



Licensing Committee

Mon 6 Oct
2025
7.00 pm

Oakenshaw Community
Centre, Castleditch
Lane, B98 7YB

 **Redditch**
Borough Council
Working together for our communities

If you have any queries on this Agenda please contact

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GUIDANCE ON FACE-TO-FACE MEETINGS

Please note that this is a public meeting and is open to the public to attend.

If you have any questions regarding the agenda or attached papers, please do not hesitate to contact the officer named above.

PUBLIC SPEAKING

The total maximum time permitted for public speaking is 15 minutes and the time limit for individual speakers is 3 minutes.

Only those members of the public who have registered to speak in advance of the meeting will be permitted to do so.

To register to speak you must contact Democratic Services by phone on 01527 64252 ext 3304, or email gavin.day@bromsgroveandredditch.gov.uk before 12 noon on Thursday 2nd October 2025.

When registering to speak you must give your name and contact telephone number and indicate which agenda item you wish to speak about, and whether you are in support of or opposed to the officer recommendation.

Notes:

Although this is a public meeting, there are circumstances when Council might have to move into closed session to consider exempt or confidential information. For agenda items that are exempt, the public and press are excluded.

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7.00 pm

Oakenshaw Community Centre

Agenda

Membership:

Cllrs:

David Munro (Chair)
Sachin Mathur (Vice-Chair)
Juliet Barker Smith
Juma Begum
Brandon Clayton
Matthew Dormer

Andrew Fry
Sid Khan
Gary Slim
Jen Snape
Paul Wren

1. Apologies

2. Declarations of Interest

To invite Councillors to declare any Disclosable Pecuniary Interests and / or Other Disclosable Interests they may have in items on the agenda, and to confirm the nature of those interests.

3. Minutes (Pages 5 - 12)

4. Public Speaking

5. Compliance Testing for Hackney Carriage and Private Hire Vehicles - Viability of approving alternative testing stations

Report to follow.

6. Deregulation Act 2015 (Pages 13 - 22)

7. Work Programme (Pages 23 - 24)

8. Exclusion of the Public and Press

In the opinion of the Chief Executive, the meeting will not be, or is unlikely to be open to the Public at the time the following items of business are considered for the reasons stated. The Committee will be asked to pass the following resolution:

“that under S.100 I of the Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) Order 2006, the public be excluded from the meeting for the following item(s) of business on the grounds that it/they involve(s) the likely disclosure of exempt information as defined in the following paragraphs of Part 1 of Schedule 12 (A) of the said Act, as amended:

- **Paragraph 1 – Any Individuals**

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- **Paragraph 2 – Identity of Individuals**
- **Paragraph 3 – Financial or Business Affairs**
- **Paragraph 7 – The Prosecution of a Crime.”**

9. Officer Update(s) - Enforcement and Appeal Matters

(In view of the fact that information may be revealed in relation to individuals, the identities and financial or business affairs of those individuals and the prosecution of crimes, any reports will be confidential and circulated to Members and relevant Officers only.)

10. Urgent Business

To consider any Urgent Reports, details of which have been notified to the Assistant Director of Legal, Democratic and Procurement Services prior to the commencement of the meeting and which the Chair, by reason of special circumstances, considers to be of so urgent a nature that it cannot wait until the next meeting.



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MINUTES

Present:

Councillor David Munro (Chair), and Councillors Juliet Barker Smith, Juma Begum, Matthew Dormer (during Minute No's 57 to 60), Andrew Fry, Sid Khan, Gary Slim, Jen Snape, Craig Warhurst (substituting for Councillor Brandon Clayton) and Paul Wren

Officers:

Vanessa Brown and Kiran Lahel, Worcestershire Regulatory Services

Democratic Services Officer:

Pauline Ross

52. APOLOGIES

Apologies for absence were received from Councillors Sachin Mathur and Brandon Clayton, with Councillor Craig Warhurst in attendance as the substitute Member for Councillor Brandon Clayton.

