



Department  
for Transport

# Automated Passenger Services permitting scheme Government Response

April 2026

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## Foreword

Great Britain stands on the threshold of a profound shift in how people move, connect, and participate in society. Automated passenger services represent one of the most significant transport innovations of our generation. An opportunity not only to transform mobility but to deliver meaningful economic, social, and safety benefits across the country. As we publish the Government Response to our consultation on the automated passenger services permitting scheme, we reaffirm our commitment to ensuring that this technology is introduced safely, responsibly, and in a way that realises its benefits for all.

Above all, safety remains our highest priority. This Government will never compromise on the safety of passengers, other road users, and the public. The Automated Vehicles Act provides a strong foundation, establishing world-leading legal responsibilities for companies that deploy self-driving vehicles. In parallel, our emerging safety framework, developed through extensive consultation with industry, local authorities, and safety specialists among many others, ensures that automated services meet rigorous, transparent, and continually monitored safety standards. We also remain committed to addressing the issues raised as part of the National Audit on Group-based Child Sexual Exploitation and Abuse, not just for existing taxi and private hire services, but also for these new and emerging transport services. As services begin to operate on our roads, the public can be confident that safety will be independently assessed, upheld, and enforced.

Automated passenger services have the potential to support independence and widen travel choices for disabled people and older passengers. We will continue to listen carefully to the voices of disabled people, user groups and accessibility experts to shape our policy as this technology matures. The introduction of the Automated Passenger Services Accessibility Advisory Panel (APS AAP), a new, non-statutory panel, will guide the department's development of accessibility considerations and non-statutory guidance relating to the deployment of these services. Our goal is clear: to ensure that automated passenger services support a more equitable and inclusive transport system.

Self-driving technology has the potential to unlock substantial economic opportunity. We are already host to several world-leading research institutions, pioneering technology developers and a globally respected regulatory environment. By enabling the safe deployment of passenger-carrying automated vehicles, we aim to create an ecosystem that will offer new high-skilled jobs, encourage private investment, and support a competitive market that drives long-term, sustainable growth. Automated passenger services have the potential to enhance local economies as well, improving access to employment, education, and essential services, particularly in areas where public transport provision is limited.

The Government Response published today reflects our ambition and our responsibility. It sets out a clear path for the introduction of automated passenger services to help realise the opportunities for greater economic prosperity, inclusivity, and upholding the highest standards of safety. Working in partnership with industry, local communities, experts and the public, we will build a future in which innovation supports a stronger, fairer, and safer transport system for everyone.



A handwritten signature in black ink, which appears to read 'Simon Lightwood'. The signature is fluid and cursive, written over a horizontal line.

**Simon Lightwood MP, Minister for Roads and Buses**

# Executive summary

## Introduction

This is the outcome to the government's consultation on the proposed Automated Passenger Services (APS) permitting scheme. The scheme is designed to provide a flexible and clear legal route to enable the carriage of passengers in vehicles designed or adapted to travel autonomously or in vehicles being trialled with the aim of developing them to travel autonomously. The APS permitting scheme provides a separate legal framework to enable the carriage of passengers to taxi and private hire vehicle (PHV) licensing and public service vehicle licensing.

Self-driving vehicles provide the opportunity to deliver a range of benefits for people who currently have limited or restricted travel options, relying on others or planning journeys around infrequent or expensive travel options. APS provide a particular opportunity for older and disabled people, supporting independent travel and greater opportunity for personalisation of service.

The APS permitting scheme is introduced by Part 5 of the Automated Vehicles Act 2024 and a statutory instrument (SI). The draft SI was procedurally focussed, setting out elements such as the application renewal process, withdrawal of a permit and the appeals process. Additionally, the consultation included questions related to the broader operation of the proposed scheme and the development of non-statutory guidance to support those who will engage with the scheme.

The consultation, which ran from 21 July to 28 September 2025, received 169 responses. Not all questions were answered by all respondents, and where a response was submitted through the web form, not all questions were available to all respondents. This included specific questions for local authorities to understand their thoughts on making guidance as useful as possible for them. Where responses were submitted through a downloaded version of the form, all questions were available to be answered.

## Proposed Automated Passenger Services Statutory Instrument

The consultation included several questions on the proposed SI. This covered the:

- Application process and renewals;
- Variation, suspension and withdrawal procedures;
- Maximum validity period;
- Fees;
- Reviews of decisions; and
- Disclosure and use of information.

Respondents had a wide range of views on the proposed SI. This reflected both the uncertainty over what the introduction of self-driving passenger transport services would mean in a Great Britain-specific context and the aspiration for them to be treated similarly to the approach to PHV licensing. The SI is designed to enable the safe deployment of services in an appropriately regulated environment, providing the opportunity to build greater experience from lessons of deployment and, where appropriate, refine regulation in the future.

Following review of the responses, one change will be made to the final SI. This will increase the scope of data sharing to enable wider non-safety related information to be shared with emergency responders, ensuring there is an awareness of how to interact with and respond to any incidents involving a permitted APS.

Alongside the SI, wider views were sought on matters including:

- Developing guidance,
- Raising awareness and understanding with local authorities,
- Reporting by permit holders on safeguarding and supporting older and disabled people,
- Criminal record checks for safety drivers,
- Permit validity period for initial pilot deployments.

A significant amount of feedback was received on making the proposed non-statutory guidance useful for authorities and other stakeholders. There was universal support for the government supporting co-ordination, information, and best practice sharing between authorities from those answering the question.

These views, where appropriate, have been incorporated into the guidance, while other wider comments will be considered in the approach to management and operation of the scheme. A core component of the guidance is raising awareness of the scheme, while the government will consider further routes to raise awareness of the scheme, and how co-ordination, information and best practice sharing can be achieved.

A wide range of views were also submitted outlining what people would expect to see permit holders report on concerning safeguarding and supporting older and disabled people. A consistent theme across responses was of the importance of APS being accessible, with reporting having a role to play in building a greater understanding of how the scheme can support inclusive travel.

Significant support (c.90%) was shown by respondents for safety drivers and passenger assistants to be subject to the same criminal record checks as taxi and PHV drivers. Support was more varied for medical standards, with safety drivers receiving strong support (89%) and passenger assistants receiving high support (76%). Routes are being explored to ensure that employees with customer facing roles and working in the same space as passengers for an APS organisation will be appropriately vetted for the role they hold.

Approximately 66% of respondents supported the proposed approach to initially granting shorter permit validity period. This approach will be adopted for the granting of permits, working within the parameters of the five-year maximum validity period.

# Introduction

## The Automated Vehicles (AV) Act 2024

The government's landmark AV Act (referred to as "the act") gained royal assent on 20 May 2024, cementing Great Britain (GB) as a leader of self-driving technology regulation. The act delivers one of the most comprehensive legal frameworks of its kind worldwide, setting out who is liable for AVs meaning that drivers can be assured that, while their vehicle is in self-driving mode, they will not be held responsible for how the vehicle drives. For the first time, corporations such as insurance providers, software developers and automotive manufacturers can assume this responsibility.

In June 2025, the government announced that the APS permitting scheme would be introduced in Spring 2026, ahead of full implementation of the act in the second half of 2027. The early introduction of the scheme is intended to help realise some of the socioeconomic benefits, including for more inclusive travel, give businesses greater confidence to invest in Great Britain and inform the development of the full regulatory framework.

## Enabling self-driving passenger carrying services

The Automated Passenger Services (APS) permitting scheme, as introduced in Part 5 of the act, was enacted to provide a clear legal route for automated vehicles to carry passengers. A permit can be granted to self-driving taxi-, private-hire-and bus-like services, or where it is a requirement of a no-user-in-charge operator, as introduced in Part 1, s.12 and s.13 of the act.

The APS permitting scheme provides a clear, flexible and targeted framework to enable different approaches to passenger transport to be deployed in recognition that this is a novel and evolving form of transport. Self-driving passenger services have the potential to provide greater choice and flexibility, including new public transport options in less-connected areas and strengthen mobility, accessibility and independence for those unable to driver.

# Consultation

## Overview

The consultation ran for 10-weeks from 21 July to 28 September 2025 and received 169 responses, of which all have been considered through the analysis. The consultation asked for views across 22 core questions, broken down to 37 sub-questions on the web-form, including the additional questions for local authorities. The consultation asked for views on the proposed APS SI, 'The Automated Vehicles (Permits for Automated Passenger Services) Regulation 2026', other matters related to management of the scheme, and proposed guidance to support local authorities.

This document summarises the responses to the consultation and includes the use of anonymised quotes from some respondents to support understanding. The use or absence of any particular quotes does not necessarily indicate agreement or disagreement.

## Methodology

The consultation was a mix of open and closed questions to gain views on the proposed SI, wider approaches to managing the scheme, and the government's consideration of developing guidance. A thematic analysis was undertaken against questions to draw out key themes raised through the responses alongside analysis of responses to closed questions. This document sets out the main themes raised through responses and the government's response.

## Overview of respondents

Stakeholder Group	Number of respondents
Individual	84
Local Authority	25
CAM Sector	9
Taxi, Private-Hire and PSV Operator	9
Insurer	9
Not for profit organisation	8
Emergency Service	7
Other company	6
Legal	6
Interest Group	4
Trade Union	2

*Table 1: Breakdown of respondents by stakeholder groups*

Responses to the consultation were received via the online form and email. Table 1 outlines the number of responses received from different stakeholder groups, including from people not responding as part of an organisation.

Some email responses did not follow the exact question format asked and presented their response differently from the survey. Where appropriate, these responses have been fed into the appropriate question or, where not clear, into the final question and recorded as 'other comment'.

Not all respondents answered each question. Any percentage or summary given is based on those who answered the question.

The order of this response will begin with the responses to the SI proposals, before going on to discuss safeguarding and accessibility, and then the responses received to the questions around guidance.

# Proposed Automated Passenger Services Statutory Instrument

## Content of proposed SI

This section provides a summary of responses related to questions on the proposed SI. This includes:

- Permit maximum validity period;
- Renewing a permit;
- Fees not initially being charged;
- Variation, suspension and withdrawal of a permit;
- Approach for ordinary and urgent cases to vary, suspend or withdraw a permit;
- Request for reviewing a decision by the Driver and Vehicle Standards Agency; and
- information sharing.

It also includes a question relating to a power not proposed for enacting at this stage.

## Maximum validity period

**Do you agree or disagree that regulations should set the maximum permit validity period at 5 years?**

**Do you agree or disagree with our proposed approach to initially grant APS permits for a shorter validity period?**

## Background

The government proposed that the maximum permit validity period should be set at five-years to align with the current maximum validity period of Private Hire Vehicle (PHV) operator licences. The intention is to give credible and reliable operators who have a proven safety record greater certainty.

## Responses

136 people answered this question, 52% (71) of respondents agreed, 36% (49) disagreed, and 12% (16) did not know.

