

*PART A

Report to: Licensing Committee
Date of meeting: 19 March 2012
Report of: Head of Environmental Services
Title: Hackney Carriage Vehicle Policy Review

1.0 **SUMMARY**

- 1.1 The Council is the licensing authority for hackney carriage vehicles within the Borough. Since 2005, it has not limited the number of licences that it grants, despite having a legal power to do so. A number of factors, including the recession, led the Committee to monitor the number of vehicle licences during 2010 and 2011. In 2011 it asked officers to conduct a qualitative and quantitative review of the current policy.
- 1.2 Officers commissioned an independent expert to carry out the review, who has proposed four policy options for consideration. The Licensing Committee is asked to consider the findings of the report and the proposals for future control of the trade.

2.0 **RECOMMENDATIONS**

- 2.1 That the Licensing Committee endorse the CTS report into taxi demand services.
- 2.2 That the Licensing Committee
- (i) immediately re-applies a limit on the number of hackney carriage vehicle licences it will issue equivalent to the number of licences in force on 15 March 2012,
 - (ii) implements an Action Plan to improve the quality of the taxi trade service provision. NB: A second report is being provided to the Committee with a proposed action plan should this recommendation be endorsed.
 - (iii) re-assesses that policy starting spring 2015 unless legislative changes make that unnecessary, and
 - (iv) recommends that the Cabinet imposes an additional fee of not less than £16.67 per hackney carriage vehicle licence per financial year for the next three years, such income to be paid as contribution towards the costs of future unmet demand surveys
- 2.3 That the Head of Environmental Services in consultation with the Chair of the Licensing Committee considers any applications for a new hackney carriage vehicle licence that appears to officers on its merits to be an exception to the policy of not granting any new licences.

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Report approved by: Alan Gough, Head of Environmental Services.

3.0 DETAILED PROPOSAL

- 3.1 The Council is the licensing authority for hackney carriages within the Borough. Under section 16 of the Transport Act 1985 there is a power to limit the number of hackney carriage vehicles (HCVs) where it appears there is no significant unmet demand for such licences. Significant unmet demand is typically defined as when passengers have to wait for hackney carriages at a rank for more than 10 minutes.
- 3.2 The effect of section 16 was approved by the Court of Appeal in these terms:
- (a) before a local authority can refuse an application for a vehicle licence in order to limit the number of licensed taxis, they must be satisfied that there is no significant demand for the services of taxis, within the area to which the licence would apply, which is unmet;
 - (b) if the local authority are thus satisfied, a *discretion*, as opposed to an obligation, arises to refuse the grant of a licence; but
 - (c) if the local authority are not so satisfied, they cannot refuse to grant a licence for the purpose of limiting the number of licensed taxis and are thus obliged to grant it.¹
- 3.3 At its meeting on 29 June 2011, the Committee asked officers to conduct a qualitative and quantitative review of existing policy.² Officers commissioned an independent consultant, CTS Traffic + Transportation, to carry out this work between August and November 2011 after obtaining three quotes for the study. CTS were chosen because, amongst other factors, of its principal consultant's familiarity with Watford, having conducted previous studies in 2001 and 2006.
- 3.4 The consultant's report has previously been circulated to Members, and is also available to download at <http://www.watford.gov.uk/ccm/content/ehl/licensing/news-for-licensed-drivers.en>. CTS will present a verbal report to the meeting of the findings identified from covert observations of taxi ranks and consultations with key stakeholders including hackney carriage drivers. Officers fully accept the report's findings.
- 3.5 The key conclusions on page v of the CTS report are:
- (a) there is no evidence of any significant unmet demand
 - (b) there appears to be a large over-supply of hackney carriage vehicles
 - (c) there is demand for formal ranks in the High Street
 - (d) there is an urgent need to resolve over-ranking issues in High Street and around Watford Junction station
 - (e) recent trade requests for policy changes by the Council have encouraged increased vehicle numbers while passenger demand is reducing
 - (f) passenger service has reduced while drivers focus on trying to make a living
 - (g) public and corporate support for the licensed vehicle service is being lost
 - (h) there appears to be around a third more vehicles than are actually required

¹ *R (on the application of Maud) v Castle Point Borough Council* [2002] EWCA Civ 1526.

