The signage should not be removed while the vehicle is licensed  <b>(comment received 45 times)</b>	This shall be considered for inclusion in any future consultation.
Appendix E.20, E.21, E.22	What are these? As there are no rules showing in the Policy or in the suggested changes  <b>(comment received 45 times)</b>	This comment is unclear as these are all existing licence conditions (E.17, E18 and E.19) which have simply changed reference number.
New proposed change	I am disappointed not to see a provision for certified wheelchair carrying: 1) ambulatory users / seated users 2) folded manual wheelchairs/fixed manual wheelchairs  Not all disabilities are equal - an indication whether a taxi is suitable to carry a wheelchair (folded or not) and whether it can carry a wheelchair with a seated user using a ramp - or not. In addition there should be a requirement on taxi firms above a minimum number of owned taxis to have a %age of wheelchair-capable taxis and at least one available at all operational hours - a minimum of one.  Trying to get a taxi to take a seated wheelchair user can be nigh impossible - and is discriminatory.	Officers are happy to take this suggestion forward for a future consultation. Details of firms with accessible vehicles can be found on the councils' websites although we cannot guarantee availability at all times.
New proposed change	Additions requested to the policy we would like to see also would be the below:-  We would like to respectfully request that the authority considers introducing a requirement for all licensed vehicles to be	Officers are happy to take this suggestion forward for a future consultation and often recommend both this and CCTV to vehicle proprietors.

equipped with GPS tracking.

In our view, mandatory GPS tracking would bring many vehicle operators in line with modern industry standards and help move the sector further into the 21st century. Many operators, including ourselves, already use GPS tracking as part of our booking and dispatch systems, and we have seen significant benefits from doing so.

GPS tracking provides an additional layer of safety and accountability for passengers, drivers, and operators. It allows operators to monitor journeys in real time and maintain a record of vehicle movements, which can be extremely valuable in situations where concerns or complaints arise.

There have been numerous occasions where our GPS records have assisted in resolving disputes, locating vehicles, and supporting investigations where taxis or private hire vehicles were involved in incidents. This type of data can also be helpful for law enforcement when investigating crimes or safeguarding issues.

In addition, GPS tracking offers reassurance to passengers and parents who may be booking journeys for family members, as they know the vehicle's journey can be monitored by the operator. Introducing a requirement for licensed vehicles to have GPS tracking would help improve transparency, enhance passenger safety, and create a more consistent standard across operators.

We believe this would be a positive step for the industry and would welcome the authority's consideration of this proposal.

Thank you for considering this feedback as part of the consultation on the

	proposed operator licence amendments other than the amendments stated above we completely agree and support the revised policy.	
New proposed change	Cameras to be mandatory in each car with live reporting at control centre or independent company office.	Mandatory CCTV was considered previously and this was not deemed to be appropriate, but we can revisit this at the next consultation. National government is also considering this matter and it may become a required standard for all licensed vehicles.
Not relevant to policy	REDACTED It's nonsense that my licence isn't valid where I live, especially given the criteria for being granted the licence are virtually identical between different licencing authorities. What a waste of time having all these DCs duplicating work... make licences issues in different regions valid in ALL regions	This is a current legal requirement. The licensing of taxis and private hire vehicles may well change as a result of central government proposed changes.
Not relevant to policy	Out of area private hire e.g. Uber driver should not roaming around and pick up passengers and drop off passengers in SODC. council should prohibit app based platforms to run in the council area as they don't operating licence.	All out of area private hire drivers including those who work for Uber are permitted to pick up in the SODC and VOWH areas provided they have a properly made booking. This is lawful and the councils cannot prevent this.
Not relevant to policy	Digital Modernisation – Online Driver Portal We strongly encourage the council to introduce a secure online driver portal for licence holders. Each driver should have their own login, allowing them to: <ul style="list-style-type: none"> <li>• submit renewals for badges and vehicle licences,</li> <li>• update details when required,</li> <li>• upload documents securely,</li> <li>• track application progress.</li> </ul> This would reduce paperwork, save time for drivers and officers, minimise errors, and improve overall compliance. <b>(Comment received 45 times)</b>	We would support this proposal, and shall continue to search for an appropriate product at a reasonable price given the cost of this would impact on applicants and licence holders.

