

## Regulatory Committee

Wednesday, 2 October 2024 at 1.00 pm  
Phoenix Chambers, Phoenix House, Tiverton

Next ordinary meeting  
Friday, 6 December 2024 at 11.30 am

**Please Note:** This meeting will take place at Phoenix House and members of the public and press are able to attend via Teams. If you are intending to attend in person please contact the committee clerk in advance, in order that numbers of people can be appropriately managed in physical meeting rooms.

**The meeting will be hybrid and an audio recording made and published on the website after the meeting.**

[To join the meeting – click here](#)

Meeting ID: 357 288 833 410

Passcode: RCGzAj

## Membership

Cllr D Broom

Cllr J Buczkowski

Cllr J Cairney

Cllr S Chenore

Cllr F J Colthorpe

Cllr L J Cruwys

Cllr A Cuddy

Cllr J M Downes

Cllr M Jenkins

Cllr S Keable

Cabinet Member for Planning and Economic  
Regeneration

Cllr L G J Kennedy

Cllr F W Letch

# **A G E N D A**

*Members are reminded of the need to make declarations of interest prior to any discussion which may take place*

- 1      **APOLOGIES AND SUBSTITUTE MEMBERS**  
To receive any apologies for absence and notices of appointment of Substitute Members (if any).
- 2      **PUBLIC QUESTION TIME**  
To receive any questions relating to items on the Agenda from members of the public and replies thereto.
- 3      **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT**  
To record any interests on agenda matters.
- 4      **MINUTES OF THE PREVIOUS MEETING** (*Pages 5 - 10*)  
To consider whether to approve the minutes as a correct record of the meeting held on 28<sup>th</sup> June 2024.
- 5      **HACKNEY CARRIAGE AND PRIVATE HIRE POLICY** (*Pages 11 - 16*)  
This report provides an update on the implementation of the Hackney Carriage and Private Hire Policy (the Policy) adopted by Full Council on Wednesday 17<sup>th</sup> July 2024.

**Stephen Walford**  
Chief Executive  
Tuesday, 24 September 2024

## **Guidance notes for meetings of Mid Devon District Council**

From 7 May 2021, the law requires all councils to hold formal meetings in person. The Council will enable all people to continue to participate in meetings via Teams.

If the Council experience technology difficulties at a committee meeting the Chairman may make the decision to continue the meeting 'in-person' only to conclude the business on the agenda.

### **1. Inspection of Papers**

Any person wishing to inspect minutes, reports, or the background papers for any item on the agenda should contact Democratic Services at [Committee@middevon.gov.uk](mailto:Committee@middevon.gov.uk)

They can also be accessed via the council's website [Click Here](#)

Printed agendas can also be viewed in reception at the Council offices at Phoenix House, Phoenix Lane, Tiverton, EX16 6PP.

### **2. Members' Code of Conduct requirements**

When considering the declaration of interests and their actions as a councillor, Members are reminded of the requirements of the Members' Code of Conduct and the underpinning Principles of Public Life: Honesty; Integrity; Selflessness; Objectivity; Accountability; Openness; Leadership.

The Code of Conduct can be [viewed here](#):

### **3. Minutes of the Meeting**

Details of the issues discussed, and recommendations made at the meeting will be set out in the minutes, which the Committee will be asked to approve as a correct record at its next meeting. Minutes of meetings are not verbatim.

### **4. Public Question Time**

Residents, electors or business rate payers of the District wishing to raise a question and/or statement under public question time are asked to provide their written questions to the Democratic Services team by 5pm three clear working days before the meeting to ensure that a response can be provided at the meeting. You will be invited to ask your question and or statement at the meeting and will receive the answer prior to, or as part of, the debate on that item. Alternatively, if you are content to receive an answer after the item has been debated, you can register to speak by emailing your full name to [Committee@middevon.gov.uk](mailto:Committee@middevon.gov.uk) by no later than 4pm on the day before the meeting. You will be invited to speak at the meeting and will receive a written response within 10 clear working days following the meeting.

Notification in this way will ensure the meeting runs as smoothly as possible

### **5. Meeting Etiquette for participants**

- Only speak when invited to do so by the Chair.
- If you're referring to a specific page, mention the page number.