53. DECLARATIONS OF INTEREST

There were no declarations of interest.

54. MINUTES

The minutes of the Licensing Committee meeting of 15th May 2025 were presented to Members.

Councillor Andrew Fry apologised for not submitting his apologies for this meeting.

RESOLVED that

The minutes of the Licensing Committee meeting held on 15th

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Chair

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May 2025 be approved as true and accurate record and signed by the Chair.

55. PUBLIC SPEAKING

There were no public speakers.

56. REVIEW OF MANDATING CCTV IN TAXIS.

The Licensing and Support Services Manager, Worcestershire Regulatory Services (WRS), presented the report to Members. The purpose of the report was to review the mandating of CCTV in taxis.

Members were informed that on 1st September 2022 Redditch Borough Council had introduced The Statutory taxi and private hire vehicle standards ('The Standards'). The Standards were published in July 2020 and included the use of CCTV as an area for Local Authority discussion.

The Council already had a voluntary CCTV option in place for all vehicle owners. On introduction of the policy in 2022 Officers had advised that they would monitor intelligence and would engage with partners to ensure that the policy remained in line with what the data was showing us.

The Licensing and Support Services Manager, WRS, highlighted to Members, that as detailed in the report, currently only a small number of licensing authorities (7%) had made it a legal requirement for all taxi and private hire vehicles to be fitted with mandatory CCTV systems. These authorities had been able to demonstrate through evidence and intelligence that such a policy was necessary. More recently these had included Barnsley Council, Portsmouth and Southampton, Cambridge City and South Cambridgeshire District Council. Swindon Borough Council did mandate CCTV but had then reversed the decision due to a number of challenges.

The Council's current policy which came into effect on 1st September 2022 was consulted upon and stated that the Council recognised that CCTV systems could act as an additional safeguard, providing protection, confidence and reassurance to the public, when travelling in a hackney carriage or private hire vehicle as well as to drivers, who could also be victims of violence and abuse.

Furthermore the current policy allowed the proprietor of any vehicle, which had been authorised to be used as a hackney carriage or private hire vehicle, to install CCTV cameras in their vehicle subject to the following requirements:-

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- No installation of a CCTV system shall take place within a licensed vehicle unless the proprietor of the vehicle has notified the Council in advance.
- All CCTV systems which are installed into licensed vehicles must be compliant with the requirements of the Data Protection Act 2018. The system must also be compliant with the Information Commissioner's requirements in respect of registering the system and the capturing, storing, retaining and using any recorded images.

Officers had assessed the complaints data received by WRS and the context of information received alongside the data from the current WRS Strategic assessment. On evaluation it was evident that the number of complaints received were more directed at driver behaviour or vehicle standards than they were connecting a driver to a serious offence or safeguarding issue such as assault, sexual assault, sexual harassment, or substance misuse.

Members were further informed that the safeguarding training for taxi drivers now included mitigating such situations and covered both drivers' personal safety and their safeguarding responsibilities.

Officers had a proactive working relationship with West Mercia Police, Community Safety, and WRS Officers were part of the Multi Agency Targeted Enforcement (MATE) network in all parts of the County. These multi-agency meetings addressed common problem issues and taxi matters were discussed regularly and intelligence analysts also examined their own data and complaints information, and currently there was no evidence that had been presented to Officers whereby a change in the Council's current CCTV position was necessary.

The Licensing and Support Services Manager, WRS, drew Members' attention to paragraph 3.21 (page 13 of the main agenda pack), which stated that:-

"It is important to note that if the Officers in partnership with external agencies felt there was a requirement for mandating CCTV in taxis they would bring the data and evidence to consider without delay to the Licensing Committee in order to proactively safeguard the travelling public."

Officers had determined that there was currently not a requirement or need for mandatory CCTV in taxis in the Borough. However, Members were reassured that Officers would continue to monitor and periodically review this.

