

Business Operator Meeting

Wednesday 28th July 2021

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1. Introduction

Councillor Ferriby opened the meeting and thanked everyone for attending. Carol Stos continued the welcome and thanked everyone for their support through a tough nearly 18 months.

Officers Present:

Sarah Ferriby (SF)	Councillor
Chris Goodall (CG)	Act. Principal Officer
Carol Stos (CS)	Licensing Service Manager
Steven Knighton (STK)	Enforcement Manager
Elisabeth Spencer (ES)	Customer Service Manager
Emma Stirzaker-Lyons (ESL)	Service Support – Licensing Officer
Samantha Kaye (SK)	Service Support – Licensing Officer

2. Outstanding Actions

There were no outstanding matters from the last meeting.

3. Licensing Service Update

Drop in Sessions for Operators and their Staff

The Service appreciates the attendance of Operators' at the Operators meetings but also understands it can sometimes be difficult for everyone to voice their concerns, queries or requests. Going forward there will be 'workshops' and smaller 'focus groups' to lower the numbers in each group to give everyone an opportunity to speak and be heard by the Officers. This will also allow the Service to discuss any potential changes to the way the Service works in more detail and to be able to provide support to everyone if the changes affect your business.

The sessions will either be held at the Depot or on request at your Operator base to work with you and key members of your business on any anything you think will help such as, a business compliance issue, understanding policy and conditions as well as licensing queries about new or renewal processes, documentation, completing application forms etc. If you are interested in accessing this please email taxi.testing@bradford.gov.uk for the attention of Elisabeth Spencer with your Operator name and what support you would like.

Clean Air Zone

Bradford Council are directed by the Government to implement the Clean Air Zone and improve air quality by 2022 at the latest. Unless advised otherwise by Parliament this will be going ahead. The CAZ seeks to provide significant improvements in the health of our residents and achieve an estimated reduction in greenhouse gas emissions of 150,000 tonnes over the life of the CAZ Plan. The Council have launched the online application process for the £10m Clean Air Taxi Programme which will provide up to 3,000 grants of between £3,200 to £5,000 for taxi and Private Hire proprietors to upgrade their vehicles to CAZ Standard.

The Service does not have the scope to change the Clean Air Zone Standards for taxi or Private Hire vehicles without further Council Executive committee decisions. The implication for allowing all Private Hire vehicles to have the option of using Euro 6 diesel cars is that the Council would then be required to implement a CAZ D, affecting passenger cars, in order to achieve compliance with legal limits for air quality.

Currently 34% of licensed vehicles are petrol electric hybrid and the number of licensed Euro 6 diesel Private Hire vehicles is 16%. The plans for the CAZ in Leeds did not allow Euro 6 diesel Private Hire vehicles although they did allow exemptions for Hackney Carriages.

Birmingham has allowed Euro 6 diesel Private Hire vehicles however they have implemented a CAZ D whereby all passenger cars are affected and you will also note that the maximum grant allowed for Euro 6 diesel private hire vehicles in Birmingham is £1000 and not the £3,200 grant that is being offered by the Council. The Council has secured the highest level of grant anywhere in the UK to help HCV and PHV drivers comply with the CAZ.

Licensing Service & CAZ

As a Service we listened to the comments from the trade and have extended the maximum licensing life of a CAZ compliant vehicle to 15 years. We also helped the trade by allowing existing vehicles reaching their maximum age to remain licensed until December 2021. Proprietors can also keep their existing vehicle to the previous maximum age of 10 years for a saloon vehicle and 12 years for a WAV if they wished. It is important to consider that at max age every proprietor would need to have funds to replace their old vehicle. The CAZ grant is in addition to that to enable the transition to a compliant vehicle.

For an LPG conversion to be CAZ compliant the conversion must be done to a petrol vehicle only, by an approved LPG installer. Approved installers can be found at [Where Can I Find an Approved Installer? \(drivelpg.co.uk\)](http://drivelpg.co.uk)

The vehicle on which the LPG installation is done must be of the correct CAZ compliant Euro standard for that vehicle type. i.e. CAZ standard for a 4 seat PHV is Euro 5 petrol hybrid so a LPG conversion must be done on a minimum Euro 5 petrol car.

We will also consider a grant if someone has a Euro 4 or older vehicle who wants to buy a Euro 5 petrol vehicle and then convert that vehicle to LPG. The maximum grant in this case is still £3,200.