Not relevant to policy	I am happy with all the proposed changes. But I think you also need to advise taxi drivers to always drive at 20 mph in the zones created by the council, as they frequently speed at 30 mph in my experience.	This comment will be passed to Thames Valley Roads Policing for their information.
Not relevant to policy	The policing of the main rank in Abingdon needs to be addressed, we as drivers as the public not to park there and we get tirades of abuse	Private vehicles parking on the rank is the responsibility of Oxfordshire County Council.
Not relevant to policy	The time it takes to get a plate on a new or transfer of license needs to be lower, as owner drivers you can never plan for a failure of a vehicle or a crash, so when this happens it should be a quick turn around to get us back on the road 1-3 days not weeks	Change of vehicle applications have always been prioritised and are usually done within five working days.
Not relevant to policy	<p>We respectfully request that the council:</p> <ul style="list-style-type: none"> <li>• Clearly distinguish between policy changes and guidance</li> <li>• Apply a proportionate, risk-based approach</li> <li>• Avoid penalising drivers for previously declared information</li> <li>• Improve direct communication for urgent matters</li> <li>• Review taxi rank provision</li> <li>• Expand access to vehicle compliance testing</li> <li>• Introduce a digital driver portal</li> <li>• Consult separately on expanded enforcement and penalty regimes</li> </ul> <p>We remain committed to working constructively with the council to support a fair, safe, and efficient licensing framework.</p> <p>We would also raise serious concern about the lack of equivalent training and safeguards for licensing officers. While drivers, operators, and taxi staff are required to undergo mandatory training and are held to strict standards, there is no evidence that licensing officers are subject to the same level of accountability, cultural awareness, or communication training. This is</p>	<p>We believe the consultation was clear in respect of the type of change.</p> <p>Our enforcement policy is clear that we take a proportionate and risk-based approach to breaches.</p> <p>Drivers who are unclear on previously declared information are welcome to contact officers for guidance.</p> <p>It is unclear what is meant by 'direct communication'; the team has a direct email address for each council and most emails are read on the day of receipt, so can be actioned if urgent. Any examples of slow response to an urgent issue would be welcomed and can then be investigated.</p> <p>A taxi rank review is already underway with Oxfordshire County Council.</p> <p>We have two proposed new compliance test garages which will be assessed once the policy review work is complete. Any MOT garage which meets the</p>

	<p>particularly troubling given that a substantial proportion of licensed drivers are from ethnic minority backgrounds and that, for many, English is not their first language.</p> <p>In practice, this creates a clear imbalance of power and a real risk of misunderstanding, misinterpretation, and unfair enforcement. Written rules and instructions are often complex, yet officers are not routinely equipped to communicate effectively with drivers who have limited English written proficiency. There is a pressing need for properly trained officers, or readily available support staff, who can communicate in commonly spoken languages such as Urdu and Punjabi. Without such safeguards, drivers are placed at a disadvantage, and enforcement decisions risk being flawed, inconsistent, and discriminatory in effect, even if not in intention.</p> <p>We respectfully submit that fair regulation requires not only training and scrutiny of drivers, but also proper training, oversight, and accountability of those enforcing the rules. Failure to address this undermines confidence in the licensing system and raises legitimate concerns about equality, proportionality, and procedural fairness.</p> <p><b>(Comment received 44 times)</b></p>	<p>requirements is able to apply. We are not aware of a significant issue in delays arranging compliance tests.</p> <p>We would agree a portal for applicants and licence holders would be useful, as noted above.</p> <p>We have no current plans to consult on the penalty points scheme and are unclear what is meant by ‘expanded enforcement and penalty regimes’.</p> <p>We always seek to write policies and communications in plain English and it is a requirement of both our policy and the Department for Transport’s Statutory Standards that drivers are required to have good proficiency in the English language, in both written and spoken form.</p> <p>All council officers receive regular training relevant to their role, as well as equality, diversity and inclusivity training which is refreshed at regular intervals. Officers are required to comply with various council policies including matters relating to their conduct.</p>
<p>Not relevant to policy</p>	<p>The policy does not adequately address taxi rank provision and management, which has a direct impact on congestion, compliance, and driver behaviour. Insufficient or poorly located ranks contribute to unnecessary circulation, congestion, and inadvertent non-compliance. A review of rank availability and enforcement should form part of a holistic compliance strategy.</p> <p><b>(comment received 45 times)</b></p>	<p>A rank review is already underway with Oxfordshire County Council.</p>