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Members debated mandating CCTV, the expense to taxi drivers with installing a CCTV system in their vehicle and the number of licensed drivers in the Borough that had had a CCTV system installed. Members also commented that CCTV would also protect the drivers as well as their passengers.

The Licensing and Support Services Manager, WRS responded to questions raised during the debate and Members were informed that CCTV in taxis was not for driver safety it was predominantly for passenger safety. The costs to install such a system, which met all of the required industry standards was approximately £500 to £1,200.

WRS had not been advised that any taxis in the Borough had had CCTV installed in their vehicles. With regard to the fitting of a CCTV system being expensive, Members were informed that, any CCTV system fitted into a licensed vehicle would have to meet industry standards / requirements. Therefore, the Council, not WRS, would have to procure a suitable supplier who met all of these industry standards / regulations.

Members raised further questions on a CCTV system being used, but the driver turning off the system to commit misdemeanours.

The Licensing and Support Services Manager, WRS, reassured Members that should a CCTV system be installed, then the driver would be required to keep the CCTV on when carrying paying passengers.

Members stated that they were surprised that drivers did not want / have CCTV in their licensed vehicles to protect themselves.

The Licensing and Support Services Manager, WRS, reiterated that as stated earlier during the course of the meeting , that a new element was now included in the mandatory Safeguarding Training for taxi drivers, which included mitigating such situations and covered both drivers' personal safety and their safeguarding responsibilities. The feedback received from taxi drivers who had attended the Safeguarding Training, since this new element was included, had been very positive.

The Licensing and Support Services Manager, WRS, further suggested that WRS could look to do more communications on how safe it was to be a licensed driver and for passengers of taxis that were licensed by Redditch Borough Council.

Some Members further commented that people used Uber as they were a lot cheaper and younger passengers often felt safer as the

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vehicle information was provided to passengers and vehicles could be tracked on the Uber application.

The Council's Legal Advisor responded to a question on sharing CCTV footage, and in doing so informed Members that, the Council would be the Data Controller for such footage and would need to determine where that data was stored and who would be able to access CCTV footage. CCTV footage would not be made available to a licensed driver / passenger but would be made available to the Police, under the Council's data sharing protocol. CCTV systems were designed for safeguarding and there was strict governance / protocols and a high standard around the safe storage of CCTV data and the use and sharing of CCTV footage.

As highlighted by the Licensing and Support Services Manager, WRS, there was currently no evidence to mandate CCTV in taxis. Should future evidence show a need to mandate CCTV in taxis, the Council would need to ensure that as the Data Controller all regulations / protocols were met and followed to the high standards required. As the Data Controller there would be a cost implication for the Council.

If a licensed driver wanted to install and use CCTV in their vehicle they would have to notify the Council in order to ensure that they complied with the Council's current voluntary CCTV policy.

Some Members commented that the thought of CCTV in all taxis in the Borough was an excellent idea. However, with the cost of living crisis and being undercut by Uber, taxi drivers were struggling financially. So if there was currently no evidence to mandate CCTV in taxis, mandating it would not help the taxi trade. Having to purchase an expensive piece of kit would be difficult for the taxi trade.

Councillor A. Fry commented that he regularly used taxis and that his experience of using taxis and licensed drivers was excellent. The majority of taxi drivers wanted to provide a good service. The main thing was that WRS had highlighted that currently there was no evidence to mandate CCTV in taxis in the Borough, and that we were a long way off from mandating CCTV.

Members asked as to how confident Officers were that the feedback received from the taxi trade was a fair representation.

The Licensing and Support Services Manager, WRS, explained that a number of people were invited to the taxi forum; operators, licensed drivers, Councillors, and that that general consensus was that they did not want to take forward mandating CCTV due to the expensive cost.

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On being put to the vote, it was

RESOLVED that

the contents of the report be noted.

57. REVIEW OF DELEGATION OF HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLES OUTSIDE OF POLICY DUE TO AGE.

The Licensing and Support Services Manager, Worcestershire Regulatory Services (WRS), presented the report to Members.