For those considering other retrofits there are also some available through CVRAS (clean vehicle retrofit accreditation scheme). These retrofits are very specific to vehicle models and years. Details of what retrofits are available can be found at: [Clean Vehicle Retrofit Accreditation Scheme - Energy Saving Trust](#) where there is a register of approved retrofits and suppliers. This list also advises on what type, make and model vehicle the retrofit is suitable for.

The Clean Air team are unable to advise on the suitability of any retrofits. It is down to the vehicle proprietor to ensure that the retrofit they choose is compliant with Clean Air Zone standards.

CAZ Queries

Operator: Are the Euro 5 diesel conversions for all vehicles?

Response: No it is not suitable for every vehicle, please see note above with the link which will take you to a list of makes and models it is suitable for. It is up to the proprietor to make the decision about which vehicle they would like to purchase.

Operator: Are there any exemptions for Euro 6 diesel Private Hire saloon vehicles?

Response: There are no exemptions, please read the vehicle specification for details about compliant vehicles, which can be found here - [Vehicle Specification pdf](#)

Operator: Are all Hackney Carriage vehicles exempt from CAZ charges?

Response: All licensed vehicles are subject to the Clean Air Zone requirements, if the vehicle is CAZ compliant no charges will be issued.

Operator: Why weren't Euro 6 vehicles exempt?

Response: Please see point 3 of meeting notes

Operator: To purchase a WAV vehicle it will cost around 25k, why can't consideration be given to the different categories of the Euro 6 such as, A, B or C?

Response: Please put your suggestion forward to the CAZ team, as this is not a decision that can be made by the Service.

Operator: Will Leeds have the same CAZ requirements as Bradford?

Response: No, each council is given their own directive from the Government. When the emission tests were carried out again last year, Leeds had managed to reduce the emissions to a suitable level whereas the emissions in Bradford had risen.

Operator: Why can't all the Yorkshire Councils get together and have the same CAZ requirements, as a vehicle might not have charges in one district but might incur charges in another? **Response:** As above.

Operator: Why are Bradford charging £12.50 to enter CAZ when Bath and Birmingham are only charging £8?

Response: The charges were decided by the Government not by Bradford Council, however the Council have written to the Government for a request to reduce the fees, as soon as a decision is made the trade will be notified. The charges do not start until January 2022.

Update: The level of charge is proposed by the Council and is subject to approval by the Government.

The proposed daily charge for Bradford was determined taking account of the CAZ proposed in Leeds and Newcastle and was set at £12.50. The Council no longer feels that this level of charge is appropriate and has presented a case to Government to reduce the charge to £7. As the Government makes a £2 charge for every payment made through the Government Payment Portal for a non-compliant vehicle, the daily charge proposed by the Council is actually £5 with a £2 additional charge by the Government

The Government is due to make a decision on the level of daily charge for taxis in the Bradford CAZ on the 7th September and any change will be communicated to the licensed taxi trade.

Operator: Why aren't drivers eligible for grants when upgrading a saloon vehicle to a WAV or minibus, the CAZ team said it's just like for like but surely the drivers are doing a good thing by offering more WAV's?

Response: Please put your suggestion forward to the CAZ team, as this is not a decision that can be made by the Service.

Operator: We keep getting passed around between the Licensing Service and the CAZ team, what else can we do?

Response: If you have a query in regards to Licensing please email the Licensing team at taxi.testing@bradford.gov.uk, if your query is in regards to the clean air zone please contact them directly using their contact form which can be found here:

[Contact us - Breathe better Bradford](#)

Operator: How often is the report updated for a vehicle being a PH/HC vehicle, if we surrender our plates and no longer use the vehicle to work will we incur charges?

Response: At the moment a list of all licensed vehicles are uploaded to the Department for Environmental, Food and Rural Affairs (DEFRA) database on a weekly basis. This is due to change however we have not heard anything from the department yet. As soon as there are any updates we will notify the Trade via email.

Operator: What about if we live within the CAZ, will we incur charges?

Response: Yes, the CAZ charges are daily charges and not charges for every time you enter the zone, your vehicle is a licensed vehicle 365 days of the year so the ANPR cameras will recognise the vehicle as being a HC or PH.

Operator: What about if we want to do our own shopping and are using the vehicle for personal use and not working, will we incur charges?

Response: As above.