<p>Not relevant to policy</p>	<p>What will you be doing to ensure taxi drivers meet national minimum wage?  Every year the government increases national minimum wage, inflation pushes up prices and the taxi tariff stays the same. I suggest the tariff should be increased yearly in April, in line with inflation and national minimum wage increases. As a taxi driver who has 17 years of experience locally I can tell you that the market has changed during that time; recently it has become much more polarised with the peak times being very busy and off peak becoming very quiet. I struggle to see how any Hackney carriage in SODC or Vale is making anywhere near national minimum hour rate for the hours worked. I would suggest you reach out to them and find out for yourselves. As the decision maker for the tariff the responsibility for ensuring national minimum wage rests on your shoulders. By keeping the tariffs low you are contributing to modern slavery by denying the drivers the ability to earn a fair wage for the time they are working. Instead you are talking about tinted windows, increasing drivers costs for card payment machines and fees and yet more time consuming safety checks which further reduce the hourly rate the drivers are able to achieve.</p>	<p>This comment will be noted for the next review of the tariff.</p>
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## Our commitment to equal access for all

We are committed to making sure that residents have equal access to all council services. Please help us to keep track of how successfully we are achieving this by ticking the appropriate boxes below.

All information is confidential and will only be used to help us monitor participation rates among all groups in our community.

### Q11. What is your sex?

62 per cent are male and 24 per cent are female.

Option	Total	Percent
Male	81	62%
Female	31	24%
Prefer not to say	16	12%
Not Answered	3	2%

### Q12. Is the gender you identify with the same as your sex registered at birth?

Most respondents (83 per cent) gender is the same as their sex registered at birth.

Option	Total	Percent
Yes	109	83%
Prefer not to say	15	11%
No (please specify below):	3	2%
Not Answered	4	3%

### Q13. How old are you?

Most respondents are aged between 35 to 64, more specifically 21 per cent from 55- to 64-year-olds, 18 per cent from 45- to 54-year-olds and 17 per cent from 35- to 44-year-olds.

Option	Total	Percent
Under 16	0	0%
16-24	1	0%
25-34	5	4%
35-44	23	17%
45-54	24	18%
55-64	28	21%
65-74	10	8%
75+	13	10%
Prefer not to say	23	17%
Not Answered	4	3%

#### Q14. What is your ethnic group?

Over half of respondents (51 per cent) are from a White ethnic background.

Option	Total	Percent
White - English, Welsh, Scottish, Northern Irish, British	67	51%
White - Irish	1	0%
White - Gypsy or Traveller	0	0%
White - Roma	1	0%
Any other White background (you can specify below)	13	10%
Asian or Asian British - Indian	1	0%
Asian or Asian British - Pakistani	10	8%
Asian or Asian British - Bangladeshi	4	3%
Asian or Asian British - Chinese	1	0%
Any other Asian background (you can specify below)	1	0%
Black, Black British - Caribbean	2	1%
Black, Black British - African background	1	0%
Any other Black, Black British, Caribbean or African background (you can specify below)	0	0%
Mixed or Multiple Ethnic Groups - White and Black Caribbean	0	0%
Mixed or Multiple Ethnic Groups - White and Black African	0	0%
Mixed or Multiple Ethnic Groups - White and Asian	1	0%
Any other Mixed or Multiple background (you can specify below)	0	0%
Any other ethnic group - Arab	0	0%
Any other ethnic group (you can specify below)	1	0%
Prefer not to say	21	16%
Not Answered	6	4%

#### Q15. Do you have any physical or mental health conditions or illness lasting or expecting to last 12 months or more?

67 per cent of respondents, don't have a physical or mental health condition or illness, whilst 11 per cent do.

Option	Total	Percent
Yes	15	11%
No	88	67%
Prefer not to say	26	20%
Not Answered	2	1%

#### Q16. Do any of your conditions or illnesses reduce your ability to carry out day to day activities?

Of the 11 per cent that said they have a physical or mental health condition or illness 8 per cent said their conditions or illnesses reduce their ability to carry out day to day activities by a lot (4 per cent) and by a little (4 per cent).

<b>Option</b>	<b>Total</b>	<b>Percent</b>
Yes, a lot	6	4%
Yes, a little	6	4%
Not at all	4	3%
Not Answered	115	88%