A majority of respondents agreed with the five-year proposal, agreeing that basing the maximum period on current licensing for services with a human driver is a sensible and fair benchmark to start with.

The most frequent reason for those who disagreed was that their preference was for permits to be granted for a shorter period of up to one year due to the speed the technology advances.

A Public Service Vehicle (PSV) operator considered the financial costs of operating a service, they responded that:

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*“The five-year period is reasonable in respect of the recovery of financial investment in vehicles, software, systems and human resources. Some of which will require substantial investment.”*

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Some respondents questioned why there is a need to set a maximum validity period. One PHV operator noted that in the utility sector, licences are often open-ended:

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*“It is standard for regulators to grant licences for regulated activities on an open-ended basis, as is evident in water and waste operations, the electricity and gas markets, and in premises licensing. These licences remain in force until the licence is surrendered or revoked, and do not require periodic reapplication.”*

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Others thought that time-bound permits would provide an opportunity for the permit granting body to reassess the service. In regard to automated technology, three individuals said:

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*“Long or open-ended permits risk entrenching flawed systems before their real-world impacts are fully understood.”*

*“It is important that service quality is monitored and evaluated, particularly as this technology is developing at a fast pace. A service that has been given a permit to operate could look very different in five years' time.”*

*“It is an opportunity to prevent bad services from continuing. If there is evidence that a service has been troublesome, it can be banned.”*

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## Shorter validity period

There were 137 responses to the question on whether people agreed or disagreed with the proposal to initially grant a permit for a shorter period. Almost two-thirds of respondents to this question agreed with the proposed approach, with 63% (86) responding that APS permits should be granted for less than five years; 28% (39) disagreed and 9% (12) say they did not know.

Separating the responses by organisation type, the Connected and Automated Mobility (CAM) sector and local authorities were generally in favour of shorter initial permits, particularly for the initial pilot period. Following this period, there was more variation in views.

Some individuals noted the speed at which technology changes and evolves. One commented that:

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*“This timeframe balances the need for regulatory oversight with the operational stability required by service providers. Automated vehicle technology and regulatory standards are evolving quickly. Regular permit renewals every five years ensure that operators remain compliant with the latest safety protocols, accessibility requirements, and data reporting standards.”*

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Another individual suggested a phased implementation, in which permits were issued for increasingly long periods:

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*“For an initial period; say three years, set one-year permits for adequate monitoring purposes. Once / if the technology is proven then extend that to three years, then five years over a period of time, e.g., one year for the first three years, three years from third renewal then five years thereafter subject to acceptable outcomes / results from the previous periods; - safeguarding, customer experience, RTCs, emergency service.”*

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## Government response

The government will introduce a five-year maximum permit validity period for APS permits which will be set in secondary legislation. A five-year maximum period is judged to be appropriate, offering some business certainty taking into account the costs to establish a new service. As a fast-developing area, setting an upper permit period encourages operators to continue to meet high standards to achieve renewal. It also allows regulators to identify gaps in standards and adjust the requirements.

Initial permits during the piloting phase will be granted for shorter periods of around 12-to-18-months to allow pilot deployments to be introduced safely. This will not be set out in secondary legislation because it is only necessary to set out the statutory maximum limit.

## Renewals

**Do you agree or disagree with the length of the proposed APS permit renewal window?**

**Do you agree or disagree with our proposal for an existing permit to remain valid, subject to the maximum 5-year period, where the renewal process is delayed?**

## Background

The proposed approach was to create a “renewal window”, beginning six months before the permit’s expiry date and ending two months before the expiry date. A permit holder who applies for a renewal within this ‘window’ would be protected against delays to the renewal which would otherwise have seen the permit expire. Once an application for renewal has been made, the permit will continue until either a decision on renewal is made, or the five-year maximum period is reached. The basis of the proposed approach was to ensure that services relied upon by passengers are not disrupted where the renewals process is delayed. The proposal also protects safety drivers and passenger assistants whose work would otherwise be affected.

## Responses

### The length of the renewal window

130 responses were received to this question. A majority of respondents agreed with setting a four-month renewal window, which starts six months before the permit’s expiry date and ends two months before it: 59% (77) of respondents agreed, 23% (30) disagreed and 18% (23) did not know.

Many respondents described the proposed window as being ‘appropriate’. As one individual noted:

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*“I agree with the proposed two-to-six-month renewal window because it offers a practical balance for both operators and regulators. It gives enough lead time for permit holders to*

*prepare and submit accurate, updated information—especially where changes in technology, safety protocols, or local conditions may affect continued eligibility.”*

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A not-for-profit organisation highlighted that the proposed renewal window helps maintain service continuity, reducing risks of service suspension from administrative delays. They did, however, warn that the period may not be long enough due to the complexity of APS operations and challenges in finding replacements. As a mitigation, it suggested that earlier indications of renewal intentions should be encouraged, possibly with incentives for operators, giving authorities more time to plan and minimise disruption.

However, there was some disagreement to the approach. A PHV operator said:

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*“We disagree that a two–six-month renewal window is sufficient. While we understand the need to balance regulatory flexibility with operator certainty, a short renewal window risks creating service disruption, particularly for operators making significant investments in fleet, infrastructure, and workforce planning. We propose six-12 months to provide operators with adequate time to prepare, compile evidence, and engage with multiple authorities. This also ensures regulators have sufficient capacity to review complex submissions without delaying decisions. It helps avoid “cliff-edge” risk where permits expire before renewal is processed. A longer renewal window ensures the process is robust and avoids rushed or incomplete submissions.”*

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Other windows proposed by respondents included:

- Four-six months,
- Three months before,
- No window.

#### Continual cover

Where a renewal is applied for within this proposed window, the recommended approach was also for the permit to continue until either a decision on renewal is made, or the permit has been in place for five years. There was less support for this proposal: of the 131 responses 47% (62) of people agreed, 38% (49) disagreed and 15% (20) did not know.

Some PHV operators and local authorities responded that this proposal does not align with existing taxi and PHV (TPH) licences, which do not remain valid.

An individual said:

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*“Don’t accept that the renewal should be delayed - this would seem to be either a failure of the process or that there is good reason for not renewing.”*

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Several respondents thought that the process should depend on the source of the delay. Some thought that the permit should remain valid if the delay was caused by the permit granting authority, but not if the applicant had delayed responding to requests for information. A CAM sector respondent noted that if it is a delay caused by the applicant, it should not remain valid. However, where delay is caused by the authority they supported a provisional grace extension of three months. Another respondent suggested distinguishing between administrative delays and delays due to safety investigations.

A few respondents asked how potential disruption to services would be avoided where permits have been granted for the full five-years. This cliff-edge situation could create an unhelpful and unnecessary deadline for consenting authorities to make decisions.

One individual suggested that the permit should remain valid for beyond the maximum five-year period where the renewal has been delayed. A local authority disagreed with this on the basis that the maximum validity period is a vital safeguard.

On the other hand, many respondents thought that the proposal struck a helpful balance. One individual commented that:

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*“This approach prevents unnecessary disruption to services and avoids penalising operators for administrative delays beyond their control. Maintaining permit validity ensures continued access to safe, reliable transport for passengers, which is especially important during the early adoption phase of automated services. However, it is essential that such extensions are time-limited and conditional upon operators maintaining compliance with all permit requirements during the delay period. This ensures safety and operational standards are upheld while providing flexibility to licensing authorities. Overall, this balanced approach supports both operational stability and regulatory oversight.”*

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A respondent from the CAM sector described this provision as a “common-sense provision that protects operators from penalties due to processing delays outside of their control, ensuring service continuity.”

## Government response

The government will introduce a renewal window which begins 6 months before an APS permit’s expiry date and ends two months before it; this position was supported by most respondents. This will be set out in secondary legislation which is scheduled to be laid in Spring 2026.

Where a renewal is applied for within the renewal window, but the decision is delayed, the original permit will remain valid up until a decision is made or the five-year maximum period is reached. The two provisions taken together should allow authorities sufficient time to review applications while deterring late applications and ensuring continuity of service for passengers.

The government notes the concerns regarding permit applicants deliberately delaying the process so their permit remains valid and the risk of a ‘cliff edge’ for five-year permits where not renewed in time. The government believes that the circumstances in which a permit can be varied, withdrawn or suspended are sufficient to take action against permit holders who use the renewal process in bad faith to extend the permit’s validity period. The intended flexible nature of the renewal process further provides an opportunity for a permit renewal to not be granted where an applicant is not engaging appropriately with the process or viewed as doing so in bad faith. As experience is gained of renewing permits, this will continue to be reviewed.

To mitigate against the risk of a ‘cliff edge’, permit holders can maintain good engagement with local authorities and other local stakeholders in advance of a renewal application. Engaging with local authorities and other local stakeholders in advance of formally submitting a renewal application is likely to provide a good understanding of any concerns and a route to enable local issues or policies to be reflected through a service. This engagement could ease the renewal process.

## Fees

**Do you agree or disagree with the proposal to not immediately charge an APS application fee?**

**Do you agree or disagree with the proposal to introduce an APS application fee in the future, following the implementation of the full act?**

## Background

Section 89(4) of the act gives the government the power to introduce fees to cover costs incurred, or likely to be incurred, in managing the APS permitting scheme. In the consultation, the government proposed that it would not exercise the fee powers at this stage. APS permit applicants would therefore not pay any sum of

money to apply for or hold a permit to carry passengers before full implementation of the act. However, from this point, the intention is to charge fees. The government will consider whether the fees should be levied on applications, renewals, grants or retentions, or on some combination of these.

The basis for the proposal to not charge a fee at this stage is the uncertainty around how much the scheme is likely to cost to operate. If a fee is set in secondary legislation now, there is a risk that it will not appropriately reflect the actual or likely costs to be included, as required by the act. Therefore, the legislation would likely need to be amended in the near future, once more evidence has been gathered on the true costs.

Instead, the intention is to determine a more accurate fee for APS permits by learning from any pilot deployment(s) in advance of full implementation of the act. Experience from any pilot(s) should provide the government with a better evidence base to develop an appropriate fee structure. Subject to appropriate review of the costs associated with managing the scheme by Driver and Vehicle Standards Agency (DVSA), fees may be implemented alongside or following full implementation of the act.

## Responses

### No immediate fees

127 responses were received, with 40% (51) of respondents agreeing with the approach to not immediately charge an APS fee, 46% (58) disagreeing and 14% (18) did not know.

Support was weaker among respondents from the existing TPH sector. A representative journal of the taxi, chauffeur and PHV sector highlighted the potential unfairness of the proposal, given that it is likely that large multi-national companies will be among the first applicants for the APS scheme, and that they will be in direct competition against existing PHV and taxi operators who do have to pay fees.

