

## **Business Operator Meeting**

Tuesday 24<sup>th</sup> March 2026

### **Officers Present:**

Carol Stos (CS)

Steven Knighton (SK)

Elisabeth Spencer (ES)

Licensing Service Manager

Regulatory and Compliance Manager

Customer Service Manager

### **1. Introduction**

Carol Stos commenced the meeting by expressing her appreciation to all attendees. She noted that forthcoming developments include a government-led review of the taxi industry at a national level. There is increasing interest in establishing uniform national standards, and a formal consultation will be launched shortly, providing an opportunity for stakeholders within the trade to contribute their views. We strongly encourage participation in this process. Our commitment remains to collaborate closely with the trade to ensure Bradford continues to be an excellent and rewarding place to work.

### **2. Outstanding Actions**

There were no outstanding actions from the last meeting.

### **3. Service Agenda Points**

#### **Online Modular Training conducted via OpenELMS (ES)**

- Modular Training questions and queries from users

The Licensing Service receives queries daily from OpenELMS users, relating to both technical IT issues and requests for help and guidance relating to accessing their account and enrolling on the training courses.

Around 50% of queries received into the service relate to:

- How do I access my account/set my own password?
- How do I pay for my training?
- Which courses do I need to complete?

These queries are covered within the “OpenELMS Quick-start guide”, which is attached to every initial OpenELMS invitation.

The HCPH Service is continuously looking at reviewing this document to address common issues and queries. Operators are advised if any such queries are directed to them, to signpost to this document in the first instance.

If a driver experiences any technical issues with OpenELMS which are not addressed via the “Quick-start guide” document, encourage drivers to contact the Licensing Service with relevant information, including any screenshots so our team can investigate.

Where any issues cannot be resolved internally, these can be escalated to OpenELMS for further investigation to take place.

The HCPH Service encourages all operators to engage with their drivers regarding the training and ask the right questions – Have they received an invitation? If they did, have they enrolled and completed the mandatory courses available to them?

- Operator engagement with drivers regarding Modular Training

The HCPH Service encourages Operators to directly engage with their drivers regarding their training, if an invitation has been sent to them.

Existing, “mid-licence” drivers with long since expired training are being sent invitations to complete training via OpenELMS.

We are also pro-actively sending invitations to drivers 3 months in advance of their renewal invitation, who also have expired training. This is to ensure that they have plenty of time to complete all requirements in advance of the renewal invitation, which is issued 6 weeks prior to the licence expiry date.

**Operator:** The onus of completing training is on the driver. There are concerns that drivers are getting friends, family or colleagues to complete this for them, on their behalf.

We feel that drivers are not getting the same engagement as the previous face to face format and we struggle to see the benefit to the driver, especially if they are not the ones to complete it.

**Response:** When accessing OpenELMS, users are accepting a statement that only the named account holder should be completing any training on that account. Any driver letting someone else complete training on their behalf is dishonest and this should be discouraged by operators or reported to the Licensing Service.

**Operator:** We wanted to hold face to face options at our base of operations, but drivers are producing OpenELMS certificates and are not interested in doing this.

We have concerns that on important topics i.e. Disability Awareness that drivers are being marked as aware and knowledgeable by producing these certificates and then would be held to account and face consequences when they never took the training themselves.

As a reputable operator, I have concerns that drivers are not completing the training independently and the delivery must change, with methods to ensure driver attendance.

**Response:** Operators are encouraged to highlight the benefits of taking the training in the current online format. Any content can be re-visited and learning refreshed at the driver's convenience. The training covers many aspects of being a driver, such as licensing processes/compliance & vehicle safety checks.

It should be encouraged by Operators that drivers complete this training for their own benefit. The Licensing Service is looking at ways of improving and delivering modular training, but consideration must be made to the number of drivers currently licensed in Bradford, which is currently around nine and half thousand and rising.

We are conducting further assessments and checks on new applicants through the new driver application process, to ensure that they have completed their training independently before a licence is issued.

We are looking at ways of introducing further checks for existing drivers, to ensure that they too have completed the training.