4. Enforcement Update

Activity during COVID and moving forward

During the initial stages of the pandemic around 2,000 licenses, including driver and vehicles were extended free of charge at a time when officers were having to personally adapt to the risks of COVID-19 and the significant limitations of home working.

In addition to licence extensions, drivers and proprietors were offered the opportunity to take a licensing holiday to help keep their costs down as there was a significantly reduced demand for licenced vehicle services.

Enforcement Officers patrolled the district throughout the pandemic issuing guidance on reducing risk of infection to drivers and passengers. They actively encouraged and advised drivers, proprietors and operators to clean their vehicles between bookings; use PPE and apply best practices for social distancing whilst at the same time ensuring licensing conditions set by the Council were met and ensuring the safety of the travelling public.

Enforcement Officers distributed in excess of 30,000 face coverings, 6,000 bottles of hand sanitiser and 3,000 in-vehicle screens to drivers as well as arranging a COVID sterilisation service for licensed vehicles.

In addition, the Enforcement Team reviewed requests for changes to standard working practices that included Operators allowing dispatch staff to work from home during quiet hours. The base check was also adapted so that Operators could submit supporting documents electronically, reducing the need for physical attendance at your bases.

As restrictions have eased we anticipate that some form of normality will resume with our activity, but we do recognise the benefits of some of the changes we made as well as recognising the downfall of others.

DFT Statutory Guidance

The Department for Transport ran a public consultation between February and April 2019 inviting respondents to submit their views on Statutory Taxi and Private Hire Vehicle Standards.

Following this consultation, the government issued statutory taxi and private hire vehicle (PHV) standards to licensing authorities last year, outlining how they should carry out their licensing function.

The focus of these standards is protecting children and vulnerable adults, however, all passengers will benefit from the recommendations, which aim to better regulate the Taxi and PHV sector. As this is statutory guidance the DFT and Government expect it to be implemented by all local authorities unless there is a compelling local cause not to. Officers from the council have reviewed the guidance and the service already complies or does more than the guidance states.

There are elements of the guidance that council will need to consider in further detail and changes to policy and conditions will be made. This will mostly affect Operators and Proprietors. The Licensing Service would like to set up a working group of Operators to discuss the proposed changes and how it will affect your business.

If you would like to take part then please submit your details to the licensing service by **23rd August 2021**, so we can plan the first meeting at a suitable location.

If you would like to review the guidance, then it is available here - [Statutory Taxi & Private Hire Vehicle](#)

Information on the consultation can be found [Taxi and Private Hire Vehicle Licensing: Protecting Users](#)

DFT Queries

Operator: Will you take written submissions regarding the DFT meetings or will we have to attend meetings in person in regards to the new guidance?

Response: The Service will consider written submissions as well as offer face to face meetings either at the Depot or at the Operator's base to help prepare you all for the changes that will be coming.

NR3 – National Register of Refused or Revoked Drivers

In August 2019, the Service announced that Bradford was developing an NR3 Policy to form part of the 'fit and proper' test. This has now been approved and Bradford Council is using the NR3 register. Officers will be checking all applications for driver licenses to confirm that an individual has not been refused or revoked with another authority. This check will be performed when an application for a new driver or a renewal driver has been submitted.

Equally, anyone refused or revoked by the service will have their details recorded. Those revoked or refused will be on the register for 25 years and the information recorded will be minimal.

Recording this information on NR3 does not mean that a person will be automatically prevented from securing a licence in future, but is intended to ensure that licensing authorities are able to access the full licensing history.

NR3 Queries

Operator: Why will the revocation or refusal details be held on the NR3 register for 25 years, why not 10 years or 5 years?

Response: The 25 years' guideline was all part of the decisions made between the Government and NAFN, the Service have had no involvement in deciding how long the driver's details will remain on the register.

Operator: Are everyone's details on the NR3 register?

Response: No, only the details of drivers that have had a licence revoked or refused with a local authority. If anyone has previously had a licence revoked or refused their details will be inputted on to the NR3 database with the appropriate notification.

Operator: When will the register start from?

Response: The service started using the NR3 database as part of their mandatory checks for driver applications in July 2021.

Operator: Will a driver still be considered for a licence if revoked or refused with another Authority?

Response: Yes, all considerations will be given and each application will be considered on an individual basis and mitigating circumstances will be taken into account.