² The report to the Licensing Committee of 29 June 2011 sets out in detail the reasons for the policy review.

3.6 The present delimitation policy was introduced in November 2006, when several factors influenced the Council to change its then-policy of managed growth of taxi numbers. These included the conclusion of the dispute over the Watford Junction rank, (then operated by Silverlink and now by London Midland), and the lodging of 76 crown court appeals against the Council which it was unable to defend in the absence of a current significant unmet demand survey. Many of the subsequent officer recommendations – such as changes to the knowledge tests, vehicle age limits, fare tariffs – have arisen through engagement with drivers and their representatives in an attempt to stimulate trade as a result of the recession, which was not a factor in 2005. As the CTS survey shows, this has not worked because the recession has created deep and prolonged problems that just could not have been foreseen at that time. The proposed limit and action plan discussed in this report are designed to support the trade by preventing further competition, but primarily are to ensure entry requirements and ongoing trading requirements result in improvements in standards and quality. This will provide an effective and quality contribution to public transport and support the town's economic growth as a whole.

3.7 Members will be aware that there are no powers to limit the number of private hire vehicle, or of any driver, licences.

3.8 **OPTIONS**

At page 59 the consultant's report identifies four alternative policy interventions which are set out below.

3.9 (1) Re-affirm the current policies and make no other changes

This recommendation is based on the view that the number of hackney carriage vehicle licences is declining, as shown in the table at page 9 of the report. It would appear from the evidence of the last few years that market forces have not had a significant impact on reducing the number of vehicle licences in the face of increased competition. On the one hand this option would not appear to be sustainable for the short- to medium-term benefit of either the hackney carriage or private hire trade, although it does allow people to freely enter the hackney carriage trade to either supplement their existing income or who might not have other employment.

3.10 (2) Attempt to overcome the impact of the current high excess of hackney carriages by other amendments to licensing policy whilst retaining the freedom of others to obtain a hackney carriage vehicle licence

This option would look at improving standards by tougher regulation, which by implication would slow down the rate of new entrants who would have to jump over a higher bar before being allowed entry to the taxi workplace. However, this would not be capping the number of vehicles and the consultant's report argues this would be untenable as more vehicles would dilute and stifle any increased regulatory burden.

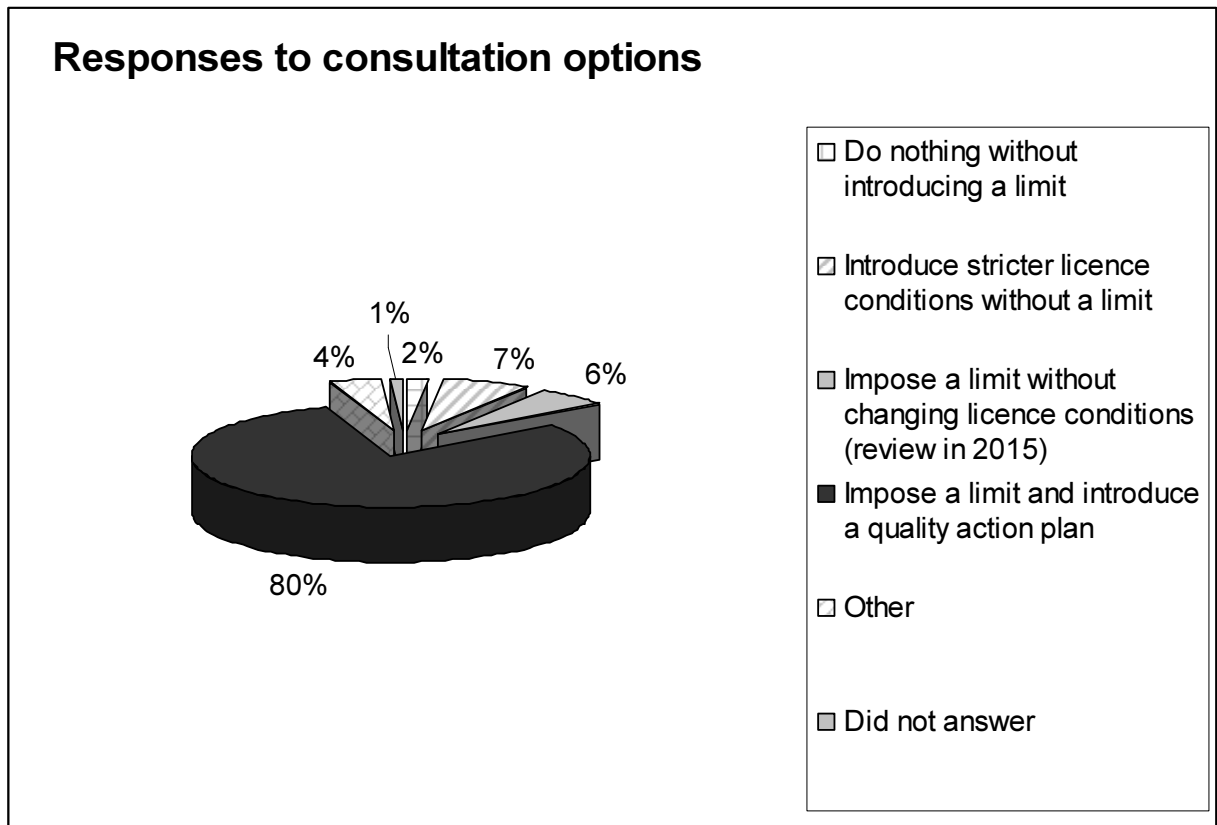
3.11 (3) Re-apply a limit on the number of hackney carriages (and review this in a maximum of three years time)