We would welcome any of the larger operators with the facilities and capacity to conduct further training with their drivers to do so, but they must be encouraged to take the OpenELMS training seriously in the meantime.

All feedback provided about the online modular training has been taken on-board and we will be working with operators going forwards on this topic.

**Operator:** About contacting drivers after they have completed their training to establish if they have independently done this, does this divert Licensing Service resources away from other issues?

Could technology such as webinars and similar online sessions be used to ensure that the person completing the training is the person named on the account?

**Response:** We have taken this feedback on-board and are looking at implementing further changes soon and looking at long term solutions to the issues raised.

### **Enhanced Disclosure and Barring Service Certificates**

The Licensing Service has started to identify via background screening that some drivers have failed to maintain a subscription to the DBS Update Service. The most likely cause of falling offline is due to the £16.00 annual payment not being made.

It has also been noted that some drivers may not know how to check their DBS or access their update service account.

We encourage all operators to encourage your drivers to check their DBS subscription is still active as at the point of licence renewal, as this can delay the issuing of a licence and cause further issues for drivers.

We will be notifying drivers who have fallen offline and then providing them with guidance on how to proceed with a new DBS.

The DBS service does send automatic reminders in the run up to the DBS update service due date. We are finding that these warning emails from the DBS service are being ignored or missed by drivers, leading them to fall offline.

The DBS update service payment is linked to a payment card, rather than a standing order or direct debit. For example, if a driver was to get a new payment card or change bank and fail to update their details via their DBS update service account, this would result in their DBS falling offline.

Should a DBS fall offline, it is costly to re-apply for a new DBS and subscribe this to the update service, so maintaining the annual subscription is also much more economical for drivers.

The Licensing Service will be issuing further guidance to the drivers in due course on how to access their DBS update service account and check the status of their DBS.

**Operator:** Is it possible to change the payment method to direct debit? This would reduce the number of failed update service payments and related issues for drivers.

**Response:** This was previously raised by several licensing authorities at a recent Institute of Licensing meetings, where they made representations for this to be changed.

The response from the DBS service was that Licensing Authorities are not the subscription holders, so until their direct customers – the drivers – make this issue known directly with them, it is unlikely to change.

This means that unfortunately, this issue is outside of the remit of the Licensing Service.

**Operator:** The Licensing Service referred to a new process for proactively checking driver DBS statuses, to see if they are offline or if there is any new information.

When will this process be live and how often will the checks be conducted by the service?

**Response:** This process is currently live, and we are in control of how often the check is conducted. When the triggers within this process are met – such as having “new information” on a certificate, this would mean that an Officer will directly contact the driver to establish a new DBS and get the required information needed to make a further decision on suitability, if necessary.

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## **Cautions and Convictions**

There is a perception amongst some drivers that cautions are “minor” due to the nature of how they are issued. There is little awareness among drivers that a caution will still show on an Update Service check result as “New Information”.

The Licensing Service considers cautions in the same manner as a conviction when reviewing driver suitability and it is important that drivers are aware of this fact.

We re-iterate that any caution is reported to the service the same as a conviction, as this will show as “new information” on a DBS check.

There is an obligation on drivers to report new convictions, cautions or arrests to the Licensing Service within 7 days. This can be done via the Licensing Service website.

**Operator:** Some drivers are using their family members email addresses for their update service account, as they are not tech literate. Often, the offline DBS is picked up at the point of renewal.

What can be put in-place to address this issue more proactively.?

**Response:** We have a new procedure in place, what can pro-actively identify drivers who have fallen offline, and this will occur “mid-licence. In this instance, the drivers will be provided with 21 days to apply for a new Enhanced DBS and evidence this to us.

**Operator:** Can a driver be provided with a 2/3-month grace period, so they can continue to work while the new DBS is being processed? If they can evidence that have paid for and applied for a DBS?

**Response:** Each case would be determined on its own individual merits, in the instance of “new information”, this would result in an Officer Review.

At the point of renewal, we must satisfy all checks before granting a licence. We also must follow mandated Department for Transport best practise and also adhere to Safeguarding guidelines.

For a “mid-licence” driver whose DBS has fallen offline with no new information present, then they will be provided with 21 days to evidence a new DBS has been applied for and submitted.

