
Licensing and Regulatory Committee

Time and Date

9.30 am on Tuesday, 18th November, 2025

Place

Diamond Room 2 - Council House

Public Business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 1 - 6)
To agree the minutes of the Committee meeting held on 5th August 2025 and the Sub-Committee hearing held on 21st October 2025.
4. **Licensing Act 2003 - Review of Statement of Licensing Policy 2026 - 2031**
(Pages 7 - 56)
Report of the Director of Law and Governance
5. **Review of the Current Statement of Licensing Policy (Taxi & Private Hire) to Include Changes on Emissions, Age of Vehicles and Best Practice Guidance** (Pages 57 - 150)
Report of the Director of Law and Governance
6. **Outstanding Issues Report**
There are no outstanding issues to report.
7. **Any other items of public business which the Chair decides to take as matters of urgency because of the special circumstances involved**

Julie Newman, Director of Law and Governance, Council House, Coventry

Monday, 10 November 2025

Note: The person to contact about the agenda and documents for this meeting is Tom Robinson tom.robinson@coventry.gov.uk

Membership: Councillors F Abbott (Chair), J Birdi, B Christopher, S Gray, A Hopkins, J Innes, T Jandu, S Jobbar, M Lapsa, K Maton, C Miks, M Mutton, R Thay and CE Thomas (Deputy Chair)

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Tom Robinson**tom.robinson@coventry.gov.uk**

Coventry City Council
Minutes of the Meeting of Licensing and Regulatory Committee held at 9.30 am
on Tuesday, 5 August 2025

Present:

Members:

Councillor F Abbott (Chair)
Councillor J Birdi
Councillor T Jandu
Councillor S Jobbar
Councillor K Maton
Councillor C Miks
Councillor R Thay
Councillor CE Thomas

Employees (by Service Area):

Law and Governance S Ahmed, P Bansal, T Robinson, A Veness, A Wright

Regulatory Services D Cahalin-Heath, M Coggins, R Masih

Apologies: Councillors B Christopher, S Gray, A Hopkins, J Innes,
M Lapsa and M Mutton

Public Business

22. Declarations of Interest

There were no declarations of interest.

23. Minutes

The Minutes of the Committee meeting held on 18th February 2025 and the Sub-Committee hearing on the 20th of May 2025 were agreed and signed as true records.

There were no matters arising.

24. Licensing Act 2003 - Review of Statement of Licensing Policy 2026 - 2031

The Committee considered a report from the Director of Law and Governance which sought approval to consult on the draft revised Statement of Licensing Policy 2026-2031 under the Licensing Act 2003.

Under the terms of the Licensing Act 2003 the Council's Statement of Licensing Policy has to be renewed every five years. The current Statement of Licensing Policy came into effect on 16th March 2021, and a review was therefore required. There is a requirement in the Act for the Council to publish and advertise the revised Statement of Licensing Policy at least 4 weeks before, by 16th February 2026.

The Statement of Licensing Policy produced by the Licensing Authority under the Licensing Act 2003 is relevant for all licensing decisions taken by the Council as the Licensing Authority over five years commencing on 16th March 2026.

The general principles of the Statement of Licensing Policy remain the same and the document is still centred around the Licensing Act's four licensing objectives, namely:

- Preventing of Crime & Disorder
- Promotion of Public Safety
- Prevention of Public Nuisance
- Protection of Children from Harm

Before amending the Policy for a further five-year period, licensing authorities are required to carry out a wide consultation process. In addition to those it must consult by law, the Council had authority to include in the process any individuals or organisations it deemed appropriate.

The Responsible Authorities included statutory consultees – West Midlands Police, West Midlands Fire and Rescue Service, Planning, Environmental Health Safeguarding Children Board, HM Revenue & Customs, Community Safety and Public Health will be consulted on the draft revised Policy.

The proposed changes to the Policy were shown highlighted in the draft revised policy (Appendix 1) and are listed below:

- Paragraph 8.11 amended to include website links for drink spiking, violence against women & girls, serious youth violence & counter terrorism.
- Paragraphs 8.38 & 8.39 added to include considerations relating to child exploitation.
- Paragraph 11.1 amended to include best practice schemes.
- Section 16 added – Environmental best practice in Licensed Premises.

RESOLVED that, the Committee:

1) Considers the draft Statement of Licensing Policy 2026-2031 and forwards the following comments as part of the consultation process:

- **Increase consultation with neighbouring Solihull Metropolitan Borough Council considering the Warwickshire technical group and existing consultation efforts with the 6 neighbouring Warwickshire authorities.**
- **Promote the 'Best Bar None' programme and its incorporation into best practice in the Policy.**
- **Promote the ask for Angela/Clive initiative and its incorporation into best practice in the Policy – endorse improving accessibility to employees through a new online learning platform and booklet.**

25. Review of the Current Statement of Licensing Policy (Taxi & Private Hire) to Include Changes on Emissions, Age of Vehicles and Best Practice Guidance

The Committee considered a report from the Director of Law and Governance which sought approval to consult on the current Statement of Licensing Policy (Taxi & Private Hire) to include changes on Emissions, Age of Vehicles and Best Practice Guidance.

The current Statement of Licensing Policy (Taxi & Private Hire) commenced on 14th September 2022. The Policy is reviewed every 5 years unless a review is required due to legislative changes or emerging issues. The purpose of the Policy was to set out the terms and conditions that will apply to new applicants and those already licensed for the Hackney Carriage & Private Hire trade.

Coventry City Council has a duty under the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 to carry out its functions as the Licensing Authority.

The Council has a duty under these acts to carry out the following functions:

- Ensure that drivers are 'fit & proper'.
- Ensure that all licensed vehicles are road worthy and fit for the carriage of fare paying passengers; and
- Protect public safety.

The DfT has national responsibility for Hackney Carriage & Private Hire legislation in England & Wales. The DfT has issued best practice guidance on taxi & private hire vehicle licensing since 2006 to assist local authorities that have responsibility for the regulation of taxi & private hire vehicle trades. This is updated periodically, considering stakeholder views and the way in which the sector operates. The DfT has published non statutory best practice guidance to compliment the statutory standards in 2010 and revised and re-issued this in November 2023, covering a range of issues outside of the remit of the statutory standards.

A review of the Statement of Licensing Policy requires a wide consultation process. In addition to those it must consult by law, the Council has authority to include in the process any individuals or organisations it deems appropriate. The Responsible Authorities (statutory consultees – Chief Officer of Police, Safeguarding Children Board and the Planning Authority) would be consulted on the draft revised Policy.

The report stated that the Council is part of the West Midlands Taxi Licensing Harmonisation Group which aims to create consistent and standardised taxi licensing policies across the region. Following discussions with neighbouring authorities, the Group proposed 1st January 2030 as the date from which new vehicle licence applications will no longer be accepted for vehicles emitting 75g CO2/km or more.

Therefore, the proposal was to amend the current section on emissions in the Policy so that any new and replacement vehicles are required to be either an Ultra-Low Emission Vehicles (a vehicle that will produce less than 75g CO2/km), produce zero emissions or be zero emission-capable by 1st January 2030.

Additionally, the West Midlands Taxi Licensing Harmonisation Group also explored a regional Emissions Policy with the aim of preventing licensees moving to other local authorities to licence their vehicle, rather than upgrading their vehicle.

RESOLVED that the Committee:

1) Considers the Statement of Licensing Policy (Taxi and Private Hire) and forwards the following comments as part of the consultation process:

- **Consider spaces at taxi ranks for wheelchair accessible vehicles only.**
- **Better signposting for drivers to subscribe to the Disclosure and Barring (DBS) Subscription Service.**
- **Update compliance tests for wheelchair accessible hackney carriage vehicles and invite Licensing Officers to attend the Disability Equality Action Partnership (DEAP) for further consultation.**

26. Outstanding Issues Report

There were no outstanding issues.

27. Any other items of public business which the Chair decides to take as matters of urgency because of the special circumstances involved

There were no other items of public business.

(Meeting closed at 12.25 pm)

Coventry City Council
Minutes of the Meeting of Licensing and Regulatory Sub-Committee (Hearing)
held at 10.00 am on Tuesday, 21 October 2025

Present:

Members: Councillor K Maton (Chair)
 Councillor T Jandu
 Councillor M Mutton

Employees (by Service
Area):

Law and Governance P Bansal, T Robinson, C Sinclair, A Veness, A Wright

Streetscene and D Blackburn, R Masih
Regulatory Services

In attendance (Interested Premises Licence Holder
Parties): Review Applicant (West Midlands Police)

Public Business

1. **Appointment of Chair**

RESOLVED that Councillor K Maton be appointed as Chair for the hearing.

2. **Apologies**

There were no apologies for absence.

3. **Declarations of Interest**

There were no declarations of interest.

4. **Exclusion of Press and Public**

RESOLVED that the press and public be excluded under Sections 100(A)(4) of the Local Government Act 1972 relating to the private report in Minute 6 below headed “Application for a Premises Licence Review under the Licensing Act 2003” on the grounds that it contains information relating to an individual or individuals and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings. The public interest in maintaining the exemption under Schedule 12A outweighs the public interest in disclosing the information.

5. **Any Other Business**

There were no other items of public business.

6. **Application for a Premises Licence Review under the Licensing Act 2003**

The Sub-Committee considered a premises licence review in respect of Jack's, 97 Harnall Lane East, Coventry, CV1 5AG.

The application for review was submitted by West Midlands Police following evidence that the premises had undermined, and would likely continue to undermine, the licensing objectives of Prevention of Crime and Disorder and Public Safety.

The Sub-Committee's statutory duty was to consider the application and to take such steps as contained in the Licensing Act 2003 as it considered appropriate for the promotion of the Licensing Objectives.

The Licensing Officer gave a brief summary of the application and confirmed that all licensing formalities had been complied with.

RESOLVED that the Premises Licence in respect of Jack's, 97 Harnall Lane East, Coventry, CV1 5AG be revoked.

7. Any Other Business

There were no other items of private business.

(Meeting closed at 10.45 am)



Public report Cabinet Member Report

Licensing and Regulatory Committee 2025	18 th November
Cabinet Member for Policing and Equalities 2025	24 th November
Full Council	2 nd December 2025

Name of Cabinet Member:

Cabinet Member for Policing and Equalities - Councillor AS Khan

Director Approving Submission of the report:

Director of Law and Governance

Ward(s) affected:

All

Title:

Licensing Act 2003 – Review of Statement of Licensing Policy 2026 - 2031

Is this a key decision?

No -

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant.

Executive Summary:

The purpose of this report is to update Members of the outcome of the eight-week consultation undertaken on the review of the Council's Statement of Licensing Policy for the Licensing Act 2003 and to recommend for approval, a revised policy for the period 2026 – 2031.

Recommendations:

Licensing and Regulatory Committee is recommended to:

1. Consider the results of the consultation, and the proposed changes on the revised Statement of Licensing Policy for the period 2026 – 2031 and notify the Cabinet Member for Policing & Equalities of its comments.

Cabinet Member for Policing and Equalities is recommended to:

1. Consider the results of the consultation, and the proposed changes on the revised Statement of Licensing Policy for the period 2026 – 2031 and any comments from the Licensing and Regulatory Committee.
2. Recommend to Council that it adopts the Statement of Licensing Policy attached as Appendix 1 to the report.

Council is recommended to:

1. Adopt the revised Statement of Licensing Policy attached as Appendix 1 to the report.

List of Appendices included:

Appendix 1 – Statement of Licensing Policy 2026 - 2031 (shaded paragraphs illustrate the amendments to the document).

Appendix 2 – Summary of consultation responses and changes to the policy.

Appendix 3 – Equalities Impact Assessment.

Other useful background papers:

Licensing Act 2003

Licensing Act 2003 Section 182 Guidance

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

Yes, meetings of the -

Cabinet Member for Policing & Equalities – 28th July 2025 & 24th November 2025

Licensing & Regulatory Committee – 5th August 2025 & 18th November 2025

Will this report go to Council?

Yes -

2nd December 2025

Report title: Licensing Act 2003 – Revised Statement of Licensing Policy

1. Context (or background)

- 1.1 The Licensing Act 2003 requires each Licensing Authority to prepare and publish a Statement of Licensing Policy. The policy sets out how the licensing authority intends to approach its licensing responsibilities and how it intends to promote the four licensing objectives.
- 1.2 The current Statement of Licensing Policy came into effect on 16th March 2021, to cover a period up to 16th March 2026.
- 1.3 This policy must be renewed every five years and be subject to a full consultation process.
- 1.4 At the meetings of Cabinet Member for Policing & Equalities on 28th July 2025 and Licensing and Regulatory Committee on 5th August 2025, a report was considered on the draft revised Statement of Licensing Policy and authorised the Director of Law and Governance was authorised to consult on its contents.
- 1.5 This report advises Members of the consultation that has taken place and outlines the comments received and amendments made to the Council's draft Licensing Policy.
- 1.6 There are no major changes to the policy except for some minor wording amendments. The general principles of the Statement of Licensing Policy remain the same and the document is still centered around the Licensing Act's four licensing objectives, namely:
 - Prevention of crime and disorder;
 - Promotion of public safety;
 - Prevention of public nuisance; and
 - Protection of children from harm
- 1.7 Following public consultation, the revised draft Statement of Licensing Policy is now ready to be recommended for adoption to take effect from 16th March 2026 (Appendix 1).

Key Changes to the Revised Licensing Policy

- 1.8 There are no proposed significant changes to the policy, only minor amendments and additions. These can be shown highlighted in yellow in the draft revised policy (Appendix 1).

2. Options considered and recommended proposal.

- 2.1 The Licensing and Regulatory Committee is recommended to:

Consider the results of the consultation on the revised Statement of Licensing Policy for the period 2026 – 2031 and notify the Cabinet Member for Policing and Equalities of its comments (Appendix 2).

- 2.2 The Cabinet Member for Policing and Equalities is recommended to:

1. Consider the results of the consultation of the revised Statement of Licensing Policy for the period 2026 – 2031 and any comments from the Licensing and Regulatory Committee.
2. Recommend to Council that it adopts the Statement of Licensing Policy for the period

2026 – 2031 attached as Appendix 1 to the report.

2.3 Council is recommended to:

1. Adopt the revised Statement of Licensing Policy 2026 – 2031 attached as Appendix 1 to the report.

3. Results of consultation undertaken

3.1 The public consultation ended on 7th October 2025 and included the following elements:

- Mail shots to representatives of the licensed trade, clubs and key partners;
- Formally writing to the Chief Officers of the responsible authorities;
- Mail shots to businesses and organisations; and
- Wider public consultation through the City Council Website.

3.2 All statutory consultees have received a letter with a link to the revised Statement of Licensing Policy 2026 – 2031 on the Council's website. The consultation was made available from 12th August 2025 – 7th October 2025. The link was sent to all licensed businesses, Responsible Authorities, businesses and organisations and other public consultees as set out in the policy inviting them to comment.

3.3 The changes to the Policy can be shown highlighted in the draft revised policy (Appendix 1) and are listed below:

- Paragraph 8.11 amended to include website links for drink spiking, violence against women & girls, serious youth violence & counter terrorism.
- Paragraphs 8.38 & 8.39 added to include considerations relating to child exploitation
- Paragraph 11.1 amended to include best practice schemes
- Section 16 added – Environmental best practice in Licensed Premises

3.4 Ten responses have been received to the consultation and this is summarised in Appendix 2. After considering the comments it is proposed that the following amendments be made, these are also highlighted in the draft revised policy (Appendix 1):

- Paragraph 1.12 – voluntary initiative for refraining from selling single unit alcohol cans in areas where street drinking is prevalent has been added;
- Paragraph 8.33 has been amended;
- Paragraph 8.39, has been amended to include **Coventry's Protocol for Addressing Adult Modern Slavery**
- Paragraph 13.6 has been amended to include Coventry City Council's Drug & Alcohol Strategy.

4. Timetable for implementing this decision.

4.1 The revised Statement of Licensing Policy must be published by 16th March 2026 allowing the Council to continue to carry out any function in respect of individual applications made under the authority of the Licensing Act 2003.

5. Comments from Director of Finance and Director of Law and Governance.

5.1 Financial implications

The financial implications associated with the recommendation are limited to the employee costs associated with undertaking the consultation exercise and any costs involved in

publishing the Statement of Licensing Policy. This will be managed within existing service budgets.

5.2 Legal implications

The Council will not be able to undertake its role as a Licensing Authority after the 16th March 2026 unless it has approved and published its revised Statement of Licensing Policy. The policy must be reviewed every five years, or more often if appropriate.

The licensing function is carried out by the Council's Licensing and Regulatory Committee and officers exercising delegated powers. The one exception is the approval of the policy, which must be approved by Full Council.

The Council is required to have regard to any current Government Guidance when carrying out any licensing functions under the Licensing Act 2003 including its Statement of Licensing Policy.

6. Other implications

6.1 How will this contribute to achievement of the One Coventry Plan?

The prevention of crime and disorder is at the centre of the licensing regime and there are strong structural links between the administration of the licensing process and the role of the Community Safety Partnership and West Midlands Police. The Licensing Policy acknowledges the **Coventry Community Safety Partnership Plan** and gives information about proposed enforcement protocols with the Police and other enforcement authorities. As a Responsible Authority, the Police have been a key consultee.

One of the licensing objectives is 'The Protection of Children from Harm'. Applicants are required to show how they will address this objective in their operating schedule when making applications. The Coventry Safeguarding Children Board is a Responsible Authority consulted when applications are made.

Although there is not a specific licensing objective related directly to health within the current legislation, Public Health is a Responsible Authority. Alcohol has been identified as a priority within Coventry's Health and Wellbeing Strategy. Public health related licence conditions will be used where practicable to reduce the impact of alcohol on public safety and other licensing objectives

This aligns with the One Coventry Plan to work together to improve our city and the lives of those who live, work and study here.

6.2 How is risk being managed?

If the Licensing Policy is not renewed in the above timeframe, the City Council will not legally be able to perform its function under the Act. The consultation process and approval dates have been planned to ensure that the Policy is in place at the required time.

The Statement of Licensing Policy will inform decisions taken by the licensing authority that will have an impact on the interests of private individuals and businesses. The Policy reflects the need to respect the relevant rights given by the Human Rights Act.

Decisions of the Licensing Authority are open to challenge through the Magistrates Court and beyond. The Statement of Licensing Policy is designed to ensure our compliance with legislation and statutory guidance, minimising the risk of legal challenge.

6.3 What is the impact on the organisation?

The adoption of the policy should have no impact on the organisation. There is no human

resource, financial or ICT implications.

6.4 Equalities / EIA

The Licensing Policy makes links to the Council's Equality and Diversity Policies, and an Equalities Impact Assessment exists for licensing activities. This has been reviewed and updated as part of the consultation process (Appendix 3).

6.5 Implications for (or impact on) climate change and the environment

None

6.6 Implications for partner organisations?

The Statement of Licensing Policy contributes towards the work of the Community Safety Partnership and specifically with the work of the police.

The effective operation of the Policy by the Licensing Authority and all enforcement agencies has an impact on the night time economy and on the co-existence of licensed premises with local residents and communities.

6.7 Human Rights Act Implications

None

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Enquiries should be directed to the above person.

Contributor/approver name	Title	Service	Date doc sent out	Date response received or approved
Contributors:				
Tom Robinson/Carolyn Sinclair	Governance Services Officer	Law and Governance	06/11/2025	06/11/2025
Debbie Cahalin-Heath	Strategic Manager - Regulation & Communities	Regulatory Services	31/10/2025	03/11/2025

Davina Blackburn	Strategic Lead - Regulation & Communities	Regulatory Services	03/11/2025	04/11/2025
Names of approvers for submission: (officers and members)				
Amy Wright	Regulatory Lawyer	Law and Governance	06/11/2025	06/11/2025
Richard Shirley	Lead Accountant	Finance	06/11/2025	07/11/2025
Julie Newman	Director of Law and Governance	Law & Governance	07/11/2025	07/11/2025
Cllr A S Khan	Elected Member	Cabinet Member for Policing & Equalities	06/11/2025	10/11/2025

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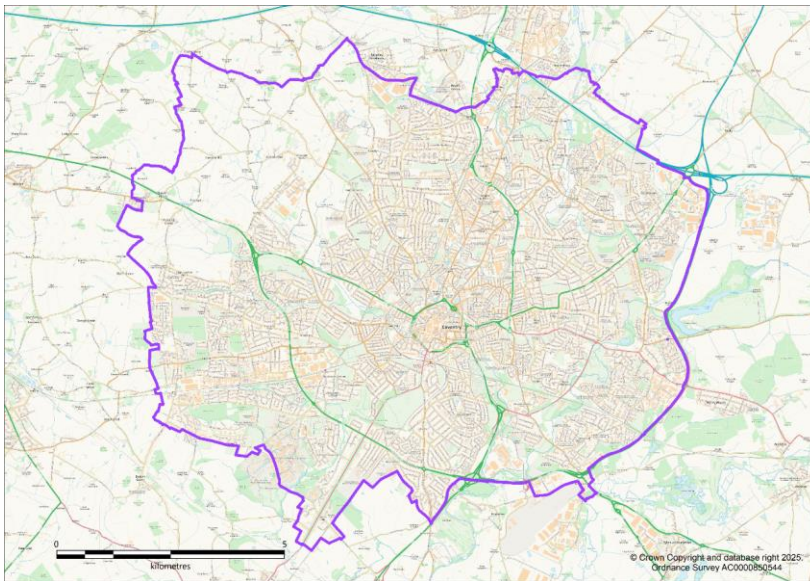
Licensing Act 2003

**Statement of
Licensing
Policy
2026 - 2031**

Important Note

In producing this Statement of Licensing Policy, the Licensing Authority is aware that the Government may from time to time amend the Licensing Act 2003, subordinate legislation and statutory guidance.

The Council does not intend to revise this policy document because of any such amendments and readers of this document are advised to check on the Home Office/Gov.uk website to ensure they have the latest information.



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Supporting documentation

The City Council, in consultation with the Responsible Authorities and the Community Safety Partnership has produced two guidance documents which give premises licence holders and other responsible staff practical guidance on the effective management of licensed premises.

These guides are issued during the licensing process and are also available from licensing pages of the City Council web site

- Guidance for On Licensed Premises
- Guidance for Off Licensed Premises

STATEMENT OF LICENSING POLICY

1 INTRODUCTION

1.1 Coventry City Council ('the Council') has a duty under the terms of the Licensing Act, 2003 ('the Act') to carry out its functions as the Licensing Authority with a view to promoting the following licensing objectives:

- **The prevention of crime and disorder**
- **Public safety**
- **The prevention of public nuisance**
- **The protection of children from harm**

1.2 The promotion of these objectives is the paramount consideration when determining an application and any conditions attached to an authorisation.

1.3 Coventry is a growing city situated in the West Midlands with a population of 360,700 inhabitants. It is mainly urban but includes significant areas that are semi-rural. A map of the city is shown on page 2.

1.4 This Statement of Licensing Policy relates to all those licensing activities identified as falling within the provisions of the Act, namely: -

- **The sale by retail of alcohol**
- **The supply of alcohol by clubs**
- **The provision of regulated entertainment**
- **The provision of late-night refreshment**

For the purposes of this document any reference to an "authorisation" means a Premises Licence, Club Premises Certificate, Temporary Event Notice (TEN) and where appropriate to the context, a Personal Licence.

1.5 The Council recognises that the licensing function is only one means of promoting delivery of the above objectives and should not therefore be seen as a means for solving all problems within the community. The Council will therefore continue to work with the Coventry Partnership, neighbouring authorities, West Midlands Police ('the Police'), the Coventry Community Safety Partnership, local businesses, arts organisations, performers, local people and those involved in child protection (Coventry Safeguarding Children Board) to promote the common objectives as outlined. In addition, the Council recognises its duty under S.17 of the Crime and Disorder Act, 1998, with regard to the prevention of crime and disorder etc.

1.6 This Policy Statement has been prepared in accordance with the provisions of the Act and the Guidance issued under Section 182 of the Act. The Policy statement is valid for a period of 5 years from 16th March 2026. This Policy Statement will be subject to review and further consultation prior to any substantial changes.

Responsible Authorities

1.7 A list of contact details for Responsible Authorities authorised under the Act is attached to this Policy Statement as Appendix 2.

- 1.8 The Council has recognised the Coventry Safeguarding Children Board as the local body competent to advise it on the Protection of Children from Harm and has designated it as a Responsible Authority for the purpose of Section 13 of the Act.

The Licensing Authority as a Responsible Authority

- 1.9 The Licensing Authority will, when acting as a Responsible Authority, act in accordance with the Government Guidance issued under Section 182 of the Act wherever possible. It will not normally intervene in applications where the issues are within the remit of another Responsible Authority and will ensure an appropriate separation of responsibilities between the officer administering an application and an officer acting as a Responsible Authority.

Public Health as a Responsible Authority

- 1.10 There is not a specific licensing objective related directly to health within the current legislation. When making a representation, the Director of Public Health is most likely to relate such representations to the objectives on Public Safety and Protecting Children from Harm. This is likely to include the prevention of accidents, injuries and other immediate harms that can result from alcohol consumption, such as unconsciousness or alcohol poisoning.
- 1.11 Health bodies hold valuable information which may not be recorded by other agencies, including analysis of data on attendance at emergency departments and the use of ambulance services following alcohol related incidents. Sometimes it may be possible to link ambulance callouts and attendance to irresponsible practices at specific premises. Anonymised data can be collated about incidents relating to specific premises and presented to Licensing Sub-Committees when representations are made.
- 1.12 Whilst the promotion of Public Health is not a licensing objective as set out in the Act, the Licensing Authority would support where appropriate, any voluntary initiatives that premises may wish to adopt to help reduce alcohol harm within our communities. These may include but is not an exhaustive list:
- Avoiding the sale of beers, lagers and ciders over 6.5% ABV which are sold in plastic bottles or metallic cans (Note: this does not include premium, craft or specialist products as these are not typically used by people with an alcohol use difficulty).
 - Taking steps to consider the display of alcohol in such a manner that will not unduly encourage people to drink irresponsibly and equally limit the exposure children have to alcohol advertising.
 - Refraining from placing alcohol products amongst, near or next to confectionary that would usually be consumed by children or young people (which would include till point toys or stickers).
 - The use of breathalysers as a means of determining intoxication and supporting door staff decisions not to admit or serve customers who are already intoxicated.
 - Refraining from selling single unit alcohol cans in areas where street drinking is prevalent.

2 CONSULTATION

2.1 Before publishing this policy statement, the Council has consulted with and considered the views of the following in line with the statutory guidance:

- Chief Constable of West Midlands Police.
- West Midlands Fire & Rescue Authority.
- Director of Public Health – Coventry City Council.
- Other responsible authorities.
- Representatives of current authorisation holders.
- Representatives of Local businesses; and
- Representatives of Local residents.

2.2 Further details on the consultation and political approval process undertaken prior to publishing this document are available via www.coventry.gov.uk/councilmeetings.

3 FUNDAMENTAL RIGHTS

3.1 Under the terms of the Act any person may apply for a variety of authorisations and have each application considered on its individual merits. Equally, any person has a right to make relevant representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the Act.

3.2 Applicants and those making relevant representations in respect of applications to the Council have a right of appeal to Coventry Magistrates' Court against the decisions of the Council.

4 LICENSING CONDITIONS

4.1 Licensing is about regulating the carrying on of licensable activities on licensed premises, by qualifying clubs and at temporary events within the terms of the Act. Premises include open spaces. Conditions attached to various authorisations will be focused on matters, which are within the control of individual licensees and others in possession of relevant authorisations. Accordingly, these matters will centre on the premises being used for licensable activities and the vicinity of those premises. If there is an incident or other dispute, the Council will primarily focus on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activities in the area concerned.

4.2 The Council cannot impose conditions unless it has received a relevant representation.

4.3 When considering any conditions, the Council acknowledges that licensing law should not be seen as the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and therefore beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned. Nonetheless, it is a key aspect of general control and licensing law will always be part of a holistic approach to the management of the evening and night-time economy of the city. For example, applicants should note that stricter conditions to control noise are likely to be imposed in the case of premises situated in largely residential areas.