This is a relatively blunt instrument, which would not enhance the gaps in standards or service which the report has identified, particularly from the public attitude survey. It is also unlikely to have any short-term effect without further regulatory intervention. In fact, it may have the opposite effect of a decline in standards as existing drivers would feel cushioned from more competition. There would be additional resource implications to the Council in commissioning further regular surveys of about £15,000 every three years, as well as the consequent officer time. The Council would also face the

possibility of individual applicants appealing to the Crown Court against decisions to refuse the grant of new licences unless it has up-to-date, credible survey evidence to support its policy.

- 3.12 (4) Re-apply a limit on the number of hackney carriages and take other appropriate actions and set this within an Action Plan with regular review against targets
This would have the effect of preventing further competition from entering the market. At the same time, phased regulatory interventions can be used to improve the quality of drivers and vehicles. By developing an agreed action plan (see below) with the trade, licence-holders will have a clear timetable of increased standards. The action plan is set out in a separate report for the Committee to consider. Those that do improve will do so in the knowledge that they will not be penalised by further competition. This option is recommended by officers although it still requires regular surveys to take place to justify retention of a limit.
- 3.13 Although options 3 and 4 suggest a limit should be imposed, the Committee will know that the Law Commission is proposing to publish a draft Taxi Bill in 2013, which if accepted by the Government may be passed by Parliament in late 2014 and implemented by 2015. One highly likely outcome from the Law Commission's work may be the abolition of the section 16 power to regulate hackney carriage numbers. For this reason, it is recommended that the policy is reviewed at that latter date. However, a restructure of the trade, painful though it may be, is as necessary as it has been for many other trades in the current economic climate to help it to a more productive future.
- 3.14 **LEGAL AND POLICY IMPLICATIONS IN IMPLEMENTING OPTION 4**
- 3.15 On receiving the CTS report, officers favoured response was option 4 for the reasons expressed above. In order to give the Committee the ability to consider all options and implement their chosen one without further delay a draft action plan was developed in consultation with the Watford Hackney Carriage Drivers' Association and placed on public consultation.
- 3.16 Public consultation
A number of stakeholders, including consumers and over 170 HCV proprietors, have been consulted on the issue of unmet demand as part of the CTS study (see pages 25 and 41). Very few of them presented arguments as to why a limit should not be imposed or the status quo retained.
- 3.17 Officers publicised the four policy options and action plan in the following ways:
- (1) in a newsletter sent to all licensed drivers and private hire operators in January 2012
 - (2) at a public consultation event at West Herts Sports Club on 7 February 2012 attended by approximately 30 drivers
 - (3) a press release, resulting in a story in the Watford Observer on 14 February 2012
 - (4) a display board in the Customer Service Centre for three weeks from 8 February 2012
 - (5) a press release on the Council's website on 8 February 2012 and
 - (6) a reminder email sent to the Watford Hackney Carriage Drivers Association, Watford Private Hire Drivers Association, and private hire driver operators on 23 February 2012.