The purpose of the report was to update Committee Members on the delegated authority to WRS Officers, to determine applications for licenses to use vehicles as hackney carriage or private hire vehicles where the vehicles did not meet the Council's required criteria in respect of the age of the vehicle.

It was noted that there was a typographical error in paragraph 3.9 (page 51 of the main agenda report). The date should read 1st August 2024 and not 1st August 2025.

Members were reminded that on 29th March 2023, following consultation, that Licensing Committee Members had directed Officers to proceed with the actions required to delegate authority to determine applications for licences to use vehicles as hackney carriages or private hire vehicles where the vehicles did not meet the Council's required criteria in respect of the age of the vehicle.

A considerable number of such applications were made each year, and it was recognised that arranging and attending Licensing Sub-Committee Hearings to determine such applications, was time consuming and resource intensive for all involved from arranging the Sub-Committee Hearings to collating information and getting Members of the Licensing Committee together to determine such applications.

The proposed delegation to Officers was considered by the Constitutional Review Working Party (CRWP) and on 7th March 2024 the CRWP made a recommendation to Council that, for a trial 12 month period, that Officers be given delegated authority to determine hackney carriage and private hire vehicle applications that fell outside of the Council's age criteria policy.

On 20th May 2024 Council resolved that the delegation be given to Officers for a 12 month period as recommended by the CRWP. The trial period was due to end on 31st July 2025.

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As highlighted in the preamble above, Council approved a 12 month trial period rather than a permanent delegation to Officers.

This report sought to update Committee Members on the outcome of the 12 month trial period.

Officers had been determining such applications since 1st August 2024 using a robust set of procedures that provided a clear audit trail on the decision-making process.

32 vehicles had been inspected, which was not dissimilar in numbers to those considered by Licensing Sub-Committee Members in the previous year (39) from June 2023 to July 2024.

During the 12 month trial period, 4 vehicles were refused and 28 were granted.

The process had worked well and had ensured well-reasoned and detailed decisions were reached using professional and transparent methods. Vehicles were inspected by a Licensing Officer with a qualified mechanic at the Council's dedicated testing facility. Officers had implemented a very strict criteria and vehicles could be seen at the Council's testing facility within a short period of time.

Officers had also noted an increase in vehicle standards throughout the duration of the 12 month trial period and overall feedback from the applicants appeared to be positive. The flexibility that this process offered enabled applicants to be dealt with more efficiently and quickly and at a time that was convenient to the applicant.

Officers considered that the 12 month trial period had been successful and would invite Licensing Committee Members to consider directing Officers to carry out a consultation to establish if the relevant stakeholders agreed with the Officers' assessment of this delegated process and whether it could be made as a permanent delegation to Officers.

Councillor S. Khan commented that he found it very interesting to note that Officers could see vehicles in a short period of time, as he had received complaints from taxi drivers who had found it difficult to get an appointment. Furthermore, could Officers evidence the increase in vehicle standards? Also, what did other authorities in Worcestershire do for age criteria vehicles?

In response the Licensing and Support Services Manager, WRS, explained that the time was quicker for applicants to be given an appointment at the Council's testing facility than the time taken to arrange a Sub-Committee Hearing. Should the delegation of Officers end, then Officers would be looking to arrange two

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Licensing Sub-Committee Hearings in August 2025 in order to deal with the number of age criteria applications received.

There were two full time mechanics at the Council's testing facility. Officers had fed back that vehicles being presented for test were much cleaner and that drivers appeared to be taking more pride in their vehicles.

With regards to other local authorities and age criteria vehicles, Worcester City Council, Wyre Forest District Council and Malvern Hills District Council had all delegated authority for such applications to be determined by WRS Licensing Officers.

Following the lengthy debate and questions raised, on being put to the vote, it was

RESOLVED that

- a) a six-week consultation period be carried out with relevant stakeholders to consider a permanent delegation to Officers to determine hackney carriage and private hire vehicle applications where the vehicle did not meet the council's policy in respect of the age of the vehicle; and
- b) the results of the 6 week consultation be reported back to the next meeting of the Licensing Committee.