4.4 The Council does not propose implementing standard licensing conditions on licences or other relevant types of authorisation across the board. Therefore, the Council will attach conditions to relevant authorisations which are tailored to the individual style and

characteristics of the premises and events concerned and that are appropriate to promote the licensing objectives in the light of the representations received.

5 OPERATING HOURS

- 5.1 The Licensing Authority welcomes the opportunities afforded to the local economy by the 2003 Act and will strive to balance this with the rights of local residents and others who might be adversely affected by licensable activities based on the principles laid down in this document
- 5.2 When dealing with licensing hours, each application will be dealt with on its individual merits. The Licensing Authority recognises that longer licensing hours regarding the sale of alcohol can assist in avoiding concentrations of customers leaving premises simultaneously. This is expected to reduce the friction at late-night fast-food outlets, taxi ranks and other sources of transport which can lead to disorder and disturbance. The Licensing Authority does not wish to unduly inhibit the development of thriving and safe evening and night-time local economies which are important for investment and employment locally and in the main welcomed by residents and visitors to the city.
- 5.3 The Licensing Authority will not set fixed trading hours within designated areas. However, an earlier terminal hour and stricter conditions regarding noise control than those contained within an application, may be appropriate in residential areas where relevant representations are received, and such measures are deemed appropriate to uphold the licensing objectives.
- 5.4 Shops, stores and supermarkets will generally be free to provide sales of alcohol for consumption off the premises at any times when the retail outlet is open for shopping, unless there are good reasons based on the licensing objectives for restricting those hours.

6 LATE NIGHT LEVY AND EARLY MORNING RESTRICTION ORDER(S)

- 6.1 The Licensing Authority, having not been presented with sufficient evidence to the contrary, does not consider that the application of a Late Night Levy or Early Morning Restriction Order(s) are appropriate for the Council's area at the present time. The Licensing Authority will keep these matters under review and accordingly reserves the right, should the need arise, to introduce these measures during the life of this statement of licensing policy.

7 CUMULATIVE IMPACT

- 7.1 For the purposes of this document 'cumulative impact' means the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area. Cumulative impact is a proper matter for the Council to consider in developing its licensing policy. This should not be confused with 'need', which concerns the commercial demand for another particular type of premises. Government Guidance states that "need" is not a matter for the Licensing Authority but is a matter for the planning authority and the free market.
- 7.2 The Licensing Authority, having not been presented with sufficient evidence to the contrary, does not consider any area within the city to currently have a particular concentration of licensed premises causing a cumulative impact on one or more of the licensing objectives. The Licensing Authority will keep this matter under review and

accordingly reserves the right, should the need arise, to introduce a special policy concerning cumulative impact during the life of this statement of licensing policy.

- 7.3 The absence of a special policy does not prevent any Responsible Authority or any other party from making representations on a new application for the grant of an authorisation on the grounds that the premises will give rise to a negative cumulative impact on one or more of the licensing objectives. The Act allows for such consideration, but the individual merits of each application must always be considered.

8 PROMOTION OF THE LICENSING OBJECTIVES

Prevention of Crime and Disorder

- 8.1 Licensed premises, especially those offering late night/early morning entertainment or alcohol and refreshment for large numbers of people, can sometimes be associated with elevated levels of crime and disorder.
- 8.2 The Licensing Authority expects existing authorisation holders and new applicants to regularly review their arrangements in addressing crime and disorder issues pertinent to their particular licensable activities, location and/or premises. Information and advice can be obtained from the Police, business network groups and other sources. The Licensing Authority also encourages local residents and other businesses to discuss issues of concern directly with individual businesses, or, to contact the Police Licensing Officer if they believe that particular licensed premises are failing to promote this objective.
- 8.3 The City Council as a statutory member of the Local Community Safety Partnership will develop and deliver against multi-agency strategies and action plans to tackle the misuse of alcohol, which has also been identified in the Cabinet Office's Alcohol Harm Reduction Strategy as being a precursor to crime and anti-social behaviour. The Licensing Authority expects existing authorisation holders and new applicants to be able to demonstrate the measures they use, or propose to adopt, to prevent and actively discourage the sale/supply of alcohol to children and the sale/supply of alcohol to individuals who are already intoxicated and thus potentially vulnerable themselves or pose a risk to others. In general, conditions will reflect local crime issues and subsequent prevention strategies.
- 8.4 The risk assessment approach remains fundamental in the operation and good practice of all licensed premises. Authorisation holders and applicants are strongly recommended to work closely with the Local Policing Unit Partnerships Team in particular, in bringing into effect appropriate control measures to either overcome established or prevent potential problems. A combination of short and longer-term strategies may need to be deployed by authorisation holders to sustain and promote the prevention of crime and disorder. The Police have a list of recommended Security Industry Authority (SIA) registered operators and we would advise that this list be used when considering the employment of SIA registered door staff.
- 8.5 During unprecedented times, such as a pandemic, authorisation holders will also have to work closely with other agencies, such as Environmental Health Officers in order to produce appropriate and adequate risk assessments to demonstrate compliance with relevant government guidance.
- 8.6 Queues at late night take-aways can be a source of disorder and applicants for Premises

licences for this type of premises are expected to address this in their Operating Schedule.

- 8.7 The City Council has specific duties under Section 17 of the Crime and Disorder Act 1998 that underpins any control strategy that is employed. The Council will continue to work in partnership with the Police in addressing crime and disorder issues.
- 8.8 The objective of preventing crime and disorder will include the Licensing Authority taking appropriate decisions and/or imposing appropriate conditions, upon a representation being received containing evidence that a licensed premises has a music policy which might incite violence, crime or disorder or the threat of such against minority groups.
- 8.9 Coventry's Director of Public Health will support the Police by facilitating access to health information such as anonymised A&E data due to alcohol related admissions. e.g. as part of a license review application. They will also provide Trading Standards with evidence of the health impact of illicit/counterfeit alcohol.
- 8.10 The Licensing Authority is of the view that generally, in order to promote the licensing objectives; all licensed premises within the city are encouraged to be members of the relevant local Pubwatch Scheme [Schemelink - Contact Coventry Pubwatch](#) where one exists.
- 8.11 The Licensing Authority and Police have a zero tolerance of illegal substance/drug misuse in licensed premises and recognise that drug use is not something that is associated with all licensed premises. However, it is recognised that special conditions may need to be imposed for certain venues to reduce the likelihood of drugs being sold and consumed on the premises and to achieving a safer environment for those who may have taken them.
Applicants & existing authorised Licence holders should consider the following:
Drink Spiking [Best practice – Coventry City Council](#)
Violence Against Women & Girls (VAWG) [Best practice – Coventry City Council](#)
Serious Youth Violence [Best practice – Coventry City Council](#)
Counter Terrorism [Best practice – Coventry City Council](#)
- 8.12 Once away from licensed premises a minority of consumers may behave inappropriately and unlawfully. There are additional mechanisms both within and outside the licensing regime that are available for addressing such issues. The Council will address a number of these issues through the Community Safety Service and the Local Partnership in line with the strategic objectives for crime and disorder reduction and drug and alcohol misuse within the city.
- 8.13 In relation to premises seeking or holding a Premises Licence and where alcohol will be sold under the terms of that licence the Licensing Authority expects that (a) any Designated Premises Supervisor (DPS) will have been given sufficient management authority and to be able to exercise effective day-to-day control of the premises and (b) authority to make alcohol sales when given by the DPS or any other Personal Licence holder should be clearly evidenced in writing. This is to ensure that premises selling alcohol are properly managed in accordance with the Act and that premises operate in a way that promotes the prevention of crime and disorder. This will also benefit operators themselves through being able to demonstrate a commitment to the proper management of premises, particularly if

enforcement becomes necessary

Promotion of Public Safety

- 8.14 Public safety is not defined within the Act, but the Government Guidance advises that it is concerned with the physical safety of people using the premises and not with public health. To ensure the safety of customers, applicants should be prepared to demonstrate, where necessary, that the premises comply with all health and safety regulations and that risk assessments, where needed are current, and in line with relevant government guidance.
- 8.15 Applicants and event organisers will be expected to assess not only the physical environment of the premises (or site) but also operational practices, in order to protect the safety of members of the public visiting the site, those who are employed in the business, those who are engaged in running an event or anyone else that could be affected by site activities. This assessment would normally take place within a risk assessment framework.
- 8.16 Holders of premises licences, and club certificates, or those organising temporary events, should interpret 'public safety' widely to include freedom from danger or harm.
- 8.17 For licensed or certificated premises and for temporary events, public safety must be kept under review and where changes to operational practices/events occur, or the customer profile changes, a review of risk assessments must be undertaken.
- 8.18 Fire safety is governed by the Regulatory Reform (Fire Safety) Order 2005 and is not something with which the Licensing Authority will normally become involved where the Responsible Authority has recommended a safe capacity limit on all or part of premises the Licensing Authority will normally expect an applicant/authorisation holder to follow such a recommendation unless there are good reasons for not doing so.
- 8.19 Businesses must ensure that in carrying out their activities they protect and support even the most vulnerable people and keep them safe from harm.
- 8.20 Coventry's Director of Public Health will support the sharing of health information such as anonymised A&E data with other responsible authorities where it links to public safety. They will also explore the impact of alcohol related incidents on emergency services such as West Midlands Ambulance Service.

Prevention of Public Nuisance

- 8.21 The Licensing Authority remains sensitive to the expectations and needs of different parts of the community in respect of leisure and cultural pursuits and will view applications accordingly. The impact of those activities on people who have to live, work and sleep within the local vicinity of a licensed premises or event will also be considered. If the impact of licensed activities is disproportionate and unreasonable or markedly reduces the amenity value of the area to local people, then the Licensing Authority will take account of this when exercising its functions. The Licensing Authority considers that the potential for public nuisance can be prevented or much reduced by good design and planning during new or ancillary construction works, by the provision of good facilities and effective management. This will require appropriate advice at the planning and development stages of new projects. Applicants should consider carefully the suitability of the premises for the

type of activity to be undertaken, particularly in terms of ventilation, odour, light emission, noise breakout and noise/vibration transmission to adjoining premises and the wider community.

- 8.22 Licence holders already in receipt of complaints should seek an early remedy to any confirmed problem. The organisers of temporary events should pre-empt potential nuisance, especially when complaints have previously arisen at the same venue.
- 8.23 The Licensing Authority expects authorisation holders to use their risk assessments and operating schedules to review and, if need be, to make necessary improvements to the premises, or to operational practices, in order to prevent public or statutory nuisance.
- 8.24 Where the provisions of existing legislation prove inadequate or inappropriate for control purposes, the Licensing Authority will consider imposing licence conditions. Any condition deemed appropriate and imposed by the Licensing Authority to promote the prevention of public nuisance will focus on measures within the direct control of the licence holder or designated premises supervisor.
- 8.25 Coventry's Director of Public Health and Wellbeing will provide evidence on the impact of the health and wellbeing of vulnerable groups such as street drinkers, and the effect this has on anti- social behaviour.

Protection of Children from Harm

- 8.26 The Act details a number of legal requirements designed to protect children in licensed premises. The Licensing Authority is duty bound to ensure that authorisation holders including organisers of temporary events, create safe environments (in terms of physical, moral and psychological welfare) for children who may be on the premises. Children should be unable to access alcohol or drugs and be subject to an appropriate level of care and supervision at all times.
- 8.27 The Act prohibits children aged under 16 years old and unaccompanied by an adult, from being present in licensed premises (including premises operating under a TEN) that are being used primarily or exclusively for consumption of alcohol
- 8.28 In premises where alcohol is sold or supplied it is a mandatory condition that premises licence holders will operate a recognised "Proof of Age" scheme. The City Council supports the Challenge 25 scheme and where this is not proposed within the operating schedule, alternative and similarly rigorous controls should be detailed. The City Council recommends that the premise licence holder operates a method for recording when a sale is refused as part of any age challenge scheme (also known as a refusals book).
- 8.29 The Licensing Authority expects that customers should be confronted by clear and visible signs on the premises that underage drinking constitutes an offence in law and that they may well be required to produce proof of their age to a member of staff. Organisers of temporary events should apply similar safeguards in their undertakings. By ensuring licensed premises refuse sales of alcohol to children, or those attempting to purchase it on behalf of children, this will impact positively on a reduction in child alcohol-related health problems.
- 8.30 Venue operators seeking premises licences and club premises certificates can volunteer prohibitions and restrictions in their operating schedules because their own risk assessments have determined that the presence of children is undesirable or

inappropriate. These will become conditions attached to the licence or certificate where no relevant representations are received by the Licensing Authority.

- 8.31 The Licensing Authority regards the Coventry Safeguarding Children Board as being the primary source of advice and information on children's welfare and would normally expect any advice/recommendations from the Board to be followed unless there are good reasons for not doing so. The Licensing Authority will attach appropriate conditions where these appear appropriate to protect children from moral, psychological or physical harm. It is also reasonable for the Licensing Authority to expect the Responsible Authorities to intervene where the basis for the intervention falls within the remit of that other authority. For example, the police should take appropriate steps where the basis for the review is concern about crime and disorder or the sexual exploitation of children.
- 8.32 The Licensing Authority will consider the need to protect children from sexual exploitation when undertaking licensing functions.
- 8.33 Where possible, the Director of Public Health and Wellbeing and the Caldicott Guardian will promote data sharing across appropriate organisations to facilitate decision making.
- 8.34 In order to prevent children from seeing films incompatible with their age, authorisation holders who exhibit films will be expected to impose and enforce viewing restrictions in accordance with the recommendations of the British Board of Film Classification (BBFC). In exceptional cases e.g. where the BBFC has not classified a film then the Council may specify viewing restrictions which an authorisation holder will be expected to comply with.
- 8.35 It is expected that authorisation holders will ensure that, whenever children are in the vicinity of a film or exhibition that is being shown/staged in a multi-purpose premises, sufficient ushers/stewards (minimum 18 years old) will be in attendance at the entrance to the viewing rooms at all times to ensure children cannot enter or view the film or exhibition.
- 8.36 Children have access to a range of regulated public entertainment venues and may be present as members of a viewing audience or as performers in their own right. The Licensing Authority expects authorisation holders including those organising temporary public events, to make proper provision for child safety and welfare during such events. Notwithstanding public safety issues, supervisory arrangements must be reflected within operating schedules. Suitable monitoring strategies should also be in place to ensure that supervisory levels are appropriate.
- 8.37 Where a large number of children are likely to be present on any licensed premises, for example, a children's show or pantomime, the Council may require that there is an adequate number of adult staff at places of entertainment to control access and egress of children and to protect them from harm. Children present at events as entertainers will be expected to have a nominated adult responsible for each child performer.
- 8.38 Child Exploitation - the exploitation of children can take a number of different forms and perpetrators may subject children and young people to multiple forms of abuse at the same time, such as criminal exploitation (including county lines) and sexual exploitation.
- 8.39 Through partnership working with the Police, Child Protection and other agencies the Licensing Authority will work towards raising awareness of the signs of child exploitation in licensed premises. This has direct links to **Coventry's Protocol for Addressing Adult Modern Slavery**

9 MANDATORY LICENSING CONDITIONS

12

- 9.1 The Government has introduced a range of mandatory conditions aimed at establishing minimum standards for the way alcohol is sold. The conditions apply to all alcohol retailers.

10 OTHER CONSIDERATIONS

Relationship with Planning

- 10.1 The Licensing Authority recognises that there should be a clear separation of the planning, building control and licensing regimes. Licensing applications will be viewed independently of planning applications.
- 10.2 The grant of any application or variation of a licence which involves a material alteration to a building would not relieve the applicant of the need to apply for planning permission or building control approval, where appropriate.
- 10.3 There are also circumstances when as a condition of planning permission; a terminal hour has been set for the use of premises for commercial purposes. Where these hours are different to the licensing hours, the applicant must observe the earlier closing time. Premises operating in breach of their planning consent would be liable to enforcement action under planning law.
- 10.4 The Local Planning Authority may also make representations against a licensing application in its capacity as a Responsible Authority, where such representations relate to one or more of the licensing objectives (see Paragraph 1.1 above).

Applications

- 10.5 An applicant may apply under the terms of the Act for a variety of authorisations and any such application will be considered on its individual merits. Any person may make representations on an application or seek a review of a licence or certificate where provision has been made for them to do so in the Act.
- 10.6 The Licensing Authority expects each and every applicant for a premises licence, club premises certificate or variation and TEN to address how they intend to meet the licensing objectives. Where no information is given by the applicant, there may be circumstances where the Licensing Authority considers the application to be incomplete and the application is returned without further processing.
- 10.7 In determining a licence application, the Licensing Authority will take each application on its merits. Licence conditions will only be imposed following a hearing and in order to promote the licensing objectives and will only relate to matters within the control and ability of the applicant. Licence conditions will not normally be imposed where other regulatory provision is in force (e.g. planning, environmental health, fire safety, and building control legislation) so as to avoid confusion and duplication, except where they can be exceptionally justified to promote the licensing objectives.
- 10.8 The Licensing Authority will impose only such conditions as are proportionate towards promoting the licensing objectives and which do not propose unnecessary burdens, and which are appropriate to the individual size, style and characteristics of the premises and events concerned.
- 10.9 In considering applications, the Licensing Authority will primarily focus on the direct impact of the activities taking place at the licensed premises on members of public living, working

or engaged in normal activity in the area concerned. The Licensing Authority recognises that licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from the licensed premises and, therefore, beyond the direct control of the individual, club or business holding the licence, certificate or authorisation concerned.

- 10.10 Conditions include any limitations or restrictions attached to a licence certificate or other authorisation and essentially are the steps or actions the holder of the authorisation will be required to take or refrain from taking at all times when licensable activities are taking place at the premises in question.
- 10.11 It is recommended that an applicant for a TEN should give at least 28 days prior notice of their intended event, together with a full description of the event, risk assessment and details of how the applicant will promote the licensing objectives. Further, that at the same time of submitting their application to the Licensing Authority they serve notice to the Police and Environmental Health (unless an electronic application). Section 100 of the Licensing Act 2003 stipulates a period of at least 10 working days, exclusive of the day on which the event is to start and exclusive of the day on which the notice is given.

Deregulated Public Entertainment

- 10.12 As a result of the Live Music Act 2012 and The Legislative Reform (Entertainment Licensing) Order 2014 most public entertainment taking place between 0800 and 2300 hrs has, subject to certain conditions, been deregulated and removed from the scope of Licensing Authority control. No authorisation is required where public entertainment is being provided under these statutory exemptions. However, if exempt public entertainment is or will be taking place as well as licensable activities (e.g. selling alcohol) then an authorisation covering the licensable activities will still be required. Operators of 'on-licensed' premises should also note that it is possible to re-introduce full licensing controls over public entertainment where a premises licence or a club premises certificate has been reviewed and a Licensing Sub-Committee determines that it is appropriate for such controls to be re-introduced.

Large Scale Events and Safety Advisory Groups

- 10.13 Organisers of major events are encouraged to approach the Council at the earliest opportunity to discuss arrangements for the licensing of their events. Larger events will require a time-limited premises licence. This will involve the preparation of a substantial operating schedule, full public consultation, and a longer lead in period.
- 10.14 The Council requires a minimum notice period of not less than 3 months for events with a maximum number of attendees between 500 – 19,999, and not less than 6 months for events with a maximum number of attendees greater than 20,000. These events have significant potential to undermine the promotion of the Licensing Objectives due to the number of attendees, the temporary nature of facilities and the variety and complexity of matters that may be relevant. The Council believes these concerns can only be properly mitigated by an applicant engaging with the licensing process at an appropriate time before the event. As part of the process the applicant will be required to participate in the Council's Safety Advisory Group (SAG) meeting(s) prior to the event being held.
- 10.15 The Council's Regulatory Services Department co-ordinates a SAG with membership comprising of all the emergency response and responsible authorities who can support

event organisers on event planning if good time is allowed. All major events will be scrutinised by the SAG.

- 10.16 The Authority acknowledges the benefits of working closely with the Responsible Authorities and other statutory bodies in supporting event organisers in operating safe and well managed events. SAGs or multi-agency meetings are one way of promoting such partnership working.

11 Best Practice Schemes

Safe & Secure Licensed Venues

- 11.1 **PubWatch** – new applicants & existing authorisation holders are encouraged to be a member of a local PubWatch Scheme. Pubwatch is a community-based scheme, primarily focused on preventing crime and anti-social behavior in and around licensed premises. It involves licensees (owners of pubs and other licensed venues) working together to improve safety and security for staff, customers, and the wider community. Pubwatch schemes often share information, exchange support, and take joint action to address issues like anti-social behavior and criminal activity. Please click on the link for more information [Best practice – Coventry City Council](#)

12 GUIDANCE FOR ON AND OFF LICENSED PREMISES

- 12.1 Guidance has been developed by the Licensing Authority and the Responsible Authorities to provide a reliable source of information to support authorisation holders in the responsible day to day management of their premises and advise what they must be doing to comply with the Licensing Act. This guidance will be referred to whenever the Licensing Authority or any Responsible Authority have made recommendations for improvements in the management of licensed premises or where new conditions of operation are being considered.
- 12.2 Every licensed premise has been issued with this guidance and new applicants or new Licensees will receive a copy as part of the application process. Further copies can be downloaded from the City Council web site. [Need to add a link](#)

13 INTEGRATING STRATEGIES AND THE AVOIDANCE OF DUPLICATION

- 13.1 By consulting widely prior to this policy statement being published, the Council has taken full account of local policies covering crime prevention, public health, anti-social behaviour, culture, transport, planning and tourism as part of an integrated strategy for the Council, police and other agencies. Many of these strategies may not be directly related to the promotion of the licensing objectives, but indirectly impact upon them.
- 13.2 There are a number of wider issues which may need to be given due consideration when dealing with applications. The Council's Licensing and Regulatory Committee can request reports, where it thinks it is appropriate on the following areas: -
- the needs of the local tourist economy to ensure that these are reflected in their considerations;
 - the employment situation and the need for new investment and employment where appropriate;

- the general impact of alcohol related crime and disorder, by providing regular reports to the planning committee. This will enable the planning committee to have regard to such matters when taking its decisions and avoid any unnecessary overlap; and
- the national and local needs of when dealing with a pandemic.

Crime, Nuisance and Harm Prevention strategies

- 13.3 Crime, nuisance, harm prevention and drug and alcohol misuse strategies developed through the Coventry Community Safety Partnership (CCSP) will be reflected in any licence conditions suggested by Responsible Authorities, so far as possible.
- 13.4 The CCSP, with membership including the Council, Police and the West Midlands Fire Service, is committed to making Coventry a safe place in which to live, work and visit. The CCSP will co-ordinate action to protect and support our most vulnerable children and adults. It is the role of the CCSP to strategically plan, commission and oversee services that tackle crime and disorder and address drug and alcohol misuse.

Health and Wellbeing Strategy & Drug & Alcohol Strategies

- 13.5 Alcohol has been identified as a priority within Coventry's Health and Wellbeing Strategy. Drinking too much can cause physical and mental harm. Public health related licence conditions will be used where practicable to reduce the impact of alcohol on public safety and other licensing objectives
- 13.6 The vision of Coventry's Drug & Alcohol Strategy is to reduce the harms caused by alcohol misuse and make Coventry a safer and healthier place where less alcohol is consumed. This aim can be supported through opportunities within the licensing process. Public Health prevention & harm reduction campaigns/projects in line with Coventry's Drug & Alcohol Strategy are integral to licensing in Coventry.

Cultural strategies

- 13.7 The Cultural Strategy has been developed within the context of Coventry's existing arts infrastructure, initiatives and activities. The Council will monitor the licensing of regulated entertainment and particularly live music and dancing, to ensure that potential event organisers have not been deterred from making applications because of licensing requirements.

Coventry a Marmot City

- 13.8 In line with the principles of the Marmot Review 'Fair Society, Healthy lives' Coventry City Council has agreed to develop common policies to reduce the scale and impact of health inequalities across the city. This includes focusing interventions such as alcohol reduction on reducing the social gradient in health.

There is a social gradient in the harms from alcohol consumption, but not in alcohol consumption itself. Quantities and patterns of drinking differ across socio- economic groups, as do harmful outcomes.

According to the Marmot Review, those people from more deprived areas who consume alcohol are more likely to have problematic drinking patterns and dependence than those from more affluent areas.

With regards to under 18s, the evidence suggests that fewer young people are drinking alcohol than they did in the past and fewer are suffering serious health implications needing attendance at hospital. However, despite recent declines, the proportion of children in the UK drinking alcohol remains well above the European average and the majority of 17 year olds do drink alcohol. The UK continues to rank among the countries with the highest levels of consumption among those who do drink, and British children are more likely to binge drink or get drunk compared to children in most other European countries. Furthermore, other consequences of alcohol consumption such as regretted sexual activity, arguments, involvement in crime and violence are more prevalent than hospital attendance ([PHE - Data intelligence summary: Alcohol consumption and harm among under 18 year olds](#)).

Transport

- 13.9 As part of an agreed enforcement protocol where the police have identified a particular need to disperse people from the city centre swiftly and safely so as to avoid situations which could lead to disorder and disturbance, the Council will inform those responsible for providing local transportation so that arrangements can be made to reduce the potential for problems to occur.

Duplication

- 13.10 When considering any application, the Council will avoid duplication with other regulatory regimes so far as possible. Therefore, the Council will not attach conditions to an authorisation in relation to a matter covered by another regulatory regime unless going beyond such a regime is considered appropriate for the promotion of the licensing objectives in the particular circumstances.

Promotion of Equality

- 13.11 The Licensing Authority in carrying out its functions under the Act is obliged to have 'due regard' to the need to eliminate unlawful discrimination harassment and victimisation, to advance equality of opportunity and to foster good relations between persons with different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The Government Guidance advises that conditions should not be attached to authorisations which would duplicate existing statutory requirements. The Council therefore takes this opportunity to remind operators of premises of their duties towards disabled persons (including performers) on their premises under the Building Regulations and the Equality Act 2010. This includes a duty that any person who provides a service to the public must make reasonable adjustments to any physical feature that makes it impossible or unreasonably difficult for a disabled person to access a service, or to provide the services by a reasonable alternative means.

14 ENFORCEMENT

- 14.1 The Licensing Authority has an established working relationship with the Police and other enforcing authorities on enforcement issues. This will provide a more efficient deployment of resources targeting high risk premises and activities.
- 14.2 This enforcement regime in relation to licensing follows the Government's Regulators' Code in that it follows the basic principles of Openness, Helpfulness, Proportionality and Consistency. This is clarified by the operation of a ladder of intervention for Licensed

Premises. This ladder of intervention is contained at Appendix A. [Link to enforcement policy.](#)

- 14.3 Licensed premises are visited by the Responsible Authorities and the Licensing Authority to carry out targeted inspections to check that the premises licence/certificate is being complied with, to check compliance with other legislation and/or to deal with a complaint that has been received.
- 14.4 On some occasions a multi-agency group (representing a number of Responsible Authorities) known as the Licensing Taskforce, will visit the premises. The Taskforce officers inspect the areas of the premises relevant to their role. Again, any action taken will be in line with the ladder of intervention.
- 14.5 There are several enforcement options available depending on the outcome of the inspection or complaint which includes:
- Verbal advice – this covers minor complaints/infringements where advice is seen as the most appropriate way to deal with the issue.
 - Written warning – this is a step-up from verbal advice and authorisation holders are given a letter recording the warning given and containing the details of any necessary remedial action.
 - Action planning – this plan will be written down and given to the authorisation holder and DPS. It explains what actions are required and within what time period, in order to comply with the licensing objectives, specific legislation or conditions. It will be regularly reviewed and if the authorisation holder/DPS have complied, the action plan will be terminated. If there are areas of non-compliance, the authorisation holder may face prosecution or their authorisation may be called for a review.
 - Mutual consent to the addition of licensing condition which reflects a harm identified by any of the Responsible Authorities and which the premise licence holder agrees not to continue (known as a minor variation).
 - Review – when there is evidence to show that the licensing objectives are not being met then the authorisation holder will have to attend a review hearing in front of the Licensing Sub-Committee. A decision will be made by the Licensing Authority Sub-Committee based on the evidence put forward as to whether the DPS will be removed and/or the authorisation revoked, suspended, amended or have additional conditions applied.
 - Prosecution – under the Licensing Act, certain offences can be instituted by the Licensing Authority / Director of Public Prosecutions / the Weights and Measures Authority (Trading Standards). In addition, Responsible Authorities have a wide range of powers to institute prosecution under other specific legislation depending on the nature of evidence found.
 - Closure – The Council and several of the Responsible Authorities have the power to close licensed premises whilst on site if they deem it necessary e.g. the Police, Health & Safety, Environmental Health, Trading Standards and the Fire Service. The Licensing Team also have powers to request closure through the Magistrates Court for continuing unauthorised alcohol sales.