3.18 Respondents were invited to either send in written comments or to complete an on-line survey at <http://tinyurl.com/2012-taxi-survey>. Written comments were received from 67 drivers, and 45 respondents replied using the on-line survey. The chart below shows that 79.64% supported the option of stopping the number of vehicle licences from increasing and introducing an action plan. Just under 9% of respondents did not support this. The next most popular option, to introduce stricter licence conditions without introducing a limit, was supported by 7.07%. Respondents' reasons from the online survey for choosing their preferred option are set out, unedited, at appendix 1. A copy of the paper responses from the drivers are available from Democratic Services for Members to read.



3.19 Nearly 65% of respondents (73 out of 113) hold drivers' licences from the council and 34% (39 people) do not. The majority of respondents provided a local postcode.

3.20 Waiting list and refusals

If a policy limiting further licences is in force, officers will refuse those applications other than those which appear to be a genuine exception (see para 3.30 below). Officers will maintain a list of people interested in obtaining licences in future, but will not accept licence applications to put on a waiting list as an unreasonable delay in making a decision on that basis amounts to a refusal and would allow the applicant the right of appeal to the Crown Court.³ However, if in future a short delay is necessary to conduct a further unmet demand survey to assess the impact of a licence application, this will not necessarily amount to a refusal.⁴

³ *Kelly and Smith v Wirral Metropolitan Borough Council* (1996) JP Rep 1047, CA.

⁴ *R v Leeds City Council, ex p Mellor* [1993] COD 352.

3.21 Cost of future surveys

Section 70(1)(c) of the Local Government (Miscellaneous Provisions) Act 1976 allows the recovery of any “reasonable administrative or other costs in connection with...the control and supervision of hackney carriages and private hire vehicles”. There is no case law that suggests the costs of an unmet demand survey could not be recouped from the private hire vehicle trade too, although it may be argued to be unfair and unreasonable to expect them to contribute to an exercise from which they do not benefit. Indeed, in *Taxis: Licensing Law and Practice*⁵ it is suggested that whilst other costs may be recouped from both sides of the trade, only the hackney carriage trade should contribute to the costs of a survey. The Department for Transport Best Practise Guide recommends that surveys can be paid from general licensing revenue. The CTS survey was paid for from the LAGBI Fund.

3.22 Impact on private hire trade and on other councils

Imposition of a limit on HCVLs may lead to a risk of an increase in private hire vehicle licences instead. The Council is unable to restrict the limit on private hire vehicles, although quality controls can slow the pace. Given the over-supply in the hackney carriage market (which can also operate as private hire vehicles), officers believe this to be a low risk although private hire operators have been saying for some time that they have a lack of private hire drivers and would welcome anything that would enable them to recruit more. There is also the likelihood that applicants unable to obtain licences in Watford may approach neighbouring licensing authorities and predominately operate within the Borough, although they would not be able to lawfully ply for hire in public places.

3.23 **GOVERNMENT GUIDANCE**

3.24 Regulators’ Compliance Code

The Code was introduced in 2008 under the Legislative and Regulatory Reform Act 2006 and requires regulators to have regard to it when “determining any general policy of principles”, including HCV licensing.

3.25 The duty means regulators must take the Code into account and give it due weight when developing policies or principles or in setting standards or giving guidance. The Code need not be taken into account if the regulator properly concludes that the provision is not relevant or outweighed by another relevant provision which is reasoned and based on material evidence.

3.26 The relevant extract from the Code for these purposes is reproduced below with officer’s comments:⁶

3. Economic progress

Regulators should recognise that a key element of their activity will be to allow, or even encourage, economic progress and only to intervene when there is a clear case for protection.