58. WORK PROGRAMME

No amendments or additions to the work programme were raised.

RESOLVED that the Licensing Committee Work Programme 2025/2026, be noted.

59. OFFICER UPDATE(S) - ENFORCEMENT AND APPEAL MATTERS

There was no Enforcement or Appeals Matters on this occasion.

60. URGENT BUSINESS

There was no Urgent Business on this occasion.

REDDITCH DISTRICT COUNCIL**Licensing Committee****6 October 2025****DEREGULATION ACT 2015 AND ITS EFFECT ON TAXI AND PRIVATE HIRE LICENSING**

Relevant Portfolio Holder	Councillor Monica Stringfellow
Portfolio Holder Consulted	No
Relevant Assistant Director	Simon Wilkes – Director of Worcestershire Regulatory Services
Report Author	Job Title: Licensing and Support Services Manager Contact email: Kiran.lahel@worcsregservices.gov.uk Contact Tel: 01562 738067
Wards Affected	All
Ward Councillor(s) consulted	No
Relevant Council Priority	Keep my place safe and looking good
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	
This report contains exempt information as defined in Paragraph(s) of Part I of Schedule 12A to the Local Government Act 1972, as amended	

1. RECOMMENDATIONS**1.1 Note the contents of the report and the implications of the Deregulation Act 2015 on Taxi & Private Hire Licensing.****2. BACKGROUND**

- 2.1 As early as June 2018 Taxi Representatives of the Taxi Association raised concerns regarding cross boarder issues within the Redditch area. This was again formerly raised in November 2023 when hackney carriage trade members expressed concerns regarding the rising number of Uber vehicles which were entering and working in and around the district. Questions are continuously raised in relation to the regulations which were implemented that allow Uber to operate in other local authority areas, under its current business model.
- 2.2 As the majority of these Uber private hire vehicles are licensed by Wolverhampton City Council (WCC) Licensing Officers wrote to WCC asking for support and have since carried out joint enforcement activity in Redditch with WCC officers. The enforcement activity was to ensure that any vehicles licensed by WCC entering and working in the district, were meeting the requirements set out in this report and working within the regulations.

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- 2.3 Members more recently have requested a reminder of the legislation that was introduced that enable Uber's operating model.

3. KEY ISSUES**Taxi legislation**

- 3.1 The relevant legislation governing hackney carriage and private hire licensing is highlighted at 3.2 to 3.5 of this report. At present there are no immediate plans by government to either review, replace or introduce updated legalisation to govern hackney carriages or private hire vehicles.
- 3.2 The main pieces of legislation which govern taxi and private hire licensing are:
- The Town Police Clauses Act 1847 (TPCA47)
 - The Local Government (Miscellaneous Provisions) Act 1976 (LGMPA76)
- 3.3 The 1847 Act provides duties relating to hackney carriage vehicle's which have transferred to district councils over the years and the adoptive provisions of the 1976 Act relating to both hackney carriage and private hire trades that have been taken up by virtually all local authorities in order to ensure that the public have reasonable access to taxi and private hire vehicle services, as they play an important part in local transport provision.
- 3.4 The main aim of licensing taxi and private hire vehicles and drivers is to "Protect the Public" by ensuring that any drivers licensed are "Fit and Proper" and that vehicles are "Suitable, Safe and Comfortable". The legislation provides a broad framework for the licensing of drivers, vehicles and operators but the detail of how this is done, including standards and conditions, is the responsibility of individual Local Authorities through their adopted policies. It is widely cited that this legislation is out of date and due for reform. Limited reform has already taken place in part by way of the Deregulation Act 2015.
- 3.5 Section 46 of the 1976 Act requires that any private hire operators, vehicles and drivers operating in a controlled district must be licensed and hold all three licences with the same local authority. However, this does not mean they are restricted to physically operating in only that local authority.
- 3.6 The 1st October 2015 saw the implementation of the Deregulation Act 2015. Section 11 of the Act inserted two new sections (55A and 55B) into the Local Government (Miscellaneous Provisions) Act 1976 in relation to the sub-contracting of bookings from one private hire vehicle operator to another. This was a major amendment to the 1976 Act affecting taxi and