15 ADMINISTRATION, EXERCISE AND DELEGATION OF FUNCTIONS

Licensing and Regulatory Committee

- 15.1 The powers of the Council under the Act may be carried out by the Licensing and Regulatory

Committee, by a Sub-Committee or, instead, by one or more Council officers acting under delegated authority.

15.2 It is considered that many of the decisions and functions will be purely administrative in nature. In the interests of speed, efficiency and cost effectiveness the Council has delegated these functions to Sub-Committees, or in appropriate cases, to officers supporting the licensing function.

15.3 Where under the provisions of the Act there are no relevant representations on an application these matters will be dealt with by officers. Should there be relevant representations then an oral hearing will usually take place before a licensing sub- committee except where all parties agree to proceed in writing. A licence/certificate review will normally take place before a licensing sub-committee. The following table sets out the delegation of functions:

Matters to be dealt with	Full Committee	Sub Committee	Officers
Application for personal licence		If a police objection	If no objection made
Application for premises licence/club premises certificate		If a relevant representation made	If no relevant representation made
Application for provisional statement		If a relevant representation made	If no relevant representation made
Application to vary premises licence/club premises certificate		If a relevant representation made	If no relevant representation made
Application to vary designated premises supervisor		If a police objection	All other cases
Request to be removed as designated premises supervisor			All cases
Application to transfer of premises licence		If a police objection	All other cases
Application for interim authorities		If a police objection	All other cases
Application to review premises licence/club premises certificate		All cases	
Decision on whether a complaint is irrelevant frivolous vexatious etc.			All cases
Decision to object when local authority is a consultee and not the relevant authority considering the application	All cases		
Determination of a police/EHO objection to a temporary event notice		All cases	
Determination of a Minor Variation application			All cases
Removal of the requirement for a designated premises supervisor at community premises		If a police objection	All other cases

Application forms and process

15.4 The application form will be in the prescribed format. The operating schedule will form part of

the completed application form for a premises licence and a club premises certificate. The form will need to contain information that describes the style of the venue, the licensable activities to be provided, the operational procedures, hours, nature of the location, needs of the local community, etc. Most importantly, the applicant will have to detail the steps that will be taken to promote the licensing objectives. Applicants should carry out a risk assessment before they apply for a licence.

- 15.5 Applicants are encouraged to fully consult the police and other statutory services well in advance of carrying out their risk assessments and submitting their applications. Application forms and guidance leaflets will be available from the Licensing Team and our website, including contact names for each of the responsible authorities that will be receiving applications. Most applications will require additional documentation and a fee to be included with the form. Incomplete applications will not be considered and will be returned to the applicant.
- 15.6 Where national guidance permits, online applications will be accepted providing the necessary documentary attachments are uploaded into the application and the appropriate fee paid. Coventry is currently using the Electronic Licence Management System (GOV.UK) which is supported by the Department of Business Innovation and Skills.
- 15.7 Applicants are encouraged to make themselves aware of any relevant planning and transportation policies, tourism and cultural strategies and local crime, alcohol, drug and disorder strategies in order to take these into account, where appropriate, when formulating their operating schedule. Guidance notes containing contact and website information about these policies will be available from the Licensing Team, Regulatory Services. Contact details are below.

16 Environmental Best Practice in Licensed Premises

- 16.1 Applicants and authorised licence holders are encouraged to provide evidence as to how they would promote environmental protection and are encouraged to join the Council in working towards their target of net zero carbon emissions by 2050 by considering a number of measures [Best practice – Coventry City Council](#)

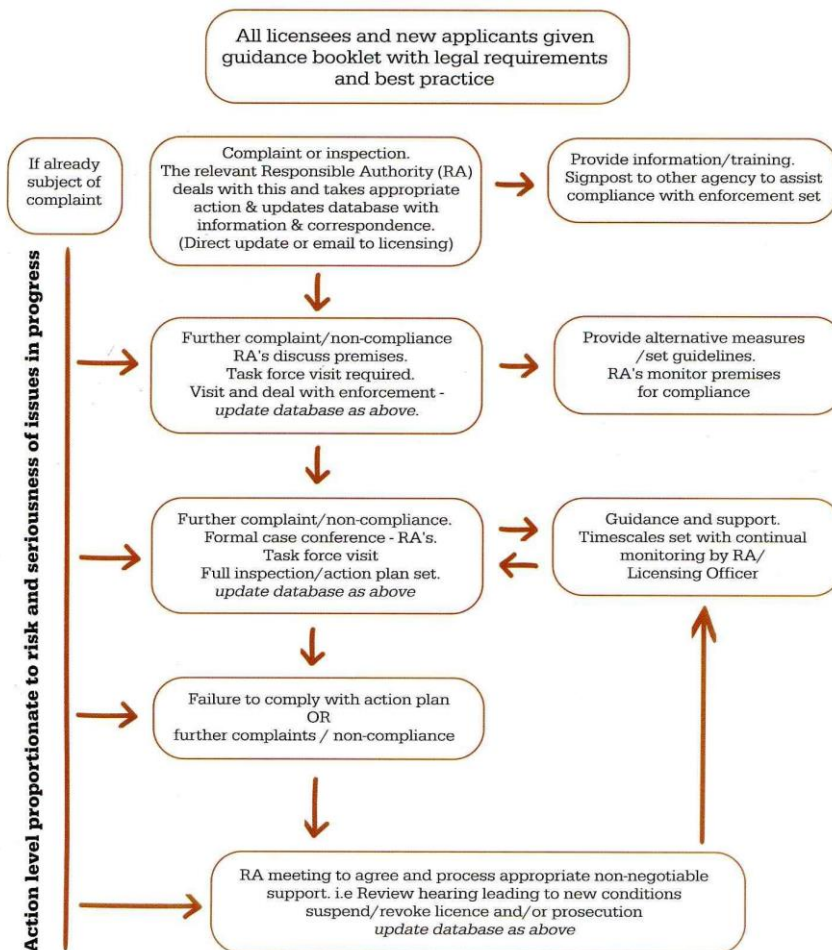
17 Comments on this Policy

- 17.1 The Statement of Licensing Policy will be reviewed on a regular basis. Individuals and organisations that wish to comment on the policy are invited to send their comments in writing to:

Regulatory Services
PO Box 7097
Coventry
CV6 9SL
Telephone Number: 024 7697 5496
E-mail: licensing@coventry.gov.uk
Website: www.coventry.gov.uk

APPENDIX A

Ladder of intervention - approach to enforcement issues



APPENDIX 2

Licensing Act 2003 – Responsible Authority Contacts

Licensing Authority:

Coventry City Council
Licensing Team,
PO Box 7097
Coventry
CV6 9SL
Telephone: 024 7697 5496

Contact:

licensing@coventry.gov.uk

Chief Officer of Police:

West Midlands Police
Little Park Street
Coventry
CV1 2JX
Telephone: 024 7653 9097

Contacts:

cv_licensing@west-midlands.pnn.police.uk

Fire Authority

Applications
Fire Service Head Quarters
99 Vauxhall Road,
Vauxhall,
Birmingham,
B7 4HW

Contact:

firesafety.admin@wmfs.net

Safeguarding Children Board

Social Services & Housing
Chairing and Reviewing Service
PO Box 7097
Coventry
CV6 9SL

Contacts:

safeguardingchildrenlicensing@coventry.gov.uk

Health & Safety Enforcing Authority

Coventry City Council
Regulatory Services
PO Box 7097
Coventry
CV6 9SL

Contacts:

Food and Health & Safety
ehcommercial@coventry.gov.uk

Environmental Protection

Coventry City Council
Regulatory Services
PO Box 7097
Coventry
CV6 9SL

Contacts:

Environmental Protection
Env.protection@coventry.gov.uk

Trading Standards

Coventry City Council
Regulatory Services
PO Box 7097
Coventry
CV6 9SL

Contact:

Trading Standards/Business
Compliance
tradingstandards@coventry.gov.uk

Director of Public Health & Wellbeing
Coventry City Council
PO Box 7097
Coventry
CV6 9SL

Contact:
Public Health
publichealth@coventry.gov.uk

Planning Authority
Coventry City Council
PO Box 7097
Coventry
CV6 9SL

Contact:
Planning
planning@coventry.gov.uk

Secretary of State (Home Office Immigration Enforcement)
Licensing Compliance Team (LCT)
2 Ruskin Square
Dingwall Road
Croydon
CR0 2WF

Contact
ie.licensing.applications@homeoffice.gov.uk

OTHER USEFUL CONTACTS:

Health & Safety Executive
Licensing Applications/Consultation
19 Ridgeway
9 Quinton Business Park
Quinton
Birmingham
B32 1AL
Telephone: 0300 790 6787

Coventry City Council Events Team
Coventry City Council
PO Box 7097
Coventry
CV6 9SL

Email: events@coventry.gov.uk

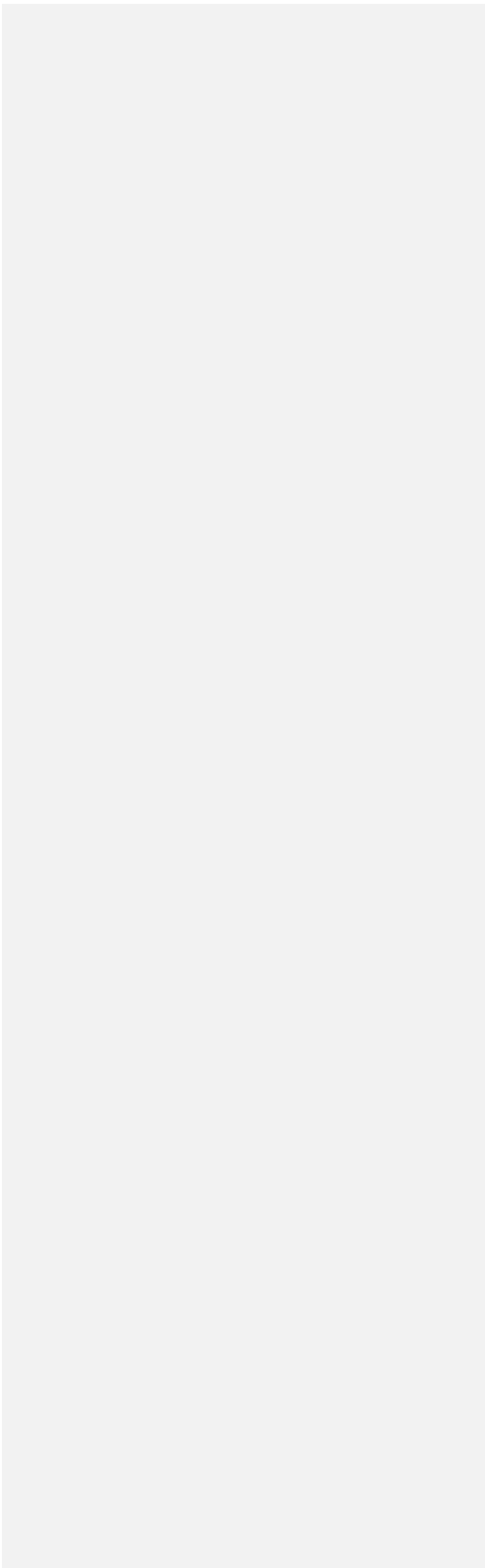
Obtain a basic disclosure DBS for your Personal Licence

[Request a basic DBS check - GOV.UK](#)

If you need this information in another format, please contact:

Telephone: 024 7697 9456

e-mail: licensing@coventry.gov.uk



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Appendix 2

Responses to Coventry City Council Statement of Licensing Policy Consultation

12th August 2025 – 7th October 2025

1. Background

- 1.1 The public consultation on the draft Statement of Licensing Policy took place for 8 weeks from 12th August 2025 – 7th October 2025.
- 1.2 The consultation was extensive and included a range of statutory consultees, stakeholders and local communities.
- 1.3 Ten responses were received during the consultation period.
- 1.4 All consultees were asked for comments on the draft policy, which have been organised into themes and are presented below.

Respondent	Feedback/Comments/Amendments	Action
	<p><u>Section 1-7 – General Statement</u> Can we ensure that not too many in areas of high anti social behaviour</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> Can we ensure that those selling school not to minors also undergo dbs checks</p> <p><u>Section 24 – Enforcement</u> Any breaks condition get stripped licence for a year without appeal and hefty fines</p>	<p>Noted. No change.</p> <p>Noted. No change</p> <p>Noted. No change</p>
	<p><u>Section 1-7 – General Statement</u> I feel that the Licencing of properties selling alcohol and food need to be stricter on the noise the general public are making when vacating the establishment . It should not be up to the residents that are suffering the noise to have to call the noise enforcement , only for them to not turn up . The responsibility should be the responsibility of the establishment. This should be enforced by the council.</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> Noise Pollution</p> <p><u>Section 10-13 – Best Practice</u> The establishment should be responsible for the noise when they leave the venue</p> <p><u>Section 14 – Enforcement</u> There should be strict rules and guidelines for these establishments</p>	<p>Noted but no action required for the Policy – Already addressed in paragraph 8.21.</p>
	<p><u>Section 1-7 – General Statement</u> I'm happy with the current licensing</p> <p><u>Section 8 – Promotion of the Four Licensing Objectives</u></p>	<p>Noted. No change</p>

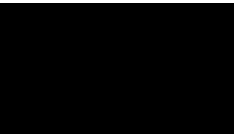

	<p>I'm happy with the current licensing</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> None</p> <p><u>Section 10-13 – Best Practice</u> I'm happy with the current licensing</p> <p><u>Section 14 – Enforcement</u> I'm happy with the current licensing</p> <p><u>Section 16 – Environmental Best Practice</u> I'm happy with the current licensing</p>	
Public Health (Coventry City Council)	<p><u>Section 1-7 – General Statement</u> The Public Health and Insight Team met and consulted on the Alcohol and Entertainment license policy, and overall were impressed with the considerations contained within the policy, however, is there a possibility for Coventry to add local licensing objective around Protecting and Improving Public Health and wellbeing (we appreciate that this is not reflected in the law but wondered if it would be something that could be considered locally) Are there any other LA areas that have done so? If not, could we add a separate section on health to the policy encompassing the points below? Also, may be useful to state how closely linked the policy has been reviewed looking through a Public Health lens (Could use examples from Scotland) For Example: Heading- Health and Wellbeing – Subheading Context</p>	<p>Noted no action required</p> <p>Public Health's role as a Responsible Authority is outlined in Para 1.12.</p> <p>This has been included in Para. 13.6</p>

	<p>Part of a wider role of licensing to promote better health in the city Our legal duty</p> <p>Local Approach to prioritising health and reducing inequalities (Including local strategies and best practice)</p> <p>How it links to One Coventry</p> <p>To also include under the subheading the following subsections:</p> <p>Health impacts of alcohol</p> <p>Public health approach</p> <p>Inequalities and Marmot city</p> <p>Health impacts</p> <p>Have a section outlining, from a health perspective, the impact of alcohol, with a few key stats, and why it's important to use this policy to promote better health of residents of Coventry</p> <p>Public health approach</p> <p>How we will address health – prevention and system work</p> <p>Link in the drug and alcohol strategy, where it feeds into the system, etc. To also include other pieces of work, HWB strategy, PH business plan, anything ICB, Prevention framework</p> <p>Public Health Teams' responsibilities</p> <p>Inequalities</p> <p>Inequalities across the city – Such as the Indices of Multiple Deprivation Mapping Marmot city since 2013, a way of tackling our health inequalities</p> <p>Wider Prevention tackling the causes of inequality by strengthening the social determinants of health/ building blocks, good quality housing, access to health care, education, transport, employment planning and responsible licensing.</p> <p>Other Comments</p> <p>1.12</p> <p>Has single-unit retail been considered?</p>	<p>Condition included in Para. 1.12</p>
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Can we include something around alcohol free options?	Noted. No change
Could we include a bullet point for joint Public Health prevention and harm reduction campaigns/projects in line with Coventry's local drugs and alcohol strategy	Noted & included in 13.6
1.3 – Coventry's population based on the 2024 Mid-Year ONS Estimate is 369.026	Noted. No change
Appendix 2 – Responsible Authority Contacts	
Public Health Email address (can this be updated?) – publichealth@coventry.gov.uk	Noted. amended
<u>Section 8 – Promotion of the Four Licensing Objectives</u>	
8.3 – Link to updated National Government Strategy regarding Drugs and Alcohol – please see link: From harm to hope: A 10-year drugs plan to cut crime and save lives - GOV.UK	Noted. No change
8.5 – To also work closely with local and regional health protection teams regarding best practices	Noted. No change
8.10 Are we considering other models (similar to Pubwatch) ?	Noted. No Change
8.11 Rather than linking to the council best practice, could be more beneficial to link to updated strategies/policies/plans.	Noted No change
Example: Domestic Abuse Strategy 2018-2025 – Coventry City Council or Enough campaign https://enough.campaign.gov.uk/	Noted. No change
8.33 - Hospital admissions data is not held by Public Health – may be helpful to rephrase this to	Noted. Updated.

	<p>Where possible, the Director of Public Health and Caldicott Guardian will promote data sharing across appropriate organisations to facilitate decision making.</p> <p>8.39 May be helpful to link to the CCC modern slavery strategy</p> <p>Overall:</p> <p>In section 8 where it refers to the Director of Public Health responsibilities, it may be more useful to say the Public Health team can support/advise.</p> <p><u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments</p> <p><u>Section 10-13 – Best Practice</u> 13.5 – Link to new health and wellbeing strategy – Coventry Health and Wellbeing Strategy 2023-2026 – Coventry City Council</p> <p>13.6 – Link to new Coventry drug and alcohol strategy - Drugs and alcohol – Coventry City Council</p> <p>Section 13 – May be worth referring to the upcoming Smoking and Vaping Bill</p> <p><u>Section 14 – Enforcement</u> No comments</p> <p><u>Section 16 – Environmental Best Practice</u> No comments</p>	<p>Noted. Updated</p> <p>Noted. No change</p> <p>Noted & referenced</p> <p>Noted & referenced</p> <p>Noted. No change</p>
<div></div> <p>(Home Office)</p>	<p>We do not currently have a response, however can you please ensure your own records and your Responsible authorities list, shows our updated contact details?</p>	<p>Noted. Updated</p>

	<p>NB: You may be aware that our team has changed name and we have moved offices in the last year.</p> <p>Our new contact details are now:</p> <p>Home Office Immigration Enforcement Licensing Compliance Team (LCT) 2 Ruskin Square Dingwall Road Croydon CR0 2WF</p> <p>Email: IE.licensing.applications@homeoffice.gov.uk</p>	
	<p>As a business owner operating on Far Gosford Street, I would like to provide feedback regarding alcohol licensing in this area. My main concern is the high concentration of off-licence alcohol outlets located within a very short distance of each other.</p> <p>This oversaturation has already had a negative impact on the community, including: An increase in antisocial behaviour and public nuisance.</p> <p>A less family-friendly environment, which discourages customers who come to the area for other services.</p> <p>Unfair competition that undermines the balance of local businesses, many of which do not sell alcohol.</p> <p>In my view, the Licensing Policy should ensure that new licence applications in areas where there is already a high density of alcohol outlets are carefully restricted, in order to protect community wellbeing and maintain a safer, more balanced local economy.</p>	<p>Noted. No change. However, we can look a cumulative impact zone</p>

	I therefore respectfully urge the Council to take these concerns into account when reviewing the Licensing Policy and when considering new applications in Far Gosford Street.	
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments <u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments <u>Section 10-13 – Best Practice</u> No comments <u>Section 14 – Enforcement</u> No comments <u>Section 16 – Environmental Best Practice</u> No Comments	Noted. No change
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments <u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments	Noted. No change

	<u>Section 10-13 – Best Practice</u> No comments <u>Section 14 – Enforcement</u> No comments <u>Section 16 – Environmental Best Practice</u> No Comments	
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments <u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments <u>Section 10-13 – Best Practice</u> No comments <u>Section 14 – Enforcement</u> No comments <u>Section 16 – Environmental Best Practice</u> No Comments	Noted. No change
	<u>Section 1-7 – General Statement</u> No comments <u>Section 8 – Promotion of the Four Licensing Objectives</u> No comments	Noted. No change

	<p><u>Section 9 – Mandatory Conditions & Other Considerations</u> No comments</p> <p><u>Section 10-13 – Best Practice</u> No comments</p> <p><u>Section 14 – Enforcement</u> No comments</p> <p><u>Section 16 – Environmental Best Practice</u> No Comments</p>	
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Equality Impact Assessment

EIA-755461224 - Review of Statement of Licensing Policy - Alcohol & Entertainment

Details

Title	Review of Statement of Licensing Policy - Alcohol & Entertainment
Author	Rekha Masih (Licensing Team Leader)
Head of Service	Davina Blackburn (Strategic Lead - Regulation & Communities)
Cabinet Member	Cllr Abdul Khan (Policing and Equalities)
Director	Julie Newman (Law and Governance)

Context and background

EIA carried out on	Review of policy or strategy
Background	<p>Licensing Act 2003 states that the Statement of Licensing Policy for alcohol & entertainment must be reviewed every 5 years. The current policy expires in March 2026.</p> <p>The Act specifies licensing objectives which are central to the regulatory regime, which are:</p> <ul style="list-style-type: none"> Prevention of Crime & Disorder Public Safety Prevention of Public Nuisance Protection of Children from Harm
Stakeholders	<p>Any premises that sells alcohol</p> <p>Any premises that provides regulated entertainment</p> <p>Any premises that provides Late Night Refreshment (hot food & drink after 23:00 hours)</p> <p>Coventry residents & visitors</p>
Responsibility	Rekha Masih

Consideration of impact

Baseline data and information

We have approximately 900 licensed premises in Coventry.

In England in 2023, 19% of adults had not drunk alcohol in the last 12 months. This proportion has remained stable, between 17% and 20%, since 2011 (NHS Digital, 2024)

The COVID-19 pandemic polarised drinking patterns, with people previously consuming alcohol at lower levels further decreasing their drinking, and people previously consuming alcohol at higher levels further increasing their drinking (Public Health England, 2021)

Marmot Principles

- 3. Ensure a healthy standard of living for all
- 4. Create fair employment and good work

Protected groups - Impact on Coventry Residents and Visitors

Age 0-18

Positive impact - Licensing Act 2003 - One of the four licensing objectives is to Protect Children from Harm. This policy will have a Positive impact on age. Actions and objectives are stated in the policy that will help protect young people. The policy outlines what the licensing authority’s duty is in and what the Council expects from licence holders in respect of protecting young people from harm. The policy makes provision for the Safeguarding Children Team to act as the responsible authority for matters relating to the protection of children from harm and enables them to comment on variations/new applications and request reviews of licences.

According to NHS England (2024), in England in 2023: 37% of pupils aged 11-16 said they had ever had an alcoholic drink

Prevalence increases with age, from 15% of 11 year olds to 62% of 15 year olds

5% of all pupils said they usually drank alcohol at least once per week, similar to 6% in 2021

The proportion of those drinking alcohol at least once per week also increases with age, from 1% of 11 year olds to 11% of 15 year olds

Age 19-64	<p>Positive impact - Enables the Licensing Team to regulate licensed premises and ensure that they are providing a safe environment for customers to enjoy the night time economy.</p> <p>In England, alcohol consumption among adults aged 19 to 64 varies significantly. According to the NHS England Digital report, 30% of those aged 55 to 74 drank at least 14 units of alcohol per week, compared to 19-24% of other age groups. The AUDIT test indicates that 88% of adults had low risk drinking behaviour or abstained. The health risks associated with drinking alcohol, such as accidents, injuries, cancer, heart disease, and reduced life expectancy, tend to increase with higher consumption. Since 2016, UK guidelines have focused on regular weekly consumption, recommending that men and women should not normally consume more than 14 units of alcohol a week, including some days where no alcohol is drunk.</p>
Age 65+	<p>Positive impact - Enables the Licensing Team to regulate licensed premises and ensure that they are providing a safe environment for customers to enjoy the night time economy.</p> <p>Among adults aged 65 to 74, the proportion who usually drink more than 14 units per week (at increasing or higher risk) varies across age groups, increasing up to the age of 55 to 64 (30% of all adults, 38% and 23% of men and women respectively).</p>
Disability	<p>Positive impact - Research suggests that individuals who live with a disability in the UK are more likely to experience the risk factors associated with alcohol dependency, such as low self-esteem, disempowerment, and living with cognitive limitations. Disabilities have a huge impact on an individual's capacity to live their life as normal.</p> <p>They can restrict physical movement, their ability to use public transport, or their confidence in doing things by themselves. Everyone can suffer differently, and unemployment is common.</p> <p>These kinds of restrictions can force individuals to give up things that they previously enjoyed (if they have developed their disability over time), or miss out on what others do, fuelling feelings of helplessness, anxiousness, or depression.</p> <p>Alcohol can become a way of dealing with this. Individuals can drink to forget that they can't do the things that they used to, or if they have always had their disability, they might drink to forget that they can't do the same things as their friends.</p>
Gender reassignment	<p>No impact -</p>

Marriage and civil partnership	No impact -
Pregnancy and maternity	Positive impact - Very few women reported that they drank more than a unit of alcohol a week in pregnancy (2.9% of women for whom alcohol usage was known), although the fact that this is self-reported means that it may be an underestimate. Most women (97.1%) reported that they drank little to no alcohol a week (1 unit or fewer).
Race	Positive impact - Ethnicity plays a significant role in alcohol consumption patterns. While some ethnic groups, such as Bangladeshi and Pakistani men and women, tend to drink less than others, there are also higher rates of higher risk drinking among certain groups, such as older Irish men and men belonging to the Sikh religion. Ethnic minorities may face barriers to accessing alcohol treatment services and often seek help only after experiencing serious health consequences. Understanding these patterns is crucial for addressing alcohol-related issues in a culturally competent and equitable manner.
Religion and belief	No impact -
Sex	Positive impact - Research consistently shows that a higher percentage of alcoholics are male compared to female, with men being roughly twice as likely to struggle with alcohol dependence. This gender gap is attributed to a combination of biological, social, and cultural factors, including differences in metabolism, societal norms around drinking, and varying levels of access to treatment. While men dominate the statistics, it's important to note that women may face unique challenges, such as faster progression from casual drinking to dependency and heightened health risks, making gender-specific data essential for tailored prevention and intervention strategies.
Sexual orientation	No impact -

Additional groups

Care experienced

Positive impact - Looked after children and care leavers aged 11–19 years have a fourfold increased risk of alcohol and drug use compared to their peers and have been found to drink alcohol more frequently and at higher intensity than those who are not care-experienced (Meltzer, 2003). children (aged 11–17 years old) placed in residential units were found to drink alcohol more frequently than those in foster care; 42% drank alcohol at least once a month, compared with 25%, figures considerably higher than the 9% for young people not looked after (Meltzer, 2003). Thus, while it is well established that the child's environment and transient lifestyle can have adverse effects on young people in care, it is also the case that placement type, whether foster, kinship or residential care, can also influence levels of alcohol.

Armed forces

Positive impact - The statistics on alcohol consumption among the armed forces reveal a significant concern regarding alcohol misuse. Between July 2012 and April 2023, 9,676 UK armed forces personnel had at least one Read code for alcohol misuse, with 966 personnel having at least one Read code for alcohol dependence. The breakdowns by service, gender, and calendar year show a pattern of alcohol misuse across various branches and demographics. The Royal Navy had the highest number of personnel with alcohol dependence Read codes, while the Army had the lowest. The data highlights the need for continued monitoring and support for personnel dealing with alcohol misuse.