Good regulation and its enforcement act as an enabler to economic activity. However, regulation that imposes unnecessary burdens can stifle enterprise and undermine economic progress. To allow or encourage economic progress, regulators must have regard to the following provisions when determining general

⁵ James Button, 2nd edn, 2004 (LexisNexis UK), para 8.213

⁶ Other Code provisions relate to issues such as providing advice for businesses; only conducting risk-based inspections; not burdening businesses with undue information requirements.

policies or principles or when setting standards or giving general guidance about the exercise of regulatory functions.

3.1 Regulators should consider the impact that their regulatory interventions may have on economic progress, including through consideration of the costs, effectiveness and perceptions of fairness of regulation. They should only adopt a particular approach if the benefits justify the costs and it entails the minimum burden compatible with achieving their objectives.

Comment: Introducing a limitation policy will hinder economic progress in terms of preventing new entrants to the market. It may increase the costs for new entrants, who will only be able to buy their way in through purchasing existing licences at a premium, albeit at a significantly lower market rate than when the market was last limited prior to 2006. It will not be perceived as being fair, particularly by those who want to enter the market and have no prior connection to the local trade. However, if adopted, the council's policy will clearly allow for exceptions to the policy to be considered. The benefits (of improving standards, reducing competition, reducing pressure on the ranks, reformatting the trade and increasing drivers' incomes over time) justifies the costs (of preventing others from freely entering the market) without imposing significant additional burdens to the existing businesses.

3.2 Regulators should keep under review their regulatory activities and interventions with a view to considering the extent to which it would be appropriate to remove or reduce the regulatory burdens they impose.

Comment: The policy has been reviewed three times since being introduced in 2006, including the comprehensive 2011 study. It is expected that it will be reviewed again in 2015, depending on further Government legislative changes flowing from the Law Commission's work.

3.3 Regulators should consider the impact that their regulatory interventions may have on small regulated entities, using reasonable endeavours to ensure that the burdens of their interventions fall fairly and proportionately on such entities, by giving consideration to the size of the regulated entities and the nature of their activities.

Comment: The limitation policy and associated action will only affect sole traders and on an equal and proportionate basis. The introduction of the limitation policy itself will not impose additional burdens on those businesses. The action plan will, over a three-year time period, impose increasing additional burdens equally on all businesses giving them time to consider how best they wish to adapt to those requirements.

3.4 When regulators set standards or give guidance in relation to the exercise of their own or other regulatory functions (including the functions of local authorities), they should allow for reasonable variations to meet local government priorities, as well as those of the devolved administrations.

Comment: The policy will be flexible to take into account potential changes associated with regulations under the Equalities Act 2010 or changes to national taxi legislation. A review in 2014/2015 will also allow for local variations to be

taken into account.

3.27 Department for Transport Best Practice Guide⁷

The Best Practice Guide (re-issued 2010) relating to quantity restrictions is reproduced below. In summary, it suggests:

- (a) the Government currently recommends the best course is for a delimited market;
- (b) the issue should be approached from the point of view of the consumer, and what would be the benefits or disadvantages to them of having controls on the number of licences?
- (c) surveys should ideally take place triennially where a limit is in place;
- (d) surveys should not be paid for by the hackney carriage trade, to preserve their impartiality. The guidance suggests that surveys could be paid for through “general licensing” revenue but there is a question over the legality of this assertion.

Quantity restrictions of taxi licences outside London

45. The present legal provision on quantity restrictions for taxis outside London is set out in section 16 of the Transport Act 1985. This provides that the grant of a taxi licence may be refused, for the purpose of limiting the number of licensed taxis ‘if, but only if, the [local licensing authority] is satisfied that there is no significant demand for the services of hackney carriages (within the area to which the licence would apply) which is unmet’.

46. Local licensing authorities will be aware that, in the event of a challenge to a decision to refuse a licence, the local authority concerned would have to establish that it had, reasonably, been satisfied that there was no significant unmet demand.

47. Most local licensing authorities do not impose quantity restrictions; the Department regards that as best practice. Where restrictions are imposed, the Department would urge that the matter should be regularly reconsidered. The Department further urges that the issue to be addressed first in each reconsideration is whether the restrictions should continue at all. It is suggested that the matter should be approached in terms of the interests of the travelling public - that is to say, the people who use taxi services. What benefits or disadvantages arise for them as a result of the continuation of controls; and what benefits or disadvantages would result for the public if the controls were removed? Is there evidence that removal of the controls would result in a deterioration in the amount or quality of taxi service provision?