For those joining the meeting virtually:

- Mute your microphone when you are not talking.
- Switch off your camera if you are not speaking.
- Speak clearly (if you are not using camera then please state your name)
- Switch off your camera and microphone after you have spoken.
- There is a facility in Microsoft Teams under the ellipsis button called “turn on live captions” which provides subtitles on the screen.

## **6. Exclusion of Press & Public**

When considering an item on the agenda, the Committee may consider it appropriate to pass a resolution under Section 100A (4) Schedule 12A of the Local Government Act 1972 that the press and public be excluded from the meeting on the basis that if they were present during the business to be transacted there would be a likelihood of disclosure of exempt information, as defined under the terms of the Act. If there are members of the public and press listening to the open part of the meeting, then the Democratic Services Officer will, at the appropriate time, ask participants to leave the meeting when any exempt or confidential information is about to be discussed. They will be invited to return as soon as the meeting returns to open session.

## **7. Recording of meetings**

All media, including radio and TV journalists, and members of the public may attend Council, Cabinet, PDG and Committee meetings (apart from items Media and Social Media Policy - 2023 page 22 where the public is excluded) you can view our Media and Social Media Policy [here](#). They may record, film or use social media before, during or after the meeting, so long as this does not distract from or interfere unduly with the smooth running of the meeting. Anyone proposing to film during the meeting is requested to make this known to the Chairman in advance. The Council also makes audio recordings of meetings which are published on our website [Browse Meetings, 2024 - MIDDEVON.GOV.UK](#).

## **8. Fire Drill Procedure**

If you hear the fire alarm you should leave the building by the marked fire exits, follow the direction signs and assemble at the master point outside the entrance. Do not use the lifts or the main staircase. You must wait there until directed otherwise by a senior officer. If anybody present is likely to need assistance in exiting the building in the event of an emergency, please ensure you have let a member of Democratic Services know before the meeting begins and arrangements will be made should an emergency occur.

## **9. WIFI**

An open, publicly available Wi-Fi network is normally available for meetings held in the Phoenix Chambers at Phoenix House.

**MINUTES** of a **MEETING** of the **REGULATORY COMMITTEE** held on 28 June 2024 at 11.30 am

**Present  
Councillors**

D Broom, J Buczkowski, J Cairney,  
S Chenore, A Cuddy, F J Colthorpe,  
L J Cruwys, J M Downes, A Glover,  
M Jenkins, L G J Kennedy and F W Letch

**Apology  
Councillor**

S Keable

**Also Present  
Officer(s):**

Deborah Sharpley (Operations Manager Legal Services and Monitoring), Harriet Said (Team Leader (Commercial), Public Health), Thomas Keating (Specialist Lead (Licensing) Officer) and Angie Howell (Democratic Services Officer)

**Officer Online**      Laura Woon

**1      ELECTION OF CHAIR (00:03:23)**

The Chair of the Council invited nominations for the election of a Chair for the municipal year 2024/2025.

**RESOLVED** that Cllr J Cairney be elected as Chair of the Regulatory Committee for the municipal year 2024/2025.

(Proposed by Cllr F J Colthorpe and seconded by Cllr A Cuddy)

**2      ELECTION OF VICE-CHAIR (00:04:50)**

The Chair of the Licensing and Regulatory Committee invited nominations for the election of a Vice-Chair for the municipal year 2024/2025

**RESOLVED** that Cllr A Cuddy be elected as Vice Chair of the Licencing Committee for the municipal year 2024/2025.

(Proposed by Cllr L Cruwys and seconded by Cllr F Letch)

### 3 **START TIME OF MEETINGS (00:06:09)**

Discussion took place regarding:-

- Whether the Regulatory Committee could commence upon the rising of the Licensing Committee. It was explained that a time must be given on the agenda to show the start time of the meeting.
- Whether the Licensing and Regulatory Committee Meetings could be combined to just one Committee rather than two separate Committees.

It was **AGREED** that Officers would investigate whether Licensing and Regulatory Committees could be combined and report back to the next meeting of the Regulatory Committee.

It was **AGREED** that, in the meantime, the start time of meetings for the remainder of the municipal year continued to be at 11.30am.

### 4 **APOLOGIES AND SUBSTITUTE MEMBERS (00:17:40)**

Apologies were received from Cllr S Keable with Cllr A Glover substituting.

### 5 **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT (00:18:03)**

There were no declarations of interest received.

### 6 **PUBLIC QUESTION TIME (00:18:17)**

There were no members of the public present and no questions were asked.