Socio economic groups

Positive impact - Socioeconomic status (SES) is one of the many factors influencing a person's alcohol use and related outcomes. Findings have indicated that people with higher SES may consume similar or greater amounts of alcohol compared with people with lower SES, although the latter group seems to bear a disproportionate burden of negative alcohol-related consequences. These associations are further complicated by a variety of moderating factors, such as race, ethnicity, and gender. Thus, among individuals with lower SES, members of further marginalized communities, such as racial and ethnic minorities and homeless individuals, experience greater alcohol-related consequences.

Next steps

Inequality	Action	Owner	Timescale

Monitor and evaluation	The Policy must be reviewed every 5 years and the EIA will also be reviewed
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Impact on Council staff

Will there be an impact?	No
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Completion statement

Potential equality impact	Positive impact has been identified for one or more protected groups
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Public report Cabinet Member Report

Licensing & Regulatory Committee
Cabinet Member City Services

18th November 2025
8th December 2025

Name of Cabinet Member:

Cabinet Member for City Service - Councillor P Hetherton

Director Approving Submission of the report:

Director of Law and Governance

Ward(s) affected:

All

Title:

Review of the current Statement of Licensing Policy (Taxi & Private Hire) to include changes on Emissions, Age of Vehicles and Best Practice Guidance.

Is this a key decision?

No

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant.

Executive Summary:

The purpose of this report is to update Members of the outcome of the eight-week consultation undertaken on the review of the current Statement of Licensing Policy (Taxi & Private Hire) to include changes on Emissions, Age of Vehicles and Best Practice Guidance and to recommend for approval, a revised policy.

Recommendations:

Licensing & Regulatory Committee is recommended to:

1. Consider the results of the consultation, and the proposed changes on the revised Statement of Licensing Policy (Taxi & Private Hire) and notify the Cabinet Member for City Services of its comments.

Cabinet Member for City Services is recommended to:

1. Consider the results of the consultation, and the proposed revised Statement of Licensing Policy (Taxi & Private Hire) and any comments from the Licensing & Regulatory Committee.
2. Approve and adopt the revised Statement of Licensing Policy (Taxi & Private Hire) attached as Appendix A of the report.

List of Appendices included:

Appendix 1 – revised Statement of Licensing Policy (Taxi & Private Hire) (shaded paragraphs illustrate the amendments to the document).

Appendix 2 – Summary of consultation responses

Appendix 3 – Representation - The Guide Dogs for The Blind

Appendix 4 – Equalities Impact Assessment

Other useful background papers:

DfT Taxi and Private Hire Vehicle Licensing Best Practice Guidance for Licensing Authorities in England (November 2023).

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

Yes

Licensing & Regulatory Committee – 5th August 2025 & 18th November 2025

Will this report go to Council?

No

Report title: Licensing Act 2003 – Revised Statement of Licensing Policy

1. Context (or background)

- 1.1** The current Statement of Licensing Policy (Taxi & Private Hire) commenced on the 14th September 2022. The policy is reviewed every 5 years unless a review is required due to legislative changes or emerging issues.
- 1.2** The purpose of the policy is to set out the terms and conditions that will apply to new applicants and those already licensed for the Hackney Carriage & Private Hire trade.
- 1.3** Coventry City Council (The Council) has a duty under the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 to carry out its functions as the Licensing Authority.
- 1.4** The Council has a duty under these acts to carry out the following functions:
- Ensure that drivers are ‘fit & proper’.
 - Ensure that all licensed vehicles are road worthy and fit for the carriage of fare paying passengers; and
 - Protect public safety.

The promotion of these functions is of paramount consideration when determining an application and any conditions attached to an authorisation.

- 1.5** The DfT has national responsibility for Hackney Carriage & Private Hire legislation in England & Wales. The DfT has issued best practice guidance on taxi & private hire vehicle licensing since 2006 to assist local authorities that have responsibility for the regulation of taxi & private hire vehicle trades. This is updated periodically, considering stakeholder views and the way in which the sector operates. The DfT has published non-statutory best practice guidance to complement the statutory standards in 2010 and revised and re-issued this in November 2023, covering a range of issues outside of the remit of the statutory standards.
- 1.6** The focus of the best practice guidance is to ensure that taxi & private hire trade provides a safe, inclusive, accessible and attractive service for the passengers they carry. Whilst the safety of the public is paramount, licensing authorities, as regulators, also have a duty to ensure that they carry out their activities in a way that supports the people and businesses that they regulate. The best practice guidance aligns with overarching principles in the Regulators Code that unnecessary burdens should be avoided and that regulators should approve proportionate approaches.
- 1.7** This policy must be renewed every five years, but an earlier review may be triggered by new legislation, regulatory changes, or emerging issues subject to a full consultation process. As such, relevant sections of this policy are under review to reflect local issues.
- 1.8** Cabinet Member for City Services on 25th July 2025 and Licensing & Regulatory Committee on 5th August 2025, considered a report on the draft revised Statement of

Licensing Policy and authorised the Director of Law & Governance to consult on its contents.

- 1.9** This report advises Members of the consultation that has taken place and outlines the comments received and amendments made to the Council's draft licensing policy.
- 1.10** Following public consultation, the revised draft Statement of Licensing Policy is now ready to be recommended for adoption to take effect from 1st January 2026 (Appendix A).

Key Changes to the Revised Licensing Policy

- 1.11** The proposed changes include:
- Paragraph 5.9 - To bring the current emissions policy in line with the other West Midlands Councils so that as of the 1st of January 2030 new and replacement vehicles are required to be either an Ultra-Low Emission vehicle (a vehicle that will produce less than 75g CO2/km), produce zero emissions or be zero emission capable by this date.
 - Paragraph 5.8 - Remove the age limit to reflect the Department for Transport guidance.
 - Paragraph 5.2 - Remove the London Conditions of Fitness to enable a greater choice of vehicles to be licensed as hackney carriage vehicles. These vehicles would be required to be wheelchair accessible (either factory made or modified in accordance with the DVSA and industry standards). There will no longer be a prescribed list of approved vehicles, but rather each vehicle will be assessed at the point of application to determine its suitability in accordance with the policy, and in line with industry standards in relation to wheelchair accessibility.
 - Paragraph 4.12.3 - All drivers must register with the Disclosure and Barring Service (DBS) by subscribing to the DBS Update Service enabling the licensing authority to check the driver's DBS status at any time (a minimum of 6 monthly intervals).
 - Paragraph 4.18.1 - When a certificate of good conduct is provided and not in English a notarised translation would need to be provided by the applicant at their own expense.

2 Options considered and recommended proposal.

- 2.1** The Licensing & Regulatory Committee is recommended to:

Consider the results of the consultation on the revised Statement of Licensing Policy for the period 2026 – 2031 and notify the Cabinet Member for City Services of its comments (Appendix B).

2.2 The Cabinet Member for City Services is recommended to:

1. Consider the results of the consultation of the revised Statement of Licensing Policy and any comments from the Licensing & Regulatory Committee.
2. Approve and adopt the proposed changes to Statement of Licensing Policy for the period 2026 – 2031.

3 Results of consultation undertaken

3.1 The public consultation ended on 3rd October 2025, and the following were consulted:

- All Taxi & Private Hire licence holders
- Hackney Carriage trade
- Unite Trade Union representing the trade
- Private Hire Operators
- Formally writing to the Chief Officers of the responsible authorities, including the Chief Officer of Police
- Neighbouring local authorities
- Relevant internal departments
- Disabled groups (DEAP)
- Wider public consultation through the City Council Website.

3.2 There were 119 responses to the consultation (117 online consultation responses, one response received by e-mail and a separate representation). The consultees were from the licensed trade, members of the public, disability groups and businesses. The comments are summarised in Appendix 2.

3.3 A separate representation was made by The Guide Dogs for the Blind which is attached as Appendix 3. Whilst this was a direct response to the consultation the issues raised are not relevant to this policy review but will be considered for future reviews to the policy.

3.4 Most of the responses supported the proposed changes.

3.5 Of the responses the comments can be summarised as follows:

3.5.1 Amendment to emissions policy

The majority of consultees supported the policy, noting that providing there is a sufficient transitional period, licensees will benefit from the change, as they will have flexibility to choose from a number of suitable vehicles commensurate to their financial position.

Some consultees indicated that the extension to the emissions policy to 2030 does not provide adequate transition time to allow for purchasing new vehicles. However, should the policy not be amended the implication is that the existing emissions policy would have to come into effect on 1st January 2026. Therefore, the amended policy

allows significant additional time for licence holders to comply.

In addition, some consultees were aggrieved by the proposed revision on the basis that they had already purchased an electric vehicle. We acknowledge their position but consider the proposed revision necessary to place Coventry in line with neighbouring authorities. We acknowledge the challenges faced within the last few years regarding cross border hiring and hope that the revision will work to reduce this and level the playing field for Coventry licencees.

Some consultees commented that no revision should be made in order to promote clean air within the city. Whilst we acknowledge the concern, this would have an adverse effect on the current fleet, in terms of the number of wheelchair accessible vehicles that comply with the current policy. Furthermore, the proposed changes have been made in collaboration with the climate change team.

Recommendation: Adopt proposed revision of the policy.

3.5.2 Removal of vehicle age limit

The majority of consultees supported the proposed change to remove the age limit. The comments included supporting an emissions policy, keeping vehicles in good condition and passing MOT's and to be consistent with other local authorities. Some consultees agreed with The Department for Transport guidance which advises against the imposition of rigid age limits on licensed vehicles, suggesting instead that vehicle eligibility be based on targeted outcomes such as emissions, safety standards and accessibility.

Those consultees who were unsupportive of the proposed change were concerned that removal of the age limit would encourage drivers to run the vehicles for longer and risk poorer quality vehicles to be on the road. We consider compliance with the revised emissions policy and regular MOT inspections would alleviate this concern.

Recommendation: Adopt proposed revision of the policy.

3.5.3 Removal of the London Conditions of Fitness.

The overwhelming majority of consultees support this change noting that it will provide more affordable vehicles for current and prospective licence holders. Those in support welcome the revision to encourage the availability of other vehicles, noting the importance of wheelchair accessibility standards.

Of those that were unsupportive the concern was around a decline in standards and a potential decline in the availability of wheelchair accessible vehicles (WAV's). To ensure that the fleet are able to respond to the demand for WAVs, the licensing authority will only licence those vehicles that are either manufactured or modified to be wheelchair accessible. These vehicles will need to demonstrate compliance by the licensing authority prior to granting a licence. There will not be a prescribed list of approved vehicles, but rather each vehicle will be assessed at the point of application to determine it's suitability in accordance with the policy, and in line with industry standards in relation to wheelchair accessibility.

Recommendation: Adopt proposed revision of the policy.

3.4.4 Subscription to the DBS update service

There is an overwhelming majority supporting this proposed change noting that this is a more efficient way of working and it promotes public safety.

An unsupportive consultee suggests the checks should be annual; however, we do not see the benefit of this as the Council has a duty under the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 to carry out its functions as the Licensing Authority to protect the public, and six monthly DBS checks provide this reassurance.

Recommendation: Adopt proposed revision of the policy.

3.4.5 Certificate of good conduct.

There was an overwhelming majority supporting this proposed change, noting that it would promote public safety and allow for more rigorous checks on the driver.

Unsupportive consultees expressed concern about the cost to the driver and accuracy of translation. However, the requirement for a notarised translation will provide reassurance in this regard. Further for the Council to meet this cost implication it would require a full fee review, which is disproportionate considering the small, anticipated number of prospective applications requiring translated documents.

Recommendation: Adopt proposed revision of the policy.

4 Timetable for implementing this decision.

- 4.1** The revised Statement of Licensing Policy must be published by 1st January 2026 allowing the Council to continue to carry out any function in respect of individual applications.

5 Comments from Director of Finance and Director of Law & Governance.

5.1 Financial implications

The financial implications associated with the recommendation are limited to the employee costs associated with undertaking the consultation exercise and any costs involved in publishing the Statement of Licensing Policy, which are funded within existing budgets.

Legal implications

The licensing function is carried out by the Council's Licensing and Regulatory Committee and officers exercising delegated powers. The one exception is the approval of the Policy, which must be approved by Full Council.

The Council is required to have regard to any DfT best practice guidance when carrying out any licensing functions including its Statement of Licensing Policy

6 Other implications

6.1 How will this contribute to achievement of the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

The Policy aligns with the One Coventry Plan to work together to improve our city and the lives of those who live, work and study here. The changes to the policy will encourage a more flexible approach to licensing which will encourage the trade to licence with Coventry, increasing the economic prosperity of the City and region.

The changes to the policy will encourage a more inclusive fleet, which aligns with the objective of tackling inequalities within communities.

The policy aligns with the One Coventry Plan as the Council is acting as partner with neighbouring authorities by harmonising our policies with those in the region, encouraging a level playing field for those within the hackney carriage and private hire trade.

6.2 How is risk being managed?

The Statement of Licensing Policy will inform decisions taken by the licensing authority that will have an impact on the interests of private individuals and businesses. The Policy reflects the need to respect the relevant rights given by the Human Rights Act.

Decisions of the Licensing Authority are open to challenges through the Magistrates Court and beyond. The Statement of Licensing Policy is designed to ensure our compliance with legislation and best practice guidance, minimising the risk of legal challenge.

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6.3 What is the impact on the organisation?

The adoption of the policy should have no impact on the organisation. There are no human resources, financial or ICT implications.

6.4 Equalities / EIA

The Statement of Licensing Policy makes links to the Council's Equality and Diversity Policies and an Equalities Impact Assessment exists for licensing activities. This has been reviewed and updated as part of the consultation process (Appendix 3).

6.5 Implications for (or impact on) climate change and the environment

The Policy has been reviewed in collaboration with the Climate Change team, and it contributes to the Council's aim for Coventry to be carbon neutral by 2050, with an interim target of a 68% reduction in emissions by 2030.

6.6 Implications for partner organisations?

The Statement of Licensing Policy contributes towards the work with partner agencies

specifically with the work of the police and safeguarding children.

The effective operation of the policy by the Licensing Authority and all enforcement agencies has an impact on the public safety of residents and communities.

6.7 Human Rights Act Implications

None

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This report is published on the Council's website:

www.coventry.gov.uk/councilmeetings

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**Statement of
Licensing Policy
(Taxis and
Private Hire)
~~2022-2027~~ 2026
- 2031**

Important Note

In producing this Statement of Licensing Policy, the Licensing Authority is aware that the Government may from time to time amend the Town Police Clauses Act 1847 and Local Government (Miscellaneous Provisions) Act 1976, subordinate legislation and statutory guidance.

The Council does not intend to revise this policy document because of any such amendments and readers of this document are advised to check on the Home Office/Gov.uk website to ensure they have the latest information.

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Supporting documentation

Taxi Licensing has produced three documents which give new applicants and existing licensed drivers, vehicle proprietors & private hire operators guidance on licensing with Coventry City Council. For the purposes of this document “Taxis” refers to hackney carriage vehicles).

These guides are issued during the licensing process and are also available from licensing pages of the City Council web site (www.coventry.gov.uk/taxilicensing)

- Guidance for Drivers entitled “Driver Information Document”
- Guidance for Vehicle Proprietors entitled “Vehicle Proprietors’ Information Document”
- Guidance for Private Hire Operators entitled “Operator Information Document”

STATEMENT OF LICENSING POLICY (TAXIS AND PRIVATE HIRE)

1. INTRODUCTION

- 1.1 Coventry City Council ('the Council') has a duty under the terms of the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 to carry out its functions as the Licensing Authority. The Department for Transport (DfT) has national responsibility for hackney carriage and private hire legislation in England & Wales. The Department has produced statutory standards for taxis and private hire vehicles which sets out standards which can be considered good practice in this area of licensing, although it also recognises that individual licensing authorities should produce their own policies in relation to specific licensing matters. The DfT has also set statutory standards for taxis and private hire vehicles. The DfT has also set statutory standards for private hire operators. These standards have been taken into consideration in preparing this statement of licensing policy.
- 1.2 There are no formal objectives, however the Council has a duty under these Acts to carry out the following functions:
- Ensure that drivers are "Fit and Proper";
 - That all licensed vehicles are roadworthy and fit for the carriage of fare-paying passengers; and
 - Protect public safety.
- 1.3 The promotion of these functions is the paramount consideration when determining an application and any conditions attached to an authorisation.
- 1.4 Coventry is a growing city situated in the West Midlands with a population of 371,500 inhabitants. It is mainly urban but includes significant areas that are semi-rural. A map of the city is shown on page two.
- 1.5 This Statement of Licensing Policy relates to all those licensing activities identified as falling within the provisions of the Act, namely:
- The licensing of Hackney Carriage Drivers & Private Hire Drivers;
 - The licensing of Hackney Carriage Vehicle Proprietors & Private Hire Vehicle Proprietors; and
 - The licensing of Private Hire Vehicle Operators.
- 1.6 The Council recognises that issuing licences are not the only means of promoting delivery of the above functions and therefore Taxi Licensing engages with neighbouring authorities, West Midlands Police (the "Police") and those involved in child protection (Coventry Safeguarding Children Board) to promote the common functions as outlined.
- 1.7 This Policy has been prepared in accordance with DfT Statutory Taxi & Private Hire Vehicle Standards guidance issued November 2023. The Policy is valid for a period of 5 years from 14th September 2022 1st January 2026. This Policy will be subject to review and further consultation prior to any substantial changes.

Responsible Authorities

- 1.8 A list of contact details for Responsible Authorities authorised under the Acts is attached to this policy statement as Appendix 1.
- 1.9 The Council has recognised the Coventry Safeguarding Children Board as the local body competent to advise it on the protection of children from harm and has designated it as a responsible authority where children may be at risk.

The Licensing Authority as a Responsible Authority

- 1.10 The Licensing Authority will, when acting as a responsible authority, act in accordance with the aforesaid Acts and the DfT Statutory Standards.

2 FUNDAMENTAL RIGHTS

- 2.1 Under the terms of the legislation any person may apply for a licence and each application will be considered on its individual merits.
- 2.2 Applicants in respect of applications to the Council for licensing have a right of appeal to Coventry Magistrates' Court against the decisions of the Council.

3. DECISION MAKING

- 3.1 Officers have been granted delegated powers in granting licences however, if an applicant has a single driving offence of four points or over or multiple driving offences for totting up purposes of over seven points then the applicant/renewal must be referred to the Licensing & Regulatory Committee (Committee) for consideration.
- 3.2 There are officers' guidelines for referrals to the Committee in the Driver Information Document, (which is available on the website: www.coventry.gov.uk/taxilicensing). Likewise, there are also guidelines for the Committee in making their decisions on applications or referrals.

4. DRIVERS

4.1 Fit and Proper

- 4.1.1 The Council will not grant a licence to a new applicant for a Hackney Carriage or Private Hire Driver's licence unless satisfied that the applicant is a fit and proper person.

4.2 Requirement for applying for a Driver's licence

- 4.1.2 There is no minimum or maximum age as such, but an applicant must have held a valid drivers licence) for a minimum of 12 months and must hold a valid UK driving licence. The Council issues three yearly driver licences to applicants for hackney or private hire licences. The Council does not issue joint licences although a driver holding one of these licences may apply for an additional licence so that they then hold both licences.

4.3 Licences

- 4.3.1 Once new applicant drivers are licensed, they are given a three-year licence and this is then renewed on a three yearly basis. Taxi Licensing does not issue licences on a probationary basis. The only exception to this is if a Right to Work has an expiry date, then the licence is only issued until the expiry date of the Right to Work.

4.4 Right to Work in the UK

- 4.4.1 The Council requires all applicants to provide documents to prove that they may legally work in the UK. The Council will also verify an applicants right to work in the UK by checking with the Home Office.
- 4.4.2 Unless an applicant or driver seeking a renewal has a valid UK or Eire passport they must supply an Immigration Code available from the Home Office website.

4.5 Medical Examination

- 4.5.1 Applicants must arrange for any Medical Practitioner to carry out a Group 2 Medical by giving their Medical Practitioner a medical form (in the Driver's Information Document). On request from the Taxi Licensing Office the applicant can ask for a form which shows whether the applicant is exempt from carrying out duties under the Equality Act 2010 (wheelchair passengers and assistance dogs).
- 4.5.2 Existing drivers are required then to undertake medicals five-yearly up to the age of 65 and annually thereafter.
- 4.5.3 The Council may also require any existing driver to undertake a medical if the Council has concerns concerning the driver's fitness.

4.6 Driving Assessment

- 4.6.1 The Council requires new applicants to undertake and pass a practical driving assessment with assessors based in fleet services.
- 4.6.2 If officers deem it necessary, they may require an existing driver to undertake a wheelchair assessment.

4.7 Wheelchair Assessment (normally hackney carriage only)

- 4.7.1 The Council requires new applicants to undertake and pass a practical wheelchair assessment with assessors based in fleet services.
- 4.7.2 If officers deem it necessary, they may require an existing driver to undertake a wheelchair assessment.

4.8 All day Driver Training Course

- 4.8.1 The Council requires new applicants to undertake and pass a Driver Training Course, that includes a written test, conducted by licensing officers, sometimes with assistance from Childrens Safeguarding. This course encompasses Customer Service, Disability Issues, Licensing Issues, Communication & Numeracy Skills, Child Sexual Abuse, County Lines exploitation and a knowledge of locations in Coventry.
- 4.8.2 Pedicab drivers, classified as Pedicab Private Hire Drivers, are only allowed to operate within the city inner ring road and therefore, are not required to undertake a driving assessment or a knowledge of locations in Coventry.

4.9 Half Day Driver Refresher Training Course

- 4.9.1 Existing drivers are required to undertake a half day driver refresher training course before they undertake their renewal of licence. This course encompasses Customer Service, Disability Issues, Child Sexual Abuse and County Lines exploitation.

4.10 Hackney Carriage Road Knowledge Test

- 4.10.1 The Council requires new hackney carriage applicants to undertake and pass a hackney carriage road knowledge written test.

4.11 Photographs

- 4.11.1 New applicants and renewals must supply Home Office (passport type) current photographs to confirm their identity and to produce badges for the driver once licensed.

4.12 Enhanced DBS check & DVLA check

- 4.12.1 New applicants and renewals must supply a code from the Disclosure and Barring Service (DBS) and the Driver and Vehicle Licensing Agency (DVLA) for the licensing office to carry out checks on convictions and any other relevant information on application

- 4.12.2 Current licensees undertake **an enhanced** DBS and DVLA check at their three-yearly renewal.

- ~~4.10.3 Registering with the DBS Update Service is currently voluntary but as of the 26 January 2023 it will be a mandatory requirement for drivers to subscribe to the Update Service. This will then enable Coventry City Council to check their DBS status on a six-monthly basis. This service is cheaper than the current DBS at the Taxi Licensing Office counter.~~

- 4.12.3 All drivers are expected to register with the DBS update service following the issue of their current DBS certificate. Subscribing to the DBS update service will allow the Licensing Authority to check their DBS status at any time (a minimum of 6 monthly intervals).**

- ~~4.10.4 There will be some drivers who are unable to register with the DBS Update Service and in this case those drivers as of the 26 January 2023 will have to undertake a six-monthly DBS by providing a DBS Code and submitting their documentation and pay the fee to the Taxi Licensing Office.~~

- 4.12.4 A check of the children and adult Barred lists is undertaken with the enhanced DBS.

4.13 Common Law Police Disclosures

- 4.13.1 Officers maintain close links with the West Midlands Police. For any licensed drivers that are subject to criminal proceedings or investigations, the Police will notify the Taxi Licensing Office. The appropriate action will be taken against the licence holder, which may include revocation of the licence.

4.14 Licensee self-reporting

- 4.14.1 As a condition of licence, Private Hire drivers are required to declare any convictions and/or cautions within seven days of receiving them. Dependant on the severity of the conviction/caution the driver may be referred to Committee

- 4.14.2 All Licence holders must notify the Taxi Licensing Office within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence.

4.15 Referrals to the Disclosure and Barring Service (DBS) and the Police

- 4.15.1 Officers refer and have referred drivers to the DBS and the Police, when they suspect criminal

activities are taking place.

4.16 Rehabilitation of Offenders Act

- 4.16.1 Cautions and convictions that are protected under Article 2A of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 do not need to be declared by new applicant drivers or existing drivers. However, offences not covered under the Act must be declared unless DBS classify them as protected/filtered.

4.17 Interview

- 4.17.1 New applicants are interviewed by Officers on submission of their application to confirm that they have declared all their names (current and previous), that they have declared their convictions (apart from convictions which are protected and filtered) and to confirm their right to work and status.

4.18 Overseas convictions

- 4.18.1 ~~Taxi Licensing requires new applications who have not lived in the United Kingdom for a minimum of five years to provide a Certificate of Good Conduct from their previous country(ies) of residence from the country's consulate, embassy or judiciary. Applications who have previously spent three or more continuous months outside the UK are also required to provide this.~~

- 4.18.1 Where documents are not in English, a notarised translation will need to be provided by the applicant at their own expense.

4.19 Conditionality - HMRC Taxi Tax Code

- 4.19.1 New applicants who have previously been licensed by another local authority as a hackney carriage or private hire driver and applicant renewals must have registered with HMRC under "Gateway" for tax purposes and obtain a HMRC Taxi Tax Code to obtain their licence or be renewed.
- 4.19.2 New applicants who have not been previously licensed by another local authority as a hackney carriage or private hire driver must by the time of their renewal have registered with HMRC under "Gateway" for tax purposes and obtain a HMRC Taxi Tax Code to obtain their licence or be renewed

5. VEHICLES

5.1 Limitation on Numbers

- 5.1.1 No powers exist for licensing authorities to limit the number of private hire vehicles they will licence.
- 5.1.2 Coventry has no limit on the numbers of hackney carriage vehicles that they will licence.

5.2 Specifications and Conditions

- 5.2.1 Local authorities have a wide range of discretion over the types of vehicles that they can licence as hackney carriage or private hire vehicles.

~~5.2.2 The Council specifies that Hackney Carriage Vehicles must comply with London's Conditions of Fitness and therefore licenses the traditional London type black cab (currently LTC's TX4; LEVC's TX; Mercedes Vito Taxi 113, 114 (with the 180 degree turning circle); and the Nissan Dynamo).~~

5.2.2 The Council will consider each application for a Hackney Carriage Vehicle Licence on its own merits. However, the Council will only licence those vehicles which are manufactured or will be modified to be wheelchair accessible and that can demonstrate compliance with industry standards, regarding wheelchair accessibility, at the time of the application.

5.2.

5.2.3 The Council specifies that Private Hire Vehicles must be as manufactured, unless adapted to carry wheelchair passengers, but must also comply with further Conditions (which are stated in the Vehicle Proprietors' Information document). The Council does not specify particular makes of vehicles to be licensed. Each case will be considered on its own merits.

5.2.4 The Council also specifies the criteria to be met by any vehicle presented for inspection which comprises:

- an MOT element dealing with vehicle safety;
- a test of the taximeter (if fitted, mandatory in hackney carriage vehicles); and
- as licensed Taxis and Private Hire Vehicles a supplementary test dealing with licensing issues such as wheelchair ramps, straps for securing wheelchairs, paintwork, advertising, stickers and minimum of 2mm tread depth (the statutory minimum of 1.6mm) etc.

5.2.5 Local authorities are able to designate external Driver and Vehicle Standards Agency (DVSA) testing stations. Coventry City Council has designated that all inspections are carried out by the Council's Fleet Services at Whitley Depot (DVSA authorised) as it is a central location in a compact city boundary therefore, vehicle proprietors are not required to travel long distances to undertake their inspections. Coventry City Council believes that having the vehicles undertake their inspections at the Council leads to a more robust testing regime for vehicles. The supplementary test requirements are dealt with by a Vehicle Inspection Manual which is available online.

5.2.6 Any vehicle licence issued by the Council may be subject to conditions as at Appendix 2.

5.2.7 The Council strongly recommends that anybody wishing to licence a private hire vehicle brings the vehicle to the Taxi Licensing Office so that officers can ensure that the vehicle complies with the relevant conditions.

5.3 Accessibility

5.3.1 All the hackney carriage vehicles currently licensed to ply for hire are wheelchair

accessible. Any private hire vehicles requiring wheelchair accessibility are required to comply with DVSA and European Whole Vehicle Type approval standards.