Visits to Shearbridge

Covid has resulted in several changes to the way we interact with our customers that mean we no longer require face to face appointments or written applications. This saves licensees time and reduces the need to travel for those that live further away. Customers will still visit Shearbridge for pre-arranged appointments or vehicle testing and it's important that visitors adhere to the sites safety requirements. If you have an appointment, please attend alone we cannot accommodate extra people at appointments unless pre-arranged.

The depot is a high traffic area with regular vehicle movements, therefore the potential for accident is high. Staff have set H&S requirements that they have to comply with. To keep visitors safe, please remain in your vehicles. Staff will be expecting you and will greet you at your vehicle at your appointment time.

Please do not get out of your vehicle, wait for the member of staff at the parking area you have been directed towards.

This includes those attending for vehicle tests, please wait in the parking bays for the vehicle testers who will come out and greet you at your car. Walking around the workshops is particularly dangerous.

Working Together

As Operators and business owners you are a crucial part of the licensing trade, the direct point of contact between the customers and the drivers.

The Service understands that drivers will come to you with many questions or issues and you may require further support from the Licensing Service. Equally you will want to improve your services to benefit your customers.

With this in mind, we will be looking into improvements to how we communicate with the Operators, how information is passed from the service to you and vice versa. In the meantime, you can continue to contact us via the email address taxi.testing@bradford.gov.uk and Officers will endeavour to assist with your enquiries.

Other Queries

Operator: If we've to stay in our vehicles whilst at the Depot what about bathroom breaks?

Response: If you let a member of staff know you need a toilet break they will guide you to where you need to be. The garage is a busy working environment to have people walking around and that's why we ask you to remain in your vehicle at all times, if you arrive for a test and the shutters are down don't leave your vehicle, the mechanics know you are there and will come out to greet you.

Operator: What about the 5-star rating, when will that resume? **Response:** Please see response in the agenda points section.

5. Licensing Update

The Licensing Service understands that clearer instructions are needed for using the online service for submitting applications and uploading documents that have been requested via the Licensing Team. The Licensing Service would like to work together with the Licensed Operators and Designated Representatives to offer further support to ensuring the trade have the skills and knowledge to be able to complete applications and submit documents with ease.

Online Applications

Due to advances in technology, in January 2020 the Licensing Service introduced an online system to submit new and renewal applications for both drivers and vehicles, less than 3 months later the pandemic forced the Service to suspend all new driver applications and modular training due to the face-to-face appointments. From Friday 23rd July 2021 the Licensing Service re-commenced new driver applications, the applications that were already submitted before the March 2020 lockdown will be processed as a priority. The new driver interviews will no longer be face-to-face and will be conducted via Microsoft Teams, this is to streamline the new driver

application process and to enable a smoother and more time efficient service for an applicant to acquire a HC/PH driver licence.

DBS Service

During the March 2020 lockdown the Licensing Service created a working partnership with the Complete Background Screening Service (CBS) to offer an online service for drivers to submit a DBS application without having to book an appointment at the Shearbridge Depot. The Service requests ID documents electronically to enable the driver to complete their application in their own time.

Training

The Service is currently exploring different options to allow current drivers to complete the modular training programmes online. New driver training has now recommenced.

Customer Surveys

Over the last few weeks the Service have put in place customer surveys that will be emailed to those that have requested any help or support. The surveys are no different to the ones you may have been emailed from utility companies or from your broadband provider asking you to rate their service. The Service will email the relevant survey to a customer at the end of the interaction with the Service asking for feedback. Please encourage everyone to complete the surveys – they take a few moments of time and provide valuable feedback to the Service to allow improvements in the Services offered or to signal what is working well.

Work Shops and Drop in Sessions

Following on from previous feedback, the Customer Service Manager will be providing valuable 'work shops' and 'drop in sessions' around the district with times and days to suit the needs of licensees. This will be to provide support with anything from issues you may be having with the base or helping to support drivers fill out applications or upload documents. It's beneficial to the driver and to yourself and us to ensure everyone has the skills and knowledge and to feel confident emailing documents, using smart forms and completing online applications.

The Service is aware that further support is required in regards to maintaining subscriptions with the DBS service, the new application process & uploading documentation. If any further support is needed please email the Service at taxi.testing@bradford.gov.uk for the attention of Elisabeth Spencer with your ideas and it will be incorporated into the 'work shops'.

Operator: Has the training started again?