### 7 **MINUTES OF THE PREVIOUS MEETING (00:18:25)**

The minutes of the meeting held on 2<sup>nd</sup> December 2023 were **APPROVED** as a true and accurate record and were signed by the Chair.

### 8 **HACKNEY CARRIAGE AND PRIVATE HIRE (TAXI) POLICY UPDATE (00:18:44)**

The Committee had before it a report \* from the Team Leader, Commercial, Public Health of the Licensing Act Policy Review.

The following was highlighted:

- The report made a number of recommendations for the Committee to consider following the consultation that had been carried out.
- The document was the same as previously presented at the meeting on the 2<sup>nd</sup> December 2023 other than the changes made following feedback from Committee, members of the public and consultee responses.
- The consultation ran for a period of 3 months and received 41 responses.
- In addition to the 41 responses, 2 workshops were held - one with Committee Members and the other with Mid Devon licenced drivers, proprietors and operators and both sessions had received positive engagement.

- Responses and feedback gathered through the survey and workshops had been revised and a number of recommendations were made:-
  - (i) Proposal to introduce safeguarding training to be refreshed every 3 years.
  - (ii) To introduce a Penalty Points Scheme from 1<sup>st</sup> September 2024 - a robust appeal process would need to be put in place with a lead officer to ensure that there was a mechanism for licensee's to appeal.
  - (iii) In terms of driving training/assessment there was a requirement to pass an initial assessment but now with a recommendation to introduce 10 yearly requirements for driver training/assessments.
  - (iv) There was a requirement for an English language assessment to be undertaken to test a driver's proficiency which would cover both oral and written English language skills.
  - (v) There were a few minor changes around medicals and rights to request a second opinion, ensuring that eye tests were included and the option of using any medical practitioner for a medical due to difficulties accessing a GP.
  - (vi) The recommendation to implement new Ultra Low Emission Zone (ULEZ) standards as a phased approach. This would mean that new vehicles from 1<sup>st</sup> September 2024 would need to comply with ULEZ; from January 2027 apply ULEZ standards to vehicles at both new and renewal application; and from January 2030 apply ULEZ standards for renewal and zero emissions for new applications.
  - (vii) Dispatch and booking staff to have Disclosure and Barring Services (DBS) checks which would be implemented by the Operator.
  - (viii) Lost property checks to be removed and also the requirement to have a road atlas.
  - (ix) There were other proposed changes which were not captured in the table:-
    - There was a proposal to increase the testing of vehicles to every 4 months however this was not supported and having reviewed the information it was felt that there was no justification to increase this therefore the recommendation was to stay with every 6 months as per the existing policy.
    - There would be an update to raise awareness that there was a National Register called NR3S which recorded taxi driving licences that had been suspended, revoked or refused in order that all local authorities could access this. The draft policy stated that licences would not be surrendered if the licence holder was involved in any investigation by the Council for non-compliance against the said licence. However, on further review it was felt that surrender of a licence should not be accepted at any time, as the Authority may not be aware of a contravention at the time of surrender. If a licence was surrendered and subsequently the Authority was made aware of an issue, this could have an issue on public safety, as the NR3s register could not be updated. This only affected driver licences, as it was important that we provided a mechanism for vehicle surrenders and the NR3s database only related to driver licences.
- It was recommended that paragraph 4.5 (page 61 of the Policy) would need to be updated and reworded as follows: *“There is no mechanism to surrender a driver licence and it remains current until expired, revoked or suspended. This will allow the licensing authority to take action should any unknown pending*

*sanction come to light and if necessary, take appropriate action against the licence, such as revocation or suspension and where relevant share on NR3s”.*

- It was also recommended to amend Paragraph 5.1.3 on page 62 by removing line (e) “*You wish to surrender your taxi driver licence*” as it would no longer apply.
- Further meetings with the taxi trade were proposed to raise awareness of the changes.

Discussion took place regarding:-

- Whether there was proof that taxi drivers had been refusing people with assistance dogs. It was explained that complaints had been received by the Licensing Team though it was not a big problem but hoped that future Disability Awareness Training would prevent any recurrence in the future.
- The procedure for dealing with such complaints and how allegations would be fully investigated if there was a breach. Currently under the Penalty Points Scheme 4 penalty points would be given if such a breach took place. It was suggested by some of the Committee Members that 12 points should be awarded which would then require a Regulatory Sub-Committee to be held.

The Chair thanked the Licensing Team for their hard work. He had attended the workshops and was proud to have been invited and to see the team doing such a good job.

The Committee **AGREED** the proposed final amendments to the policy document outlined in section 4.1 of this report with the additional recommendations:-

- Paragraph 4.5 (page 61 of the Policy) would need to be updated and reworded as follows: “*There is no mechanism to surrender a driver licence and it remains current until expired, revoked or suspended. This will allow the licensing authority to take action should any unknown pending sanction come to light and if necessary, take appropriate action against the licence, such as revocation or suspension and where relevant share on NR3s”.*
- To amend Paragraph 5.1.3 on page 62 by removing line (e) “*You wish to surrender your taxi driver licence*” as it would no longer apply.
- To change 4 penalty points to 12 under the Penalty Point Scheme.

(Proposed by Cllr L Kennedy and seconded by Cllr A Glover)

(Cllr F J Colthorpe and Cllr L Cruwys voted against the recommendation to change 4 penalty points to 12)

The Committee **APPROVED** the following recommendations:-

- That the draft proposed policy attached as Annex A to include the additional amendments that were outlined by a verbal update be recommended for adoption by Full Council in July 2024, with a proposed implementation date from 1<sup>st</sup> September 2024.



- That delegated authority for amendments to the Penalty Point Scheme be given to the Head of Housing and Health.
- That delegated authority to approve the standard for English communications assessment be given to the Head of Housing and Health.

(Proposed by the Chair)

Note: \* Report previously circulated.

Reason for the decision as set out in the report.

## 9 LICENSING UPDATE REPORT (01:01:10)

The Committee had before it, and **NOTED**, the Licensing Update Report, the contents of which were outlined by the Team Leader, Commercial, Public Health.

The following was highlighted:-

- The report provided an overview of the activity carried out by the Licensing Team during the second half of 2023/24.
- There had been a slight increase in the number of Hackney Carriage and Private Vehicle licences.
- 51 taxi inspections had been carried out, currently one of the Service's key performance indicators which was met.
- Following on from the consultation the Licensing Team were looking to reintroduce an annual forum for taxi drivers to address key changes and to open up 2-way conversations.
- Animal welfare licenced premises remained constant with no increase.
- Specified beauty treatments were covered by the Local Government (Miscellaneous Provisions) Act 1982 which included tattooing piercing, electrolysis and acupuncture. A piece of work would be carried out later this year with the Licensing Team and officers from the Food and Health and Safety Team due to the risks associated with infectious diseases which the Committee would be updated with at its next meeting in December.
- 3 Regulatory Hearings were conducted in the second half of 2023/24 and the outcome of those Hearings were summarised within the report.

Cllr L Kennedy thanked the Licensing Team for their hard work.

The Chair asked the Committee to please respond to the Clerk when asked if they were available for Sub-Committee meetings.

Note: \* Report previously circulated.

(The meeting ended at 12:38)

**CHAIRMAN**

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**Report for: Regulatory Committee**

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Date of Meeting: 2 October 2024

Subject: **HACKNEY CARRIAGE AND PRIVATE HIRE POLICY IMPLEMENTATION UPDATE**

Cabinet Member: David Wulff - Cabinet Member for Quality (Cost) of Living, Equalities and Public Health

Responsible Officer: Simon Newcombe, Head of Housing and Health

Enclosures: Annex A: proposed minor changes to Policy

**Summary:**

This report provides an update on the implementation of the Hackney Carriage and Private Hire Policy (the Policy) adopted by Full Council on Wednesday 17<sup>th</sup> July 2024.

**Recommendation(s):**

**That Regulatory Committee approve and recommend to Full Council:**

- 1. The new proposed timeline for implementation of the Policy at section 2 of the report, and that the existing Policy (implemented 1<sup>st</sup> January 2019) continues to have effect until such time as the new Policy is fully implemented.**
- 2. The changes proposed and detailed within section 3 and Annex A of this report.**
- 3. To delegate authority to make minor amendments to the Policy to the Head of Housing and Health.**

**1. Introduction**

- 1.1 The new Policy was approved by Regulatory Committee on 28<sup>th</sup> June 2024 and adopted by Full Council on 17<sup>th</sup> July 2024. The proposed implementation date at the time of adoption being 1<sup>st</sup> September 2024.
- 1.2 Delays to the implementation of the new Policy have resulted in this timescale not being met. A revised timeline is now proposed at section 2 of this report.

- 1.3 The delays have been a result of high summer workloads, coinciding with some unexpected changes within the Licensing Team that have led to a lack of resource to carry forward the significant work that is involved in bringing in the scale of changes in the new Policy (e.g. the Penalty Points Scheme), within the original timescale that was proposed.
- 1.4 The Policy was originally drafted by an external licensing expert bringing together examples of best practice from multiple sources. This has led to some oversights that were not identified through the consultation process and final preparation of the Policy and report.
- 1.5 Since 17<sup>th</sup> July 2024 a number of errors and omissions (some administrative) to the Policy have been highlighted. As a result of the logistical delays it was decided to include some changes to the Policy prior to the new implementation programme; these are detailed within section 3 of this report and at Annex A.

## 2 Proposed implementation timeline

September October	Complete review of all processes, application forms and associated guidance documentation.  Write to trade with planned date of implementation and invitation to workshop. During the consultation process the Trade requested a further workshop to discuss the changes that the new Policy were making.
November	Hold trade workshop to talk through changes to processes at renewal and new training requirements that will affect them on renewal. This will include an informal consultation exercise – see 3.2 below.
December	Run first training session for Safeguarding and Disability awareness to enable drivers, due for renewal from January 2025, to meet the requirements of the new policy.
January 2025	New policy fully implemented.

## 3 Changes to Policy

- 3.1 During the initial stages of implementation, officers have identified a number of questions within the new Policy document that need to be resolved prior to implementation. In addition officers have highlighted a number of sections where they feel applicants need further clarification. These proposed minor changes are detailed in Annex A.
- 3.2 In addition to the minor changes, a number of more significant changes are proposed (see 3.3 and 3.4 below). As these changes are being sought outside

of the previous consultation, we intend to discuss with and seek the opinion of the Trade at the workshop in November 2024.

- 3.3 In the revised Policy at Appendix 3, section 4.1 it states that where a driver acquires 6 or more penalty points on their DVLA licence, they may be referred to the Regulatory Sub-Committee. The existing Policy states that this will occur when 7 or more penalty points are acquired. This change was not identified during the preparation of the new Policy for the consultation exercise. This administrative error has a significant impact on the Policy and there is no evidence to justify a reduction from 7 to 6 points triggering a referral to Sub-Committee at a lesser level.
- 3.4 The existing Policy allows for preservation of the anniversary of the vehicle test if the test is conducted within a specified period of time before it is due. This encourages licence holders to arrange their vehicle tests in a timely manner, and therefore assists with the renewal process. This has not been transferred into the new Policy. It is proposed that this is introduced within Appendix 4, section 4.16, Vehicle tests.

#### **4 Recommendations and next steps**

- 4.1 It is recommended that the Regulatory Committee approve and recommend to Full Council:

The new proposed timeline for implementation of the new Policy as set out at section 2 of this report, and that the existing Policy continues to have effect until such time as the new Policy is fully implemented.

The changes proposed and detailed within section 3 and Annex A of this report.

To delegate authority to make minor amendments to the Policy to the Head of Housing and Health. This is referenced in the new Policy at Section 1, Introduction, paragraph 1.9.

A further update on the implementation of the Policy will be brought to the Regulatory Committee on 6<sup>th</sup> December 2024.

**Financial Implications:** None that are not contained within existing resources.

**Legal Implications:** It is necessary that policies meet legislative and regulatory requirements.

**Risk Assessment:** There is a significant risk of severe service disruption and criticism if we implement the policy before we have the processes and procedures in place to facilitate the changes. By amending the implementation timeline, we create time to ensure that the framework is in place to administer the changes and the tools available to support applicants with the new processes.

**Impact on Climate Change:** There is no direct impact on climate change as a result of this report.

**Equalities Impact Assessment:** No equality issues identified for this report.

**Relationship to Corporate Plan:** This report links directly to the Licensing Authority functions of the Council with the primary aim of protecting public safety and ensuring the well-being of our community including users of taxis. It therefore contributes to the priority of Community, People and Equalities within the Corporate Plan 2024-28 and in particular objective 2.3 to support the health, wellbeing and safety of our residents.

**Statutory Officer sign-off/mandatory checks**

**Statutory Officer:** Stephen Walford  
Agreed by or on behalf of the Section 151  
**Date:** 17.9.24

**Statutory Officer:** Maria de Leburne  
Agreed on behalf of the Monitoring Officer  
**Date:** 17.9.24

**Chief Officer:** Simon Newcombe  
Agreed by or on behalf of the Chief Executive/Corporate Director  
**Date:** 13 September 2024

**Performance and risk:** Steve Carr  
Agreed on behalf of the Corporate Performance & Improvement Manager  
**Date:** 18 September 2024

**Cabinet member notified:** Yes

**Contact for more Information:**

Harriet Said, Team Leader (Commercial), Public Health or Simon Newcombe, Head of Housing and Health  
Email: [hsaid@middevon.gov.uk](mailto:hsaid@middevon.gov.uk) / [snewcombe@middevon.gov.uk](mailto:snewcombe@middevon.gov.uk)  
Telephone: 01884 255255

**Background Papers:**

Hackney Carriage and Private Hire Policy 2023

## Annex A: Proposed changes to new Hackney Carriage and Private Hire Policy 2024

Page number	Section	Change required	Reason for change
17	5.7	Change will to may	Change wording from will to may, as this should be decided on a case by case basis depending on the circumstances of the missed appointment.
23	11.5	Add link to application guidance pages	The requirement is ambiguous and more guidance is required for applicants on the detail of how to comply.
27 57	14.2 3.9.1	Include summary medical history	Summary medical history is an acceptable alternative source of information for a medical practitioner to access prior to issuing a medical certificate.
29 & 30 31	15.3 & 16.3 17.4	Basic DBS - delete reference to update service	Basic DBS checks cannot be connected to the update service.
38	D41 & D42	Change 4 to 12 points for failing to provide mobility assistance	Request by the Committee to increase failure to carry an assistance dog to 12 points, and changed others for consistency. Delegated authority had been provided previously to make these changes.
47	2.7.2	Add paragraph on drug testing	In line with statutory standards.
54	3.4.3	Add alternative option of applicant providing DVLA check code	Widely used to carryout online check of DVLA licence status.
54	This is a new paragraph	Insert paragraph to inform applicant that DVLA licence checks are carried out at the time of application and during the life of the licence.	The Policy does not specify that checks will be made as required during the period of the licence.
55	3.5.1	Delete MDDC website and change to Home Office website	Better to have a single and accurate up to date source of information.
56	3.8.1	Provide timescale to new applicants for driving standards assessment within 12 months of date of application	The requirement is ambiguous and clarification of validity period for evidence of driving standards is required.
57	3.9.2	Add paragraph to provide defined standard for medical practitioner	To enable officers to check against a defined standard to consider who is suitably qualified.
57	3.9.3	Insert paragraph	Clarify validity of medical fitness associated with PSV/HGV entitlement.

## Annex A: Proposed changes to new Hackney Carriage and Private Hire Policy 2024

80	4.7	Insert paragraph	Need to emphasise that the vehicle specification detail <b>conditions</b> attached to vehicle licenses, it was not felt this would be clear to applicants/Licence holders.
83	4.7.21	Add word 'exterior'	Ambiguous, this is necessary to distinguish between internal and external lights.
84 85	4.8.1 (d) 4.10.1	Remove requirement to provide service history	Requirement there for vehicle to be maintained and serviced but remove the requirement for the full history to be made available for inspection and provided prior to licence issue. This will be an administrative burden and vehicle maintenance standards are established through the vehicle tests.
88	This is a new paragraph	Add paragraph with link to Inspection standards Best Practice Guidance	To provide the reference point for vehicle inspection. This is the same document that was used to specify the current inspection standard.
92	4.23.8	Change wording must to may	We will not always be able to approve the location of taximeters, so this is to ensure we can operate within the requirements of the Policy.
104	4.11.3	Remove the requirement to notify MDDC of action taken by the operator	This is the operators' policy, we will check the records to establish its implementation on inspection, but will not need to receive notifications. This is potentially information that we have no legal justification to hold.
103	4.8.3	Change sentence to specify ceasing to use an address, as they are not permitted to change or add an address without it first being added to the licence. Remove paragraph	This is an error, as the operating address must be detailed on the licence, otherwise the licence is void.
110	5.10	Delete para 5.0.3 and change timescale at 5.11 to 72 hours	Ensure consistency. These conditions contradict each other in terms of timescales for reporting.
104 & 111	5.0.3 & 5.11.1		