However, opposition to the proposal was not unanimous, even within this sector: A PHV operator commented:

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*“This approach is proportionate at this early stage to allow government to gain experience before setting fees that reflect the true cost of administering the scheme.”*

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Similarly, an accessibility organisation commented:

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*“The charging of fees should not discourage small providers who might be able to offer innovative accessible APS services, especially in underserved areas.”*

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Of the 17 local authorities who answered this question, 71% (12) disagreed with the proposal, 23% (four) agreed and 6% (one) did not know. The most frequent reason given by those who disagreed was a concern around financial support to make the consenting decision in their roles as TPH licensing authorities / bus franchising authorities as required in the draft statutory instrument. However, one local authority with experience in operating early trials agreed with waiving fees during the initial pilot stages of the scheme. They argued that it would lower the barrier to entry, encourage innovation from a wider range of operators, and allow the government and the DVSA to accurately assess the administrative costs involved before designing a fair and proportionate fee structure. A second local authority further supported the proposal, reasoning that the government needs to build evidence, experience and encourage investment.

Some individuals suggested that APS fees should be based on the current fees that are charged for TPH licensing. This was considered by the government however, due to the different range of fees charged by licensing authorities and feedback that not all licensing fees charged fully cover costs, was not seen as an appropriate approach for a national scheme. Calculating and charging an average would also be inaccurate as a means to base a fee regime as it would be highly unlikely to reflect real administration costs.

### The introduction of a fee in the future

From 122 responses, 61% (75) of respondents agreed with the proposal to introduce an APS fee in the future, 21% (25) disagreed and 18% (22) did not know.

Those who disagreed included respondents who thought a fee should be introduced from the start and those who fundamentally disagreed with enabling self-driving passenger transport services to be deployed. Those who fundamentally disagreed with enabling self-driving passenger transport services also typically responded in the negative to other questions.

A broader response included the below from an organisation in the CAM sector:

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*“Fees should be introduced in the future if fees are proportionate, transparent, and based on fleet size or commercial revenue to avoid stifling innovation.”*

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A technology developer agreed with the proposal to introduce a fee and requested clarification on future intentions to consult on this before they are introduced. The government will consult on the proposed fee structure in future.

A motor insurer noted that once the framework is fully implemented and industry is more mature, it is reasonable to expect operators to contribute to permitting and the overall cost of monitoring, provided that fees remain transparent and proportionate.

An individual raised the issue of frivolous applications, noting that a fee is required to deter these. One PSV operator suggested that no fee should be charged when the APS scheme is introduced or in the future to maintain consistency with regulatory principles that are already in place for introducing PSV services with a human driver.

On the other hand, one individual summarised:

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*“Not charging a fee from the outset is unfair as self-driving services are likely to require more oversight than other services due to the experimental nature of this new technology and that if passengers are paying to use the service, operators should be paying to be granted an APS permit to run the service.”*

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## Government response

The power to introduce fees will not be exercised at this stage. The government recognises the range of views expressed on the need and basis for charging a fee and it remains the intention to introduce fees following full implementation of the act when there is a stronger evidence base. The government will seek to understand the overall costs of managing the APS scheme during the pilot phase, where the government will be able to gather real-world evidence to build an accurate and robust fee structure.

## Vary, suspend, withdraw

**Do you agree or disagree with our proposed approach to vary, suspend or withdraw an APS permit?**

**Do you agree or disagree that in ordinary cases, the Secretary of State for Transport should give the APS permit holder and consenting authority notice of an intention to vary a permit and invite representations?**

**Do you agree or disagree that in urgent cases, the Secretary of State for Transport may suspend or make a temporary variation to an APS permit first, and then invite representations?**

## Background

The proposed regulations set out the circumstances in which the Secretary of State may vary, suspend or withdraw an APS permit. Draft regulation 5(1) allows changes to a permit in any circumstances, if the permit holder consents. This is likely to be led by a request from the permit holder to vary a permit. In other cases, the Secretary of State for Transport may vary, suspend or withdraw a permit unilaterally, in any of the circumstances set out in the proposed regulation 5(2).

These proposed grounds are:

- The permit holder breaches a permit condition.
- A vehicle to which the permit applies commits a traffic infraction that the Secretary of State for Transport considers serious or repeated.
- Multiple vehicles to which the permit applies commit the same or similar traffic infractions.
- The permit holder does not fulfil an undertaking given to the Secretary of State for Transport.
- During the application process, the applicant made a statement of fact that (whether to the applicant's knowledge or not) was false.
- During the application process, the applicant made a statement of expectation, and that expectation has not been fulfilled.
- Since the permit was granted, there has been a material change of any circumstances that were relevant to the grant of the permit.
- The Secretary of State reasonably believes, in relation to a vehicle to which the permit applies, that:
  - there are serious safety concerns about the vehicle.
  - the vehicle has caused or will cause serious or repeated disruption to traffic.
  - the vehicle has caused or will cause an unacceptable delay to an emergency worker who is responding to emergency circumstances.
- A vehicle to which the permit applies is in an unroadworthy condition within the meaning of section 75 of the Road Traffic Act 1988 (vehicles not to be sold in unroadworthy condition or altered to be unroadworthy).

Regarding the proposed approach to vary a permit, 119 respondents answered this question with a good majority agreeing with the proposed approach: 72% (86) agreed, 11% (13) disagreed and 17% (20) did not know.

On the proposed approach to suspend a permit, 121 responses were given, with a clear majority of respondents agreeing: 77% (93) agreed, compared with 8% (10) who disagreed and 15% (18) who did not know.

For the proposed approach to withdraw a permit, 77% (92) of the 120 respondents agreed, 8% (10) disagreed and 15% (18) did not know.

## Responses

### Overarching responses on normal variation, withdrawal and suspension

Several respondents said that public safety should be paramount and considered the proposed approach to be a sensible way to achieve this. The approach was described by an individual as: "essential for effective regulatory oversight and ensuring ongoing compliance with safety, accessibility, and operational standards."

A strong theme from emergency service respondents was supporting the inclusion of unacceptable delays to emergency workers as grounds for suspension or withdrawal, due to the time-critical nature of incidents where every second counts.

The importance of using these powers proportionately was raised by a range of respondents, with one individual noting:

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*“I agree with the proposed approach provided the powers are exercised transparently, proportionately, and in accordance with statutory duties—particularly in relation to public safety, equality law, and consumer protection”.*

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Respondents from a tech industry association stressed that actions should focus on serious or systemic safety or compliance issues, not minor or administrative errors. The association said:

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*“The term “repeated infractions” needs clarification to avoid disproportionate enforcement for minor breaches. This balanced approach will protect passengers, build public confidence, and reduce unnecessary service disruptions while supporting innovation.”*

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Similarly, an operator said criteria for suspension should exclude routine operational issues (e.g., technical malfunctions) and focus on genuine safety risks, avoiding vague or overly broad grounds that could undermine industry growth.

A few individuals commented on the need to ensure that there are high standards for granting APS permits, to lessen the need for variations, suspensions, and withdrawal.

One respondent asked why civil sanctions were not being introduced alongside the APS permitting scheme. They argued that the threat of civil sanctions will increase the likelihood that operators will focus on safety and more closely follow the regulations, to the benefit of APS customers. They also deemed civil sanctions to be a more proportionate penalty for minor infractions (such as entering a yellow box junction before the exit is clear) than altering the operator’s permit.

Finally, some respondents raised the need to address safeguarding concerns. Emergency services said that if there are serious safeguarding concerns that have been identified, this may warrant variation, suspension, or withdrawal of an APS permit to protect public safety.

#### Responses to proposed approach in ordinary cases

124 respondents answered the question on the approach to variation, suspension or withdrawal in ordinary circumstances. 76% (94) of respondents agreed, 11% (14) disagreed and 13% (16) responded that they did not know.

Many respondents supported the idea of giving operators the opportunity to explain the situation or circumstances and provide evidence. An example of this is from an individual who said:

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*“Yes, I agree. Due process should be followed in all non-urgent cases to ensure accountability, avoid arbitrary decisions, and allow affected parties to make legal or factual representations, especially where commercial investments, passenger safety, or local authority consent are involved. This maintains a fair regulatory environment.”*

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A technology industry association said:

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*“We agree, this process guarantees objectivity, transparency, and procedural fairness. It also strengthens confidence in the regulatory system by making clear that decisions are not arbitrary and that operators have the ability to respond before final action is taken. This aligns with existing PHV licensing practice, where licensing decisions are subject to review, and would provide automated passenger services with the same stability and fairness.”*

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An insurer said:

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*“This mirrors our own practice. Before varying policy terms, we provide written notice explaining the proposed changes, supporting evidence, and opportunity for the client to respond or remediate issues. This process often resolves concerns without needing enforcement action. In our experience, operators who receive proper notice and opportunity to explain their position are more likely to accept final decisions, even when unfavourable. Procedural fairness builds trust in the regulatory system and reduces disputes.”*

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A research organisation evaluated the approach as having the following benefits:

- Procedural fairness: Operators and consenting authorities should have the opportunity to clarify facts, present mitigating evidence, or correct misunderstandings before a decision is finalised.
- Regulatory certainty: A structured process helps maintain operator confidence that decisions are made consistently and based on complete information, which is vital for long-term investment planning.
- Collaborative problem-solving: Inviting representations allows issues to be resolved constructively, for example by agreeing remedial measures or operational adjustments, rather than resorting immediately to suspension or withdrawal.
- Public trust: A transparent procedure reinforces confidence that regulatory actions are evidence-based and proportionate, strengthening trust among passengers, local authorities, and wider stakeholders.

A CAM sector respondent also noted that: “this incentivises operators to maintain clean, auditable records (safety logs, change control).”

Some respondents commented that this would be a reasonable approach, but it depends on the definition of ‘ordinary’. A road safety group said:

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*“We agree, however, there must be a clear distinction between an ordinary case and an urgent case, with no room for ambiguity.”*

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### Overarching responses to proposed approach for urgent cases

125 responses were received on the question on the proposed approach to variation, suspension and withdrawal in urgent circumstances. Most respondents agreed with the proposed approach: 81% (102) agreed, 9% (11) disagreed and 10% (12) did not know.

