

## Appendix 1

### Consultation questions for local authorities

**Question 1: Any one-off costs? If so, what would the one-off costs your authority be for? How much would the costs be? Please provide a monetary value in pounds, if possible, otherwise the resource time required in hours.**

One off costs are likely to be restricted to TUPE and other related staffing costs if staff are required to relocate working locations. It is assumed that these costs would be funded centrally and would not be required to be funded by Local Authorities. These costs are unknown until staff are formally consulted on potential workplace moves. Depending on timing of the proposal there may also be one off ICT contract costs.

**Question 2: Any ongoing costs? If so, what would the ongoing costs to your authority be for? How much would the additional costs be? Please provide a monetary value in pounds, if possible, otherwise the resource time required in hours.**

It's possible there will be unforeseen ongoing costs, as with any other change in practice, but until implemented these will not be known. Although Taxi licensing is a ringfenced financial service, the income provides a contribution to the general overhead running costs of the Authority (heating, lighting of accommodation, HR, finance, etc.) and this contribution would be lost if the service was taken out of Local Authority control. The contribution is based on a percentage of expenditure budget and is in the region of £50k for FY 2026-27.

**Question 3: Any one-off savings? If so, what would the savings to your authority be for? How much would the savings be? Please provide a monetary value in pounds, if possible, otherwise the resource time required.**

None anticipated.

**Question 4: Any ongoing savings? If so, what would the savings to your authority be for? How much would the savings be? Please provide a monetary value in pounds, if possible, otherwise the resource time required.**

None anticipated.

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### **Consultation questions for all respondents**

#### **Consultation questions on proposals**

#### **Question 13 – Should all local transport authorities be responsible for taxi and private hire vehicle licensing? Why?**

Coventry City Council welcomes the opportunity to respond to the Government's consultation. We have significant concerns regarding the proposal to transfer taxi and private hire vehicle (PHV) licensing responsibilities from existing licensing authorities to Local Transport Authorities (LTAs), and we do not support the proposal in its current form. Concerns and comments are outlined as follows:

**1. Safeguarding and National Audit Office (Casey) Findings** - The consultation does not adequately address whether the proposals will improve safeguarding, despite the National Audit Office's findings on group-based child sexual exploitation and the Casey Report's Recommendation 11, which calls for more rigorous and consistent approaches across local authorities. The current proposals do not address the core issue of inconsistency, as currently there is no requirement for national licensing standards. LTAs could still licence to differing standards, meaning problems such as 'out-of-area' working will persist. Without statutory mandatory national standards, including measures such as mandatory CCTV, recommendation 11 cannot be met. Coventry City Council does not currently operate a mandatory CCTV policy for licensed vehicles (only a voluntary policy). The introduction of such a condition at local level would require a full public consultation, consideration of proportionality, and assessment of costs and privacy implications for both drivers and passengers.

However, the lack of national consistency continues to result in safeguarding disparities across licensing authorities, particularly relating to out-of-area working. If Government considers CCTV to be an appropriate safeguarding tool, introducing it through national legislation—rather than relying on individual local schemes would create the necessary consistent baseline envisaged by Recommendation 11 of the Casey report.

**2. Passenger Safety and Capacity of LTAs** - Passenger safety must remain the primary objective of taxi and PHV regulation. Many LTAs currently do not employ specialist licensing officers, lack established enforcement and compliance frameworks, and have no history of handling safeguarding-related licensing decisions. Transferring responsibility risks diluting safety oversight at a time when public protection—particularly for women, children, lone travelers and late-night users—must be strengthened, not weakened.

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**3. Loss of Local Responsiveness and Policy Flexibility** - The proposal assumes that harmonisation is best delivered through LTAs. However, Coventry's experience demonstrates that local licensing conditions must be responsive to local demand, geography and demographics. Blanket or region-wide licensing risks, removing the flexibility necessary to address local concerns and may lead LTAs to prioritise strategic transport goals over day-to-day public protection.

**4. Impacts on Environmental and Decarbonisation Policies** - A shift to LTA control may create fragmentation if environmental requirements differ between neighbouring LTAs, and it must ensure consistency with the position on environmental policies and incentive schemes.

**5. Implications for Drivers and their Livelihoods** - Taxi and PHV drivers in Coventry are predominantly self-employed and rely on a stable, predictable licensing regime. A sudden shift to LTAs creates uncertainty about future fees, potential changes to conditions, risks to income stability, and confusion during the transition. This instability could disproportionately impact part-time and vulnerable workers.

**6. Night-Time Economy and University City Demands** - Coventry's thriving night-time economy, including its Purple Flag accreditation, relies on a well-regulated taxi and PHV network. As a major university city, demand for safe transport late at night is high. Any disruption to licensing operations risks undermining public confidence, the safety of students and night-time workers, and the city's ongoing accreditation and reputation. CCTV has been highlighted in various national discussions as a potential measure to support safety within the Night Time Economy. Should Government determine that CCTV is necessary to support safeguarding and public confidence nationally, implementation through legislation would ensure consistency across boundaries and prevent the inequity that arises when individual authorities introduce different requirements.

**7. Priorities Around Violence Against Women and Girls (VAWG)** - Taxi and PHV licensing is a critical safeguarding tool in Coventry's strategy to tackle Violence Against Women and Girls. Reduced local oversight or inconsistent standards across LTAs could weaken protective measures and create gaps in safeguarding. CCTV is one of several measures that may contribute to strengthening protections for women and girls, particularly where journeys take place late at night or across local authority borders.

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If Government concludes that CCTV is an appropriate safeguarding measure, a national approach would provide clarity and consistency for drivers, operators and passengers, ensuring expectations are fair and aligned.

**8. Wheelchair Accessible Vehicles and Accessibility** - Coventry continues to address unmet demand for wheelchair accessible vehicles (WAVs). Licensing authorities can respond quickly through targeted incentives, specific conditions, and local enforcement. A centralised LTA approach risks slower responses and inconsistent action across regions, potentially widening accessibility gaps.

**9. Impact on Existing Licensing Staff and Transition Risks** - Specialist licensing officers have significant experience and local knowledge. The proposed transfer raises serious concerns about staff retention, TUPE arrangements, potential loss of expertise, and disruption to live applications and compliance work. Transition risks could lead to reduced service quality, processing delays and loss of trust from drivers and the public.

**10. Overall Position and Recommendations** - Coventry City Council does not support the blanket transfer of taxi and PHV licensing responsibilities to LTAs.

### **We recommend:**

- Retaining the current licensing authority structure
- Government must introduce comprehensive legislative reform to establish mandatory national safeguarding standards, including mandatory CCTV.
- Addressing out-of-area working through legislative reform, not structural re-organisation. The current legislation governing taxi and private hire licensing is not fit for purpose, is out of date and requires updating as it doesn't fit with modern practices.
- Strengthening cross-boundary collaboration rather than removing local accountability
- Engaging directly with councils, drivers, and stakeholders before determining any further reforms
- Request that the Government publish clear timelines for next steps once this Consultation questions on economic benefits and costs

**Question 14: Are there wider economic benefits in making all local transport authorities responsible for taxi and private hire vehicle licensing? If so, what are they?**

N/A

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***Question 15: Are there other costs in making all local transport authorities responsible for taxi and private hire vehicle licensing? If so, what are they?***

*N/A*