48. In most cases where quantity restrictions are imposed, vehicle licence plates command a premium, often of tens of thousands of pounds. This indicates that there are people who want to enter the taxi market and provide a service to the public, but who are being prevented from doing so by the quantity restrictions. This seems very hard to justify.

49. If a local authority does nonetheless take the view that a quantity restriction can be justified in principle, there remains the question of the level at which it should be set, bearing in mind the need to demonstrate that there is no significant unmet demand. This issue is usually addressed by means of a survey; it will be necessary

⁷ Taxis and Private Hire Vehicle Licensing – Best Practice Guide (*Department for Transport*, 2010)

for the local licensing authority to carry out a survey sufficiently frequently to be able to respond to any challenge to the satisfaction of a court. An interval of three years is commonly regarded as the maximum reasonable period between surveys.

50. As to the conduct of the survey, the Department's letter of 16 June 2004 set out a range of considerations. But key points are:

The length of time that would-be customers have to wait at ranks. However, this alone is an inadequate indicator of demand; also taken into account should be...

Waiting times for street hailings and for telephone bookings. But waiting times at ranks or elsewhere do not in themselves satisfactorily resolve the question of unmet demand. It is also desirable to address...

Latent demand, for example people who have responded to long waiting times by not even trying to travel by taxi. This can be assessed by surveys of people who do not use taxis, perhaps using stated preference survey techniques.

Peaked demand. It is sometimes argued that delays associated only with peaks in demand (such as morning and evening rush hours, or pub closing times) are not 'significant' for the purpose of the Transport Act 1985. The Department does not share that view. Since the peaks in demand are by definition the most popular times for consumers to use taxis, it can be strongly argued that unmet demand at these times should not be ignored. Local authorities might wish to consider when the peaks occur and who is being disadvantaged through restrictions on provision of taxi services.

Consultation. As well as statistical surveys, assessment of quantity restrictions should include consultation with all those concerned, including user groups (which should include groups representing people with disabilities, and people such as students or women), the police, hoteliers, operators of pubs and clubs and visitor attractions, and providers of other transport modes (such as train operators, who want taxis available to take passengers to and from stations);

Publication. All the evidence gathered in a survey should be published, together with an explanation of what conclusions have been drawn from it and why. If quantity restrictions are to be continued, their benefits to consumers and the reason for the particular level at which the number is set should be set out.

Financing of surveys. It is not good practice for surveys to be paid for by the local taxi trade (except through general revenues from licence fees). To do so can call in question the impartiality and objectivity of the survey process.

Quite apart from the requirement of the 1985 Act, the Department published a [non-statutory] letter on 16 June 2004 asked all local licensing authorities that operate quantity restrictions to review their policy and justify it publicly by 31 March 2005 and at least every three years thereafter. The Department also expects the justification for any policy of quantity restrictions to be included in the Local Transport Plan process.

3.28 A recommended list of questions for local authorities to address when considering

quantity controls was attached to the Department's letter. Although the consultant's report has answered them at page 45 of their reports, officers have also independently answered those questions at appendix 2 of this report.

3.29 **Exceptions to the policy**

3.30 If the Committee decides to adopt a policy of limiting licences, it should be aware that there are three potential circumstances when that limit may be breached:

- (a) if the relevant regulations are made under the Equality Act 2010 in respect of wheelchair accessible vehicles (WAVs). At that point, if the existing vehicle fleet does not contain a specified percentage of WAVs, the Council must grant the number necessary to make up any short-fall;
- (b) if anyone presents a vehicle to provide hackney carriages for a service where demand is not yet met – for instance, some form of specialist market area which is not currently being catered for. In those circumstances, the applicant may be said to be a genuine exception to the general policy and officers recommend that when it appears on its merits to officers to be an exception, the decision to grant a licence should be delegated to the Head of Environmental Services in consultation with the Chair of the Licensing Committee;
- (c) the Crown Court on appeal orders additional licences to be granted following a refusal by the Council to grant one when it is demonstrated that in fact there is significant unmet demand at the time of the appeal. In that instance it is for the Council to allocate the licence according to its own criteria and not the court's.⁸

3.31 As a subsidiary point, there is no power for the Council to restrict the transfer of HCV licences from one proprietor to another; the Council is under a legal duty to register such transfers within 14 days of it taking place. This process sometimes gives the appearance that there are more licence-holders than there actually are although in reality any agreed limit is not breached.