#### Agreement

Most consultees agreed that swift action was needed in urgent cases. A road safety organisation said:

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*“This ensures immediate risks to passenger safety, other road users, or emergency services can be addressed without delay, while still allowing the permit holder and consenting authority to provide input afterwards.”*

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An interest group added:

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*“Allowing for urgent intervention will provide the following safeguards:*

- *Rapid risk reduction – unsafe system behaviour or repeated near-misses*

*involving vulnerable road users can be halted before they result in serious harm.*

- *Public reassurance – road users and passengers can be confident that*

*regulators will act decisively when safety concerns emerge.*

- *Accountability – APS operators remain under continuous scrutiny and cannot continue operations unchecked where serious risks are evident.”*
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## Safeguards

However, many respondents stressed the needs for safeguards. As one individual said:

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*“I agree with this approach in genuinely urgent cases where there is a credible threat to public safety or legal compliance, such as incidents involving loss of control, safeguarding failure, data breaches, or non-compliance with anti-discrimination law. However, such powers must be subject to strict internal checks and documented justifications to avoid overreach.”*

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A PHV operator added:

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*“This would benefit from guidance or a specific framework about how a case is deemed ‘urgent’ by the Secretary of State. Otherwise, there is a risk this decision will be overly subjective and subject to outside influence or pressure.”*

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A respondent from the CAM sector agreed “with the principle that APS permits should be subject to variation, suspension, or withdrawal”, which they described as a “standard regulatory safeguard”. However, they highlighted the following concern:

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*“We ask that the process for variation be clearly defined, including more detail on exactly how the grounds for unilateral action by the Secretary of State are to be understood, interpreted, and applied.”*

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It was suggested that urgent cases should be limited, for example to situations where:

- A vehicle was involved in a serious incident; or
- Immediate risks were posed to passengers or other road users.

A respondent from the emergency services added that:

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*“Any evidence of AVs delaying or interfering with emergency response operations should be considered as urgent”.*

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A bus operator asked that where only certain elements of the operation were affected, authorities should consider varying a permit, to allow a modified service to continue.

Many respondents stressed the need for a fast review process of the representations. An individual asked for:

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*“Timely review processes to avoid indefinite suspensions or variations without proper assessment. Balancing swift action with procedural fairness is key to maintaining public confidence and operator trust.”*

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A respondent from the CAM Sector thought that a single event should not lead to automatic withdrawal:

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*“To ensure deployments are successful in the future and integrate with the wider transport ecosystem, there has to be an understanding and shared responsibility that there will be a learning curve and operations may have unfortunate events that, once discovered and accounted for, may not happen again and this should not be a reason to automatically withdraw a permit.”*

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A technology developer added:

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*“Imposing an immediate restriction prior to notice and response procedures can be enormously impactful on an APS permit holder and could create existential repercussions for an APS business - including loss of ridership and long-term degradation of public trust. Recognising the real business and fairness concerns that immediate restrictions can impose, it is essential that any use of this authority is tethered to a demonstrable and urgent safety purpose that cannot be addressed in a less restrictive manner.”*

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This developer therefore asked for a definition of “urgent”; requirements to document the process; a rapid process for review; and the right to appeal to a court.

### The role of consenting authorities

A local authority raised the role of consenting authorities, saying:

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*“A consenting authority may need to vary or suspend a permit urgently but lacks this power. Government should set out how consenting authorities will be able to inform the Secretary of State of urgent cases or in what circumstances consenting authorities may withdraw consent and whether this would lead to the permit not having legal effect. Additionally, consenting authorities may think a case is urgent, but the Secretary of State does not. In such cases, local authorities, the police or other relevant bodies need to be able to stop services immediately and not have to go through protracted justification.”*

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## Government response

Overall, the proposal to varying, suspending or withdrawing a permit was supported by a majority of respondents. The proposed approach achieves a balanced framework, prioritising public safety while maintaining commercial certainty for operators. Including grounds such as serious safety concerns, repeated traffic infractions, misrepresentation, and unroadworthy conditions ensures regulators can act decisively when risks arise. The framework also supports commercial integrity by allowing proportionate interventions, preventing unsafe or non-compliant services from undermining trust and APS deployment.

The government has decided to implement the proposed approach to vary, suspend or withdraw an APS permit. Monetary penalties will be imposed when the full Act is implemented.

## Reviews

### **Do you agree or disagree with our proposed approach to reviews of decisions made by DVSA?**

*The smart survey questionnaire asked only for reasons for disagreements.*

## Background

Under proposed regulation 9(1), applicants and permit holders will be entitled to request an internal review if they are dissatisfied with a decision that DVSA have made on behalf of the Secretary of State for Transport.

The right to a review applies to the full range of DVSA decisions, including:

- Refusing to grant a permit;
- Refusing to renew a permit;
- Imposing a permit condition;
- Refusing a request to vary or remove a permit;
- Varying, suspending or withdrawing a permit under regulation 5(2); and
- Specifications made under section 82(4) about the areas and vehicles in which services may be provided and the period for which the permit is valid.

Any applicant or permit holder may request an internal review within 28 days, beginning the day after the day on which the decision was sent. The request must include any written representations they wish to make.

Under regulation 9(3), DVSA will then confirm receipt of the request within 14 days and provide a date on which they anticipate sending the applicant or the permit holder the outcome of the internal review.

Requesting a review of a consenting authority's decision is outside the scope of the power for review. Any consideration of a review or appeal would need to follow the consenting authority's local process.

## Responses

120 responses were received to the question on the proposed approach to reviews. 62% (74) of respondents agreed, 23% (28) disagreed and 15% (18) did not know.

### Reasons for disagreements and alternative approaches

A local authority advised that a formal appeal process needs to be applied after the initial trial period using the learning from the appeals submitted to DVSA during this period.

A range of respondents said that operators should have confidence that reviews are fair and free from bias. This included a technology developer saying that solely relying on an internal review process conducted by DVSA lacks independence or transparency. Other transport sectors, including licensing for taxis, PHVs, and PSVs, benefit from independent appeal mechanisms, such as tribunals or oversight by the Traffic Commissioners.

A PSV operator evaluated that:

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*"In this case the specialist nature of the subject might preclude the ability to have such an independent review – but we nevertheless recommend that the area Traffic Commissioner is nominated as the "appeal" body for decisions taken by DVSA on behalf of the Secretary of State."*

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A PHV operator shared that the appeal process that has worked well for the taxi and PHV industry over decades has been to be able to appeal to the Magistrates' Court.

Another technology developer said that this is not in keeping with the Law Commissions' review. There is no role given to an independent arbiter in either permitting or consenting decisions. The Law Commissions recommended that decisions by the regulator may be taken to the First-Tier or Upper Tribunal. The DVSA, acting on behalf of the Secretary of State for Transport, would be solely responsible for auditing its own decisions should an applicant wish to challenge them.

Respondents suggested alternative approaches, including:

- A separate team within DVSA,
- An independent body separate from the DSVA,
- A court process,
- The Office for Traffic Commissioners for bus-like APS vehicles, and
- The Secretary of State for Transport.

### Other issues raised

A local authority agreed with the proposal; however, they wanted this to be considered a transitional arrangement:

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*“As the scheme matures and the commercial value and complexity of permits increase, a fully independent appeals process, for example via the Upper Tribunal, will be necessary to ensure transparency, robustness, and legal certainty for all parties. The government should commit to a formal review of this process within the first three to five years of the full scheme's operation.”*

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A technology developer suggested adopting a default deadline for completing the internal review of 21 days, which can be extended by the Secretary of State upon identifying reasons why the review required more time to complete the review.

A local authority suggested that the government should set out how consenting authorities will be informed of additional conditions to be attached to a grant of an APS permit, how consenting authorities can make representations based on these, and how consenting authorities can request a review of decisions made by the DVSA.

The concern of resilience within DVSA to ensure it can cope with the increased workload these new regulations will likely produce was raised.

## Government response

While a range of views were received, including on the importance of trust in the process and concerns that DVSA reviewing their own process was insufficiently transparent, the government believes that the proposed approach is proportional for early deployments. The experience from any pilot will be used to inform future considerations on the approach, including feedback from stakeholders such as permit holders, APS applicants and local authorities.

## Information Sharing

**Do you agree or disagree with our proposed approach to information sharing?**

## Background

The consultation question asked if respondents agreed with this approach, with 132 responses to the question. Most respondents agreed with the approach, with 78% (103) agreeing, 12% (16) disagreeing and 10% (13) responding they did not know. The consultation document explained that permit conditions may require information to be collected and shared, either with public authorities or private businesses. Where information is collected under a permit condition, that information is protected. Under section 88(6) of the act, it is a criminal offence for the recipient to disclose the information to a third party unless the disclosure is authorised by regulations.

Draft regulation 10 proposes that information collected under a permit condition may be shared in six circumstances, listed below:

1. Bus open data may be shared with anyone.
2. Section 170 of the Road Traffic Act 1988 requires drivers to report accidents to the police. Where permit conditions require similar reports to be made to the police, the police may share them in the same way as section 170 reports.
3. Information about safety-related incidents shared with the Secretary of State may be disclosed where this would be in the public interest and the information is factual.
4. Information disclosed to the Secretary of State may be disclosed to courts or tribunals where it is relevant; or to prosecuting agencies for the purpose of investigating potential criminal offences.
5. Where the permit holder is required to publish information but has failed to do so, the Secretary of State may publish the information.
6. Where the permit holder provides information to a complaints-handling organisation about a complaint, that complaints-handling organisation may disclose it to the complainant.

## Responses

### Bus Open Data Service (BODS)

Overall, more respondents agreed than disagreed with the proposal to share information with BODS. In respect of accessibility, impaired respondents explained that they depend on BODS to get timetables. A respondent from the legal sector explained that for bus open data to be effective, apps must reliably provide route, time, and fare information to encourage public uptake.

A local authority outlined the public benefits of greater transparency and open data, summarising that:

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*“Reliable and accessible information on timetables, fares, real-time vehicle location, and accessibility is essential to improving passenger confidence, enabling multimodal journey planning, and driving uptake of sustainable public transport.”*

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However, some respondents from the technology sector questioned whether the full BODS requirements may be too onerous for flexible, on-demand models not resembling traditional human-driven bus services.

### Information sharing for insurance purposes

Feedback from insurers indicated that information sharing is critical for claims management, liability determination, and risk assessments. It was suggested that information should be shared promptly and in a secure manner. Respondents requested explicit inclusion in government guidance and permit conditions.

Benefits of this approach were said to include:

- Proper liability determination and efficient claims handling,
- Avoiding litigation and sub-optimal liability placement,
- Supporting development of suitable insurance products, and
- Enhancing public trust, safety, and sector accountability.

An insurer said:

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*“To ensure the effective handling of claims and the provision of appropriate insurance cover, it is essential that permit holders are required to share relevant operational and incident data not only with regulatory authorities, as outlined in the consultation, but also directly with insurers.”*

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### Local authorities

The following themes were raised by local authorities: local authority oversight, mandatory sharing of operational data, data accessibility, the reliability of systems, real-time alerts for incidents, and algorithm transparency for dispatch and pricing.

One local authority focused on the issue of transport network management. They wanted anonymised, aggregated operational data, including journey origins and destinations, wait times, and vehicle movements, to be shared with consenting transport authorities. This would enable effective management of congestion, inform transport planning, and allow for the strategic integration of new services with the wider public transport network.

### Emergency services

An emergency services representative supported the proposed approach for sharing safety-related information. There was an emphasis on disclosure to relevant authorities and emergency services for the purpose of public interest. They raised specific challenges posed by electric vehicles and a recommendation for permit holders to report information on any instances of this. They suggested that APS operators should provide emergency response guidance on isolation procedures, rescue cutting points, and associated training for first responders.