5.3.2 The Council maintains a list of accessible taxis and private hire vehicles in accordance with section 167 of the Equality Act 2010. The effect of this is to require the driver of any accessible vehicle contained in the list:

- to carry the passenger while in the wheelchair;
- not to make any additional charge for doing so;
- if the passenger chooses to sit in a passenger seat, to carry the wheelchair;
- to take such steps as are necessary to ensure that the passenger is carried in safety and reasonable comfort; and
- to give the passenger such mobility assistance as is reasonably required.

5.3.3 Under the Equality Act 2010 and Taxis & Private Hire Vehicles (Disabled Persons) Act 2022 drivers on medical grounds are available to get their GP to designate that they are exempt from carrying wheelchair passengers and/or assistance dogs. The Council then issues them a sign to display in their front window to that effect.

5.4 Stretch Limousines, Novelty Vehicles and Pedicabs/Tuk Tuks

5.4.1 The Council will licence stretch limousines, novelty vehicles and Pedicabs/Tuk Tuks however, they are required to comply with different conditions from a normal private hire vehicle. These conditions are attached at Appendix 2. Pedicab Private Hire Vehicles also do not have to undertake an MOT inspection but must undertake a CYTEC inspection by an external tester which must specify their chassis number.

5.5 Taxi Ranks

5.5.1 The Council can designate ranks on the public highway under licensing legislation, the designation and enforcement of ranks in Coventry is undertaken by the Traffic Management team under Traffic Regulation Orders. These ranks are only to be used by Coventry licensed hackney carriage vehicles when they are plying for hire and cannot be used by other local authority vehicles or Coventry licensed private hire vehicles.

5.6 Area of Use

5.6.1 Vehicles will not be licensed if they are intended to be used primarily outside the city of Coventry. This is to ensure that vehicles are available for hire for residents of the city and to ensure that enforcement checks and inspections can be undertaken, which would not be the case if they were working elsewhere.

5.6.2 Applicants for new licences and renewals need to demonstrate a real intention to ply for hire within the administrative area of Coventry City Council under the terms of the licence for which application is being made. All applicants are required to sign to confirm that they will predominantly work within the Coventry area.

- 5.6.3 Where a licence has been granted under these terms and subsequently found to be plying for hire to a material extent in another authority's area then the matter will be brought before the Licensing and Regulatory Committee for a review of the licence.

5.7` Transfer of Ownership when a licensed vehicle is transferred from one person to another

- 5.7.1 Section 49 of the Local Government (Miscellaneous Provisions) Act 1976 enables a licensed proprietor to transfer his licensed vehicle to a new proprietor. The same requirements for area of use are applicable to the new proprietor.

5.8 Age Policy of Vehicles

- 5.8.1 ~~On the 27 August 2019 the full Cabinet of Coventry City Council required that as of the 1 January 2020 any vehicle that is 15 years of age or older at the expiry of the licence is not renewed or granted a licence.~~

5.8.1 The Council does not impose an age policy on vehicles.

5.9 Emissions Policy

- 5.9.1 ~~On the 27 August 2019 the full cabinet of Coventry City Council put into place an Emissions Policy for replacement and new vehicles.~~

- 5.9.2 ~~From 1 January 2020 any replacement vehicles were required to be Euro 4 Emission or above while any new vehicles were required to be Zero Emission Capable.~~

- 5.9.3 ~~From 1 January 2022 any replacement vehicles are required to be Euro 5 Emission or above while any new vehicles are required to be Zero Emission Capable.~~

- 5.9.4 ~~From 1 January 2024 any replacement vehicles and any new vehicles are required to be Zero Emission Capable.~~

- 5.9.5 ~~An amended to the above has been made so that it is from 1 January 2025 any replacement vehicles are required to be Zero Emission Capable.~~

5.9.1 From 1st January 2030 any replacement vehicles and any new vehicles are required to be ultra low emission, zero emission or zero emission capable. (Ultra-low Emission Vehicles (ULEV's) produce less than 75g CO2/km.

5.10 Vehicle Inspection Frequency

- 5.10.1 Vehicle proprietors are required to have their vehicles tested at least once a year (at application or prior to the licence renewal).

- 5.10.2 Hackney Carriage Vehicles which are five years of age or older are required to have six-monthly inspections (i.e. twice per year), once on the application/renewal and six months later (i.e. mid-term of the annual licence).

- 5.10.3 Private Hire Vehicles and Pedicab Private Hire Vehicles which are three years of age or older are required to have six monthly inspections (i.e. twice per year), once on the

application/renewal and six months later (i.e. mid-term of the annual licence). Pedicab Private Hire Vehicles undertake a CYTEC inspection by an external tester.

5.11 Advertising on Private Hire and Hackney Carriage Vehicles

- ~~5.11.1~~ Advertising is not allowed on Private Hire Vehicles apart from the approved Council stickers stating the vehicle operator and vehicle details
- 5.11.2 The Council has produced guidelines relating to advertising (also known as liveries) on Hackney Carriage Vehicles. These advertisements must be approved by Taxi Licensing prior to be placed on the vehicle. These Guidelines are attached at Appendix 3.

5.12 Roof Signs

~~5.12.1 All London Conditions of Fitness purpose built hackney carriage vehicles are already factory fitted with roof signs.~~

5.12.1 All Hackney Carriages must have a 'Taxi' roof sign. When the roof sign is illuminated, it tells the public the taxi is available for hire. When the roof sign is not illuminated, it means the taxi is occupied or not available for hire. The roof sign should be illuminated bearing the word 'Taxi' in black letters on a yellow background facing forwards and on a red background facing backwards.

5.12.2 It is a requirement of the Local Government (Miscellaneous Provisions) Act 1976 that a private hire vehicle shall not be of such design and appearance as to lead any person to believe that a vehicle is a hackney carriage. Therefore, private hire vehicles shall not carry roof signs.

5.13 Fares

5.13.1 The Council sets maximum fares for journeys within the boundary of the city of Coventry in hackney carriage vehicles, most private hire operators also adopt this tariff.

5.14 Vehicle Repair and Maintenance

5.14.1 Hackney Carriage and Private Hire vehicles must be kept at all times in an efficient, safe, tidy and clean condition. Compliance with the vehicle specifications and conditions is essential and will be enforced by periodic, random vehicle inspections by the Council, sometimes in conjunction with other agencies e.g. West Midlands Police, DVSA, Housing Benefit, Home Office. When it is found that any vehicle is not being properly maintained, a defect notice(s) will be served on the driver and/or proprietor setting out the defect(s) and where public safety is likely to be imperilled, suspending the further use of the vehicle for work purposes, until the defects have been remedied. The proprietor may be required to have the vehicle inspected at Whitley Depot fleet services and this may be at the proprietor's expense.

5.14.2 Where a vehicle is consistently being presented for routine inspections and is found to have significant safety defects then previous inspections will be reviewed and taken into consideration. If previous reports reveal a history of poor maintenance, then officers may revoke the vehicle proprietor's licence.

5.15 Fees

5.15.1 Fees for Private Hire and Hackney Carriage licensing are levied on a cost recovery basis. These fees are reviewed yearly and operate on a three-year rolling basis to ensure that the

service is cost neutral.

5.16 Tinted Windows

5.16.1 Vehicle tint must be as manufactured and comply with the law.

5.17 Licences

5.17.1 Licences are issued annually.

5.18 Basic DBS check

5.18.1 New applicant and annual renewals for vehicle proprietors are required to undertake a basic DBS check unless they already subscribe to the DBS Update Service.

5.18.2 A Revocation or Refusal of a Driver's licence does not preclude that person applying to become a licensed vehicle proprietor.

5.19 Common Law Police Disclosures

5.19.1 Officers maintain close links with the West Midlands Police.

5.20 Licensee self-reporting

5.20.1 Hackney Carriage and Private Hire Vehicle Proprietors are not required to declare any convictions and/or cautions until their annual renewal although are encouraged to report when they are convicted. Dependant on the severity of the conviction/caution the driver may be referred to Committee.

5.20.2 All Licence holders must notify the Taxi Licensing Office within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence.

5.21 Referrals to the Disclosure and Barring Service (DBS) and the Police

5.21.1 Officers refer and have referred drivers to the DBS and the Police.

5.21.2 Specifically, officers will refer to the DBS and the Police if;

- An individual has harmed or poses a risk of harm to a child or vulnerable adult;
- An individual has satisfied the 'harm test'; or
- received a caution or conviction for a relevant offence and;
- the person they are referring is, has or might in future be working in regulated activity;

5.22 CCTV and Accident Data Recording Devices /Dashcams in vehicles

5.22.1 Vehicle proprietors are permitted to install an Accident Data Recording Devices (ADRD) in their vehicle. This must not include any personal data (i.e. words or images either inside or outside the vehicle).

5.22.2 Vehicle proprietors are permitted to install CCTV in their vehicles. Audio recording of

conversations is not permitted and any facility to use audio must be disabled.

5.22.3 The Information Commissioners Office (ICO) is the office responsible for regulating matters relating to CCTV. Responsibility for informing the ICO applies to a specified company, organisation or individual vehicle owner (data controller). The reason for this is that information captured on CCTV is regarded as personal data.

5.22.4 Further requirements for CCTV and ADRD systems are listed in detail on the Vehicle Proprietors' Information Document.

6 PRIVATE HIRE OPERATORS

6.1 Objective

6.1.1 The objective in licensing private hire operators is ensuring the safety of the public who will be using operators' premises, vehicles and drivers arranged by them.

6.2 Licences

6.2.1 Once new applicant drivers are licensed, they are given a five-year licence and this is then renewed on a five yearly basis. Taxi Licensing does not issue licences on a probationary basis.

6.3 Planning

6.3.1 Any person(s) wishing to apply for an Operator's licence within Coventry City Council must have sought the relevant planning permission or obtained an exemption from planning.

6.4 Bookings

6.4.1 A private hire operator must ensure that they only take bookings for, and dispatch private hire vehicles licensed by Coventry City Council and only driven by drivers who hold a private hire licence issued by Coventry City Council unless the work is contracted out in accordance with the Deregulation Act 2015 and Sections 55a and 55b of the Local Government (Miscellaneous Provisions) Act 1976.

6.5 Application Process

6.5.1 The application process is available in the Operators' Information Document.

6.6 Length of Licence

6.6.1 The licence lasts for five years.

6.7 Fit and Proper

6.7.1 The Council will not grant a licence for a Private Hire Operator unless satisfied that the applicant is a fit and proper person. Applicants/renewals are asked for their criminal record. Their immigration/right to work is checked. Licensed operators must notify the taxi licensing office within 14 days of any convictions or cautions or if the operator is a company/partnership then any imposed on the company/partnership or any of the directors/partners.

6.8 Basic DBS check

6.8.1 New applicant and annual renewals for private hire operators are required to undertake a basic DBS check, unless they subscribe to the DBS Update Service and must declare their convictions. This must include all Directors (if a limited company) and all Partners (if a

partnership).

6.9 Common Law Police Disclosures

6.9.1 Officers maintain close links with the West Midlands Police. For any operators that are subject to criminal proceedings or investigations, the Police will notify the Taxi Licensing Office. The appropriate action will be taken against the licence holder, which may include revocation of the licence.

6.10 Referrals to the DBS and the Police

6.10.1 Officers refer and have referred operators to the DBS and the Police especially if;

- An individual has harmed or poses a risk of harm to a child or vulnerable adult;
- An individual has satisfied the 'harm test'; or
- received a caution or conviction for a relevant offence; and
- the person they are referring is, has or might in future be working in regulated activity.

6.11 Training

6.11.1 Staff working for operators taking private hire bookings must undertake training in order to understand their duties to disabled persons, so that they understand the issues of communicating with disabled persons and so that they can arrange an appropriate vehicle for those with a particular requirement or need.

6.12 Booking and dispatch staff

6.12.1 Under the Private Hire Operators Conditions of Licence at Appendix 2, the Operator is required to keep records of:

Proprietor/vehicle records

- (a) vehicle registration number;
- (b) local authority licence plate number;
- (c) colour, make and model of each vehicle;
- (d) name and address of proprietor;
- (e) the date on which the vehicle became available to the operator;
- (f) the date on which the vehicle ceased to be available; and
- (g) current and continuous certificate of insurance or cover note relating to vehicle.

Driver records

- (a) name and address of driver;
- (b) driver's contact telephone number (if applicable);
- (c) driver's unique call signs; and
- (d) photocopy of the driver's badge showing a true likeness.

The driver and vehicle records referred to above shall be held and secured at the operator's business address and shall be immediately available at the request of an authorised council officer or police constable at all reasonable times.

6.12.2 In addition under the Operator's Conditions of Licence the following must be retained:

The operator shall, in the record referred to above, enter or cause to be entered therein, before the start of each journey, the following particulars of every booking received:

- (a) date on which the booking is made and, if different, the date of the proposed journey;
- (b) time of booking;
- (c) time job was allocated to driver;
- (d) time of passenger pick-up (POB);
- (e) name of hirer;
- (f) point of pick up and destination;
- (g) driver's unique call sign or name;
- (h) where requested, any fare agreed or estimated for the journey; and
- (i) details of any sub-contractor used.

6.13 Use of passenger carrying vehicles licensed drivers

6.13.1 The Conditions of Licence for Private Hire Operators do not specify anything concerning Passenger Carrying Vehicles (PCV) licensed drivers and therefore, members of the public are entitled to expect when booking with an operator that they receive a private hire vehicle licensed vehicle and driver.

6.14 HMRC Taxi Tax Code

6.14.1 New applicants who have previously been licensed by another local authority as a private hire operator and applicants for renewals must have registered with HMRC under "Gateway" for tax purposes to obtain a HMRC Taxi Tax Code for their licence or be renewed.

6.14.2 New applicants who have not been previously licensed by another local authority as a private hire operator must by the time of their renewal have registered with HMRC under "Gateway" for tax purposes and obtain a HMRC Taxi Tax Code to obtain their licence or be renewed.

6.15 Contractual Obligations with Passengers

6.15.1 Private Hire Operators will be required to demonstrate that their contractual obligations comply with section 55 of the Local Government (Miscellaneous Provisions) Act 1976 and the Divisional Court's decision in UTAG and Uber v TfL [2021] EWHC 3290 whereby a licensed operator who accepts a booking from a passenger is required to enter as principal into a contractual obligation with the passenger to provide the journey which is the subject of the booking.

7 WHISTLEBLOWING

- 7.1 Coventry City Council maintains a robust whistleblowing process by reporting to the Chief Internal Auditor or the Council's Monitoring Officer. This policy is available on the Council's website.

8. LICENSING CONDITIONS

- 8.1 Reasonable conditions can be imposed on Hackney Carriage Vehicle Proprietors, Private Hire Drivers, Private Hire Vehicle Proprietors and Private Hire Operators. Conditions cannot be imposed on Hackney Carriage Drivers, these conditions are listed at Appendix 2.

9 OTHER CONSIDERATIONS

9.1 Working with the Police

- 9.1.1 The Police under the notifiable occupations scheme have a duty to inform Taxi Licensing if they know that a licensed hackney carriage or private hire driver has been arrested or have information with concerns about the driver.
- 9.1.2 The Cabinet Member for City Services chairs a Taxi Forum meeting where representatives of the trade, Unite Union and the Police are invited to attend.

9.2 Sharing licensing information with other licensing authorities

- 9.2.1 Officers attend regular meetings with the other West Midlands authorities and Warwickshire Councils where information can be shared.
- 9.2.3 Applicants and licensees are all required to inform Taxi Licensing if they hold/have held a licence with another local authority and to disclose if an application for a licence has been refused, revoked or suspended by another other local authority.
- 9.2.4 Coventry City Council uses the NAFN NR3 Register of Revocations, Refusals & Suspensions in order to assess whether a driver has previously been revoked, refused or suspended by another local authority who uses the register.

9.3 Multi-agency Safeguarding Hub (MASH)

- 9.3.1 Taxi Licensing shares information concerning safeguarding children from sexual abuse and exploitation with Childrens' Safeguarding.

9.4 Training decision makers

- 9.4.1 Training is provided to members annually of the licensing Committee; normally by a solicitor who is conversant in licensing legislation.

9.5 Complaints against licensees

- 9.5.1 Taxi Licensing have an online complaint form whereby complainants can report their concerns. The complainant can also be sent a hard-copy complaint form if required. When a complaint comes in the licensee is contacted and interviewed, then dependant on the nature of the complaint and a driver's complaint history the taxi licensing office takes action. This is normally on an escalating nature (e.g. None, Verbal Advice, Written Advice, Written Warning, Referral to the Licensing &

Regulatory Committee). If the complaint warrants a prosecution under licensing legislation then Pace interviews are carried out.

- 9.5.2 Complaints are recorded on an excel spreadsheet with various classifications dependant on the complaint nature. The complaint details are recorded on the driver's file. These complaints are retained on the licensees file indefinitely.

9. ENFORCEMENT

9.1 Licensing & Regulatory Sub-Committee (Committee)

- 9.1.1 New applicant drivers may be referred to the Sub-Committee by Officers dependant on DBS, DVLA, Police or any other relevant authority information that may deemed to be relevant. Applicants or licensees may be also referred concerning complaints when previously licensed by Coventry or other local authorities or if they have ever been refused/revoked by another local authority.
- 9.1.2 Existing drivers may be referred to the Sub-Committee by officers dependant on DBS, DVLA, Police or any other relevant authority information that may deemed to be relevant. Drivers may also be referred concerning their history of complaint (s).
- 9.1.3 Private Hire Drivers must notify any offences with 7 days of receiving them to the Taxi Licensing Office. Hackney Carriage Drivers are not required to notify the Taxi Licensing Office until their renewal; however the office advises them to declare the offences to us anyway.
- 9.1.4 If a new applicant/driver has multiple driving endorsed offences of 7 or more points or a single offence of 4 points then they will be referred to the Sub-Committee.
- 9.1.5 Licence holders must notify the issuing authority within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence. An arrest for any of the offences within this scope will result in a review by the issuing authority as to whether the licence holder is fit to continue to do so. It is for the licensing authority to consider what, if any, action in terms of the licence should be taken based on the balance of probabilities.
- 9.1.6 Guidelines to Officers for Sub-Committee referral and Guidelines to the Sub-Committee for any such referrals are in the Driver Information Document and attached at Appendix 4.

9.2 Joint authorisation of enforcement officers.

There are no current joint authorisations in place, however Wolverhampton licensing Officers come into Coventry on a regular basis to carry out checks on their licensed drivers operating in Coventry. This is something that has been discussed with the Taxi Harmonisation Group and Coventry City Council are in talks with Wolverhampton Council concerning joint authorisations of enforcement Officers.

10. ADMINISTRATION, EXERCISE AND DELEGATION OF FUNCTIONS

Licensing and Regulatory Committee / Sub-Committee

- a. The powers of the Council under the Act are carried out by the Licensing and Regulatory Committee / Sub-Committee, or by the Senior Licensing & Enforcement Officer in conjunction with the Chair/Deputy Chair of the Licensing and Regulatory Committee acting under delegated authority.
- b. It is considered that many of the decisions and functions will be purely administrative in nature. In the interests of speed, efficiency and cost effectiveness the Council has

delegated these functions to officers supporting the licensing function.

- c. A driver's licence can be revoked under delegated powers if;
 - i. A driver is disqualified from driving during the term of a licence issued by the City Council and where the driver's DVLA licence will not be restored during that term;
or
 - ii. In the opinion of the Senior Licensing and Enforcement Officer in consultation with the Chair of the Licensing Committee (or in his/her absence the Deputy Chair or in the absence of either, the City Solicitor) it is necessary that immediate steps be taken to revoke a licence in the interests of public safety.

11. COMMENTS ON THIS POLICY

- a. The Statement of Licensing Policy will be reviewed on a regular basis. Individuals and organisations that wish to comment on the policy are invited to send their comments in writing to Taxi Licensing, 259 Whitley Depot, London Road, Coventry, CV3 4AR.

Appendix 1

Authority Contacts

Licensing Authority

Coventry City Council
Taxi Licensing Office
Whitley Depot
259 London Road
Coventry
CV3 4AR
Telephone: 024 7683 2183
taxi.licensing@coventry.gov.uk

Disclosure & Baring Service

PO Box 110
Liverpool L3 6ZZ
Disclosure Tel: 0870 90 90 844
Dispute Tel: 0870 90 90 778

Hackney Carriage Vehicle Ranks

Coventry City Council
Traffic Management
Telephone: 024 7683 4324
e-mail: TrafficManagement@coventry.gov.uk

Unite Union

(Coventry Taxi Trade Representatives)
02476 227361)

Coventry City Council Planning Service

Place Directorate.
Tower Block Earl Street
Coventry CV1 4LF
Telephone: 024 7683 1212
e-mail: planning@coventry.gov.uk

Radio Communications Agency

New King's Beam House
22 Upper Ground
London SE1 9SA
24 hour enquiries: 0171 211 0211

Responsible Authority Contacts

Chief Officer of Police:

West Midlands Police
Little Park Street
Coventry CV1 2JX
Telephone: 024 7653 9097

cv_licensing@west-midlands.pnn.police.uk

Safeguarding Children Board

Social Services & Housing
Chairing and Reviewing Service
PO Box 15,
Earl Street
Coventry
CV1 5RR

safeguardingchildrenlicensing@coventry.gov.uk

Planning Authority

Coventry City Council
PO Box 15
Earl Street
Coventry
CV1 5RR

planning@coventry.gov.uk

Appendix 2

Private Hire Drivers' Conditions of Licence

1. Conduct of Driver

The driver shall;-

- a) afford all reasonable assistance with passengers' luggage,
- (b) at all times be clean and respectable in his/her dress and person and behave in a civil and orderly manner,
- (c) take all reasonable steps to ensure the safety of passengers conveyed in, entering or alighting from the vehicle driven by him/her,
- (d) not without the express consent of the hirer, drink or eat in the vehicle,
- (e) not without the express consent of the hirer, play any radio or sound reproducing instrument or equipment or equipment in the vehicle other than for the purpose of sending or receiving messages in connection with the operation of the vehicle,
- (f) at no time, cause or permit the noise emitted by any radio or other previously mentioned equipment in the vehicle which he/she is driving to be source of nuisance or annoyance to any person, whether inside or outside the vehicle,

2. Passengers

- 1) The driver shall not convey or permit to be conveyed in a private hire vehicle a greater number of persons than that prescribed in the licence for the vehicle.
- (2) The driver shall not allow there to be conveyed in the front of a private hire vehicle:-
 - (a) any child below the age of ten years; or
 - (b) more than one person above that age.
- (3) The driver shall not without the consent of the hirer of a vehicle convey or permit to be conveyed any other person in that vehicle.

3. Lost Property

- 1) The driver shall immediately after the termination of any hiring of a private hire vehicle or as soon as practicable thereafter, carefully search the vehicle for any property which may have been accidentally left there.
- 2) If any property accidentally left in a private hire vehicle by any person who may have been conveyed therein is found by or handed to the driver the latter shall seek to identify the owner thereof failing which the property shall be delivered to the nearest police station with an explanation of the circumstances.

4. Written Receipts

The driver shall if requested by the hirer of a private hire vehicle provide him/her with a written receipt of the fare paid.

5. Animals

The driver shall not convey in a private hire vehicle any animal belonging to or in the custody of him/herself or the proprietor or operator of the vehicle.

6. Prompt Attendance

The driver of a private hire vehicle shall, if he/she is aware that the vehicle has been hired to be in attendance at an appointed time and place or he/she has otherwise been instructed by the operator or proprietor of the vehicle to be in attendance at an appointed time and place, punctually attend at that appointed time and place, unless delayed or prevented by sufficient cause.

7. Deposit of Licence

If the driver is permitted or employed to drive a private hire vehicle of which the proprietor is someone other than him/herself, he/she shall before commencing to drive that vehicle deposit this licence with that proprietor for retention by him/herself until such time as the driver ceases to be permitted or employed to drive the vehicle or any other vehicle of his/her.

8. Taximeter

If a private hire vehicle being driven by the driver is fitted with a taximeter, the driver shall not cause the fare recorded thereon to be cancelled or concealed until the hirer has had a reasonable opportunity of examining it and has paid the fare.

9. Fare to be Demanded

The driver shall not demand from any hirer of a private hire vehicle a fare in excess of any previously agreed for that hiring between the hirer and the operator or, if the vehicle is fitted with a taximeter the fare shown on the face of the taximeter.

10. Change of Address

The driver shall notify the council of any change of his/her address during the period of the licence within 7 days of such change taking place.

11. Convictions/Cautions

The driver shall within 7 days disclose to the council in writing details of any conviction or caution imposed on him/her during the period of the licence.

12. Return of Badge

The driver shall upon the expiry (without immediate renewal), revocation or suspension of this licence forthwith return to the council the driver's badge issued to him/her by the council when granting this licence.

13. Records

- 1) The driver shall maintain and carry within the vehicle driven by him/her a record in the form of a loose leaf or bound book and shall enter therein before the commencement of each journey the following details:-
 - (a) The name of the driver.
 - (b) The registration number of the vehicle being driven.
 - (c) The name and address of the hirer or passenger to be carried.
 - (d) The time and date for commencement of journey.
 - (e) The destination of journey.
 - (f) The point of pick-up.
 - (g) Signature of driver
- 2) The records shall be retained by the driver and delivered to the operator not later than 7 days from the date of the last entry.

14. Cashless Facilities

Functioning cashless facilities must be carried and cashless payments cannot be refused and must not incur the passenger additional costs. These cashless facilities must be registered as a "transport" provider or similar with the payment card reader provider.

15. Test/Assessments for new first time applicant Pedicab Private Hire Drivers

A new applicant pedicab private hire driver is not required to undertake the private hire driver road knowledge test or the driving assessment. However, it should be noted that the pedicab cannot be used outside the inner ring road and if the pedicab private hire driver should subsequently want to be licensed as a private hire driver to use motorised vehicles then they are required to undertake the private hire road knowledge test and driving assessment.

16. Vaping

Drivers are prohibited from vaping in Private Hire Vehicles.

Private Hire Vehicle Proprietors Conditions of Licence

1. Maintenance of Vehicle

The vehicle and all its fittings and equipment shall at all times when the vehicle is in use or available for hire be kept in an efficient, safe, tidy and clean condition and all relevant statutory requirements including in particular those contained in the Motor Vehicles (Construction and Use) Regulations shall be fully complied with.

2. Details of Vehicle

All vehicles shall be painted in a single colour save that two colours may be permitted provided only one appears above or below the contour line of the vehicle.

No material alterations or change in the specification, design, condition or appearance of the vehicle shall be made without the approval of the council at any time while the licence is in force.

3. Identification Plate (+ Disk)

The plate identifying the vehicle as a private hire vehicle and required to be exhibited on the vehicle, pursuant to Section 48(6) of the Local Government (Miscellaneous Provisions) Act 1976 shall be securely fixed to the rear of the vehicle in a conspicuous position and in such a manner as to be removable by an authorised officer of the council or a police officer.

4. Interior Markings

The proprietor shall cause to be clearly marked and maintained inside the vehicle in such a position as to be visible at all times to persons conveyed therein the number of this licence and the number of passengers prescribed in this licence.

5. Safety Equipment

There shall be provided and maintained in the vehicle at all times when it is in use or available for hire a suitable and efficient fire extinguisher and a suitable first aid kit containing appropriate first aid dressings and appliances, such equipment to be carried in such a position in the vehicle as to be readily visible and available for immediate use in an emergency.

6. Signs, Notices, Etc.

- a No signs, notices, advertisements, plates, marks, numbers, letters, figures, symbols, emblems or devices whatsoever shall be displayed on, in or from the vehicle except as may be required by any statutory provision or required or permitted by these conditions; provided however that this condition shall not apply to any indication on a taxi meter fitted to the vehicle.
- b The proprietor shall cause to be affixed and maintained in the vehicle in a conspicuous position in accordance with the directions of the council any sign or notice relating to private hire vehicles which the council may from time to time require.
- c There may be displayed within the vehicle for the information of passengers a table of fares in a form and printing previously submitted to and approved by the council.