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private hire drivers and operators as it permitted the sub-contracting of bookings from one private hire vehicle operator to another who can be licensed by a different local authority. The Act therefore allowed taxi and private hire companies to change the way in which they operate.

- 3.7 It has always been the case that a taxi or private hire vehicle had the “right to roam” meaning that they are not limited or restricted to simply working within their controlled district, this meant that a driver and vehicle licensed by a Local Authority could work anywhere in the country on a pre-booked basis. It has also always been the case that a resident of one area could make a booking with a private hire operator licensed in a totally different area and that an operator could lawfully accept the job and dispatch a driver and vehicle licensed by their local authority into the local authority area where the passenger wanted to be picked up.
- 3.8 The Deregulation Act 2015 however, further enabled a private hire operator licensed by one Local Authority to accept a booking and then sub-contract it to another operator licensed by a different Local Authority (previously they could only sub-contract to an operator licensed by the same Council as them).
- 3.9 Whilst on the face of it this did not appear radical, it meant that private hire operators throughout the UK could set up satellite offices in a neighbouring area and operate under a licence issued by that local authority, therefore they could essentially sub-contract work to themselves and then dispatch both a vehicle and driver licensed by that local authority to undertake bookings coming into a central location.
- 3.10 Since its implementation in 2015, many private hire operators have taken advantage of the freedoms which the Deregulation Act 2015 introduced. Companies have set up satellite offices in other cities and neighbouring districts and are now sub-contracting private hire bookings to themselves and dispatching a vehicle and driver licensed by that local authority.
- 3.11 The Government’s intention when implementing the Deregulation Act 2015 was to encourage free trade across district council borders, which inevitably has led to the current situation within UK. The Government does not see this as problematic, as it has achieved what it intended to with the introduction of the Act, so it is not a loophole as many people seem to state, hence within Redditch Borough Council it is now commonplace to see vehicles and drivers licensed by other Local Authorities undertaking pre-booked journeys.
- 3.12 Various elements of the taxi trade have expressed concerns at the risk that unsafe vehicles or unfit persons may be trading in Redditch, because they are not licensed locally. Whilst this is an understandable perception as there can be significantly different provisions between local authorities

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for licences, for vehicles in particular, and members can make different decisions in relation to whether an applicant's previous convictions make them a fit and proper person to be a driver. However, as yet the WRS licensing team has yet to identify any significant threat to the local public from these changes.

- 3.13 The National Taxi Standards introduced in September 2022 created a National Register of Taxi Licence Revocations and Refusals (NR3). NR3 contains information relating to any refusal to grant, or revocation of a hackney carriage/private hire driver licence. This information is important in the context of a subsequent application to another Authority for a drivers' licence by a person who has had their licence refused or revoked in the past. All of the licensing authorities within Worcestershire, including Redditch have signed up to and are utilising NR3.

Plying for hire

- 3.14 "Plying for hire" refers to the act of a vehicle stopping to pick up a passenger for hire and reward when that passenger hasn't pre-booked the journey through a licensed private hire operator.
- 3.15 Concerns have been raised by Redditch's taxi drivers that vehicles and drivers licensed by other local authorities are plying for hire in Redditch. As explained earlier in this report, providing that a private hire vehicle and driver (and operator) are properly licensed by a Local Authority they can wait in any location for a booking to be dispatched to them quite legally. A recent legal case taken by Reading Borough Council against Uber drivers licensed by TfL who were waiting in Reading for bookings has confirmed that, as long as they are not actively "plying for hire," a private hire or hackney carriage vehicle can wait anywhere for a booking, providing that they are parked lawfully.
- 3.16 Officer interaction with private hire drivers and vehicles in the Redditch area, indicate that the drivers licensed by other authorities do appear to be simply waiting for passenger bookings to be allocated by their respective companies. However, issues have arisen when these vehicles have allegedly parked or waited near or even on taxi ranks. Officers are monitoring this matter and following up where necessary any reports of persistent or repeat offending with the respective local authorities and licence holders.