There were calls for AV companies to provide vehicles for rescue research through the United Kingdom Rescue Organisation (UKRO). It was suggested that new AV materials and designs required updated extrication techniques and additional specialist training and equipment for firefighting and rescue teams.

Respondents from the emergency services also said that reporting failures and collisions should go beyond occupant safety to include the safety of all road users and require reporting of all collisions, not just serious ones. Similarly, near-miss data could identify accident hotspots and improve safety. The government should ensure that safety takes precedence over commercial concerns.

### Industry

The main theme in industry responses on information sharing was the need to avoid duplication and regulatory overlap.

A technology developer said that they support DfT-led information sharing that minimises duplication, uses standard templates, and protects commercially sensitive material. In their view, data sharing requests should help operationalise services and communicate service performance to users, rather than re-assess technical safety authorisations. Where safety-related incidents occur, it was said that data and reporting structures linked to approval and authorisation will apply and should not be duplicated specifically for APS deployments. They thought that this structure was best placed to coordinate the flow of information between relevant stakeholders.

Another technology developer also thought that service-level reporting should be limited to data that is necessary for assessing the operational delivery of passenger services – for example, service availability, reliability, passenger experience, or accessibility. It said that guidance to consenting authorities and the DVSA must explicitly recognise that the collection and analysis of safety-relevant technical data is governed by the type-approval and in-service monitoring and reporting frameworks under UN rules. It wished to avoid conflicting or duplicative reporting requirements, provide clarity to operators, and ensure that safety oversight remains consistent with the international regulatory framework. Finally, data sharing must protect commercially sensitive information while fulfilling regulatory requirements.

A trade association working in the technology sector said that they supported the proposed approach to information sharing, provided it was proportionate, clearly scoped, aligned with existing regulatory frameworks, and protected commercial interests. Commercially sensitive data should be anonymised and aggregated before publication, with clear criteria for “public interest,” transparent decision-making, and a process for representations prior to disclosure. While APS permit holders should report safety-related failures or damage, reporting must align with existing approval and authorisation obligations to avoid duplication.

The trade body recommended a tiered framework to distinguish between critical safety incidents, non-critical faults, and routine maintenance. This would ensure the APS permitting scheme complemented rather than duplicated requirements under type-approval, authorisation, or other statutory obligations.

### Road safety and vulnerable users' groups

This group of respondents highlighted the balance between the need to protect commercial interests and road safety, with road safety being the highest priority. The issue of whistleblowing was also raised; there is a possibility that it may be necessary for whistle-blowers to disclose confidential information to the authorities without the consent of the information source.

A road safety group said:

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*“This approach supports learning from incidents, enhances service safety, and helps protect passengers and other road users, while maintaining appropriate safeguards against misuse of data.”*

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A vulnerable road users group supports empowering the Secretary of State to disclose safety-related information, reasoning that:

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*“Public trust in APS depends on transparency. It is in the public interest to routinely publish safety data to promote accountability, raise safety standards, and reassure 2-wheel vehicle users. Such disclosure can protect commercial interests through anonymisation and aggregation while still providing meaningful insights. Additionally, data should highlight APS performance with vulnerable road users (VRUs), including motorcycle users, enabling regulators and the public to assess safe interaction without compromising legitimate commercial confidentiality.”*

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### Other types of respondents

Most individuals supported this approach. An individual summarised that:

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*“Effective information sharing between permit holders, licensing authorities, enforcement agencies, and other relevant stakeholders is crucial for ensuring passenger safety, operational transparency, and regulatory compliance. The approach should include clear protocols on what information is shared, how it is protected, and who has access, respecting data protection and privacy laws. Transparency in information exchange enables timely identification of risks, better enforcement, and improved service quality. However, safeguards must be in place to prevent misuse or unauthorized disclosure of sensitive data, and permit holders should be informed about data sharing practices affecting them. Overall, a well-defined and secure information-sharing framework supports a collaborative regulatory environment that benefits all parties involved.”*

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Some respondents from the legal sector suggested that reporting duties should extend beyond failures or damage to include near-miss data, such as traffic infringements or system errors (e.g., sudden braking,

running red lights). Their reasoning for this was that full disclosure of incidents is in the public interest, with safety-related information made publicly accessible under clear rules on data format, retrieval, and retention. Safety data should also be shared with police and the Road Safety Investigation Branch to enable investigations and recommendations. Furthermore, incident details involving injury or death should be accessible to affected parties and their legal representatives.

A research company also supported the proposed approach, saying that it appropriately balances commercial confidentiality with the need for transparency and regulatory oversight. Publishing safety-related information is vital for building public trust, demonstrating accountability, and ensuring operators are held to high standards. Key benefits include fostering public confidence, enabling effective regulatory oversight and enforcement, supporting continuous improvement through shared lessons, and maintaining consistency with other transport modes. While safeguards for sensitive data are necessary, the presumption should favour disclosure where public safety and accountability are concerned, ensuring APS earn and sustain public trust.

## Government response

### Bus Open Data (BODS)

The government has decided that APS operators of bus-like services will be required to share information with the BODS in recognition of BODS playing a critical role in improving the accessibility, reliability, and attractiveness of public transport.

### Safety-related incidents

APS permit holders will be required to report any failure or damage affecting safety to the Secretary of State for Transport, acting through DVSA. This requirement ensures that safety-critical information is captured consistently, enabling effective regulatory oversight and timely interventions to protect passengers and other road users. The approach will prioritise openness on safety performance while incorporating measures such as anonymisation and aggregation to protect legitimate commercial interests. This will apply to permitted APS vehicles.

Under section 170 of the Road Traffic Act 1988, drivers are required to report accidents to the police in some circumstances. Where APS operate with safety drivers, this obligation will fall on the safety driver in the same way. For vehicles without safety drivers, the report will need to be made by the permit-holder. The police may share these reports with victims and others, in the same way as they do with section 170 reports.

The government understand industry's concerns about unnecessary duplication and will work to avoid this risk following full implementation of the act.

### Sharing information with insurers

The government recognise insurers' concerns that they should receive prompt and full disclosure from their APS policyholders. However, the government do not intend to include an obligation for permit holders to share information with their insurers as part of the APS permitting scheme. Instead, this issue will be dealt in the policy held between permit holder and insurer.

All permit holders will be required to be appropriately insured. Obligations to provide information will be based on contractual agreements between the insurer and policyholder and be included in the policy terms in the normal way.

### Publishing reports about the service

Under section 87(4) of the act, permits must include a requirement on the holder to publish reports on the automated passenger service. Reports must include information about the steps the permit holder takes to meet the needs of older or disabled passengers and to safeguard passengers more generally but are not limited to this. In the consultation document, it was explained that it could include an obligation to publish an annual report, listing any safety-related incidents and giving figures of complaints, broken down by category. The government also envisage that it would include the basic metrics of the service, such as numbers of vehicles, miles driven and passenger journeys undertaken.

Published information will be available to the public and will inform judgements to evaluate the service. This increases accountability and encourages operators to make improvements to their services. If the permit holder is under an obligation to publish, but fails to do so, the Secretary of State for Transport may intervene. The Secretary of State may share information that is required to be published under APS permit conditions but has not been published.

#### Information to allow emergency services to respond to incidents

The government note the concerns expressed by the emergency services that they should be able to respond appropriately to any incidents involving a self-driving vehicle. It was noted by one respondent that APS operators should provide emergency response guidance on isolation procedures and rescue cutting points and that an emergency service should be able to share this information with a different emergency service. Emergency services might also need to know how to exercise their power to stop the vehicle under section 57 of Automated Vehicles Act 2024. Regulation 10 will be updated accordingly.

The government hope that in the initial phases, permit holders will share this information with emergency vehicles on a voluntary basis and will assist in training. If not, the government will consider the need to make future provisions through full implementation of the act.

Overall, the government recognises that public trust in automated passenger services is essential for their successful deployment. Transparency and accountability are key to achieving this trust, which is why the proposed approach to information sharing has been designed to provide clear, factual data to regulators, public authorities, and, where appropriate, the public. This overall approach aims to reassure passengers and road users in addition to fostering confidence in the technology, paving the way for wider public acceptance of automated transport solutions.

# Safeguarding and accessibility

This section provides a summary of responses to questions related to safeguarding, covering views on DBS and health checks for safety drivers and passenger assistants, and for permit holders to report on safeguarding and accessibility.

## DBS checks and medical standards

**Do you agree or disagree that safety drivers or passenger assistants should be subject to the same criminal record checks and medical standards as taxis and PHV drivers and why?**

This question was broken down into a number of sub-questions. These are outlined individually below on a specific aspect of the role and requirement compared to those for existing TPH drivers.

**Should safety drivers be subject to the same criminal record checks as taxi and PHV drivers?**

140 respondents answered this question: 94% (131) agreed, 4% (6) disagreed and 2% (3) did not know.

**Should safety drivers be subject to the same medical standards as taxi and PHV drivers?**

137 respondents answered this question: 89% (122) agreed, 7% (10) disagreed and 4% (5) did not know.

**Should passenger assistants be subject to the same criminal record checks as taxi and PHV drivers?**

139 respondents answered this question: 88% (122) agreed, 2% (3) agreed except for remote assistants, 6% (9) disagreed and 4% (5) did not know.

**Should passenger assistants be subject to the same medical standards as taxi and PHV drivers?**

136 respondents answered this question: 76% (103) agreed, 1% (1) agreed except for remote assistants, 19% (26) disagreed and 4% (6) did not know.

Respondents were asked to provide further information on their responses. The information received centred around core themes such as passenger safety, public trust, and the importance of protecting vulnerable passengers. These are summarised in the following sections.

## Criminal record checks for safety drivers and assistants

### Responses

#### Support

Respondents provided similar reasons for requiring that safety drivers and non-driving passenger assistants are subject to the same criminal record checks as TPH drivers. Primarily, responses noted that passenger

safety is a priority and that people in these roles will be alone in vehicles, potentially with vulnerable passengers.

It was also said that there should be no lowering in safety standards for passengers compared to TPH drivers. Checks were necessary to reassure the public and to fulfil operator's duty of care.