7. Change of Address

The proprietor shall notify the council in writing of any change of his/her address during the period of the licence within seven days of such change taking place.

8. Convictions

The proprietor shall within seven days disclose to the council, in writing, details of any convictions imposed on him (or, if the proprietor is a company or partnership, on any of the

directors or partners) during the period of the licence.

9. Deposit of Driver's Licences

If the proprietor permits or employs any other person to drive the vehicle as a private hire vehicle, he shall before that person commences driving the vehicle cause the driver to deliver to him his private hire driver's licence for retention until such time as the driver ceases to be permitted or employed to drive the vehicle or any other vehicle of his/hers.

10. Notification of Drivers

A proprietor shall inform the Taxi Licensing Office of Coventry City Council of the names and addresses of all licensed drivers permitted or employed to drive licensed vehicles within seven days of the date of appointment or termination as the case may be.

11. Functioning Cashless Payment Facility in Vehicles

Proprietor(s) must ensure their vehicles are equipped with a functioning cashless payment facility. These cashless facilities must be registered as a "transport" provider or similar with the payment card reader provider.

12. Vaping

Drivers are prohibited from vaping in Private Hire Vehicles.

Private Hire Stretched Limousine Vehicle Proprietors Conditions of Licence

1. All bookings for a licensed limousine must be on an 'exclusive hire' basis and be taken by a licensed Private Hire Operator.
2. Each vehicle will only be licensed by the Council if it is:
 - Suitable in type, size and design;
 - Not of a design and appearance whereby it could be confused with a hackney carriage;
 - In a suitable mechanical condition;
 - Safe and comfortable;
 - Insured for private hire use not just for weddings and funerals.
3. A stretched limousine for the purpose of licensing in Coventry shall be a vehicle modified as a stretched vehicle, such as a Ford Lincoln, Ford Excursion, Cadillac, Volvo or Mercedes, by a converter approved by the manufacturer.
4. The criteria for licensing these vehicles by Coventry City Council will be the same as for private hire vehicles subject to the following amended conditions
 - The vehicle will be licensed for a maximum of eight passengers;
 - Tinted windows must comply with the Road Vehicles (Construction & Use) Regulations 1986 in so far as the windscreen and front side windows are concerned;
 - The vehicle may be left hand drive provided it is fitted with a forward-facing camera on the offside of the vehicle (such as in the wing mirror) and a monitor displaying video from the camera and visible to the driver;
 - A seat belt must be fitted for each seat in accordance with the Construction and Use Regulations and must be used by passengers;
 - Each passenger must be able to exit the vehicle on both sides of the vehicle by either a door or an emergency window exit. Childproof locks which prevent egress from the rear of the vehicle shall not be fitted or if fitted, shall be permanently disabled;
 - The vehicle will be required to pass a vehicle inspection, before licensing and at four monthly intervals, to a standard set by the City Council at a City Council nominated garage/MOT testing station;
 - Where alcohol is supplied it must be authorised under the Licensing Act 2003 and no alcohol shall be supplied to any person below the age of 18.
 - A notice, authorized by the Taxi Licensing Office, must be displayed so that it is visible to all the passengers denoting that the vehicle is licensed as a private hire vehicle and that any complaints should be addressed to the Taxi Licensing Office. An additional notice, authorized by the Taxi Licensing Office, must be displayed on the front windscreen (but not in the swept area) advising pedestrians that the vehicle is licensed by Coventry City Council.
5. As with Executive Hire Private Hire Vehicles, the plate identifying the vehicle as a Private Hire Vehicle, in accordance with section 48 of the Local Government (Miscellaneous Provisions) Act 1976, will not have to be displayed on the rear but may alternatively be fitted in a conspicuous position on the inside of the vehicle. The vehicle will also not be required to display yellow/black window stickers apart from the notice on the windscreen.
6. The correct type of tyres of both the appropriate size and the correct weight loading must be fitted.

Private Hire Novelty Vehicles (including fire engines) Proprietors Conditions of Licence

1. That whenever passengers are entering or leaving the vehicle, physical assistance is provided to ensure their safety
2. Suitable signage is to be clearly displayed within the passenger cab advising passengers not to embark or disembark the vehicle without assistance from the operators/crew.
3. That the restrictions on access to disabled persons be advised to passengers at the time of booking and in any promotional literature.
4. That seatbelts be provided for all passengers.
5. That if there is a blue light and siren on the vehicle it is permanently disabled. (must comply with regulation 16 of the Road Vehicles Lighting Regulations. 1989)
6. That all external lockers on the vehicle be secured to prevent access by passengers or the public.
7. That the floor area in the passenger compartment of the vehicle be kept clear and unobstructed at all time.
8. That additional steps be carried and used on the vehicle to facilitate access to and egress from the vehicle.
9. That no person involved in operating the vehicle shall wear any clothing that might lead a member of the public to believe that the person is an officer of the fire service.
10. A full risk assessment relating to the operation of the vehicle for private hire purposes shall be forwarded to the Council prior to the issue of the licence.

Private Hire Pedicabs and Tuk Tuks Vehicle Proprietors Conditions of Licence

1. Introduction

Pedicabs and Tuk Tuks permitted to be licensed in Coventry are motor assisted vehicles with three wheels, used for the purpose of carrying fare paying passengers.

As with all licensed taxis these vehicles have to comply with Conditions of Fitness and are required to meet a minimum standard that must be maintained throughout the licensing period.

2. General Requirements

- a. Licensed vehicles must be of a design which has the driver/rider to the front and the passengers seated to the rear.
- b. Vehicles will have a minimum of three wheels and must be fitted with an electric (maximum 250 watts) or zero emission capability engine / motor (maximum 50 cc).
- c. If pedalled the vehicle must be fitted with an electric motor to either power the vehicle unassisted or to assist with pedalling (maximum 250 watts).
- d. Vehicles licensed by this authority will operate within the inner ring road and the Railway Station only.
- e. Pedicabs and Tuk Tuks are only permitted to accept pre booked fares received through a Coventry licensed Private Hire Operator and are not permitted to utilise hackney carriage ranks.
- f. The maximum number of passengers that can be carried in each vehicle will be assessed and determined by the Taxi Licensing Office and this number must be displayed on the licence plate issued by the Council to be fixed securely to the rear of the vehicle. This plate must also display the expiry date of the licence.
- g. Vehicles must be maintained in a sound, mechanical and structural condition and comply with all relevant legislation that affects the construction and use of such vehicles to include but not restricted to:-
 - a. Motor Vehicles (Construction and Use) Regulations
 - b. Road Vehicle Lighting Regulations
 - c. The Pedal Cycle (Construction and Use) Regulations 1983 and the Pedal Cycle (Construction and Use) (Amendment) Regulations 2015.
 - d. The Pedal Cycle (Safety) Regulations 2003.
 - e. The Pedal Bicycle (Safety) Regulations 2010.
 - f. The Electrically Assisted Pedal Cycle Regulation 19863 and the Electrically Assisted Pedal Cycle (Amendment) Regulations 2015.

3. Vehicle Testing

- a. All vehicles are subject to a mechanical examination prior to licensing and every 12 months thereafter. Any vehicle over 3 years old is required to undertake 6 monthly inspections.
- b. All inspections must be undertaken at Whitley depot or an alternative facility as appointed and authorised by the Council. Failure to secure a pass certificate will

prevent a licence being issued or result in suspension of a licence (if at 6 monthly inspection).

- c. Where applicable a current MOT certificate will be required to be submitted with an application for a licence and annually thereafter on renewal of a licence.

4. Maintenance of Vehicle

The proprietor shall ensure that;

- a. The bodywork of the vehicle is in good condition and the paint work is clean and well maintained.
- b. Any roof covering is watertight.
- c. The condition, fixing and routing or positioning of electric cables and fitting, if any, are such that there is no risk of electrical fire or other incident.
- d. The vehicle is provided with an audible warning device such as a bell or a horn.
- e. Any door hinges, locks and handrails and any grab handles fitted to the vehicle are secure and sound, and not liable to injure any passengers, damage or soil their clothing or luggage.
- f. A suitable spare wheel and tyre is provided and readily available for use or an alternative temporary repair system is provided, together with the tools and equipment required to carry out any emergency replacement or repairs required to the vehicle.
- g. The vehicle is fitted with seatbelts to each seat. The seat belts shall be readily accessible for use by all passengers and must be maintained in a safe condition at all times.
- h. The fittings and furniture of the vehicle are clean and well maintained and in every way fit and safe for public use.
- i. Any internal linings of the vehicle are sound, clean and not liable to damage or soil passengers' clothing or luggage, and the floor is provided with a carpet, mat or other suitable, non-slip floor covering which is sound and clean.
- j. The seats are properly cushioned and covered by a water resistant material and that seat covers are in a sound and clean condition, which may be easily cleaned and dried.
- k. There shall be provided and maintained in the vehicle at all times a dry powder fire extinguisher of at least 1kg in weight and stamped EN3 or BSEN3 (which should be red in colour). The fire extinguisher must have a dial reader and be serviceable. A basic first aid kit must be carried which is CE, HSE, BSI, BS or DIN compliant.

5. Insurance

The proprietor or owner of the vehicle shall present, on application for a licence a valid vehicle insurance policy covering private hire for private hire use. This policy shall include details of;

- a. The proprietor or owner as the policy holder.
- b. Cover for any other persons who drive the vehicle who shall be named on the policy and be licensed Coventry private hire drivers.

6. Drivers

An applicant for a driver's licence for a Pedicab or Tuk Tuk shall;

- a. Undertake all the (relevant) requirements for a Coventry licensed private hire driver as stipulated in the Driver Information Document 044 plus any additional / amended requirements specific to the licensing of Pedicabs and Tuk Tuks.
- b. Meet the DVLA Group 2 medical standards (a medical examination form from the Council must be completed by the applicants own GP).
- c. Notify the Council of any medical condition which arises after the issue of the licence which may affect their ability to perform their duties.
- d. Not be permitted to drive any other type of private hire vehicle unless the relevant application, tests and assessments are undertaken and passed and the correct licence held.

7. Licence Requirements

Drivers of Pedicabs and Tuk Tuks must;

- a. be over 21 years of age
- b. hold a full DVLA driving licence

8. Functioning Cashless Payment Facility in Vehicles

Proprietors must ensure their vehicles are equipped with a functioning cashless payment facility. These cashless facilities must be registered as a "transport" provider or similar with the payment card reader provider.

9. Vaping

Drivers are prohibited from vaping in Private Hire Vehicles.

Hackney Carriage Vehicle Proprietors Conditions of Licence

1. A proprietor shall be engaged in a full time capacity in the business of letting for hire one or more hackney carriages.
2. A proprietor shall keep proper records in the form approved by the city council of all journeys undertaken by drivers engaged by him/her and of the hours worked by such drivers.
3. A proprietor shall provide and thereafter maintain in respect of the licence granted a hackney carriage of the metropolitan type which shall be of one colour approved by the city council.
4. A proprietor shall cause to be delivered to him and shall retain in his possession the licence of any driver engaged by him and shall ensure that such driver is in possession of the appropriate driver's badge issued by the city council.
5. A proprietor shall keep the licensed hackney carriage in a fit and road-worthy condition at all times and shall clean the same inside and outside daily.
6. A proprietor shall inform the Taxi Licensing Office of Coventry City Council of the name and address of all licensed drivers engaged by him/her and of any such driver ceasing to be so engaged within seven days of the date of appointment or termination as the case may be.
7. The licence granted shall remain in force for one year.
8. Advertisements shall not be displayed on any hackney carriage, either internally or externally, (including upon any window), without the written approval of the city council.
9. Where approval for the display of advertisements has been granted, the proprietor shall ensure the advertisement(s) are displayed in the prescribed manner and maintained in a clean and tidy condition.
10. Stickers identifying the vehicle as a licensed hackney carriage (including current plate number) and issued by the City Council shall be adhered directly to the vehicle to which they relate as follows:
 - a. One to the nearside quarterlight and one to the offside quarterlight, located towards the bottom when viewed from outside and readable from outside the vehicle.
 - b. One located at the top of the windscreen and readable from outside the vehicle.
 - c. If the information on any of the stickers is inaccurate or not clearly readable the vehicle must not be used for hire until replacement stickers have been issued by the City Council and adhered to the vehicle. The information on the stickers must not be altered or obliterated other than by the City Council. Stickers must not be located elsewhere on the vehicle without prior written approval from the City Council.
11. Proprietors must ensure their vehicles are equipped with a functioning cashless payment facility. These cashless facilities must be registered as a "transport" provider or similar with the payment card reader provider.
12. Drivers are prohibited from vaping in Hackney Carriage Vehicles.

Conditions attached to the grant of a Private Hire Operator's Licence

1. Journey Records

- (i) The records required to be kept by the operator under section 56(2) of the Local Government (Miscellaneous Provisions) Act 1976, shall be kept in a bound book with consecutively numbered pages, or any other approved system (e.g. but not limited to computers and other automated systems such as computers or "Apps").
- (ii) Approval to use a system other than a bound book shall be obtained from the Licensing Office, in writing and prior to installation taking place.
- (iii) The operator shall, in the record referred to above, enter or cause to be entered therein, before the start of each journey, the following particulars of every booking received:
 - (a) date on which the booking is made and, if different, the date of the proposed journey;
 - (b) time of booking;
 - (c) time job was allocated to driver;
 - (d) time of passenger pick-up (POB);
 - (e) name of hirer;
 - (f) point of pick up and destination;
 - (g) driver's unique call sign or name;
 - (h) where requested, any fare agreed or estimated for the journey;
 - (i) details of any sub-contractor used.
- (iv) All entries shall be made and maintained in a coherent and legible way using clear written English.
- (v) Paper records

All records shall be retained in their original state with any alterations made clearly identifiable.
- (vi) Computer records and automated systems

Where Data is inputted into a computer or stored within an automated system alterations or deletions are not permitted. Provisions should be in place to allow officers access to information immediately by producing a clear print out of all bookings received and / or via remote access. Where solely automated (web based) systems are used remote access must be provided to the Council for provision of all information which would otherwise be available through a manual or other system,
- (vii) Journey bookings may only be accepted from the business address stipulated on the operator's licence.
- (viii) All types of journey records shall be held and secured at the operator's business address and on their computer or automated system where used and shall be made immediately accessible at all reasonable times to an authorised council officer or police constable at that address.

2. Call Signs

The operator shall allocate one call sign only to each driver operated by him/her. The call sign shall be unique to the driver.

3. Records

- (i) The operator shall hold and retain a copy of the current local authority licence relating to any vehicle that is being operated and of any driver who is driving such a vehicle.
- (ii) In addition to the above, records shall be kept of the particulars of all proprietors, their vehicles and of drivers being operated. These particulars shall include the following:
 - (a) vehicle registration number;
 - (b) local authority licence plate number;
 - (c) colour, make and model of each vehicle;
 - (d) name and address of proprietor;
 - (e) the date on which the vehicle became available to the operator;
 - (f) the date on which the vehicle ceased to be available;
 - (g) current and continuous certificate of insurance or cover note relating to vehicle.
- (iii) Proprietor/vehicle records
 - (a) vehicle registration number;
 - (b) local authority licence plate number;
 - (c) colour, make and model of each vehicle;
 - (d) name and address of proprietor;
 - (e) the date on which the vehicle became available to the operator;
 - (f) the date on which the vehicle ceased to be available;
 - (g) current and continuous certificate of insurance or cover note relating to vehicle.
- (iv) Driver records
 - (a) name and address of driver;
 - (b) driver's contact telephone number (if applicable);
 - (c) driver's unique call signs;
 - (d) photocopy of the driver's badge showing a true likeness.
- (v) The driver and vehicle records referred to above shall be held and secured at the operator's business address and shall be immediately available at the request of an authorised council officer or police constable at all reasonable times.

4. Complaints Record

- (i) The operator, on receipt of a complaint, shall document in a suitably bound book or on any other approved system the following information:
 - (a) name of driver(s) implicated in the complaint;
 - (b) badge number of driver;
 - (c) vehicle registration number;
 - (d) facts of allegation including complaints of dissatisfaction with service delivery or any alleged breach of contract with the operator;
 - (e) date complaint made;
 - (f) date investigation was completed;
 - (g) action taken;
 - (h) contact details of complainant.
- (ii) Prior to obtaining the above mentioned complaint details, the operator shall inform the complainant that on the request of an authorised council officer, or police constable, all relevant information may be made available for inspection in person and/ or on their computer or automated system where used and may be used as evidence at a later date.
- (iii) The complaint records referred to above shall be held and secured at the operator's business address and shall be immediately available at the request of an authorised council officer or police constable at all reasonable times

5. Storage/Accessibility of all Records

- (i) The operator shall keep all driver, vehicle, journey and complaint records for a period of not less than 12 months following the last date of entry. At the request of an authorised

officer, or police constable, these records shall be made immediately available for inspection at all reasonable times.

- (ii) The operator shall provide to the Licensing Office, on the first day of each month, a current list of all licensed vehicles and drivers operated by him or her in the format required by the Licensing Office.

6. Managers

- (i) Operators shall be required to inform the Licensing Office, in writing, of the name, home address and contact telephone number of a manager prior to him or her commencing duties or as soon as is practicable thereafter. This person shall be available to be contacted at all reasonable times.
- (ii) A manager shall be over the age of 18 years and be fully conversant with the conditions attached to this operator's licence.

7. Premises

- (i) Public waiting areas and booking rooms shall be clean, adequately heated and ventilated during the hours of business and at all times shall comply with relevant health and safety requirements.
- (ii) The operator shall ensure, where a waiting area is provided for the use of prospective passengers, that adequate seating is available.
- (iii) The operator shall only operate from that business address disclosed on his or her current operator's licence application form or as disclosed under paragraph (v) below.
- (iv) The operator shall act within the terms of any deemed or express planning permission relating to the address he or she operates from.
- (v) Any change to an operator's current operating or home address must be disclosed in writing to the Licensing Office no later than 7 days before the change takes place.
- (vi) Appropriate public liability Insurance is required for premises which are open to the public.
- (vii) Operator's premises located outside of Coventry must have their offices within a reasonable distance to ensure that officers can access records quickly and efficiently

8. Convictions

Within 14 days of an operator being convicted or receiving a police caution for an offence he/she shall disclose to the council in writing details of the conviction or caution imposed on him/her (or if the operator is a company or partnership, any imposed on the company or on any of the directors or partners), during the period of the licence.

9. Notifying the Council of Material Changes

Any material change to your business must be communicated to the Licensing Office in writing prior to the change taking place. A material change may be defined as a change in any of the particulars disclosed on your current operator's licence application form.

10. Standard of Service

- (i) The operator shall ensure that when a licensed vehicle has been hired to be in attendance at an appointed date, time and place the hirer shall be informed, prior to

acceptance of the booking, of any likelihood of delay in fulfilling the contractual terms.

- (ii) Where there is likely to be any delay in fulfilling a contract with a hirer the operator shall communicate to the hirer an accurate estimate of the time when a vehicle will be provided.

11. Lost Property

- (i) The operator shall deal with lost property in one of three ways:
 - (a) make every effort to return lost property which is found at either the operating premises or in any vehicle used to carry out a booking accepted by him/her or;
 - (b) hand lost property to the nearest police station as soon as is practicable thereafter or;
 - (c) after completing (a) above, dispose of lost property if perishable.

12. Transferring a Licence

This licence may not be transferred to another named individual, partnership or company. In the event of the death or bankruptcy of a personal licence holder or the insolvency, winding up or dissolution of a company or partnership licence holder this licence shall immediately become null and void. Any change in a named operator may only be effected by an application for a fresh operator's licence.

13. Appropriate Training of Staff on their Duties & Responsibilities to the Disabled Community

Staff working for operators taking private hire bookings must undertake training in order to understand their duties to disabled persons, so that they understand the issues of communicating with disabled persons and so that they can arrange an appropriate vehicle for those with a particular requirement or need.

INSPECTION OF PREMISES

An inspection will be conducted of the business premises named on your application form. This inspection will be carried out when you apply for a 'First Grant' or a 'Re-Grant' licence.

Officers will expect the premises to be clean and in good order. If members of the public are to be allowed to wait on the premises it must be in a satisfactory condition for their comfort and safety.

The 'Health and Safety Executive', a Government Department, not part of your Local Authority, has certain powers to enforce health and safety regulations and may also visit premises in order to enforce their regulations.

Public Liability Insurance is a core requirement for businesses. It protects you for your actions whilst at work. It covers any damages that a member of the public may be awarded as a result of injury or damage to them or their property caused by your business. It also covers legal fees and other expenses to do with defending any claim. It is the responsibility of the licence holder to take out insurance cover adequate for the size of the operating premises named on the private hire operating licence. It is advisable that a risk assessment is undertaken to establish what would constitute adequate cover.

Criteria for Private Hire Operators own stickers on doors

If any PHO wishes to advertise their services using their own sticker they will be allowed to do this subject to a maximum width of 450mm and a maximum height of 300mm. This will be limited to a maximum of two PHOs. If one PHO's own sign this must be displayed externally on the nearside and offside rear doors (with the traditional current sign being externally displayed on the nearside and offside front doors).^{*} If two PHO's own sign one PHO must be displayed externally on the nearside and offside rear doors and the other PHO own sign must be displayed externally on the nearside and offside front doors.

These signs would display;

- 1) Coventry City Council's Coat of Arms
- 2) PHO's name
- 3) PHO telephone number and/or email, if required
- 4) PHO's logo Digital Distribution Service(s) logos (e.g. Google Play or the App Store), if required
- 5) "Pre-Bookings Only"

This will be in addition to Coventry City Council's normal

If there are two PHOs with their own stickers, then the current signage will be dispensed with. It should be noted that the PHV also displays external & internal smaller window stickers (with the licence plate number and registration number of the vehicle) and also displays a plate on the rear so that members of the public outside and inside can identify the vehicle. These signs will still be required, however if there is only 1 PHO advertising with their own sticker then the sign will not be advertising the PHO's Digital Distribution Service logo.

Coventry City Council does not allow magnetic signage on their vehicles.

^{*} The traditional sign will display:

- 1) Coventry City Council's Coat of Arms;
- 2) Vehicle Licence Plate Number (e.g. PV0001) and the vehicle registration plate number (e.g. B999WMP);
- 3) Name of the PHO and their landline telephone number;
- 4) "Pre-Bookings Only"; and
- 5) "Private Hire".

Appendix 3



ADVERTISING GUIDELINES FOR PRIVATE HIRE & HACKNEY CARRIAGE VEHICLES

FORM 110

Data Protection: We will use the information provided to process your request for a licence, for updating or to take enforcement action. The information is used to ensure the safety of the public and to protect public may be shared with other local authorities, the Cabinet Office, Insurance Companies and Enforcement Agencies. Information is held as part of a statutory licensing function. The information will be kept for 7 years with our retention and disposal schedule. More information on how we handle personal information and your under the data protection legislation can be found on our Privacy Notice at; http://www.coventry.gov.uk/info/25/hackney_carriage_ie_taxi_and_private_hire_licensing/3222/taxi_licensing_notice

Private Hire Vehicles

No advertising is allowed outside or inside private hire vehicles licensed in Coventry other than stickers/notices approved/required by the Taxi Licensing Office.

Hackney Carriage Vehicles

The following are the conditions for advertising on the outside or inside of hackney carriage vehicles licensed in Coventry.

1. GENERAL

- a) Suitable advertisements may be displayed on or in hackney carriages, subject to written approval from the Taxi Licensing Office being obtained before advertisements are applied to vehicles.
- b) Advertisements must be of a form and quality that cannot become easily soiled, defaced or detached.
- c) Advertisements must be affixed directly onto the body of the hackney carriage or initially attached to an approved magnetic panel, which is then attached to the vehicle.

2. EXTERIOR ADVERTISING

- a) Exterior advertising may be displayed on the bodywork of the vehicle.
- b) Where full livery advertising is proposed, or where an advertisement runs across more than one panel, provision must be made for the immediate replacement of any damaged panel(s). Hackney carriages will not be permitted to work with damaged or unmatched panels, nor will they be accepted for re-licensing in this condition.
- c) Advertising involving the fixing of a structure, board, roof or other type of fixture, which significantly alters the original shape of the vehicle, shall not be allowed.
- d) Advertising on the boot lid, which in any way obscures the hackney carriage licence plate shall not be allowed.

vehicle is working may be displayed on either side of the vehicle on the area along the roof edges/along the top of the doors.

3. INTERIOR ADVERTISING

- a) Advertisements may only be displayed within the passenger compartment on the base of the occasional (flip up) seats and along the bulkhead above the passenger/driver partition.
- b) Occasional seat advertisements must be encapsulated in clear, non-flammable plastic.
- c) No material may be placed on the driver/passenger partition other than notices approved by the Taxi Licensing Office or that set out in section d) below.
- d) A flat multimedia screen (e.g. LCD TV) will be permitted, no larger than 11"/280mm across the diagonal, on the partition screen behind and above the driver's head, facing the passenger, displaying advertising and images from CCTV installed in the vehicle. The advertising content must conform to the requirements in section 5 below and no audio/sound will be allowed. A technical assessment by a recognised organisation in vehicle safety, or certification by the equipment manufacturer/installer or the vehicle manufacturer must be supplied, covering the safety implications of the multimedia screen and accompanying equipment.

4. WINDOW ADVERTISING

- a) One advertisement, no larger than 450mm wide and 80mm deep, may be displayed at the top of the rear window containing the company name and telephone number supplying journey bookings.
- b) Additionally, an advertisement no larger than 1200mm wide and 200mm deep may be displayed in the rear window. The advertisement must be of an approved material (e.g. dot matrix style), visible only from outside the vehicle and must not obstruct vision.
- c) Advertising material must be maintained in a good condition at all times. Advertisements should be correctly fitted and sealed to prevent the egress of water on to the advertising materials. Any advertisement that retains water or obscures rear vision should be removed from the vehicle.

5. ADVERTISEMENT CONTENT

- a) All advertisements must comply with the UK's Advertising Standards Authority's Advertising Codes and it is the responsibility of the hackney carriage proprietor to make sure that they do so.
- b) Each proposal shall be considered upon its own merits but the following advertisements WILL NOT BE APPROVED:
 - i) those of a political, racial, religious, sexist or controversial nature;
 - ii) those for escort agencies, gaming establishments (with the exception of bingo halls), sex shops or massage parlours;
 - iii) those displaying nude or semi-nude human figures;
 - iv) those promoting the use of drugs or consumption of alcoholic drinks;
 - v) those promoting the use of tobacco or other smoking related products;
 - vi) those likely to offend public taste;
 - vii) those depicting men, women or children as sex objects;
 - viii) those depicting direct and immediate violence;
 - ix) those which may be regarded as promoting any racist individual, group or organisation, or any racist message or activity.

COMMITTEE

TLO OFFICER GUIDANCE FOR REFERRAL TO THE COMMITTEE

The Licensing and Regulatory Committee has the authority to delegate some licensing decisions directly to the officers of the Taxi Licensing Office (TLO). When officers make decisions resulting in refusal, revocation or suspension of a licence you will be notified in writing of the decision, the reason for it and any rights of appeal.

In some situations the staff of the TLO are not authorised to make a decision in connection with an application or a current licence. In these situations the application or licence will be referred to the Licensing and Regulatory Committee. As a general guide the following charts indicate if your application or licence will be referred to the Committee. However, there may be circumstances where an application for a licence or a current licence will be referred to the Committee even where the guidance below indicates otherwise.