Uber and App based private hire booking systems

- 3.17 Uber Technologies Inc. is an American international transportation network company with headquarters based in San Francisco, California. The company develops, markets and operates the Uber mobile app, which allows consumers with smartphones to submit a trip request which is then routed to Uber drivers who use their own cars to complete the

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booking. Essentially it is an online booking service for private hire vehicles.

- 3.18 Using GPS, they detect your location and connect you with the nearest driver. You can also request a specific type of car if you prefer - such as a luxury ride or a straightforward private hire vehicle. The app texts you when the driver arrives, and you can check the identity of the driver against who actually shows up.
- 3.19 By May 2015, the service was believed to be available in 58 countries and 300 cities worldwide.
- 3.20 It should be noted that Uber is not the only smartphone app to have been developed to help connect passengers and taxi / private hire service providers. Other examples of companies operating in the UK include Bolt, Veezu, Addison Lee, Bounce, Kabbee and Gett. There are also app-based companies set up in Worcestershire.
- 3.21 The activities of Uber have sometimes provoked controversy in some countries with questions raised about the legalities of their operating model. However, within the UK it should be stressed that Uber appears to be operating entirely lawfully within the private hire licensing regimes provided for in London by the Private Hire Vehicles (London) Act 1998 and in the rest of England and Wales under the Local Government (Miscellaneous Provisions) Act 1976.
- 3.22 The Uber website at www.uber.com/legal/gbr/terms states that Uber is the holder of a Private Hire Vehicle operator licence in each of the jurisdictions in which it operates, and accepts bookings at its registered address and/or operations centre, via private hire bookings made by the Uber App.
- 3.23 Over the years Uber have expanded its operation in England and Wales beyond London and the company now has licences to operate in Manchester, Leeds, Birmingham, Bristol, Newcastle, Sheffield, Wolverhampton and many other local authority areas. The company's expansion has been rapid and indications are that it will continue to grow and will seek to expand its services into other towns and cities throughout England and Wales.
- 3.24 As with all licensed private hire operators, Uber can dispatch vehicles and drivers to carry out work anywhere in the country, providing that the vehicle and driver that is allocated the booking is also licensed with the local authority that issued the relevant private hire operator licence.
- 3.25 Due to the relaxation on sub-contracting rules for private hire vehicles that came into effect on 1st October 2015, Uber can also sub-contract

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bookings to other licensed private hire operators in other local authority areas so that the operator can dispatch an appropriately licensed vehicle and driver.

- 3.26 As bookings are made via the smartphone app, it is difficult to see how it can be proven precisely in which local authority areas Uber is “making provision for the invitation and acceptance of bookings for private hire vehicles” and therefore where it needs to obtain licences from, however enquiries with Birmingham City Council and Wolverhampton City Council have revealed that Uber has an operating base in both areas that is used in connection with their private hire operator’s licence there.
- 3.27 The emergence of Uber and other smartphone taxi booking apps has highlighted the urgent need for reform of the outdated taxi and private hire legislation that struggles to cope with regulating this area of licensing due to modern technological advances like smartphones and the internet, which were not around in 1976.
- 3.28 Uber vehicles and drivers, can now regularly be found working in and around Worcestershire, including Redditch. Officers have and will continue to engage with Wolverhampton City Council if any issues are identified by intelligence or enforcement operations.