4.0 **IMPLICATIONS**

4.1 **Financial**

4.1.1 The Head of Strategic Finance comments that there is no identified budget to carry out future unmet demand surveys. Provision could be made in each of the three preceding years to reserve funds for the estimated £15,000 costs in 2014/15 on the assumption that section 16 of the Transport Act 1985 (requiring such surveys) is not repealed by then. The Government guidance suggests that the survey costs could be recouped from "general licensing revenue" which would represent an increase in licence fees of around £16.67 per HCVL holder per year over the next three years.

4.1.2 There is also no identified budget to defend any appeals to the Crown Court arising from refusing licences as a result of a limitation policy.

4.2 **Legal Issues (Monitoring Officer)**

4.2.1 The Head of Legal and Property Services comments that relevant legal issues are

⁸ *Kelly and Smith v Wirral MBC*, above.

dealt with in the main body of the report. There is no statutory duty to consult before changing this policy but, if there is consultation, it must be conducted properly. The consultant's report indicates where the consultation has been conducted, and further consultation has been consulted on the relevant policy options.

4.2.2 *Removal* of the limit in future years has not been taken by the courts to breach an individual's right to his property or personal possessions under article 1 of the First Protocol to the European Convention on Human Rights.⁹

4.2.3 Any decision to impose a limit (or in future years to remove the limit) must not be *Wednesbury* unreasonable, in that the Licensing Committee's decision must be one that any reasonable committee, taking account all relevant considerations and disregarding all irrelevant considerations, would have made.

4.3 Equalities

4.3.1 Over 99% of current HCVL holders are male, and the majority of them are Asian or Asian British, a situation which has not been significantly changed for many years. Introducing a limitation policy could potentially perpetuate this position by making it harder for other people to obtain a licence. Conversely, it may increase equality of opportunity because, if applicants applied for a licence to target customers with a particular "protected characteristic" (e.g. to specifically attract women drivers), the Council would have to consider whether that application was a genuine exception to the policy and ought to be allowed.

4.3.2 There are already a significant number of vehicles available for wheelchair users and for other consumers with various disabilities. All existing drivers have attended a disability awareness course. The policy will be adapted in the light of any further guidance or regulation under the Equalities Act, and the action plan suggests drivers should undergo regular refresher training in disability awareness.

4.3.3 An equalities impact assessment has been completed, and is attached at appendix 3.

4.4 Potential Risks

| Potential Risk | Likelihood | Impact | Overall score |
|---|------------|--------|---------------|
| Challenge to policy by way of judicial review | 1 | 3 | 3 |
| Challenge to policy by way of appeal to Crown Court | 1 | 3 | 3 |
| Increased number of private hire vehicles | 2 | 2 | 4 |
| No reduction in number of HCVLs | 3 | 3 | 9 |
| Significant reduction in number of HCVs | 1 | 2 | 2 |
| Change in national legislation by 2015 | 1 | 3 | 3 |
| Repeal of section 16 relating to unmet demands | 3 | 3 | 9 |
| Increase in applications applying to Three Rivers District Council for licences | 3 | 3 | 9 |
| | | | |

⁹ *R (on the application of Royden) v Metropolitan Borough of Wirral* [2003] BLGR 290, Admin Ct.

4.5 **Community Safety**

- 4.5.1 A significant reduction in the number of HCVs could have community safety implications for the night-time economy, but this is considered to be a very low risk.

Appendices

Appendix 1 – Consultation responses

Appendix 2 – Response to Department for Transport questionnaire

Appendix 3 – Equalities Impact Assessment

Background Papers

Taxi and Private Hire Vehicle Licensing – Best Practise Guide (Department for Transport, 2010)

Regulators' Compliance Code (Department for Business, Innovation and Skills, 2008)

Previous reports to Licensing Committee in 2001, 2005, 2006, 2010 and 2011.

File Reference

HCV Review 2011