Convictions & Cautions (Except driving convictions and fixed penalty endorsements - see below)

Conviction/Caution/Sentence	Interval	Refer to Committee?
Convicted of crime resulting in death or was intended to cause the death or serious injury of another person	Always referred	Yes
Convicted of crime involving, related to, or has any connection with abuse, exploitation, use or treatment of another individual (includes slavery, child sexual abuse, exploitation, grooming, psychological, emotional or financial abuse)	Always referred	Yes
Convicted of any offence involving or connected with illegal sexual activity or who is currently on the Sex Offenders Register or any barred list.	Always referred	Yes
Imprisonment for a term exceeding 48 months	Always referred	Yes
Offences involving violence against the person.	Less than 10 years since sentence completed	Yes
Conviction for, or related to, supply or drugs, or possession with intent to supply or connected with possess with intent to supply.	“ “	Yes

Possession of a weapon, or any other weapon offence	Less than 7 years since sentence completed	Yes
Dishonesty an element of an offence	“ “	Yes
Conviction involving or connected with discrimination in any form	“ “	Yes
Conviction for driving or driving under the influence of drugs	“ “	Yes
Conviction for possession of drugs or related to the possession of drugs	Less than 5 years since sentence completed	Yes
Using a hand-held mobile telephone or hand-held device whilst driving	“ “	Yes
Imprisonment for a term exceeding 30 months but not exceeding 48 months	Less than 7 years since sentence completed (or 42 months if aged under 18 at time of conviction)	Yes
Imprisonment for a term exceeding 6 months but not exceeding 30 months	Less than 4 years since sentence completed (or 2 years if aged under 18 at time of conviction)	
Removal from HM Service	Less than 12 months since conviction (or 6 months if aged under 18 at time of conviction)	
Imprisonment for a term not exceeding 6 months	Less than 2 years since sentence completed (or 18 months if aged under 18 at time of conviction)	Yes
Conditional Caution	Less than 3 months since caution given or terms discharged	Yes
Simple Caution	Never referred	No
Fine	Less than 1 year since conviction (or 6 months if aged under 18 at time of conviction)	Yes
Community Order		
Conditional Discharge or Bound Over (When imposed as a sentence for an offence for which they have been convicted)	Where order still in effect	Yes

Driving Convictions and Fixed Penalty Endorsements

Conviction/Sentence/Endorsement	Interval	Refer to Committee?
A conviction/endorsement resulting in 4 or more penalty points.	If endorsed on licence. (See 'Endorsements Information' below)	Yes
A total of 7 or more penalty points.	If endorsed on licence. (See 'Endorsements Information' below)	Yes
Offences involving Drink or Drugs.	Less than 5 years since conviction	Yes
A disqualification from driving for a single offence.	Less than 4 years since conviction	Yes
A disqualification from driving under totting-up.	Less than 4 years since conviction	Yes
A Fine without any penalty points. (e.g. non-endorsable offence)	Less than 4 years from the date of offence	Possibly

All Convictions & Cautions

Conviction/Caution/Sentence	Interval	Refer to Committee?
Any conviction or caution that casts doubt on your suitability to hold a licence.	N/A	Yes

Where there is a history of convictions and/or cautions.	N/A	Probably
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Other Reasons	Refer to Committee?
If you have been living in the United Kingdom for less than 5 years.	Possibly
If you have made a false declaration (given incorrect information).	Yes
If you have had a number of taxi related complaints made against you.	Probably
If you have had a serious taxi related complaint made against you.	Yes

Endorsements Information

Endorsements remain on a licence for 11 years from date of conviction if the offence is:

- drinking/drugs and driving (shown on the licence as **DR10, DR20, DR30** and **DR80**).
- causing death by careless driving whilst under the influence of drink/drugs (shown on the licence as **CD40, CD50** and **CD60**).
- causing death by careless driving, then failing to provide a specimen for analysis (shown on the licence as **CD70**).

or 4 years from date of conviction if the offence is as listed below:

- reckless/dangerous driving (shown on the licence as **DD40, DD60** and **DD80**),
- offences resulting in disqualification.
- disqualified from holding a full licence until a driving test has been passed.

or 4 years from the date of offence in all other cases.

Do not fail to declare a conviction or caution to avoid your application or licence being referred to the Committee. Unfortunately, if your application is referred to Committee, it will be delayed. The Committee can also be asked to review the licence held by a driver if a driver has been convicted for an offence, been cautioned or had complaints made against him/her. If your application or licence is referred to the Committee then you will be told in writing and the procedures will be explained to you. When an application or an existing licence holder is referred to the committee, the Committee members take the 'Relevance of Convictions' guidelines into consideration when making their decision to grant, refuse to grant, suspend, or revoke a licence.

Appendix 4

GUIDANCE FOR THE COMMITTEE WHEN MAKING DECISIONS ON A SUBMITTED REPORT

GUIDELINES ON THE RELEVANCE OF CONVICTIONS ETC

The following are the guidelines adopted by the City Council on 26 January 2022, regarding the relevance of criminal convictions, cautions, fixed penalty endorsements, complaints and false declarations to becoming or remaining licensed as a Hackney Carriage or Private Hire driver in Coventry. The Licensing Committee of the City Council consider these guidelines when making their decision to grant, refuse to grant, renew, refuse to renew, suspend, or revoke a licence.

General Principles

1. Each case will be decided on its own merits.
2. The overriding consideration shall be the protection of the public and all other matters, including unemployment, shall be secondary to the public safety factor.
3. An individual with a conviction for one or more criminal offences need not be permanently barred from obtaining a licence, but should be expected to remain free of further convictions for the periods indicated in these guidelines before an application is favourably entertained. In making a decision, the licensing authority shall take into consideration the number of convictions/cautions, the nature and circumstances of each offence, the age of each conviction/caution, the age of the individual at that time and whether the individual's circumstances have since changed, any mitigating circumstances, any aggravating factors and any other relevant factors.
4. Offences which took place many years in the past may often have less relevance than recent offences. Similarly, a series of offences over a period of time is more likely to give cause for concern than an isolated minor conviction. Offences where the victim was a passenger will be regarded with particular concern.
5. The authority generally considers that offences committed by licensees should be regarded more seriously than offences committed by individuals when not licensed. This is because current licensees have previously been judged as fit and proper and are aware of the standards required of them and are expected to maintain those high standards of personal conduct.
6. Convictions/cautions are considered equally relevant to both hackney carriage and private hire drivers. Cautions are treated in a similar way to convictions since an individual must have admitted the offence in question in order to have received a caution.
7. Where the following specific guidelines indicate that the authority may suspend a licence it may do so in circumstances where, despite being satisfied as to an individual's basic suitability to be licensed, the authority still feels it has reasonable cause to strongly register its disapproval of an individual's conduct and to discourage any future repetition of such conduct.
8. These guidelines may be referred to when considering complaints against individuals, or additional information included in the DBS disclosure by the police, where the nature of that complaint or additional information is of a similar nature to the matters covered by these

guidelines.

- 9 The guideline at F6 may be referred to when considering cases of false declaration where the individual has not been prosecuted.

Specific Guidelines

- 10 The following specific guidelines afford an indication of how particular cases involving the consideration of convictions or cautions are likely to be dealt with. Where an individual has more than one conviction/caution recorded against them, the authority will consider the number and nature of convictions and may not necessarily regard the period of time that has elapsed since the last conviction as being sufficient to demonstrate the individual's fitness to be licensed. The following guidelines are not binding on the authority and it is free to depart from them where the particular circumstances of an individual case make it appropriate to do so:-

A Traffic Offences

Hackney Carriage and Private Hire Vehicle Drivers are professional drivers. In addition to their duty of care to other road users, they have responsibility for the safe transport of their passengers, and traffic offences should be considered carefully.

OFFENCES		COMMITTED WHILST NOT LICENSED BY COVENTRY CITY COUNCIL		COMMITTED WHILST LICENSED BY COVENTRY CITY COUNCIL		
		Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (First Grant/Re-Grant)	Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (Renewal/First Grant/Re-Grant)	Guideline for Licensee (Current licence holder)
A.1	Minor speeding offences up to 3 points. Minor motorway offences. Pedestrian crossings. Traffic direction & signs.	3 years.	Grant with verbal warning. (Normally delegated to officers)	3 years.	Grant with verbal warning. (Normally delegated to officers)	Verbal warning. (Normally delegated to officers)
A.2	Major speeding offences 4 to 6 points. Major motorway offences. Construction and Use offences. Licence offences. Leaving a vehicle in a dangerous position. Defective eyesight.	3 years.	Grant with written warning.	4 years.	Grant with written warning or grant and suspend for up to 3 months*.	Written warning or suspend for up to 3 months.
A.3	Insurance offences. Disqualified Driver offences. Aggravated taking of a vehicle.	3 years.	Grant with written warning or grant and suspend for up	4 Years.	Grant with written warning or grant and suspend for up	Written warning or suspend for up to 4

			to 3 months*.		to 4 months*.	months.
A.4	Careless driving offence. Failing to report/stop after an accident.	3 years.	Grant with written warning or grant and suspend for up to 4 months*.	4 Years.	Grant with written warning or grant and suspend for up to 6 months*.	Written warning or suspend for up to 6 months.
A.5	Disqualification due to totting up.	2 years from end of disqualification period.	Refuse.	3 years from end of disqualification period.	Refuse.	Revoke.
A.6	Reckless/Dangerous Driving offences.	3 years.	Refuse.	4 Years.	Refuse.	Revoke.
A.7	Using a handheld mobile telephone or handheld device when driving.	5 years.	Refuse.	5 years.	Refuse.	Revoke.
A.8	Drink or Drugs driving offences.	7 years.	Refuse. **	7 years.	Refuse. **	Revoke. **

* Subject to any right of appeal, a period of suspension shall run from the date of the Licensing Committee hearing or the date by which all application requirements have been met, whichever is the later.

** Any applicant may also have to undergo drugs testing, at their own expense, to demonstrate that they are not using controlled drugs.

B Drug Offences

Drug related offences should be carefully considered as Hackney Carriage and Private Hire Vehicle Drivers are professional drivers and are expected to be fully in control of themselves and their vehicles whilst working or they may have close contact with vulnerable members of the public, e.g. children, young adults and addicts.

OFFENCES		COMMITTED WHILST NOT LICENSED BY COVENTRY CITY COUNCIL		COMMITTED WHILST LICENSED BY COVENTRY CITY COUNCIL		
		Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (First Grant/Re-Grant)	Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (Renewal/First Grant/Re-Grant)	Guideline for Licensee (Current licence holder)
B.1	Drug conviction/caution for possession of drugs or related to the possession of drugs	5 years.	Refuse. *	5 years.	Refuse. *	Revoke. *
B.2	Drug conviction/caution for the supply of drugs, or possession with intent to supply or connected with possession with intent to supply.	10 years.	Refuse. *	10 years.	Refuse. *	Revoke. *

- * Any applicant may also have to undergo drugs testing, at their own expense, to demonstrate that they are not using controlled drugs.

C Sexual Offences

As Hackney Carriage and Private Hire Vehicle Drivers often carry unaccompanied or vulnerable passengers, applicants with convictions/cautions for sexual offences should be refused a licence until they can show a substantial period free of such conviction/caution. Licensees should have their licence revoked and not be re-granted a licence until a similar substantial period has elapsed.

OFFENCES		COMMITTED WHILST NOT LICENSED BY COVENTRY CITY COUNCIL		COMMITTED WHILST LICENSED		
		Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (First Grant/Re-Grant)	Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (Renewal/First Grant/Re-Grant)	Guideline for Licensee (Current licence holder)
C.1	Any sexual offence or currently on the Sex Offenders Register or any barred list.	No time limit.	Refuse.	No time limit.	Refuse.	Revoke.

D Violence Offences

As Hackney Carriage and Private Hire Vehicle Drivers have close contact with the public, applicants with convictions/cautions for violence offences should be refused a licence until they can show a substantial period free of such behaviour. Licensees should have their licence revoked and not be re-granted a licence until a similar substantial period has elapsed.

OFFENCES		COMMITTED WHILST NOT LICENSED BY COVENTRY CITY COUNCIL		COMMITTED WHILST LICENSED BY COVENTRY CITY COUNCIL		
		Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (First Grant/Re-Grant)	Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (Renewal/First Grant/Re-Grant)	Guideline for Licensee (Current licence holder)
D.1	Assault/Battery.	3 years.	Grant and suspend for up to 4 months* or Refuse.	4 years.	Grant and suspend for up to 6 months* or Refuse.	Suspend for up to 6 months or Revoke.
D.2	Grievous bodily harm.	4 years.	Refuse.	5 years.	Refuse.	Revoke.
D.3	Wounding.	5 years.	Refuse.	6 years.	Refuse.	Revoke.
D.4	Threats to kill.	7 years.	Refuse.	8 years.	Refuse.	Revoke.
D.5	Manslaughter/Murder.	10 years	Refuse.	15 years	Refuse.	Revoke.

- * Subject to any right of appeal, a period of suspension shall run from the date of the Licensing Committee hearing or the date by which all application requirements have been met, whichever is the later.

E Dishonesty Offences

Hackney Carriage and Private Hire Drivers are expected to be persons of trust. The widespread practice of delivering unaccompanied property is indicative of the trust that business people place in drivers. Moreover, it is comparatively easy for a driver to defraud the public by demanding more than the legal fare etc. Overseas visitors can be confused by the change in currency and be considered “fair game” for an unscrupulous driver. For these reasons, a serious view should be taken of any conviction involving dishonesty.

OFFENCES E.g. Theft, Burglary, Handling, Fraud, Forgery, Deception, Making a false statement, Using a conveyance without authority, etc.		COMMITTED WHILST NOT LICENSED BY COVENTRY CITY COUNCIL		COMMITTED WHILST LICENSED BY COVENTRY CITY COUNCIL		
		Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (First Grant/Re-Grant)	Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (Renewal/First Grant/Re-Grant)	Guideline for Licensee (Current licence holder)
E.1	Any dishonesty offence or where dishonesty is an element of the offence.	7 years.	Refuse.	7 years.	Refuse.	Revoke.

- * Subject to any right of appeal, a period of suspension shall run from the date of the Licensing Committee hearing or the date by which all application requirements have been met, whichever is the later.

F Hackney Carriage/Private Hire Offences

Hackney Carriage and Private Hire Drivers are expected to operate within the laws governing their trade and comply with the requirements and policies of Coventry City Council.

OFFENCES Covered by the:- Local Government (Miscellaneous Provisions) Act 1976. Town Police Clauses Act 1847 Any relevant Coventry Local Byelaws.		COMMITTED WHILST NOT LICENSED BY COVENTRY CITY COUNCIL		COMMITTED WHILST LICENSED BY COVENTRY CITY COUNCIL		
		Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (First Grant/Re-Grant)	Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (Renewal/First Grant/Re-Grant)	Guideline for Licensee (Current licence holder)
F.1	Any other contravention not mentioned below.	3 years.	Grant with written warning or grant and suspend for up to 3 months*.	3 years.	Grant with written warning or grant and suspend for up to 3 months*.	Written warning or suspend for up to 3 months.
F.2	Plying for hire when	N/A.	N/A.	3 years.	Grant with	Written

	licensed as a Coventry private hire driver.				written warning or grant and suspend for up to 3 months*.	warning or suspend for up to 3 months.
F.3	Not wearing ID.	3 years.	Grant with written warning or grant and suspend for up to 6 months*.	3 years.	Grant with written warning or grant and suspend for up to 6 months*.	Written warning or suspend for up to 6 months.
F.4	Plying for hire whilst licensed in another district.	3 years.	Refuse.	N/A.	N/A.	N/A.
F.5	Obstructing an officer.	3 Years.	Refuse.	3 years.	Refuse.	Revoke.
F.6	False Declaration.	3 Years.	Grant and suspend for up to 6 months* or Refuse.	3 years.	Grant and suspend for up to 6 months* or Refuse.	Suspend for up to 6 months or Revoke.
F.7	Driving without any private hire or hackney carriage driver's licence.	5 Years.	Refuse.	N/A.	N/A.	N/A.
F.8	Wheelchair not secured safely/correctly and/or loading procedures not carried out safely/correctly	N/A	N/A	2 years.	Grant and suspend for up to 6 months* or Refuse.	Suspend for up to 6 months or Revoke.
F.9	Refusal to take card payments	N/A	N/A	2 years.	Grant and suspend for up to 6 months* or Refuse.	Suspend for up to 6 months or Revoke.

* Subject to any right of appeal, a period of suspension shall run from the date of the Licensing Committee hearing or the date by which all application requirements have been met, whichever is the later.

G Other Offences

This section includes offences which do not easily fit within one of the above categories but are considered relevant to the suitability of an individual to hold a Hackney Carriage and/or Private Hire Drivers licence.

OFFENCES		COMMITTED WHILST NOT LICENSED BY COVENTRY CITY COUNCIL		COMMITTED WHILST LICENSED BY COVENTRY CITY COUNCIL		
		Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (First Grant/Re-Grant)	Period since Conviction, Caution or completion of Custodial Sentence during which the guideline will apply	Guideline for Applicant (Renewal/First Grant/Re-Grant)	Guideline for Licensee (Current licence holder)
G.1	Perverting the course of justice.	4 years.	Refuse.	5 years.	Refuse.	Revoke.
G.2	Arson.	4 years.	Refuse.	5 years.	Refuse.	Revoke.
G.3	Possession of a weapon or any other weapon offence.	7 years	Refuse.	7 years	Refuse.	Revoke.
G.4	Public order offences including Riot, Violent Disorder, Affray, Harassment, Threatening abusive insulting words or behaviour etc, Drunk and Disorderly, Breach of the Peace, Obstruct police.	3 years.	Grant and suspend for up to 3 months* or Refuse.	4 years.	Grant and suspend for up to 6 months* or Refuse.	Suspend for up to 6 months or Revoke.
G.5	Criminal damage.	2 years.	Grant and suspend for up to 2 months*.	3 years.	Grant and suspend for up to 4 months*.	Suspend for up to 4 months.
G.6	Refusal to take an Assistance Dog.	4 years.	Grant and suspend for up to 6 months* or Refuse.	3 years.	Grant and suspend for up to 6 months* or Refuse.	Suspend for up to 6 months or Revoke.
G.7	Refusal to take passenger.	4 years.	Grant and suspend for up to 6 months* or Refuse.	3 years.	Grant and suspend for up to 6 months* or Refuse.	Suspend for up to 6 months or Revoke.
G.8	Crimes resulting in Death of another person or serious injury.	No time limit.	Refuse.	No time limit.	Refuse.	Revoke.
G.9	Exploitation or any connection with abuse, exploitation, use of treatment of another individual irrespective of whether victim(s) were	No time limit.	Refuse.	No time limit.	Refuse.	Revoke.

	adults or children. This includes slavery, child sexual abuse, exploitation, grooming, psychological, emotional or financial abuse etc.					
G.10	Discrimination in any form.	7 years.	Refuse.	7 years.	Refuse.	Revoke.

- * Subject to any right of appeal, a period of suspension shall run from the date of the Licensing Committee hearing or the date by which all application requirements have been met, whichever is the later.

If you need this information in another format please contact:

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Appendix B

Responses to Coventry City Council Statement of Licensing Policy Consultation

8th August 2025 – 3rd October 2025

1. Background

- 1.1 The public consultation on the draft Statement of Licensing Policy took place for 8 weeks from 8th August 2025 – 3rd October 2025.
- 1.2 The consultation was extensive and included a range of licensed trade, stakeholders and the general public..
- 1.3 There were 119 responses received during the consultation period (117 through the online portal, one by e-mail and a separate representation). The breakdown of respondents is as follows:

Licensed Trade - 80 (67.2%)
Licensee with other authority - 1 (0.8%)
Disability Group - 2 (1.7%)
Member of the public - 32 (26.9%)
Business / Business association - 4 (3.4%)
- 1.4 All consultees were asked for comments on the draft policy, which have been organised into themes and are presented below.

1. It is proposed to change the current emissions policy in line with the other West Midlands Councils so that as of the 1st January 2030 new and replacement vehicles are required to be either an Ultra-Low Emission vehicle (a vehicle that will produce less than 75g CO2/km), produce zero emissions or be zero emission capable by this date.

Are you supportive of this measure YES or NO

- **Yes – 67**
- **No – 45**
- **No opinion – 7**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Under the current economic condition, totally no, we have abundance of Wolverhampton plated vehicles operating within our city with empurity and free will
As a Coventry City Council Licensed Vehicle Proprietor, As a Coventry City Council Licensed Operator, A driver, proprietor or operator licensed with another licensing authority	The new vehicles being offered are just not affordable to comply with this.
As a Coventry City Council Licensed Driver	Electric Taxis are too expensive and Uber has taken alot of the trade.

	If vehicle is maintained to a good standard and it passes the emissions test during inspection, it should be allowed to carry on
As a Coventry City Council Licensed Driver	Because of gray areas in law already drivers suffering from changing who went on hybrid cars and still city council allowing 20to fifteen years cars ...city council s monopoly law destroy black cab drivers.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Due to previous emissions policy and vehicle age policy, as an abiding licensed proprietor I made the financial commitment to purchase a new LEVC taxi. This was a huge undertaking for me and during COVID time it was very difficult. Moving the goal post on the emissions policy is grossly negligent and irresponsible to proprietors like myself
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	2030 is an ambitious target unfortunately councils and the wider government have always been over confident in there emissions targets and zero emission zones we clearly do not have enough zero emission vehicles on the road and they are costly to purchase.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	As you know there is lot competition in taxi trade, since uber and bolt operating in Coventry our taxi trade has significantly decreased so we can't afford to buy new vehicles at the moment thx.
As a Coventry City Council Licensed Driver	<p>Despite living costs contineously going up including council tax, other bills such as electricity, gas water, and food costs that has negatively impacted the population of this city, this extra cost of new or replacement of vehicle will put everyone and my family below any poverty imagenable.</p> <p>As you aware in our profession (taxi) no one can earn enough to live on and this has put many people on state benefit.</p> <p>The council must have this in mind that the main concern for it is the competition that other large company outside of the city such as Uber that has put our job at risk of complete collapse.</p>

	The last thing that poor working people of this city need is for it's own council to purposely bring in a policy that make every family poorer and the children to suffer even more.
As a Coventry City Council Licensed Vehicle Proprietor	As I purchased a levc electric vehicle i am disgusted that the council keep on changing the policy year after year I know times are tight but vehicle are getting older and older and the owners won't replace them if there being given a reprieve year after year
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Operator	It's practically impossible to cover airport transfers in low emission vehicle's due to size and mileage capacity.
As a Coventry City Council Licensed Driver	As a hackney driver in Coventry our trade in the city has been significantly impacted by the border crossing of other council licenced vehicles working in the city. It has to be extended beyond 2030 as theirs not enough trade for drivers to buy these new levc for working in the city.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	It is grossly negligent to change the goal post on this, against proprietors who have made financial commitment based on current policy.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	The taxi trade has changed due to online companies and its not viable to purshase a ultra low emmision taxi or eletric taxi .
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Should be sooner
As a Coventry City Council Licensed Driver	In order to meet the emmision one need to buy a new car, only allowed to use one brand which a low income driver like me can not think about let afford , other vehicle options should be available like other councils offer
	Yes I completely support this change to the emissions law

	Because there is no chance of affording a LEVC electric vehicle not enough work because of UBER and other taxi services operating in Coventry. If we could get a few more years beyond 2030 would also help.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Only vehicles over 15 yrs should b removed
As a Coventry City Council Licensed Driver	Far too many Uber in Coventry has taken black cab jobs. Black cab must stay. Stop cross border hiring.
As a Coventry City Council Licensed Driver	You have only given us a one option which is Levic Taxis not any others makes so it's very difficult to run the taxi which is very expensive and on the other side is Uber so at least give us more options like other councils so we can pick and choose more reliable vehicles.
As a Coventry City Council Licensed Driver	Under current circumstances of work no driver can afford any new vehicles
As a Coventry City Council Licensed Driver	No thanks.
As a Coventry City Council Licensed Driver	Our earning margin is low compared to other# uber drivers and also paperwork fees are higher.
As a Coventry City Council Licensed Driver	The deadline is unrealistic
As a Coventry City Council Licensed Driver	As a Hackney carriage driver a replacement vehicle will cost £70000 which not affordable in the current climate
As a Member of the public	Usd exactly the same rules as Wolverhampton
As a Member of the public	2030 is too soon to introduce this policy. The infrastructure for EV cars will not be in place in sufficient numbers to support the amount of vehicles in the city.
As a Member of the public	There are still so many older taxis in use which are clearly highly polluting, this is a major step forward.

As a Member of the public	Why do you have to wait until 2030? There are very old taxis polluting Coventry.
As a Member of the public	Unlikely to have enough national power generation for the drive to change to all electric for this to be viable.
As a Member of the public	Can we ensure this applies to uber driver also why we got Uber driver from Wolverhampton operating in coventry
As a member of a Business, Business Association or Manufacturers	Whilst supportive of this change an impact assesment should be carried out on the current fleet and what support is offered to local firms to support with the transition to a greener fleet.
As a Member of the public	I think it's important to have a phase out period for current older vehicles
As a Member of the public	Fully support this move. In my opinion, many of the older taxis look incapable of meeting modern emission requirements.
	<p>LEVC supports revisions to emissions policies that are aimed at accelerating the uptake of zero emission capable (ZEC) vehicles and support the Council's clean air ambitions.</p> <p>Coventry originally introduced a ZEC requirement for new taxis in 2019, to apply to new vehicles from 1st January 2024. We consider this a sufficient amount of time for drivers to prepare for the transition and to plan their investment in a new vehicle. Coventry should not further delay the enforcement of stricter emissions criteria for taxi drivers to ensure the local population is able to benefit from cleaner air as soon as possible. Road traffic is often the largest contributor to local CO2 and NOX emissions, and a single non-ZEC taxi or PHV can produce multiple times more pollution than a private passenger car due to the time spent on the road. Accelerating the switch to ZEC taxis with a mixture of 'carrot and stick' policies will have a more significant impact on local air quality and deliver greater environmental benefits in urban areas than private vehicles.</p>
As a member of a Business, Business Association or Manufacturers	<u>Euro Standards to 2030</u> . We support the Council's recommendation in 5.9.1 that from 1st January 2030 any replacement vehicles and any new vehicles are required to be ultra-low emission, zero emission or zero emission capable.

	<p>However, in the interim, (1st Jan 2026- 31st Dec 2029) the proposal indicates that the Council will continue to licence older Euro 4 or Euro 5 taxis which significantly contribute to poor local air quality. The government's recommendation is to move over to Euro 6 as the minimum standard for taxis. Many local authorities, and not only those in Clean Air Zones, have already done so, or set earlier time limits.</p> <p><u>Defining zero emission capable.</u> In addition to CO2 rates the Council should also consider the minimum zero emission mileage range for hybrid vehicles, (e.g. 20, or 30 miles). For example a more defined policy for zero emission capable might be that a wheelchair accessible taxi should have CO2 emissions of 75gm/km or less, measured according to the WLTP and be capable of being operated at zero emissions for 30 miles or more.</p>
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2. It is proposed that the policy be amended to reflect the DfT guidance and that the age limit of vehicles be removed.

Are you supportive of this measure YES or NO

- **Yes 69**
- **No 39**
- **No opinion 11**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Driver	In the current economic climate, Age limit should be removed
As a Coventry City Council Licensed Driver	Stop two yearly MOT,s ..as if major faults driver have to fix it to b on road .second MOT is just money making machine for tlo.

As a Coventry City Council Licensed Driver	Providing it passes existing emissions controls
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Again grossly negligent to proprietors made financial commitment on previous policy.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	It is quite clear to everyone in the trade and out of the trade that if you take out older taxis as intended you will only have a handful of taxis on the road which is no where near enough to cover demand.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Age limit should not be removed
As a Coventry City Council Licensed Driver	If vehicle has passed mot and fit to be on the road then no age limit should apply
As a Coventry City Council Licensed Vehicle Proprietor	As the work is really quite we need time to get opinions
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Operator	In the current format it's practically impossible to license newer vehicles and be competitive against the likes of UBER.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Having a taxi myself we have 2 mot a year and keep the cab in top condition.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Remove the old sheds on the road
As a Coventry City Council Licensed Driver	There should not be an age limit

As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	15 yrs or less
As a Coventry City Council Licensed Driver	Wolverhampton council issued far too many private hire licence they work in Coventry as an Uber driver. No need to stop age restrictions vehicle . If implemented there will be no Black cab in Coventry for disabled and night out customers.
As a Coventry City Council Licensed Driver	Age restrictions should be removed because other councils in surrounding not have any age restriction like Solihull Birmingham Nanton Bedworth.
As a Member of the public	Age limit should remain
As a Member of the public	Need to keep the taxis in good condition and high quality
As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	As long as it is in excellent condition
As a Member of the public	Not enough information in the statement to give an answer.
As a Member of the public	Only the new least polluting car should be used
As a Member of the public	Really old vehicles need to be removed.
As a Member of the public	This combined with the rules around emissions could encourage drivers to run vehicles for far longer increasing risk of failures, poor emissions etc. given the mileage covered and wear and tear from roads cars carrying fee paying public should have a maximum age limit in my opinion.
As a Member of the public	No need to scrap a vehicle that can still pass safety and emission requirements.
As a member of a Business, Business Association or Manufacturers	The Department for Transport advises against the imposition of rigid age limits on licensed vehicles, suggesting instead that vehicle eligibility be based on targeted outcomes such as emissions, safety standards and accessibility. LEVC agrees with this approach; vehicle age is a less important measure when deciding on licensing

	<p>requirements than meeting the transport needs of the local population and meeting clean air ambitions.</p> <p>It is our view that arbitrary age limits could prevent low-emission and zero-emission capable vehicles being sold in favour of higher-emitting, newer vehicles. As more ZEC taxis enter the second-hand market, these vehicles offer a more affordable option to many drivers.</p>
As a Member of the public	I support the Age of Vehicles revision, provided all vehicles meet the updated Emissions policy (as of the 1st January 2030 new and replacement vehicles are required to be either an Ultra-Low Emission vehicle, produce zero emissions or be zero emission capable by this date).