Geofencing

- 3.29 Geofencing is a virtual boundary, set around a specific area such as a city, airport, or a particular area and is used by app based private hire booking companies such as Uber. When a private hire vehicle enters or exits this defined area, the system detects it using GPS or other location services on the driver's device. Once the vehicle crosses the boundary, certain actions can be triggered, such as sending notifications to the driver, logging the entry/exit time, or updating the status of the vehicle.
- 3.30 For app based private hire booking companies this can help their dispatchers know when vehicles are available in a specific area, allowing for quicker allocation of a booking. It also ensures that vehicles are operating within permitted areas, helping to enforce local regulations and safety standards. For customers it provides real-time updates on the proximity of their booked vehicle, which has been proven to improve service reliability and satisfaction.
- 3.31 At a meeting with Taxi representatives the trade representatives put forward a request for the council to contact Uber, asking them to limit their operation in the Redditch area as the business competition is affecting Redditch’s hackney carriage drivers’ income. Officers have recently made contact with representatives of Uber, who state that they have no intention of limiting their operations in any UK’s districts.

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3.32 There is no legal framework to restrict or limit private hire operations in the UK and one UK local authority which attempted to restrict the operation of private hire vehicles within their district, found themselves the subject of a Judicial Review in the high Court. The outcome of the Judicial review resulted in the Council having to remove any restrictions which they had put in place.

3.33 Officers will continue to monitor the activity of these vehicles and drivers, to ensure that they are operating lawfully and in accordance with current taxi law and regulations.

4. FINANCIAL IMPLICATIONS

4.1 The trade has indicated that the introduction of deregulation and Uber have had a negative impact on the trade and income.

5. LEGAL IMPLICATIONS

5.1 These are outlined in the main body of the report and outline the impact of the Deregulation Act 2015.

6. OTHER - IMPLICATIONS**Local Government Reorganisation**

6.1 The Government White paper have acknowledged that Taxis and private hire vehicles are an important part the transport networks and some of the most vulnerable groups in our society rely on them. They recognise the concerns about out-of-area working by private hire vehicles and are exploring how best to address these concerns. As part of this, they will be in due course consulting on whether to make all Local Transport Authorities (including Strategic Authorities) responsible for taxi and private hire vehicle licensing.

Relevant Council Priority

6.2 The Council's priority is to keep the residents of Redditch District Safe and any policy discussion regarding Taxi's must align with the Council's key priorities.

Climate Change Implications

6.3 No Implications

7. RISK MANAGEMENT

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- 7.1 Licensing officers acknowledge the impact that the Deregulation Act has had on the trade and the report outlines the proactive work licensing officers will continue to do with the intelligence team and using NR3 to try and limit the risk to the travelling public in Redditch.

8. APPENDICES and BACKGROUND PAPERS

None

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Please record the name of the relevant Portfolio Holder who has signed off the report here.	Please give the date they signed off the report here.
Lead Director / Assistant Director	Please record the name of the relevant lead Director / Assistant Director who has signed off the report here.	Please give the date they signed off the report here.
Financial Services	Please record the name of the relevant Officer in Financial Services who has signed off the report here.	Please give the date they signed off the report here.
Legal Services	Please record the name of the relevant Officer in Legal Services who has signed off the report here.	Please give the date they signed off the report here.
Policy Team (if equalities implications apply)	If applicable, please record the name of the relevant Officer in the Policy team who has signed off the report here.	If applicable, please give the date they signed off the report here.

Licensing Committee

6 October 2025

Climate Change Team (if climate change implications apply)	If applicable, please record the name of the relevant Officer in the Climate Change team who has signed off the report here.	If applicable, please give the date they signed off the report here.
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LICENSING COMMITTEE**6th October 2025****LICENSING COMMITTEE WORK PROGRAMME 2025/26****6th October 2025**

- Compliance Testing for Hackney Carriage and Private Hire Vehicles – Viability of approving alternative testing stations
- Deregulation Act 2015

8th December 2025

- Delegation of Hackney Carriage and Private Hire Vehicles outside of policy due to Age. Responses received to the 6 week consultation

8th March 2026

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