A local authority commented:

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*“Although APS will not be PHV, taxi or bus services, it is not right for there to be two standards for individuals in passenger facing roles. If APS is to be successful, public safety must be the priority and APS must demonstrate to be at least the same as, but ideally higher than, traditional services.”*

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An individual highlighted the recent findings of the Baroness Casey Audit into Group-Based Child Sexual Exploitation and Abuse, which was commissioned by the Prime Minister. They reflected that:

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*“Both safety drivers and passenger assistants will need safeguarding and disability training to the same standards as taxi/PHV drivers so as to ensure the ramifications from the Casey report are not undermined.”*

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An individual summarised the arguments as follows:

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*“Safety drivers and passenger assistants have direct interaction with passengers and a duty of care. Ensuring they have undergone the same rigorous Disclosure and Barring Service (DBS) checks as taxi and PHV drivers protects passengers—particularly vulnerable groups such as children, older people, and disabled passengers—from potential harm. This fosters public trust in automated services.”*

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One CAM respondent suggested that safety drivers should hold a PHV driver's licence:

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*“In-vehicle safety drivers should pass a safety standard in line with the requirements of a PHV driver licence. Rather than create a whole set of processes by which to do this, we suggest that safety operators should hold a private hire driver's licence (PHDL), under APS permitting.”*

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It was pointed out that TPH drivers not only require enhanced DBS checks. Under the Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022, licensing authorities must also check the National Register for Revocations, Refusals and Suspensions (NR3S) before deciding whether to grant a TPH driver licence. It was suggested that this requirement should also apply to safety drivers.

## Concerns

A few respondents noted the importance of proportionality, commenting that stringent criminal record checks may be unnecessary where staff are not alone with passengers. Traditional human-driven PHV call centre staff are not on the listed roles for the enhanced DBS check, for example. Consequently, it may be unduly onerous for those undertaking remote oversight and support undergo the same enhanced checks as drivers.

## Buses

The rules for DBS checks for PSV drivers, which includes buses, are different from those required for TPH drivers. As one PSV operator pointed out, most PSV drivers only require basic DBS checks. Enhanced DBS checks are only required for drivers of dedicated schools PSV services where the driver is expected to perform these duties on a regular scheduled basis. The operator recommended that similar rules should apply to automated buses and coaches.

## Medical standards for safety drivers

There was strong agreement that safety drivers should be subject to the same medical standards as TPH drivers. It was pointed out that safety drivers may need to intervene at a moment's notice, both to safely operate a vehicle and respond appropriately in emergencies. They therefore need to be equally as healthy as traditional TPH drivers.

On both the safety checks and medical standards for safety drivers, an individual compared the nature of the role to that of traditional TPH drivers:

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*“Safety drivers will be effectively acting as a taxi/PHV driver but in an autonomous vehicle and therefore should be subject to the same DBS and medical standards.”*

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## Support for medical standards for passenger assistants

There were wide-ranging views on whether passenger assistants should be required to undergo medical tests.

Some respondents thought that passenger assistants should meet the same medical standards as taxi and PHV drivers. It was pointed out passenger assistants need to be physically capable of safely assisting passengers, especially those with mobility challenges or health conditions. As one respondent noted, wheelchairs and luggage can be heavy, so require a level of fitness.

## Medical standards for passenger assistants should not be required

Several respondents said that rigorous medical standards should not be required for non-driving staff. Instead, permit holders should assess whether staff can provide the assistance required.

A PHV operator commented:

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*“Requiring full criminal record and medical checks for all employees acting in a customer service capacity would be disproportionate and impractical. Customer service assistants do not carry the same level of safety-critical responsibility as drivers or remote operators.”*

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Some respondents went further, suggesting that requiring unnecessary physical standards might be discriminatory. For example, many people with disabilities who are looking for work would be able to provide customer assistance, even if they could not drive. Indeed, enabling a wider workforce pool to be used for autonomous transport is a significant benefit of the technology. What was important was that passenger assistants were able to meet the needs of all passengers, especially in terms of communications.

Some noted that APS operators will have their own medical checks for staff and it is not necessary for regulations to dictate particular types of checks for passenger assistants. This was thought to be particularly true for remote assistants. It was pointed out that if a remote assistance agent became ill and was no longer able to provide support to an AV, they could quickly and easily be substituted with another agent.

## Government response

Different levels of check reflect the proximity of the role to passengers. It is essential that passengers have confidence that they will be safe onboard these new services. This is particularly important for vulnerable people, who may include women and girls. The government will not allow the APS permitting scheme to be a loophole in safeguarding requirements.

Given the similarity of their roles, level of vehicle control and access to passengers, the government's position is that a safety driver operating in a vehicle carrying passengers should be required to have the same level of vetting as a TPH driver. Therefore, a permit condition will be attached to all APS permits for at least the piloting period requiring safety drivers to hold a taxi or PHV licence where they will be working in a vehicle carrying passengers. This makes them eligible for the enhanced and barred lists DBS check and will bring safety drivers within the National Register of Refusals, Revocations and Suspensions (NR3S).

This would be an interim measure while the government explores options for amending enhanced DBS check eligibility, allowing pilot deployments to proceed as planned without accepting a lower level of vetting for safety drivers than is required for TPH drivers.

A safety driver for a bus-like vehicle operating under an APS permit will not require a TPH driver licence to align with current requirements for human-driven buses. The expectation is that applicants intending to deploy a bus-like service will undertake checks of driver suitability, and that this would include a basic DBS check. This will be reviewed as any bus-like use cases come forward.

Some potential operators are considering providing optional in-vehicle 'passenger assistants' to support passengers. The appropriateness of amending eligibility criteria for DBS checks above basic are currently being explored. Safety drivers, where deployed, may also potentially fulfil this role for any initial pilot deployments.

Concerning remote assistants and customer service operators who have no in-person customer contact, the government would expect an operator to set out their approach to safeguarding customers as part of their permit application. Their behaviours and customer interactions would typically be recorded and monitored by the operator. Subject to those assurances, it would be reasonable to initially require basic DBS checks for remote assistants/operators. This is, for example, consistent with requirements for bus drivers and PHV booking operators. As part of the wider review, the government will also explore whether they should also be added to the list for enhanced and barred lists checks.

As it has been explained, during the piloting period, all APS safety drivers will be required to hold a taxi or PHV licence. The effect is that safety drivers will also need to undergo the same medical assessment as a TPH driver applying for the same licence.

## Permit holder reporting on safeguarding

### **What information would you expect to see published by permit holders on the safeguarding of passengers?**

Many respondents engaged fully with this question, highlighting the importance of ensuring that passengers are safe from harassment, abuse and assault. Some respondents misinterpreted this question to mean safety of the self-driving technology instead of the safeguarding of passengers onboard the service. These responses will be shared with the relevant safety teams.

## Responses

139 responses were received to this question and there was broad agreement on the importance of safeguarding for automated passenger services.

A CAM sector respondent drew attention to the unique safeguarding challenges that APS present. They considered that operators should publish information on the steps taken to ensure that passengers feel secure in vehicles without a human driver present and how services are monitored in real-time, in addition to the traditional aspects of safeguarding such as driver vetting and incident reporting processes.

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*“Guidance on safeguarding best practice would be welcome and should be developed in collaboration with those with professional expertise (such as the police) as well as those with lived experience.”*

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A respondent from the emergency services said that:

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*“The publishing of information and material on the safeguarding of passengers to the public is essential for building trust and confidence in Automated Passenger Services and creating a safe service. We would expect to see a comprehensive safeguarding policy in place, clearly defining roles and lines of responsibility for all staff involved in safeguarding. The policy should include the nomination of a designated safeguarding lead who is responsible for safeguarding practices. The policy should be regularly reviewed and updated to reflect lessons learned both internally and from external sources, ensuring continuous improvement and alignment with national best practice.”*

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There were many calls for permit holders to publish a detailed, clear safeguarding policy on their website to maintain public trust and support passenger safety. This should set out how safeguarding risks are identified, managed, and monitored, either in the presence of the safety driver or, following removal of safety driver, in the absence of a human driver. In particular, it should include how permit holders will ensure the safety of passengers where vehicles are shared by multiple passengers on different bookings or tickets.

Several respondents provided lists of what a published safeguarding policy should contain. These included:

- Requirements for background checks (such as DBS checks) and, more broadly, procedures for vetting and recruiting staff who have contact with passengers.
- In-Vehicle Safety Features for behaviour-monitoring, including whether remote operators are monitoring the vehicle in real-time, any AI capabilities, and any video or audio monitoring in use during the ride.
- In the event of video and audio monitoring, a clear policy on data privacy and retention.
- Accessible instructions for passengers on how to get help if there is a problem (such as an attempted vehicle break-in or harassment), including the availability of two-way communication.
- Ways to report incidents, including an anonymous reporting option and protections to ensure confidentiality.
- Named safeguarding officer(s) and contact details for staff responsible for passenger protection and reporting. One consultee suggested that the procedure should also include contact details for the national permitting authority, and external bodies such as the police or the National Society for the Prevention of Cruelty to Children (NSPCC).
- Unaccompanied minors: a clear and unambiguous policy on unaccompanied children, specifying any age restrictions and specific procedures for safeguarding.
- Equality impact assessments.
- Incident management protocols, including coordination with emergency services.
- Key safeguarding metrics (e.g. number of incidents reported, resolution times, passenger satisfaction measures).
- How learnings from safeguarding incidents are used to strengthen policies and vehicle/service design.

In this context, respondents also highlighted the need to make it possible to make a complaint. It was said that this should be clear and accessible; should be open to both passengers and the public; and should have clearly defined timescales for acknowledging, investigating, and responding to complaints. Regulation updates should be provided to the complainant throughout the process. Furthermore, the procedure should

allow individuals with communication difficulties to submit complaints through alternative means and support channels.

### Risks

Across all responses to this question, the following risks of not having a human driver in the vehicle were identified:

- Unaccompanied children;
- Availability of child seats and International Standard Organisation Fix (ISOFIX) points;
- Drugs and county lines;
- Human trafficking and exploitation;
- Sexual harassment and assault;
- Passengers being left stranded;
- Strangers getting into someone else's booked vehicle while they are inside;
- Vehicle being attacked by a person outside of it;
- Vehicles being used for criminal and terrorist activity;
- Cleanliness and hygiene of the vehicle; and
- Privacy concerns around onboard closed-circuit television (CCTV).

A representative of the emergency services said:

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*"I believe that vehicles should be monitored, whether this is by live stream CCTV to a control room to monitor the locations of vehicles and ensure the safeguarding of passengers, particularly around those who are vulnerable, whether that be children, those intoxicated, disabled etc."*

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A professional institute body pointed out that drivers often play a protective role:

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*"Drivers of taxi and private hire vehicles are often valuable assets in identifying and disrupting exploitation. Will there be any measures in autonomous vehicles to enable identification of vulnerable passengers, or to spot anomalies such as young passengers travelling with an adult under duress, potential county lines victims or passengers with hostile intentions?"*

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This sentiment was shared by a local authority:

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*"Currently drivers in many authorities are trained to spot the signs and indicators of exploitation. How will this take place in a driverless vehicle?"*

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### Safeguarding measures

Recommendations for safeguarding measures that should be introduced on automated services included:

- The use of technology in or on the vehicle, for example CCTV, live location tracking of vehicles, and panic buttons.
- Assurance of human support access, e.g. live access to call centre operators.
- Safeguarding training for all staff to identify signs of vulnerability and respond appropriately. Training should include scenarios specific to APS, such as a child left onboard. Staff must be confident in reporting and escalation protocols.
- Information on how passengers can access human support in the event of an emergency, breakdown or concern.