Response: The Service is currently offering training courses, however these are only available to new applicants for the moment. The Service is considering the different options available to allow current drivers to complete their modular training

online. This will not prevent a badge renewal as a condition for training will be added to the licence.

6. Agenda Points

The Licensing Service received agenda points prior to the meeting. Thank you to those that provided these questions or queries.

Point 1. On reaching the age of 70 I got a shock. My P.H. insurance more than doubled From £1300 to £2896. Even with 12 years No claims discount. I call this age discrimination. What does the trade say about it? I've done this job for 40 years and for the last 20 I've had to pay over the odds for things due to other people's whims and greed.

Response: STK recently attended a meeting hosted by the Institute of Licensing, with representatives from all major Licensing Authorities in the North of England. During the meeting an expert from a corporate law firm advised us on Insurance Scams, primarily surrounding road traffic accidents and the hiring of replacement vehicles. It's evident that this activity is pushing up insurance premiums as insurance companies need to cover their losses that can mount into thousands of pounds.

These scams are taking place in Bradford, Leeds, Sheffield etc. Drivers are often unaware of the scam but are enticed into the scam by the offer of an upfront premium for referring their accident to a particular company who will assist them in resolving their claim, hiring a replacement car etc. Many operators are advertising these services in their bases without knowing what's going on behind the scenes. We have already started to improve our processes to capture relevant information following a road traffic collision. This information can be requested by insurance companies should they be investigating a claim that they believe to be fraud. Further to this we will be looking into how our hire companies operate, their compliance requirement and insurance cover etc.

We advise anyone unfortunate enough to be involved in an accident to deal with your insurance company directly so not to open the door to the scammers. Drive defensively and consider using dash cams to evidence non fault RTC's. In regards to your concern with high premiums. You can raise concern with high premiums through the Financial Ombudsman, link below.

[Financial Ombudsman Complaints](#)

Point 2. I want to know why I cannot use a E Class 230DE for my business. I only do corporate work and very rarely drive through Bradford only to get to the motorway. The plug in Petrol Hybrid cars are no good for my work I.E Heathrow Gatwick Stanstead Manchester Airports. And as I have a exemption for my car (No decals or Plate) I have to run a premium car I.E Mercedes E CLASS . BMW 5 Series . Audi A6.

Response: Bradford is one of several local authorities who have been directed by the government to improve air quality in the shortest possible time as nitrogen dioxide levels have been monitored in the district and exceed the legal limits.

In recognition of the instructions issued to the Council, the Licensing Service has amended the vehicle specification so that all new vehicles being licensed meet the CAZ requirements and made provision for these vehicles to be licensed for longer periods of time increasing the Max age to 15 years for those cleaner vehicles. Subsequently a Mercedes E Class 230DE, a Diesel Saloon Vehicle, would not meet the vehicle specification if this car was submitted for a first licence.

There are some national and local exemptions from the charge. Corporate or executive hire and reward is not included in these exemptions, these exemptions are applied by the Government and not local authority. Further info can be found here - [Guidance Driving in a Clean Air Zone](#)

Point 3. Dual rules for Euro 6 compliant vehicles. Those Hackney carriages operating in the CAZ are not subject to a charge.

Response: Euro 6 Diesel, Private Hire Minibus vehicles (5-8 passenger seats) and PHV WAV are CAZ compliant.

The allowance for Minibuses and Wheel Chair Accessible Vehicles (WAV) was made, as there is no reasonable alternative for WAV or minibuses at this time. As all of Bradford Hackney Carriages are required to be WAV there are very limited options available for vehicles that are Petrol-Hybrid, Electric etc. In making this exemption for the Hackney Carriage vehicles it was reasonable to apply a direct reflection to the Private Hire vehicles as well.

Point 4. Private Hire taxis that meet the Euro 6 Standard are not exempt from the CAZ charge.

Response: Once a vehicle is licensed it remains a PHV/HCV at all times and is continually subject to the legal and conditional requirements of that licence. Case Law supporting this can be found in the stated case of [Benson V Boyce 1997](#).

The charge in this case was for driving a Private Hire Vehicle without having a PH Drivers licence. The defendant/appellant in this case attempted to use the mitigation that he was not using the vehicle for private hire use (was not working) and therefore he believed there was no offence. The Judge in this case found that once the vehicle is granted a private hire vehicle licence, the vehicle is always a private hire vehicle.