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## **Department for Transport (DfT) Consultation**

The Department for Transport consultation has been running for a period of time now. For those who are not aware, this is looking at moving from local authorities to regional authorities.

The consultation is looking at potentially changing licensing authorities to local transport authorities, such as West Yorkshire Combined Authority. It is assessing potential impact of this change on the following:

- Local Authorities
- Taxi and Private Hire Businesses
- Passengers

The consultation is due to close on 1 April 2026. As Operators, you may wish to share this with your drivers so they can have their say on how it may impact them.

It is noted that some operators have already shared the consultation via their social media with the public and their drivers and this is appreciated.

## **Operator Agenda Points**

**Operator:** There are a number of Bradford licensed vehicles on the roads which are still displaying dual operator stickers. As an operator, I appreciate the demands of the Compliance Team on the Licensing Service, but what action is being taken against drivers who display dual operator stickers on their vehicles, such as licence suspensions?

**Response:** The Licensing Service is on-boarding 2 more Compliance Officers, and they are currently conducting their training and will be out on the roads soon to address issues such as this.

Since the introduction of the Bradford Council door stickers last year, we have noticed a drop in the number of vehicles displaying dual stickers.

We will continue to act against vehicles which are displaying dual stickers and offering advice and education to drivers on how a vehicle should display their operator stickers.

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**Operator:** Some drivers are working for more than one operator, other than us. If a driver wants to work for us, they need to obtain a permission letter. However, some operators do not require a permission letter to work for them, which means we have no knowledge they may be working for another operator.

This may be affecting our contractual obligations we have in place, which state the driver can only work for us.

What can be done about this?

**Response:** When a driver changes their operator and wishes to work for more than one, we request that the letter from each operator confirms they are aware they may work for the other operator. For example:

- A driver currently works for operator “A”
- They submit a change of operator request, requesting to add Operator “B” to their licence
- They must provide a letter from both operators (A&B), stating each operator is aware the driver will work for both companies.
- If the event a letter does not grant this permission, the request would not be processed

The Licensing Service itself cannot restrict the number of operators a driver may choose to work for. If the permission letters are in place and correct, we are obliged to process this request.

If a driver approaches an operator, requesting to work for an additional operator, they can refuse to provide a permission letter should they wish to do so.

**Operator:** What about dual working? For example, a driver has multiple operator applications running at the same time looking for work – is this permitted?

**Response:** The Licensing Service takes the view that this practise would not be permitted. The vehicle should display the operator stickers which they are currently working for and accepting jobs from. This practise is also known as “job farming”.

If a driver has accepting work from more than one operator at any given time, then they would not be able to display the stickers in the correct manner on their vehicle.

A driver can have more than one operator on their badge, subject to the relevant permissions being in place. However, they would not be able to “dual work” with more than one operator at the same time for the above reason.

**Operator:** Different licensing authorities have differing rules about displaying operator stickers. Some allow the display of multiple stickers; some allow no stickers at all. This creates confusion amongst the drivers as to what is permitted.

**Response:** This is what the ongoing Department for Transport consultation is looking at, improving national standards and making them more uniform across authorities.

Raising this during the Department for Transport consultation period is recommended, as previously covered in the meeting.

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## **Operator queries and Questions**

**Operator:** Regarding wheelchair training, we are noticing that drivers are licensing a Wheelchair Accessible Vehicle (WAV) but do not have the certification in place to operate these vehicles and carry wheelchair passengers.

Should there not be checks in place to prevent a WAV licence being granted to a driver who does not have the required in-person training?

Also, can more in-house sessions be arranged for these drivers?

**Response:** When processing a WAV application Officers should be cross referencing against the driver's record to confirm if they have the required training in place.

If WAV licences are being granted to drivers who do not have the required training in place, then this will be raised within the team to make sure that this is being checked – we will follow up internally on this topic as a priority matter.

With regards to Hire Companies, they are responsible for ensuring that any driver who hires a WAV vehicle from them holds the required training certification, before that vehicle is handed over. We would expect this to be recorded internally by the Hire Company.