- Commitment to attend the Taxi Safeguarding and Disability Awareness Training provided by Safeguarding Training and Consultancy (STC).

The safety of women and girls was raised by several respondents. Mitigating solutions included vehicles with live location tracking, good lighting, CCTV, and having women-only APS vehicles. It was also recommended that providers should be trained specifically on awareness of violence against women and girls.

A PHV operator said:

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*“CCTV has a proven track record of having a positive impact on safety by deterring bad behaviour and improving accountability. We suggest that government introduce national standards for in-car video recording and data handling.”*

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A local authority said:

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*“Licenced PH/HC drivers undergo significant Safeguarding training & testing before getting licensed, passenger facing roles should undergo the same training. The training centres around the four ‘R’s of Recognise, Respond, Refer, Record. Passenger facing individuals for APS’ should be Fit & Proper persons and publish their badges.”*

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## Government response

Transparency around passenger safety is essential to building public trust in automated passenger services. The government has accepted the recommendations of the Baroness Casey Audit into group-based child exploitation. It is recognised that certain groups such as women and girls, ethnic minorities and LGBTQ+ people can feel less safe on public transport, with concerns about discrimination highest among ethnic minorities, LGBTQ+ respondents and those with mental or neurological conditions.<sup>1</sup>

There is already a well-established set of requirements and guidance on what existing operators must do to ensure the safeguarding of passengers. Under section 87(4)(b) of the Act, permit holders are obliged to publish reports on the steps they take to safeguard passengers.

Respondents have given considerable thought to what these reports should include. The government has taken this valuable feedback onboard in developing guidance on how permit holders will be expected to fulfil this obligation. The government will learn from pilot deployments to update this guidance to account for a full range of new safeguarding measures.

## Permit holder reporting on accessibility

### **What information would you expect to see published by permit holders on how the service was meeting the needs of older and disabled people?**

There was significant interest throughout responses to the consultation on the accessibility of APS permitted vehicles and the broader service provision. The following sections summarise responses to the above question on reporting expectations for APS permit holders.

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<sup>1</sup> [www.gov.uk/government/publications/perceptions-of-personal-safety-on-public-transport](http://www.gov.uk/government/publications/perceptions-of-personal-safety-on-public-transport)

## Responses

125 respondents completed this question, with some including more general disagreement with APS and self-driving vehicles or related to other topics. However, a wide range of respondents, including many accessibility organisations, engaged with the question.

Consultation respondents underlined the importance of the reliability of any accessibility features. A local authority noted that:

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*“Performance data on these features, such as the success rate of automated ramp deployments and the reliability of audio-visual information systems should be published by APS operators.”*

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Other concerns raised by respondents include:

- Whether or not all vehicles are 100% accessible to all types of wheelchairs and other ways in which disabled people may have limited or restricted mobility.
- Accessibility must cater for the needs of vulnerable users and disabled passengers, including those with mental or sensory impairment.
- Storage arrangements for luggage, pushchairs, mobility aids etc.
- Whether disabled users are given enough time to enter and exit the vehicle.
- Digital inclusivity for any new app-based booking services.

Although the consultation question focused on reporting requirements, best practice guidance was referenced during the passage of the act, with evidence subsequently being provided by respondents on this topic. Consultation responses can therefore be split into two categories: reporting requirements and best practice.

On reporting requirements, responses can be grouped by and defined as:

- Usage statistics: quantitative data on demographic ridership information, wait times and data on the number and percentage of journeys provided to disabled passengers including the number of trips involving ramp or lift use.
- Customer feedback and complaints: summaries of feedback from disabled passengers, highlighting satisfaction levels, complaints, and actions to address concerns or service failures.
- Staff training: details on training programs on disability awareness, use of assistive devices, and communication skills to support disabled passengers given to all staff who have a role in the passenger journey, from customer service agents to remote operators.
- User engagement: involving disability organisations in testing, reviewing, and advising on design and operation, not just as one-time consultees.
- Service adaptations and assistance requests: information on specific adaptations made to services, such as assistance with boarding and alighting, minimised walking pick-up and drop-off points, priority booking, and accessible booking methods.
- Public dashboards: accessible online dashboards where headline accessibility and safeguarding metrics are published in real time.
- Continuous improvement plans: year-on-year targets for increasing accessibility usage and reducing barriers, with progress reports.

User engagement was a particularly important aspect of reporting, with one local authority advising that:

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*“Detailed evidence of ongoing engagement with local and national disability representative groups is required. The report should specify which groups were consulted, the feedback they provided, and precisely how that feedback has influenced vehicle design, journey planning tools, and operational procedures.”*

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Overall, it was recommended by a local authority that:

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*“The published reports must go beyond a simple compliance checklist and provide meaningful evidence of how the service is actively learning and adapting to meet the diverse needs of older and disabled passengers. This is central to the act’s objective of improving understanding in this area.”*

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Suggestions relating to best practice included:

- Closed-circuit television (CCTV),
- Live access to call centres and remote assistants,
- Access for assistance dogs,
- Accessible booking systems,
- Clear visual and audio information including hearing loop systems,
- Step-free access or low floor boarding,
- Tactile surfaces,
- Multiple booking options, including telephone booking, to ensure accessibility for those unfamiliar with digital platforms,
- Passenger assistance information: a clear and accessible description of the assistance available to passengers, outlining how they can book it, how to communicate specific needs to a remote operator (e.g., requesting longer dwell times at stops), and what to expect during their journey.

One local authority recommended that:

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*“Permit holders should publish guidance for users of the service including customer guidance on booking and using the service, with specific reference to accessibility features such as wheelchair/mobility scooter access and space for prams; clarity on accepted mobility aids, including the maximum dimensions and weight limits for ramps, and securement systems; and information on supported display language and accessible communication formats.”*

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## Older people

The Government recognises that it is essential that to support the health and wellbeing of older people, it is important that local services and visit opportunities for family and friends can be accessed. The introduction of APS has the potential to create new links in rural areas, where the demographic is generally older than in towns and cities, connecting people to larger towns and transport hubs.

In respect of older passengers, respondents said that anonymised usage data on the age range of passengers with a focus on those over the age of 65 should be routinely published. Stakeholders also shared concerns around digital exclusion, public trust and the ability of artificial intelligence to recognise mobility aids.

## Government response

This feedback and the responses to this consultation have fed into the development of non-statutory guidance, which the government recently published to support the introduction of automated passenger services. Evidence collected may also assist the APS Accessibility Advisory Panel in their work considering reporting requirements.

The feedback received will inform the development of non-statutory guidance on accessibility best practice to support automated passenger services. The Accessibility Advisory Panel will inform the development of this guidance and will be briefed on the information provided as part of this consultation. The Department will also continue working closely with accessibility representatives.

# Proposed guidance for Automated Passenger Services

**What guidance, if any, do you think government should provide to enable preliminary discussions between those wishing to apply for an APS permit and authorities?**

**What information do you think should be requested in the APS application process?**

**What information do you think should be requested in the APS renewal process?**

**In your view, should we support any coordination, information sharing and best practice sharing between authorities?**

**In your view, what would you expect to see included to make the proposed guidance as useful as possible for your authority?**

**In your view, what information are taxi and private hire licensing authorities likely to view as useful in deciding whether to grant or refuse consent?**

**In your view, what information are bus franchising bodies likely to view as useful in deciding whether to grant or refuse consent?**

**What information do you think would be useful to include in any guidance to support discussions between APS permit applicants and emergency services and traffic authorities?**

In this section the government summarise the responses received for these questions. The questions will be grouped where relevant.

## Preliminary discussions

**What guidance, if any, do you think government should provide to enable preliminary discussions between those wishing to apply for an APS permit and authorities?**

## Background

The consultation document outlined the key role that existing TPH licensing and bus franchising authorities will play in granting consent for APS deployment.

The government said that it was considering publishing guidance for consenting authorities. This would explain the process, support information exchange between applicant and authority, and clarify the role of consent. Consenting authorities do not need to repeat the safety tests carried out centrally. Nor do they need to check issues such as insurance, maintenance or staff criminal records, as this will be done by DVSA.

However, consenting authorities do need to bring their expertise to assess how automated passenger services will fit within their local transport mix.

The first stage of the process will be for APS permit applicants and consenting authorities to hold preliminary discussions, so that authorities understand the nature of the service, and applicants understand authorities' concerns. The government asked what guidance should be provided about this.

## Responses

136 responses were received to this question from a cross-section of respondents.

### Summary of responses

Responses covered a wide range of matters, such as procedural and substantive issues, including safety, safeguarding, cybersecurity and jobs.

Below are the views of local authorities and then the CAM sector.

### The local authority viewpoint

Most local authorities welcomed guidance. As one put it:

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*“Government guidance is not merely helpful but essential to ensure preliminary discussions between APS applicants and authorities are structured, productive, and efficient. Without a clear framework, these crucial early engagements risk becoming inconsistent across the country, creating uncertainty for operators and imposing an unnecessary administrative burden on authorities.”*

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### Guidance on the statutory background

Many respondents asked for more information about automated vehicle regulation more generally. They wanted to understand the legislative framework, including the various new roles set out in the legislation. They asked for guidance on how APS permits tied in with the other statutory schemes, including authorisation, no user-in-charge operator licences and existing PHV licensing. There were also concerns about the number of new terms. One respondent requested a “list of definitions for typical industry jargon, including what the levels of autonomy are”.

Local authorities also wanted guidance on their legal duties as consenting authorities. They asked, for example, for greater clarity about the grounds on which they might refuse consent “including what constitutes reasonable or unreasonable grounds”.

Several consultees asked for examples of good practice and experience from any lessons, both in Britain and overseas.

### Initial information

The consultation document explained that applicants would need to approach consenting authorities with a description of the service, including the proposed deployment area, the number and types of vehicles, what vehicles will do between rides and the operating hours.

Many local authorities said that the initial information should go beyond these basics. As one local authority respondent put it:

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*“The guidance should ensure preliminary discussions go beyond the list of information set out in the consultation to ensure applicants provide their initial assessment of how their service will take account of the local context and ensure it meets local needs and priorities.”*

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Another asked for a “formal pre-application engagement protocol”:

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*“This protocol should go beyond the useful but basic information suggested in the consultation document, such as proposed deployment areas and vehicle numbers. For an authority managing a complex metropolitan network, a much richer level of detail is required from the outset.”*

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Several respondents highlighted the issue of “network integration” – that is how the new service would contribute to the local transport strategy. One local authority wished to see potential operators demonstrating an understanding of local challenges regarding the existing transport network, “showing how their service may improve the situation, not make matters worse”.