Point 5. WHY EURO 6diesel CARS ARE NOT ALLOWED WHILE E6 MINIBUS AND WAV ARE??. Private Hire Vehicles 4 passenger seats (Non-Wheelchair Accessible Vehicle) Euro 5/6 Petrol Hybrid or LPG Atmos-Clear Ltd. The EXO:1 Unit (For mainstream automotive use) currently retails, including full approved installation, at a cost of £459.00 inclusive of VAT. The grant among lowest compared to other councils Scotland £10,000 Manchester, Birmingham £5000 Bath £4500 Portsmouth and Bradford £4000

Response: Covered in previous agenda points above. Grants are awarded by the Government and are not controlled by the Licensing Service.

Point 6. Why do we have to pay more for annual checks on vehicle which are over 6 years old when the test is not more time consuming or any different than newer cars

Response: Prior to 2015 vehicles over 6 years old were subject to and charged for 2 tests per year, costing the proprietor £350 per year. This was replaced with random vehicle testing in 2015 reducing the vehicle cost to £240 for vehicles that are over 6.

The difference in cost covers the additional administration, testing and Enforcement requirements for vehicles over 6 years of age.

Point 7. Base audit online, we have struggle to upload and attach documents online whilst doing the base audit via emails. We were unaware that the attachments did not go through and we were told over the phone that you are having issues with your email.

Response: The Online submissions were designed to assist operators during the pandemic and reduce the overall time required for EO's to visit bases.

Larger operators may have struggled due to limitations on email attachments.

The Annual Base Audit will be reviewed as restrictions continue to lift to ensure that Operators are able to provide the required documentation and information to meet compliance as simply as possible.

Point 8. Five star rating, we would like to know if you are resuming the five star rating (red, amber and green)

Response: The 5 Star Audit project was halted as a result of the pandemic and is under review

Point 9. PTS modular training, when will this resume?

Response: New Driver training has resumed, in small classes to allow for social distancing. We are considering the options for renewal training and are contemplating using an online package.

Point 10. When will you be taking on new applications?

Response: The New Driver Applications are being accepted again and you can complete a new driver application via our website.

Point 11. Private Hire working in other cities, are Bradford Private Hire drivers allowed to work in other cities?

Response: It is lawful for a licensed PHV operator to accept bookings that start and end outside the operator's licensing district, and that a PHV driver can undertake journeys starting anywhere in England and Wales:

Adur District Council V Fry [1997] (between Worthing and Brighton).

In this case the Journey was accepted by an Operator in Hove Borough Council, for a booking starting and finishing in Adur District Council.

An Operator can only dispatch a Driver and vehicle licensed by the same authority, this is known as the trilogy of licenses and means that Bradford Operators can only dispatch Bradford drivers and vehicles.

An Operator can hold licenses for multiple districts and can subcontract between those licenses.

Point 12. CAZ Grant, as one of Bradford's leading Private Hire companies our minibus and wheelchair access vehicles are struggling to purchase replacement vehicles. They believe the grant for these particular vehicles is very low. The cost of a replacement vehicle which meets CAZ's criteria is around £18,000 - £25,000

Response: The Clean Air Team put proposals forward to the Government and the Government made the final decision for what grants would be issued. Grants are awarded by the Government and not the Licensing Service.

Point 13. Can I raise the point of Bradford council allowing more than one operator on a badge? At the moment it's quite concerning the number of dual badged drivers and hard to distinguish for safety and safeguarding, whom they are working for when on road. I remember I was refused similar decals once as council said it would compromise safety as it causes confusion (despite several safeguards) yet the same council allows drivers to work for 2 firms. I would like an operator vote in favour of those who want 2 names on badges and those who don't. At the moment drivers are taking advantage of this.

Response: Operators are able to apply their own discretion, when it comes to drivers working for multiple companies. Drivers are required to provide confirmation, that both operators are happy for the driver to be linked to other companies when they apply. Should you not want your drivers working for other Operators then refuse this permission.

The Drivers vehicle must have permanent decals affixed for the Operator they are working for to prevent confusion. Vehicles with incorrect decals are subject to enforcement action when identified. This can include suspension of the vehicles licence until corrected. The Operator needs to check the vehicle they are dispatching has the correct decals and visors.

7. Action Points

1. Inform the trade on how often the DEFRA report will be updated to ensure vehicles no longer licensed as a PH or HC get charged for entering the CAZ.