Wheelchair Training sessions are arranged for drivers based on current demand. If the number of drivers requesting or requiring WAV training increases, we in-turn offer more sessions for them.

If a driver-proprietor requires WAV training prior to licensing a WAV vehicle, our internal process states they should be booked onto the next available WAV course. This will be re-iterated to the Licensing team.

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**Operator:** We are aware that some Licensing Service staff work from home frequently. How does the Licensing Service facilitate badge collections at short notice?

We are aware some drivers have collections arranged several days away, which is resulting in them being off the road and out of work. Can the service work closer with the trade to ensure this doesn't happen?

**Response:** The Licensing Service operates two collection slots per day – 11:00 and 15:00. The two daily collection slots are to ensure that we can maintain a log of depot footfall and maintain depot visitor safety while on site.

We advise that postal services usually take between five to seven working days to arrive at the driver's home address.

In instances where a driver would be disadvantaged by waiting for a postal delivery, such as being unable to work, we would normally arrange for a same or next day collection at the depot at the above time slots.

We will re-iterate the importance of arranging collections with our team should it mean, a driver would be dis-advantaged by waiting for a postal delivery. This is included within our business support processes.

It also important to note that we operate a Service Level Agreement with the trade. We send all licence renewal invitations 6 weeks prior to the expiry date of the licence.

Unfortunately, we do receive renewal applications close to the expiry date on occasion. This can impact our ability to resolve any potential issues before the licence is due to expire.

We would encourage you to remind your drivers to submit their renewal applications as soon as they receive the invitation to do so. We have also communicated this via driver newsletters over the past few months.

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**Operator:** Why are collections not offered as standard? Could the council implement a secure “locker” style system, locked with a pin code? This would work similar to parcel collection lockers and pick up points.

**Response:** In most instances, a badge is issued well in advance of the licence expiry date, allowing this to be posted and delivered in good time so a collection would not be required.

Your suggestion regarding collection lockers is an interesting proposition and is something we can look into in the future to streamline the business support processes.

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**Operator:** Regarding vehicle inspections, there is currently a 6-8 week wait time for vehicle inspections. With new vehicles, this means that a driver who does not have a replacement vehicle is waiting a prolonged period and out of work.

Similarly, accident repair companies are also booking vehicles and waiting for significant periods of time for an inspection, which is further limiting the supply of vehicles to drivers who have been involved in a road traffic collision and do not have a vehicle.

What processes are in place to prioritise these individuals so they can be put back on the road and working?

We do recognise that recent changes to the vehicle renewal process are making it faster to renew a vehicle licence and this is appreciated within the trade.

**Response:** We operate a vehicle test cancellation register. Vehicles are added to this at the request of the proprietor.

Our team works through the register in the date order each vehicle was added, to ensure that the process is fair for all involved. We monitor this register closely

everyday and ensure any “last minute” cancellations are handled as a priority matter to reduce wastage of testing resources.

Testing capacity is currently at a premium, so we understand drivers see little movement while waiting on the cancellation register due to the high numbers waiting.

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**Operator:** We are having issues with recruitment for new drivers, and this is affecting our service levels to our customers. What is the cause of the delay in processing new drivers and is there any way as operators we can fast track a new driver through the process?

**Response:** We are aware of current delays in the processing of new driver applications, and we are actively looking at solutions to speed the process up. We will issue a further update on this soon.

We process all applications in the date order they are received, to keep the process fair and equal for all.

The reasons for the high numbers of applicants are varied, with the numbers of people across all backgrounds looking for alternative or secondary income. Some applicants will only wish to work part-time or alongside education for example.

We currently have several thousand new drivers who are within the new driver process. This spans people who recently applied to those at the end of the process.

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### **Further actions required**

- Licensing Service to issue trade wide communication regarding the on-going Department for Transport consultation
- Licensing Service to issue trade wide communication on how to check a DBS Update Service subscription

### **Close**

We would like to thank everyone for attending the Business Operator Meeting.

If any of you have any further comments or possible improvements, please email [taxi.testing@bradford.gov.uk](mailto:taxi.testing@bradford.gov.uk) with your full name and query so we can respond.

The next Operator Business Meeting is to be confirmed.