3. It is proposed to remove the London Conditions of Fitness to enable a number of other vehicles licensed as hackney carriage vehicles. These vehicles would be required to be wheelchair accessible (either factory made or modified in accordance with the DVSA).

Are you supportive of this measure YES or NO

- **Yes 93**
- **No 15**
- **No opinion 11**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Vehicle Proprietor, As a Coventry City Council Licensed Operator, A driver, proprietor or operator licensed with another licensing authority	More affordable vehicles may interest drivers to upgrade their current Taxi

As a Coventry City Council Licensed Driver	For too long Coventry City Council had held drivers back by having these conditions, we the drivers should be allowed to have any vehicle as long as it's wheelchair accessible.
As a Coventry City Council Licensed Driver	I'd only support that if Uber was restricted from working in Coventry.
As a Coventry City Council Licensed Driver	This should have been done 20 years ago. We should follow middle cities and towns.
As a Coventry City Council Licensed Driver	The trade has been strangled with the TfL guidelines
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	There are many vehicles that are suitable to be licensed and have been able to be licensed for many years. Councils' stubborn attitude has led to the situation we are in now.
As a Coventry City Council Licensed Vehicle Proprietor	That would enable the driver to upgrade their vehicle as the trade have lost confidence with levcs and the tax isn't suitable for some wheelchairs
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Operator	Current vehicles are too expensive to operate.
As a Coventry City Council Licensed Operator	WE NEED MORE WHEELCHAIR ACCESSIBLE OPTIONS
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	It is grossly negligent to change the goal post on this, against proprietors who have made financial commitment based on current policy.
As a Coventry City Council Licensed Driver	no wheelchair vehicles
As a Coventry City Council Licensed Driver	It's a good idea to have other vehicles in place.
As a Coventry City Council Licensed Driver	This should have happened many years ago
As a Member of the public	Need more wheelchair and disability friendly vehicles

As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	More support for wheel chair users is always welcome.
As a Member of the public	I am puzzled why London are not making similar changes.
As a member of a Business, Business Association or Manufacturers	<p>The Conditions of Fitness represent the gold standard in taxi licensing and should be retained as essential to guaranteeing accessibility, safety and consistency in Coventry; abandoning them would represent a dilution of standards and risks the long term reputation and retention of the taxi sector in Coventry without addressing the root cause of affordability concerns (driver earnings and cross border hiring).</p> <p>LEVC developed the TX taxi to meet the exacting Conditions of Fitness, resulting in a purpose built vehicle with inbuilt features including fixed partitions, CCTV compatibility and high visibility that are impossible to retrospectively incorporate into a converted vehicle without major cost.</p> <p>The Conditions of Fitness guarantee universal access for disabled passengers, ensuring the Council is meeting its obligation to wheelchair users. There is evidence of decline in availability of wheelchair accessible vehicles in areas where Conditions of Fitness have been dropped, for example in North Yorkshire which has seen a corresponding rise in private hire license applications. We are very concerned that removal of the Conditions of Fitness would result in further degradation of the Coventry fleet, with drivers choosing the cheapest option without sufficient consideration of the impact on passengers. Disabled passengers and people unable to access other forms of public transport rely on taxis for essential appointments and reducing their availability would represent a real-world decline in the Council's ability to meet transport needs, leading to hardship for some of the most vulnerable local residents. Coventry is already underserved by wheelchair accessible vehicles due to issues relating to enforcement and cross border hiring. To remove the CoF would fatally damage the future of the taxi trade here on our doorstep and with a growing number of high-quality, lower priced used taxis that meet CoF now entering the market, would undermine the future sustainability of wheelchair accessible vehicles in Coventry.</p>

As a member of a Business, Business Association or Manufacturers	<p>We welcome that Coventry Council is considering the removal the 8.54m turning circle requirement of the London Conditions of Fitness. Coventry now joins all other major UK cities outside London to remove this mandatory requirement and opens the opportunity for other alternative wheelchair accessible taxis to enter the market.</p> <p>Vehicle list The Council may wish to review the list of approved taxis. Some included are generic donor vehicles and not taxis (e.g. Citroen Dispatch, Ford Tourneo Custom or Fiat Scudo). These are likely to have been converted by several different converters over the years, only some of whom are likely to have been granted an ECWVTA or a GBTA for their conversions. Indeed some, might have only been granted "small series" or "Individual" approvals - or even no approval at all, in some of the worst cases). In addition, some of the specific taxis mentioned on the list, have not been manufactured for 15-20 years (e.g. SVA, TX1 or TW200) and will be of Euro 4 or, at best, Euro 5 standard.</p>
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- 4 **It is proposed that there is an expectation that all drivers register with the Disclosure and Barring Service (DBS) by subscribing to the DBS Update Service enabling the licensing authority to check the driver's DBS status at any time (a minimum of 6 monthly intervals).**

Are you supportive of this measure YES or NO

- **Yes 93**
- **No 19**
- **No opinion 7**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Anything that keeps everyone safe is good
As a Coventry City Council Licensed Driver	It is easier monitoring and reduces the hassle.
As a Coventry City Council Licensed Driver	Should be one yearly.
As a Member of the public	Good idea
As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	I'm surprised that this is not the case already. Photo ID should also be displayed inside the vehicle and random council stop checks enforced.
As a Member of the public	Will this also apply to Uber drivers?
As a Member of the public	This should apply to those who Trent under a alias and uber drivers
As a Member of the public	Sounds a good way to reduce paper work, time and cost whilst maintaining public safety
As a Member of the public	This is important as vulnerable people utilise the taxi service often. Including women on evenings out.
As a member of a Business, Business Association or Manufacture	This expectation supports passenger safety and ability of the licensing authority to spot-check licenses whilst saving drivers money.

5 It is proposed that the policy will be amended to include that when a certificate of good conduct is provided and not in English a notarised translation would need to be provided by the applicant at their own expense.

Are you supportive of this measure YES or NO

- Yes 88
- No 17
- No opinion 14

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Vehicle Proprietor, As a Coventry City Council Licensed Operator, A driver, proprietor or operator licensed with another licensing authority	More checks are always a good thing considering the reputation that taxi drivers have and how the public feel about us
As a Coventry City Council Licensed Driver	When people enter UK they have to provide all relevant documents.councils are not above home office so please stay away from Wolverhampton model.it causes lots of stress and undue pressure...person living in England for 20 years with clean records all of sudden asked to produce paperwork from third world countries is unfair and totally disgrace.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Good idea implementing it will be tricky if applicant is meant to provide translation, the council should be the one who has it translated independently
As a Coventry City Council Licensed Vehicle Proprietor	Why should we have to foot the bill when it the person is after a job
As a Coventry City Council Licensed Driver	It is vital and required for the safety and security of the community. In addition it makes the driver responsible and accountable for the job what he/she has taken among the society.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	I disagree because there is a lot of carupution in a lot of countries and these certicates are easy to get hold off
As a Coventry City Council Licensed Driver	The council should pay for this
As a Coventry City Council Licensed Driver	How can you sure it's right.
As a Member of the public	Makes sense

As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	Everything should be also checked that it is not forged
As a Member of the public	Again how is this not policy already! An application for any UK licence etc should be supported by documents written in English.
As a Member of the public	Who would police the translation service such that any record could not be 'cleaned up'. The origin of the certificate of good conduct should be required to provide an English version.
As a Member of the public	All drivers should have a level qualification who from abroad can drive and pass a uk test not international
As a Member of the public	As long as council maintains control of the companies authorised to make the translations on its behalf to protect quality of translations
As a Member of the public	This is absolutely of importance to ensure that criminals who have fled another country do not line work directly with the public.
As a Member of the public	All drivers should be fluent in English.



Guide Dogs
Warwick New Road
Leamington Spa
CV32 6AH

20 August 2025

Taxi and private hire vehicle licensing policy: consultation response from Guide Dogs

Introduction

Guide Dogs is the largest sight loss charity in the UK and provides services that support the independence of people with a vision impairment. In the UK, there are 2 million people with sight loss and this number is set to double by 2050¹. It is estimated that there are 9,410 people with sight loss living in Coventry, and for a number of reasons, including an ageing population, this number is predicted to increase to 10,800 by 2032².

Taxis and private hire vehicles (PHVs) and the door-to-door service they provide are essential for disabled people. They are particularly important for the independence of blind and partially sighted people, who are unable to drive, and often face barriers when using public transport. However, accessing taxis and PHVs can be a major challenge for assistance dog owners.

It is a criminal offence to refuse to carry a guide or other assistance dog in a taxi or private hire vehicle, unless the driver has been issued with a valid medical exemption certificate by the licensing authority or DVA. Despite this, our research (2024) found that taxi and private hire vehicles remain one of the most common settings in which guide dog owners experience access refusals. Almost 60 per cent of guide dog owners have been refused access to a taxi or minicab; and 40 per cent

¹ Deloitte, 2017.

² [RNIB Sight Loss Data Tool - statistics on sight loss | RNIB | RNIB](#)



of guide dog owners reported that a taxi or minicab drove away when the driver saw their guide dog.

Access refusals represent a deeply harmful form of discrimination, preventing people with sight loss from getting to work, to medical appointments, or taking part in leisure activities.

Key recommendations:

1. Highlighting the law: taxi and private hire vehicle licensing policy should clearly state that all drivers have a duty to carry, free of charge, any assistance dog. We advise stating within the policy that **this is a legal requirement under the Equality Act 2010 and failure to do so is a criminal offence.**
2. Test for medical exemption certificate: licensing policy should state that a medical exemption certificate is required for drivers who are unable to carry an assistance dog for medical reasons. The policy should specify that medical exemption certificates can only be issued when authorised by a medical practitioner and accompanied by medical evidence, such as a blood test, skin prick test or clinical history. The policy should make it clear that, in the absence of a medical exemption certificate, drivers are required by law to carry an assistance dog and refusal to do so is a criminal offence.
3. Tactile marker for exemption certificates: medical exemption certificates should be accompanied by features distinguishable to vision-impaired passengers, such as an embossed (or raised) 'E'.
4. Zero tolerance: the policy should state that the Council will investigate all reported violations of the Equality Act 2010 in a timely manner, with a view to pursuing a conviction, and that failure to carry an assistance dog will lead to automatic revocation of a taxi or PHV licence.
5. Disability equality training: all drivers should be required to undertake disability equality training when they apply for or renew their taxi or PHV licence.

6. Mystery shopping: the policy should state that the Council will work with assistance dog owners to ensure that taxi and PHV drivers are complying with licensing policy, through various means such as, but not limited to, test purchases.

The impact on guide dog owners

Taxi access refusals and the consequences of delayed travel, combined with the emotional impact of facing discrimination and confrontation when trying to carry out everyday activities, take a significant toll on assistance dog owners. Apart from feelings of anger and embarrassment, refusals can undermine the independence that assistance dogs bring to their owners. 81 per cent of guide dog owners said that access refusals negatively impacted their ability to get out and about independently.

Assistance dog owners also reported that the stress of refusals had a detrimental impact on their mental health and on whether they feel able to leave the house. This also has a negative impact on their ability to access work and other opportunities.

“I was left on my own at the side of the road in the dark. I am deaf and unable to phone for help, and it made me feel very vulnerable. It makes me feel afraid to go out.” - Assistance dog owner.

“I was very upset, it was dark, raining and late at night. I was scared. I avoid evening invites, as I worry about getting home. I lose out on the chance of socialising with friends, which is bad, as I have no family.” - Guide dog owner, Rochester

“I used to have a very tough, two-hour commute to work. The taxi part of the journey was the shortest bit travel-wise, but it always ended up being the bit that held me up the most because I was having to spend time facing drivers who wouldn’t take me with my dog. ... It’s good that my contract was flexi hours otherwise I’m sure I would have been sacked for being late all the time - it happened so often.” - Guide dog owner, Daventry



Highlighting the law in respect of Assistance Dogs

We advise that Coventry City Council's licensing policy explicitly states that all drivers have a legal duty under the Equality Act 2010 to carry, at no extra charge, any assistance dog and failure to do so is a criminal offence.

Guide dog owners also report taxi access refusals which take the form of drivers not stopping the vehicle when they see the assistance dog. **Therefore, we recommend that failure to stop when flagged down by an assistance dog owner is clearly identified as an illegal taxi access refusal within the taxi licensing policy.**

Medical exemption certificates

We believe a taxi and/or private hire vehicle licensing policy should specify that medical exemption certificates must be authorised by a medical practitioner and accompanied by medical evidence, which demonstrates that a driver's medical condition is aggravated by exposure to dogs, such as a blood test, a skin prick test or clinical history.

It is often difficult for vision-impaired passengers to identify the validity of exemption certificates. Currently, it is not permissible for licensing authorities to issue exemption certificates that incorporate tactile features, as this would alter the certificate's prescribed form and render it invalid. We therefore recommend that the Council issues exemption certificates that are accompanied by features distinguishable to vision-impaired passengers, such as an embossed or raised 'E' and a braille marker to accommodate both braille readers and non-braille readers.

Enforcement

Given the significant impact an access refusal can have on assistance dog owners, it is important that all cases are taken seriously and are properly investigated.

It is a criminal offence for any operator or driver to refuse to carry assistance dogs, and the policy should make clear that failure to comply can result in a fine up to £1,000 and revocation of the taxi or PHV licence. **We recommend a zero-tolerance approach to enforcement.**



The licensing policy should clearly state that failure to carry an assistance dog without the required medical exemption certificate will result in immediate suspension or revocation of a driver's licence. It should also state that the Council will investigate all reported violations of the Equality Act 2010 in a timely manner, with a view to prosecution.

We also recommend that the Council works with assistance dog owners to ensure that taxi and PHV drivers are complying with licensing requirements by various means such as, but not limited to, test purchases.

Disability equality training

To help reduce the number of access refusals, it is important that drivers know their legal obligations and how best to assist customers with vision impairments, including those travelling with a guide or other assistance dog.

A Guide Dogs survey found that many taxi drivers are unaware of their legal obligation to carry an assistance dog and of the impact refusals have on assistance dog owners. The best way to address this is by making disability equality training for all taxi and PHV drivers mandatory, when applying for or renewing a licence.

Coventry City Council has a public sector equality duty (PSED) (Equality Act 2010) to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between people who share a 'protected characteristic' (such as a disability) and those who do not.

The [Taxis and Private Hire Vehicles \(Disabled Persons\) Act 2022](#)³ amends the Equality Act 2010 and places duties on taxi and PHV drivers and operators, so that any disabled person has specific rights and protections when using a taxi or PHV, without incurring an additional charge. Under the amendments, taxi and PHV drivers could face fines up to £1,000 if they fail to provide reasonable mobility assistance to disabled passengers taking a pre-booked vehicle.

³ [Taxis and Private Hire Vehicles \(Disabled Persons\) Act 2022 \(legislation.gov.uk\)](#)



As well as highlighting a driver's legal obligations and disabled people's rights, disability equality training should focus on the social model of disability, where people are 'disabled' by barriers and attitudes in society, rather than by their impairment. The training should emphasise the role an organisation and individuals play in the removal of these barriers, while also including awareness elements, such as customer care, etiquette, and appropriate communication.

Many of the positive experiences disabled people report when using taxis and PHVs are a result of drivers attending disability equality training. Councils that have made this training a condition of licensing report very positive results, with fewer refusals and drivers feeling more confident in assisting disabled people. In Northern Ireland, completing disability equality training is a pre-condition when applying for or renewing a taxi/PHV licence and, as a result, access refusals in these settings are extremely rare.

Useful resources

- Equality and Human Rights Commission Guidance for all Businesses: Assistance Dogs
<https://www.equalityhumanrights.com/guidance/assistance-dogs-guide-businesses-and-service-providers>
- Guide Dogs' Guidance for Taxi and Minicab Staff
<https://www.guidedogs.org.uk/about-us/what-we-do/research/policy-and-guidance-for-businesses/guidance-for-taxi-staff/>

Contact

Jessica Luke, Regional Policy & Campaigns Manager, Guide Dogs

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COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Title of EIA		Statement of Taxi Licensing Policy 2026-2031
EIA Author	Name	Mick Coggins
	Position	Senior Licensing & Enforcement Officer - Taxi Licensing
	Date of completion	
Head of Service	Name	Debbie Cahalin-Heath
	Position	Strategic Manager - Regulation & Communities
Cabinet Member	Name	Councillor Patricia Hetherton
	Portfolio	City Services

PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- ☐ New policy / strategy
- ☐ New service
- ☒ Review of policy / strategy
- ☐ Review of service
- ☐ Commissioning
- ☐ Other project *(please give details)*

1.2 In summary, what is the background to this EIA?

Amendments to the Taxi Licensing Policy

The changes to the emissions policy are necessary as should we continue with the existing policy arrangements, and not extend the emissions policy to January 2030. This will allow further time for over 400 of our current vehicles which are required to be replaced by the taxi licensed trade.

If the amendment is not agreed a reduction in the overall operational fleet would have several significant impacts. Firstly, there would be a reduction in the number of wheelchair accessible vehicles, currently only Coventry licensed Hackney Carriage vehicles are wheelchair accessible (no Coventry licensed private hire vehicles are wheelchair accessible).

Secondly, much of the Coventry licensed Hackney Carriage vehicle undertake school contracts in Coventry and Warwickshire, and a reduction in the number of available vehicles may have had an adverse effect in this service.

As many of the licensed trade have been adversely impacted by the pandemic and the cost of living crisis, and the availability of vehicles licensed outside of the Coventry Boundary, the extension to the emissions policy will provide sufficient time for the trade to prepare for the trade to prepare for complying with the proposed emissions standards and obtaining suitable compliant vehicles.

Removing the London Conditions of Fitness, which restricts the type of vehicle that can be licensed as a Hackney Carriage, in conjunction with the revision of emissions standards in the Policy will provide a greater flexibility for drivers when selecting vehicles to license and will further enable a more accessible fleet in terms of wheelchair accessibility. Such vehicle will be required to be either as manufactured Wheelchair Accessible Vehicles (WAVs) or modified (with the approval of the Driver Vehicle Standards Agency (DVSA)) as WAVs. Removing the London Conditions of fitness will also even the playing field as all neighbouring authorities do not adopt such conditions to their Hackney Carriage fleet.

The current London Conditions of Fitness ([taxi-conditions-of-fitness-update-2019.pdf](#)) require amongst other matters for their hackney carriages to be able to turn within a 25 foot turning circle.

By widening the type of vehicle, it will provide greater choice to the licensed trade, which may give flexibility in the affordability of vehicles and this in turn may attract a new generation of drivers entering the trade. This also may enable more licensed drivers to work in the Night Time Economy, where the safety of particularly women and girls and vulnerability is of paramount importance.

1.3 List organisations and people who are involved in this area of work

Licensed Private Hire Operators, Private Hire Drivers, Private Hire Vehicle Proprietors, Hackney Carriage Drivers and Hackney Carriage Vehicle Proprietors. Public who travel by Private Hire Vehicles or Hackney Carriage Vehicles. Coventry City Council and Warwickshire County Council School Contracts.

1.4 Who will be responsible for implementing the findings of this EIA?

Debbie Cahalin-Heath

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.



COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

Data Sources to consider are :

- Previous research - consultation or EIAs carried out
- Customer feedback - including complaints, comments, surveys
- Employee feedback - including surveys, workforce monitoring, trade unions
- Specialist feedback - including focus groups, technical experts, subject specialists
- Feedback from organisations - such as those representing target groups
- National and local statistics –
 - National guidance or legislative requirements
 - Census data
 - Audit information
 - JSNA
 - Public health profiles
 - LG inform
 - Census
 - Office for National Statistics
 - Facts about Coventry
 - Breakdown of Coventry by Protected Characteristic
 - Armed Forces Veteran Data

Where possible, when you are analysing the data please try and break the data down by protected characteristic and additional groups.

2.1 Baseline data and information to include data

Please include a summary of data analysis below, using both your own service level management information. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA etc

Taxi Licensing currently licenses 597 Hackney Carriage Drivers, 464 Private Hire Drivers, 430 Hackney Carriage Vehicles, 356 Private Hire Vehicles, 52 Private Hire Operators. Most of these licensee holders live within the Coventry City boundary or within a few miles outside the border.

Drivers have to have a Group 2 Medical from any Medical Practitioner.

The Taxi Licensing Office does not collate protected information about the licensee holders apart from their name, address, date of birth, contact details, national insurance number, driving license number and passport number - in line with the National Anti-Fraud Network (NAFN) requirement & Department for Environment, Food and Rural Affairs (DEFRA).

2.2 Please highlight which Marmot Principles this EIA supports

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Ensure a healthy standard of living for all
4. **Create fair employment and good work for all**
5. **Create and develop healthy and sustainable places and communities**
6. Strengthen the role and impact of ill health prevention
7. **Tackle racism, discrimination and their outcomes**
8. Pursue environmental sustainability and health equity

SECTION 3 – Protected Groups and Additional Groups

3.1 Based on section 2, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)

Please include considerations of health and digital inequality as part of your analysis below.

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	<p>.Gradual emission reductions will lead to improved air quality, offering significant health benefits—particularly for individuals with respiratory conditions who are more vulnerable to pollution</p> <p>If the proposed amendment is not approved, school transport contracts supported by this service will be adversely affected. A substantial reduction in available vehicles would compromise service delivery, potentially disrupting children's access to education.</p>



Age 19-64	P	<p>By removing the London conditions of fitness drivers could choose from more affordable or varied models. Due to lower costs it Could attract new drivers to the trade.</p> <p>Reducing emission reductions will lead to improved air quality, offering significant health benefits—particularly for individuals with respiratory conditions who are more vulnerable to pollution</p> <p>Many taxi drivers in Coventry fall within this age group and are more likely to be in lower-income brackets, making the upfront cost of transitioning to electric vehicles a considerable challenge.</p> <p>Extending the implementation period would give these drivers more time to manage the financial transition and explore available government grants and other forms of financial support.</p> <p>This extension would also help ensure that residents of Coventry continue to have access to reliable taxi services, which are essential for enabling social interaction and participation in work. Without this amendment, a significant reduction in available vehicles could occur, potentially disrupting these vital connections and negatively impacting community wellbeing</p>
Age 65+		<p>Gradual emission reductions will lead to improved air quality, offering significant health benefits—particularly for individuals with respiratory conditions who are more vulnerable to pollution</p> <p>Extending the implementation period would give these drivers more time to manage the financial transition and explore available government grants and other forms of financial support.</p> <p>This extension would also help ensure that residents of Coventry continue to have access to reliable taxi services, which are essential for enabling social interaction. Without this amendment, a significant reduction in available vehicles could occur, potentially disrupting these vital connections and negatively impacting community wellbeing.</p> <p>A considerable number of the drivers are over the age of 65 and the extension would help drivers to make informative decisions about whether to finance a replacement vehicle or possibly look to retirement.</p>

Disability	P	<p>If the amendment is not agreed a reduction in the overall operational fleet would have several significant impacts.</p> <p>There would be a reduction in the number of wheelchair accessible vehicles, currently only Coventry licensed Hackney Carriage vehicles are wheelchair accessible (no Coventry licensed private hire vehicles are wheelchair accessible).</p> <p>This extension would also help ensure that residents of Coventry continue to have access to reliable taxi services, which are essential for enabling social interaction. Without this amendment, a significant reduction in available vehicles could occur, potentially disrupting these vital connections and negatively impacting community wellbeing</p>
Gender reassignment	NI	
Marriage and Civil Partnership	NI	
Pregnancy and maternity	NI	
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	<p>Many taxi drivers in Coventry fall within this group and are more likely to be in lower-income brackets, making the upfront cost of transitioning to electric vehicles a considerable challenge.</p> <p>Taxi drivers may also face language barriers, limited access to information, the extended time will allow targeted intervention to take place with group</p> <p>Without targeted outreach and support, these groups may be excluded from transition benefits or face penalties and possible lead to loss of livelihoods</p>
Religion and belief	NI	
Sex	P	<p>If this amendment is not agreed there will be a disproportionate negative impact on males and they make up most of Coventry taxi work force</p> <p>This could lead to loss of livelihood if their vehicles are non-compliant with emission standards</p> <p>Expanding the range of permitted vehicles will offer greater choice to the licensed taxi trade, potentially making vehicle ownership more affordable. This increased flexibility may encourage a new generation of drivers to enter the profession.</p>



COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

		Additionally, it could enable more licensed drivers to operate during Night Time Economy hours, where ensuring the safety of women, girls, and vulnerable individuals is especially critical.
Sexual orientation	NI	

3.2 Based on section 2, complete the table below to show what the potential impact is for each of the additional groups.

Group	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Care Experienced	NI	
Armed Forces	NI	
Social Economic Groups	P	<p>If the amendment is not agreed: Drivers from low-income backgrounds may not afford the upfront cost of EVs, even with grants. This can lead to loss of livelihood if their vehicles are non-compliant with emission standards</p> <p>Over time, EVs can be cheaper to run due to lower fuel and maintenance costs, which may benefit drivers from lower socio-economic backgrounds and ethnic minority groups, who are overrepresented in the taxi trade</p>

SECTION 4 –Next steps

Planned Action	Owner	Timescale
Collating ethnicity data for taxi drivers	Debbie	

4.2 How will you monitor and evaluate the effect of this work?

Monitor the number and type of complaints from passengers. Taxi Licensing receives about 5% of its complaints from passengers who have disability issues. All the hackney carriage vehicles licensed by Taxi Licensing are Wheelchair Accessible Vehicles (WAVs). Liaison with Disability Groups.

SECTION 5 – Impact on Council Staff

5.1 Will this area of work potentially have an impact on Council staff? Yes/No
If yes

Nature of impact and any mitigation required

n/a

5.2 Please provide headcounts for the below.

If you think by completing this section's headcounts, employees will become identifiable please email equality@coventry.gov.uk for advice on data protection implications

Impact on Council staff - Sex

Female

Male

Impact on Council staff - Disability

Disabled

Not disabled

Prefer not to state

Unknown

Impact on Council staff - Ethnicity

White

Black, Asian, Minority ethnic

Prefer not to state

Unknown

Impact on Council staff – Sexual orientation

Heterosexual



LQBT+

Prefer not to state

Unknown

Impact on Council staff – Age

16-24

25-34

35-44

45-54

55-64

65+

Impact on Council staff – Religion

Any other

Buddhist

Christian

Hindu

Jewish

Muslim

No religion

Sikh

Prefer not to state

Unknown

SECTION 6 – Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

- No impact has been identified for one or more protected groups ☐
- Positive impact has been identified for one or more protected groups** ☒
- Negative impact has been identified for one or more protected groups ☐
- Both positive and negative impact has been identified for one or more protected groups ☐

Before you submit this form - please save your progress and forward the email you receive with any questions to equality@coventry.gov.uk. The team will review your Equality Impact Assessment and provide you with feedback.

SECTION 7 - Approval

Name of Head of Service:	Date approved by Head of Service:
Name of Director:	Date sent to Director:
Name of Lead Elected Member:	Date sent to Councillor:

