

**Licensing Committee**  
**2 March 2015**

**REVIEW OF THE PENALTY POINTS SYSTEM FOR TAXI ENFORCEMENT**

**1 Purpose**

- 1.1 For Members to note the outcome of a review of the penalty points system for taxi enforcement.

**2 Recommendations/for decision**

- |     |   |
|-----|---|
| 2.1 | For Members to note the review of the penalty points system for taxi enforcement and agree that it should continue in its current form; and   |
| 2.2 | For Members to note that a revised draft Taxi and Private Hire Policy will be brought back before Licensing Committee in June for comment and discussion prior to consultation with the trade and partners. |

**3 Supporting information**

- 3.1 During 2014 members of Licensing Committee agreed a penalty points system for taxi enforcement and the procedure attached as Appendix 1 to this report received Cabinet Member approval. Members will recall that the purpose of the system is to provide a more transparent, targeted, consistent and structured approach to taking enforcement action in respect of certain and usually repeated breaches of the Council's taxi standards. The introduction of the points system of enforcement was in response to the continuation of a significant level of contraventions for breaches and offences for which a regulatory sanction such as a suspension would not be warranted. However should points be imposed each time a driver fails to meet the Council's standards and those points 'tot up' above an agreed level of 12 it would then trigger a review of the driver's suitability to continue to be licensed.
- 3.2 Following agreement of the points system it took several months to prepare for its practical implementation and make arrangements for efficient record keeping and monitoring. On the first occasion that points were issued it was during a joint enforcement operation with roads policing. Unfortunately it was not well received by a number of members of the private hire trade who, on the night threatened to protest. They were advised to put their grievance in writing.
- 3.3 A week or two later an e mail was received from the 'Aylesbury Private Hire Association' and is attached to this report as Appendix 2. The contents of the e mail was discussed with the Chairman of Licensing Committee and Thames Valley Police and a written response was sent to all private hire operators. Attached as Appendix 3 is a copy. In addition a meeting was convened with a number of private hire operators, the Aylesbury Hackney Carriage Association and also the Chair and Vice Chair of Licensing Committee. It was agreed that the points system would be continued as originally drafted but

would be reviewed and a report brought before Licensing Committee. Notes arising from that meeting are attached as Appendix 4. Members will note that additional issues were raised. These will be dealt with later in this report.

- 3.4 Attached as Appendix 5 is a summary of points issued so far and for what breaches. Since the first use of the points system the trade have been cooperative and only 2 appeals have been received. The first related to both not displaying a plate and not wearing the badge. The driver asserted that the plate had fallen off and it was, in the meantime placed in the boot of the car. As for the badge the driver claimed that he had it on him but forgot to wear it. All drivers are required to read a list of essential requirements prior to licensing and to sign to attest that they have done so. As both of the breaches are included on the list and taking into consideration the evidence of the enforcement officer it was decided to uphold the points. The fact that there was more than one offence was also a material consideration. The other related to a private hire driver dropping off a passenger on a taxi rank. This was witnessed by one of the taxi team and inexcusable. Again the points were upheld.
- 3.5 The most common breach for which points have been issued relates to the driver not wearing their badge in a prominent position. The badge shows an up to date photograph of the driver, the name, licence number and licence expiry date. It is issued with a lanyard which incorporates a plastic 'safety break' which effectively snaps the lanyard if tugged. If drivers' are not comfortable with the lanyard they may use alternatives such as a clip or obtaining a badge holder that can be secured to the dash board. Maintaining fire extinguishers and first aid kits is also prompted the use of points.
- 3.6 As mentioned earlier the trade brought additional concerns to the meeting, notably the difficulties posed in respect of medicals and the Driver Standards Agency taxi test. The Council's current policy on taxi and private hire was published in 2010 and it is intended to review it and publish a new copy later this year. A report will be brought back to Licensing Committee later this year with a revised draft policy and once agreed the licensing service will consult the trade and all interested parties.

#### **4 Options considered**

- 4.1 None

#### **5 Reasons for Recommendation**

- 5.1 To provide feedback to members of Licensing Committee on the efficacy of the penalty points system of enforcement.

#### **6 Resource implications**

- 6.1 None

Contact Officer	Peter Seal 01296 585083
Background Documents	None

## **Penalty Point System for Hackney and Private Hire Enforcement**

### **Use and enforcement**

The following document provides guidance in respect to the penalty point system for taxi enforcement. The system will operate without prejudice to or in addition to the council's other enforcement powers in respect of hackney carriage and private hire controls (referred to in this document as 'taxi'). The operation of the system is not intended to fetter the council's discretion to exercise the full range of its enforcement powers as it sees fit.

It is intended that the penalty points system will be enforced by licensing officers and Aylesbury Vale District Council's Civic Enforcement Officers, all of which have the appropriate authorisation under the Local Government (Miscellaneous Provisions) Act 1976 and Town and Police Clauses Act 1847. In addition, police constables and Police Community Support Officers may refer taxi misdemeanours, along with the appropriate evidence to the council's licensing services which in the council's discretion could result in the issuing of points. Similarly, Bucks County Council / Amey transport enforcement officers may refer breaches and offences to licensing services. Points may also be issued arising from complaints from other third parties such as members of the public.

The system will target the following breaches:

- **Failure of a Hackney Carriage / Private Hire Driver to wear driver's badge** (private hire and hackney carriage drivers must wear a badge in a prominent position at all times) – **2 Points**
- **Failure of a Hackney Carriage / Private Hire Driver to produce driver's badge** (drivers must wear and be able to produce their driver's badge on request) – **3 Points**
- **Failure to display licence plate, door signs or window badge** (all vehicles are subject to a set livery in order for the vehicle to be identifiable to the travelling public) – **3 Points**
- **To obstruct or fail to comply with any requirement properly made by or fail to give information or to give false information to an authorised officer or constable** (this could be a request to see a DVLA driver licence and a subsequent refusal, or a request to be shown the fire extinguisher and again, a refusal) – **4 Points**
- **Private Hire vehicle entering or stopped in a Taxi Rank** (The taxi ranks are for hackney carriage vehicles only. A private hire vehicle may not stop, drop off, pick up or wait in a rank) – **4 points**
- **Failure to operate the taximeter from commencement of the journey and charging more than the fixed charge for hire of Hackney carriages** – all journeys in a hackney carriage taxi vehicle must be charged based on a running taximeter calibrated to the latest tariff – **3 Points**
- **Failure to carry the required first aid kit or fire extinguisher** – **3 Points**
- **Driving a vehicle not properly maintained, defective or not clean and tidy** (this would include but not be limited to defective tyres, damage to bodywork or rips and tears to passenger seating) – **2 - 4 Points**

### **Implementation**

- Whilst a multi-agency approach is used to identify offences and breaches of condition it is the council's licensing services that issue penalty points. The council's Taxi and Private Hire Policy will be considered when determining the manner in which any offence or breach of licensing conditions is dealt with.

- Penalty points will be issued depending on the points designated for that specific breach or, as appropriate, a specific number of points within the designated range depending on the facts and circumstances.
- Points will remain on the licensee's file for a period of 18 months. If the licence lapses during this period, the points would be noted on the system and may be carried onto a new application. If the licensee applies again at a later date points may be "carried forward" for the remaining period that the points would have remained "live".
- If a driver accumulates 9 points, the driver will be interviewed by a licensing officer
- If a pre-determined amount of points are accrued in the 18 month time period (currently set at 12 points) the offender will be requested to attend the council offices and be interviewed by a licensing officer.
- Following interview, a report will be presented to the Environmental Health & Licensing Group Manager or the Licensing Services Manager who may impose a regulatory sanction such as a suspension or revocation.
- If the Environmental Health & Licensing Group Manager or the Licensing Services Manager feels the matter does not warrant suspension or revocation consideration maybe given to an extension to the period with which the points remain on the licence or/and issue a formal warning.
- Once the driver has been dealt with the points will be removed from his/her licence, however a file note will be kept for the life of the licence and on renewal. If, however the action taken is to extend the period of the points, the points will remain live until such time as decided by the Environmental Health & Licensing Group Manager or the Licensing Services Manager. If a formal warning is given the points will remain "live" for an 18 month period, as usual.
- Whether or not penalty points have been issued, the council reserves the right to suspend, revoke or refuse to renew a licence or to prosecute.

### **Right of Appeal**

If a driver is not satisfied that the points attributed for an alleged breach were given fairly, then an appeal may be made, in writing, to the Environmental Health & Licensing Group Manager or the Licensing Services Manager within 14 days of the points notice being given. A decision will be made to either uphold or dismiss the points based on the evidence provided by the enforcement officer and the representations made by the appellant. The appeal must detail all of the circumstances as to why the points were unfairly issued. It would be important that for a multiple point breach the alleged offender must stipulate for what breach he or she is appealing. The council, if the appeal is upheld, would then dismiss those points only and apply the remaining points. The response from the Licensing Services Manager would be sent back detailing whether the appeal was upheld or dismissed and the reasons why. The points, if accepted as correct would be issued on the driver from the date of the offence.

A revocation or suspension of a driver's licence or the refusal to renew a licence can be appealed to the Magistrates' Court and must be done within 21 days of the date of the decision to suspend or revoke or refusal to renew.

### **Changes to the points system**

The council reserves the right to make changes to the points system and, in particular, to vary the number of points which can be issued for a specified breach and to vary (by adding, removing or otherwise) the list of specified breaches.

**From:** [Seal, Peter](#)  
**To:** [Seal, Peter](#)  
**Subject:** FW: Penalty Points System  
**Date:** 16 February 2015 10:08:42

---

**From:** Aylesbury Private Hire Association []

**Subject:** Penalty Points System

We are writing to express grave concerns as regards the recent, spontaneous taxi inspections conducted by you on Saturday 15 November.

It is regretful that local taxi firms were unable to meet all their taxi obligations and had to suspend or reduce services significantly owing to discontent and frustration manifested by taxi drivers.

The inspections were carried out without any prior consultation with the local taxi license holders and thus much disruption ensued on the night in question.

The dominant feeling among the local operators with regard to the wholly new point system and the initiation of sudden checks is that such measures should have been taken after having informed all local taxi operators, who are keen to extend their cooperation in this respect.

We, the local taxi firms, and you share a common objective; that is to ensure that all vehicles are in a satisfactory condition and that all is in order.

To that end, we must establish a healthy working relationship; therefore, we request that in future the trade is consulted properly when proposals affecting it are considered.

However, since the trade was not properly consulted or informed there has been disagreement with the points system, we wish to raise the following and our Drivers have demanded that the points given on this night should be quashed, the whole system needs to be reviewed within 14 days. We do not wish to cause any disruption, or be put in a position where our Drivers refuse to work due to the risk of them getting points on their license and ultimately risking or losing their livelihood. The Council seem to be of the impression that they can just suspend or revoke a license as and when they feel, without giving any proper regard to causing unemployment or putting an individual in difficulty.

- We would like a cap on the number of points a Driver gets in any once instance. We as a trade have agreed that this should be no more than 4 points.
- If a Driver is not signed on or is not working, they should not be subject to any enforcement or receive points for not carrying his badge.
- We do not agree with any enforcement being carried out on a Friday or Saturday night. We as a trade are in agreement that we will suspend services should this occur.
- We are totally against the procedure that was used on Saturday night. In front of our passengers our Drivers had their badges seized and told to Drive back to the Mothercare Car Park to have them inspected.
- Why is there nobody ever available to answer our queries. We would like to know the number of days each member of staff in the Taxi Department has taken off in the past 12 months. Whenever, we call staff are either off sick, in a meeting or on a day off. Our messages and queries are not responded to.

- Not all Operators have access to computers or email, therefore, they should also be informed by letter. Some Operators did not receive any consultation papers or anything on the introduction of the points system.
- We believe that enforcements officers systematically abuse their positions. We feel that we are being treated as criminals, disrespected and made to feel low in front of our passengers and the public. Our Drivers face the backlash by the public and they feel threatened
- Why do CRB applications with AVDC take up to 12 weeks, whereas the same checks are completed by Bucks County Council within two to four weeks.
- Our Taxi Plates take up to a week or two to be ready on occasions. Other Councils, the plate is ready straight after the vehicle has passed. We would like a paper license immediately to carry with us once the vehicle has passed its inspection and Drivers should be allowed to work straight away.
- We would like the Council to abolish the DSA test and introduce the Midas course to improve standards.
- Medicals – We would like to have external medicals. Paying for a medical a Taxi License can cost a Driver up to £400.
- We want a review of our plate fees and we would like a full breakdown of the fees we pay ie, cost of license, admin costs, materials etc.
- Taxi inspections – We would like the Council to nominate 5 garages we can go to and get our MOT's done, we have to wait too long and if our Drivers are delayed by a few minutes, the inspection is cancelled and we have to fork out another fee. MOT takes 45 minutes and we are allotted 1 hour, if we are late by 6 minutes why is the inspection cancelled.
- Fare Dodging – Our Drivers are always told it is a civil matter by the Police, when we are all well aware that it is an offence. Passengers are taking advantage of this and this leads to our Drivers taking matters in to their own hands.

We believe the points system is unfair. Our Drivers should not be suspended if they accumulate 12 points, rather be called in for an initial warning.  
 On 16 points a second warning needs to be given.  
 Once they reach 20 points and no improvement has been made the Driver should then be considered for suspension.  
 Points should be cleared off their license after each year.

We agree to the points as follows:

Points System:

- Failure of a Hackney Carriage/Private Hire Driver to wear driver's badge – 1  
Drivers can be wearing this under their jacket.
- Failure of a Hackney Carriage/Private Hire Driver to produce driver's badge – 1  
Driver should be given 7 days if he cannot then should be considered for points.
- Failure to display licence plate, door signs or window badge (livery) – 1  
Plates can fall off without the Driver noticing, the bracket is not very durable.
- To obstruct or fail to comply with any requirement properly made by or fail to give information or to give false information to an authorised officer or constable – 2
- Private Hire vehicle entering or stopped in a Taxi Rank – 1
- Failure to operate the taximeter from commencement of the journey and charging more than the fixed charge for hire of Hackney Carriages – 2
- Hackney Carriage vehicle not displaying the tariff from within the vehicle – 2
- Licensed vehicle not carrying either the required Fire Extinguisher and First Aid Kit – 1

- Vehicle defect Major, Immediate suspension e.g. bald tyres, prohibition – 2
- Vehicle defect Minor, advisories e.g. rust, cleanliness – 0 – a slight scratch or dent does not warrant the vehicle to be unroadworthy. We do not accept that our Drivers should get points for any damage to a vehicles bodywork. We get passengers that kick our vehicles, slam our doors, rip our seats.
- Other – 1

We would like a response to the above in 14 days please.

We wish to hold a meeting with members of the committee and the Head of the Licensing department. There is too much unrest in the trade, our Drivers are considering a number of peaceful protests within the town centre over the coming weeks.

Yours faithfully

Aylesbury Private Hire Association

# AYLESBURY VALE DISTRICT COUNCIL

## Environmental Health and Licensing

Please ask for:

Direct Line: 01296 585083

Switchboard: 01296 585858

Text Relay: prefix telephone number with 18001

Email: [pseal@aylesburyvaledc.gov.uk](mailto:pseal@aylesburyvaledc.gov.uk)

Our Ref:

Your Ref:



26 November 2014

Dear Operator

### Re: Penalty point enforcement system

On the 24 November 2014 I received an e mail from the 'Aylesbury Private Hire Association' predominantly expressing concerns regarding the recently introduced penalty point enforcement system. I am unaware of who the Association represents, it's terms of reference and internal governance. I am therefore writing to all private hire operators to ensure a consistent and totally inclusive message. I would ask that this important message is conveyed without delay to all your drivers.

Earlier this year the Council's Licensing Committee agreed the introduction of the penalty point system. This followed consultation with all operators and various statutory partners. In fact 2 private hire operators and a hackney carriage driver attended the committee meeting that agreed the points system. Initial formal discussion with licensing committee occurred as early as 2013 in response to repeated breaches of licence conditions. The points system is seen as a transparent, targeted, consistent and structured approach to enforcement. It seeks to deal with specific and usually repeated breaches of licence conditions. Such breaches are susceptible to absolute proof and, in all but the rarest occasions, inexcusable, such as a driver not wearing his badge. I have discussed the content of the e mail from the Aylesbury Private Hire Association with the Chairman of Licensing Committee. The use of the penalty point system will continue. However a formal report will be brought before licensing committee in March 2015 to review its effectiveness and indeed fairness. You will have every opportunity to participate in that review. In the meantime I have also discussed the implementation of the points system with both colleagues in taxi licensing and Thames Valley Police and in respect to the demands made I would comment as follows:

1. The maximum number of points a driver will be given at any one time is 7. During a recent enforcement evening a driver totted up 8 points, although only 7 were awarded.
2. In respect of whether a driver or not is working at the time is entirely irrelevant in respect of all the targeted offences other than wearing a badge. If a driver is not satisfied there is an appeal procedure. Once invoked a decision will be made to either uphold or dismiss the points based on the evidence provided by the enforcement officer and the representation made by the appellant.
3. Enforcement will continue to be carried out both during the week and at weekends. Both ourselves and the police will carry it out sensitively and avoid peak periods and disruption to your business. Points will only be issued where necessary.
4. Ordinarily vehicles conveying passengers will not be stopped unless they are committing a road traffic offence. The operation on the 15<sup>th</sup> November 2014 was unusual in that it was led by the Roads Policing Team. We have no intention to mount a similar operation this year but may do so in 2015.
5. All operators provide an e mail address on application so that we can quickly and efficiently communicate with them all.
6. In relation to the request to quash the points issued on the 15<sup>th</sup> November I have given this





some considerable thought. The points issued that evening were done so entirely legitimately and in accordance with the scheme. If drivers were unhappy with the points issued there is an appeal procedure available. It is entirely unacceptable to remonstrate with and threaten Council and police officers. On that basis the points still stand. However as some of those affected may not have availed themselves of the appeal process due to the letter from the Aylesbury Private Hire Association I will extend the appeal closing date to the 5<sup>th</sup> December 2014.

Finally the letter mentions a number of other issues relating to taxi and private hire licensing, including criminal disclosures, the Driver Standards Agency taxi test, medicals and fees. I intend to convene a meeting with the trade within the next week or so. The Chairman of the Council's Licensing Committee intends to attend as well as a police representative. Please confirm if you wish to attend by e mailing [taxilicensing@aylesburyvaledc.gov.uk](mailto:taxilicensing@aylesburyvaledc.gov.uk)

The letter from the Aylesbury Private Hire Association asserts that 'we must establish a healthy working relationship'. Over the years of working together I believe we already have that. I am more than happy to listen and discuss any thing that obstructs your business and find acceptable solutions but I will not compromise the safety of the taxi travelling public. I hope that our forthcoming meeting can establish some constructive initiatives that we can take forward in 2015.

Yours faithfully

Peter Seal

Licensing Services Manager

## Taxi Trade meeting 10 December 2014

## Gateway Offices – Olympic Room

Peter Seal	-	Licensing Manager
Kyle Bennett	-	Senior Licensing Officer
Cllr Judy Brandis		Chair of Licensing Committee
Cllr Tim Mills	-	Vice Chair of Licensing Committee

## Trade Representatives

Iftikar Ul-Haq Rafiq	Ansar Mahmood
Masud Azram	Sakhi Awan
Mohammed Nawaz	Indie Sangherre
Mohammed Fiaz	Nigel Manly
Manzoor Hussain	Frank Carter

## 1. Points System –

- The current points system will remain unchanged. It will however be reviewed in the new year and a report brought before Licensing Committee. The trade will be consulted, along with other interested parties.
- The police have been very supportive of the scheme but it has been acknowledged that on the first operation it was very abrupt and did cause quite a lot of disruption to the night time trade. The police will now not stop any licensed vehicle with any visible passengers on board, unless there a road traffic offence is being committed.
- The points system addresses those issues we have had for years – no first aid kits, fire extinguishers, door signs and plates missing and drivers not wearing their badge.
- Operators should be supporting this initiative to raise standards and provide a better service to customers
- The request to quash the points received on the 15<sup>th</sup> is denied, however an extension for the appeal of the points was given. We have received one appeal.
- Masud – where there is no discretion (badge, bald tyre etc) there isn't a problem however concern was raised over officer discretion on cleanliness. PS responded that the cleanliness was more about the general wear and tear on the vehicle but could be used if the plate or registration plate is not clear due to mud etc. He confirmed that no points have currently been handed out for cleanliness and that this will form part of the review. He also pointed out that in consultation prior to implementation the level of points was consistent with other authorities who have adopted a similar scheme.
- Nigel Manly – in Kingsbury, at night it is very hard to pick up from the pubs and clubs as it is a single track road and that the only place to pull over is in

the taxi rank. Would this be allowed for drop off and pick up for private hire without picking up these points. PS pointed out that points will be issued on a case by case basis but the scenario described might be construed as unlawful and might lead to multiple private hire vehicles waiting for their fares in the taxi rank. The ranks are where the licensed taxis are legally allowed to ply for hire and would only cause more confusion to the travelling public. Sakhi Awan echoed this sentiment and insisted that allowing private hire vehicles to stop in ranks would be ruinous and lead to an unenforceable situation.

- Masud – could the max number of points be reduced from 7. PS responded that this could form part of the review but at this time the point values will remain.
- Masud – sometimes he has to move vehicles around and he may have forgotten his badge, would he get points. PS reminded him that there is an appeals procedure, however it would be more important not to forget your badge.
- Frank Carter – If there are rules and standards, they should be followed. The points system is there to assist in enforcing these standards. Why are the trade arguing to remove them. Cllr Brandis agreed with Frank but stated that there must be the ability to feed back, learn and see if the system needs changing. This is just a process.
- Iftikhar – Fire extinguishers and first aid kits are regularly stolen from his cars. Fiaz agreed that there are thefts from vehicles. PS pointed out that Thames Valley Police are progressive and supportive and recognise the importance of the taxi trade and are looking at ways they can assist. PS urged the trade to sign up to the TVP alerts system and will provide more information in the new year.
- Iftikhar – thinks the system is unfair
- Manzoor – supports the points system and thinks the trade need to be more aware that they are in a profession with standards that need to be met.
- Nawaz - wanted to reduce all the points and increase the limits – PS once again stated that the system would be reviewed.
- Fiaz – talked about the Saturday night enforcement and the rush hour morning enforcement and stated that this has a very negative ripple effect especially when having to complete school contracts. PS acknowledged this and will talk to team about enforcement and avoiding disruption to trade.
- Sakhi – Can there be an alternative to wearing the neck lanyard. KB advised that there are clips available if they would rather and there is a product called Docu-dash which holds the badge on the dashboard. However taking into consideration the comments regarding things being stolen, for some, this might not be a good idea.

## 2. DBS Checks

- The trade had expressed concerns about the length of time it was taking to obtain the criminal record. KB informed the trade about the DBS Updater service which is an annual sign up which must be adopted within 18 days of receiving their DBS. It costs £13 a year and means that a full DBS no longer needs to be sought.

### 3. Medicals

- Both the licensing team and the trade have some concerns over the reliability of the medical. It has become very costly and waiting times can often be 4 months. PS has will take a report to the licensing committee in March and present various options, from abandoning medicals and resorting to a doctor letter after 65 years of age to full medicals for those over 45 years. Manzoor suggested that medicals for over 45 year olds would be appropriate and repeated on every other renewal.

### 4. DSA test

- Similar concerns have been raised regarding the DSA test. The scheme was not something that taught new drivers but instead tested them on manoeuvres they didn't yet know. Fiaz stated that new drivers need to be taught but the drivers are tested before learning anything. He suggested a MIDAS course.
- Masud – would like the DSA abolished and the council introduce the Advanced Driver Course which would then also reduce insurance premiums for the drivers. PS mentioned the BCC course that could be created and be more readily available. Masud agreed this might be more appropriate. PS said this would also be a subject for licensing committee next year.

### 5. AOB

- Manzoor acknowledged to Council's attempt to assist the trade but wanted to ensure that standards do not drop
- Can the Private hire use bus lanes? This will be raised with the County in the new year.
- Tests – can AVDC nominate 5 x garages that can be used instead of just Pembroke road. This is not an option at this time.
- Can fees for wheelchair vehicles be reduced. PS has agreed to do a full fee review in 2015 as previously agreed by committee.
- PS advised regarding the Driver safety leaflet which was handed out
- Can we re-look at age limits on vehicles possibly introducing a matrix for style of vehicle, quality of vehicle, miles on vehicle etc. PS will add to work programme for 2015.

### Penalty points given to 15 February 2015

Points given	Code	Reason for points	Comments
2	TXP01	Not wearing badge in prom position	Admitted not wearing it
2	TXP01	Not wearing badge in prom position	Said he wasn't working
2	TXP01	Not wearing badge in prom position	In the car door
2	TXP01	Not wearing badge in prom position	He was on a break so left it in the car and forgot to put it back on.
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	
2	TXP01	Not wearing badge in prom position	In centre console
3	TXP03	Plate, door signs etc not displayed	
3	TXP03	Plate, door signs etc not displayed	
4	TXP05	PHV waiting/parked in rank	Parked in Buckingham St rank
4	TXP05	PHV waiting/parked in rank	Just dropped off
4	TXP05	PHV waiting/parked in rank	No where to park
4	TXP05	PHV waiting/parked in rank	
2	TXP08	No fire extinguisher or first aid kit	Expired (Gauge in red)
2	TXP08	No fire extinguisher or first aid kit	No fire extinguisher or first aid kit on board
2	TXP08	No fire extinguisher or first aid kit	First aid kit 11 months out of date
2	TXP08	No fire extinguisher or first aid kit	Expired fire extinguisher 2013
2	TXP08	No fire extinguisher or first aid kit	First aid kit open and expired 2004
2	TXP08	No fire extinguisher or first aid kit	
2	TXP08	No fire extinguisher or first aid kit	
2	TXP08	No fire extinguisher or first aid kit	
2	TXP08	No fire extinguisher or first aid kit	
2	TXP08	No fire extinguisher or first aid kit	
4	TXP09	Major vehicle defect - imm suspension	Tyre below legal limit
4	TXP09	Major vehicle defect - imm suspension	Tyre below legal limit and defective tyre
4	TXP09	Major vehicle defect - imm suspension	The boot could not be opened
2	TXP10	Minor vehicle defect - advisories	