This was linked to more general concerns about congestion and pollution, especially if vehicles travel empty for substantial periods. Several consultees wanted to know how applicants would manage their use of the kerbside. One authority asked for a “Kerbside Management Strategy”, showing preliminary plans for managing pick-up and drop-off points, commenting:

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*“This must include an analysis of the potential impact on traffic flow, pedestrian safety, and existing infrastructure such as bus stops, cycle lanes, and taxi ranks.”*

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Consultees also raised specific issues about:

- What vehicles will do between trips.
- How vehicles will be marked, and
- Engagement with enhanced bus partnerships.

Local authorities also wanted to know how far the new service would serve the needs of different communities, so as to “connect all residents to economic and social opportunities”. Considerations raised included access for disabled people, whether the service would be affordable and how it would cater to all age groups.

### Managing the consultation process

Local authorities wanted greater clarity on who needed to be consulted and when, both within and outside the authority. One local authority suggested that the guidance should include “a Stakeholder Map” to guide the internal discussions, by identifying the relevant individuals and departments within a local authority. The respondent explained:

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*“This extends beyond transport planners to include highways management, legal teams, planning officers, and elected members, ensuring all relevant parties are involved from the start.”*

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Another local authority pointed out that a deployment may need to be co-ordinated between several consenting authorities. Furthermore, the legislation requires the appropriate national authority to consult with traffic authorities and emergency services. Consultees wanted clear guidance on how co-ordination between different authorities would be managed.

## Standardised protocols

There were many calls for standardised protocols, frameworks and checklists to manage the process. As one local authority put it:

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*“The government should provide a standardised framework and checklist to guide preliminary discussions, including expected timelines, key contact points, and roles of consenting authorities. This would reduce ambiguity and encourage early, effective collaboration.”*

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Another authority recommended that guidance for applicants included:

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*“A Pre-Application Checklist: A standardised template that applicants complete before their first meeting with an authority. This should cover core operational details, the intended service area, the problem the service aims to solve, and an initial assessment of how it aligns with local transport plans.”*

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## CAM Sector

### Support for a standardised approach

Those involved in developing APS made similar points and supported guidance. One said:

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*“We strongly support the Government’s proposal to issue guidance for consenting authorities which would clarify their role in the permitting process.”*

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Another concurred:

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*“We strongly recommend the government provide detailed, standardized guidance to ensure consistency and build trust early in the process.”*

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Developers also wished to encourage early conversations, particularly about how APS would integrate into the transport network. As one said:

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*“We think the most useful guidance would be to encourage applicants and local authorities to engage in early conversations not just about the individual service, but also about how that service integrates into the wider transport system.”*

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Potential developers were particularly likely to stress the need for uniformity across different authorities. One said:

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*“For successful deployment of APS in the UK, the Government should encourage national uniformity as much as possible. It is not feasible to design vehicles or software stacks for each city or metropolitan area, and local imperatives could conflict with or create ambiguity with national regulation.”*

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Developers asked for standardised procedures and forms, including “a standardised Consenting Authority request form, that could provide a default approach for use by multiple local authorities”. They wanted the government to play a central role in this. As one said:

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*“We would welcome a single “front door” within the Department for Transport for the purposes of the coordination of preliminary discussions to avoid multiple parallel conversations with different stakeholders involved in the granting of authorisation and APS consent.”*

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#### Nature of the decision

As with local authorities, developers asked for the guidance to specify the grounds on which a consenting authority could reasonably refuse consent (such as the impact on congestion or air quality). It should also show examples of unreasonable grounds.

There was particular concern that consenting authorities would try to replicate the safety tests carried out by others. One said:

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*“There is a risk that consenting authorities may inadvertently seek to replicate functions that, under the statutory scheme created by the Automated Vehicles Act, should be centralised. These include, for example, the evaluation of vehicle safety or design and oversight of the vehicle when in motion.”*

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#### Other issues

The CAM sector also highlighted several other issues that the guidance should cover. One developer pointed out that trials would involve a transition from services with an onboard safety driver to fully autonomous services. They thought that the guidance should address this process.

There were also calls for the guidance to describe Best Practice, learn from international trials, emergency service interaction, and public information.

#### Other stakeholders

Other stakeholders made similar points. They were however more likely to stress the need for wider community engagement. A research organisation said:

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*“Guidance should also encourage applicants and authorities to consider engaging other relevant stakeholders at an early stage, including emergency services, accessibility groups, and neighbouring transport operators. This will support holistic integration into the wider mobility system.”*

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Similarly, a not-for-profit organisation said:

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*“Government guidance should also mandatorily require comprehensive stakeholder engagement including trade unions, community groups, and civil society organisations.”*

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A trade union was particularly concerned about the effect on jobs, asking for a mechanism “to take responsibility for any displacement/replacement of drivers.”

A research organisation highlighted a positive aspect that they saw, suggesting that the guidance should encourage authorities to consider the benefits of APS, including extending coverage to undeserved areas or off-peak time slots; improving accessibility for groups with limited mobility; and strengthening first-/last-mile links to existing transport hubs.

## Application content and renewal

**What information do you think should be requested in the APS application process?**

**What information do you think should be requested in the APS renewal process?**

## Background

This question sought to understand views on the information that should be asked of APS permit applicants to initially apply for a permit and when looking to renew a permit. The consultation set out our proposed approach to have a flexible application process to enable us to learn from the experience of going through the process and providing the ability to develop and refine the process over time.

116 responses were received to the question on what should be requested for the application and 110 for the renewal process.

## Responses

### Local authority views

Views from local authorities focussed on the need for an application to include information on how the service would operate and fit in with the existing transport network and any longer-term plans, passenger safety, safeguarding and accessibility, and the operational and fleet management arrangements.

Responses included the provision of lists setting out views on what should be included, with one local authority outlining the below:

- Number of vehicles;
- Operating areas and kerbside access, Operating times;
- Proposed routes, stops, and depot arrangements;
- Accessibility features (e.g. step-free access, audio-visual announcements);
- Service types (e.g. ridesharing, fixed route, mixed service);
- Vehicle specifications (e.g. emissions, onboard CCTV);
- Vehicle design, livery and advertising;
- Insurance coverage;
- Environmental impact, including emissions and mode shift potential;
- Safety plan and management system, including in-vehicle safety measures like seatbelts;
- Safeguarding plans;
- Incident response protocols;
- Fare structure and affordability measures;
- Lost property arrangements;
- Information on previous applications, discussions with consenting authorities, and grants or refusals of APS permits relating to any of the parties providing the service;
- Information on any other transport services offered by any of the parties providing the service, for example private hire services or bus services;
- Data collection, sharing and cybersecurity plans;
- Public complaints and feedback mechanisms.

They summarised that:

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*“It will be necessary to reassess over time what information should be provided, as there are many unknowns and uncertainties at this stage. It is also difficult to predict how services will operate in context, how the public will respond, and how on-street behaviour may be influenced.”*

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A different local authority shared their reflection on renewals, stating:

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*“The permit renewal process must be a substantive, evidence-based review of the operator’s performance and should not be a simple administrative exercise. It is the key opportunity for the regulator and consenting authority to hold the operator to account for the commitments made in their original application.”*

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#### CAM sector views

The sector, as potential applicants, had similar views to local authorities, but with attention being drawn to information on how the service would work, how it would be accessible and data sharing arrangements. There was less reference to the application covering aspects such as the safety of the vehicle, which was broadly viewed as being separate from the passenger-carrying focus of the APS scheme.

An industry group summarised that:

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*“We support a streamlined and consistent application process that provides clarity for operators and avoids duplication with other regulatory regimes. The information requested should be proportionate to the scale and risk of the proposed service and should reflect the maturity of the technology and the operational model.”*

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A technology developer gave the following examples:

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*“Information about the fares charged, information on the type of vehicle(s) used under this permit, information about what signage and livery may be used by this service, information about how passengers can access support for lost property.”*

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#### Taxi, PHV and bus operator views

Drawing on experience from existing passenger carrying licensing regimes, several respondents outlined the importance of having an equivalency with existing approaches. Additional views considered where there may be differences with an automated passenger service and what this may require, with reference to the need to reflect on the safety performance of the vehicle and data and performance monitoring.

A PHV operator responded that the following information should be requested in the application:

- Evidence of insurance,
- Copy of written notification to local authorities of proposed operation,
- Law enforcement interaction plan,
- Operator training program materials,
- Safety information,
- Service area plan.

Regarding information requested during the renewals process, another PHV operator provided the following points:

- history of compliance during the duration of the permit,
- history of openness and transparency,
- any change of use,
- number of accidents and trends,
- number of traffic infractions and trends,
- complaint handling process and the number of complaints and trends,
- survey/rating analysis and trends,
- focus group feedback process and trends,
- service delivery target vs actuals,
- utilisation targets vs actuals,
- demand analysis vs actuals,
- clear rationale for number of vehicles of duration of service increased/decreased.

### Other stakeholders

A respondent from the emergency services said that the below information should be disclosed during the renewal application:

- Records of any complaints made to the operator from members of the public or passengers, along with any action taken by the operator.
- Details of any safeguarding issues relating to APS vehicle use along with records of action taken by the operator.
- Details regarding any changes to the scheme, particularly where there is a significant shift in the level of automation, or the technology used. This is to ensure transparency and allows authorities to update any risk profile.
- Records of any collisions involving APS vehicles, including details of the severity and identified causes of each collision.
- Details for any incidents where emergency procedures have been activated in response to passenger-related situations. This may include medical emergencies, safeguarding concerns, or behavioural issues. This should cover the nature of the incident, the response taken, and any action taken by operators.

An insurer described four key areas:

- Operational scope & service design: clear description of service proposed, including routes, geographical area, hours of operation, vehicle types, automation level, safety drivers' presence, safety procedures.
- Timelines: deployment plan, including pilot, scaling milestones, full roll-out timeline.
- Accountability & oversight: identification of legal entity, including designated contact, insurance & liability arrangements.
- Data and transparency commitments: details of data that will be shared with authorities/relevant parties, and assurance around data protection guidelines.

## Guidance on granting and refusing consent

**In your view, what information are taxi licensing and PHV licensing authorities likely to view as useful in deciding whether to grant or refuse consent?**

**In your view, what information are bus franchising authorities likely to view as useful in deciding whether to grant or refuse consent?**

## Background

These questions are considered together as there was a significant amount of overlap between the responses. The questions were predominantly targeted at local authorities in their roles as TPH licensing authorities and/or bus franchising authorities. The government wanted to understand what would be useful to them, as they plan to take on their new consent powers.

In total, 18 responses to these questions were received from local authorities or from those representing local authorities. There were also 17 responses from other respondents, including from TPH and PSV operators, the insurance industry, and emergency service providers.

## Responses

Responses to this question were similar to the answers on preliminary discussions. Local authorities indicated a wide range of information that would be useful in deciding whether to give consent. Other respondents gave similar answers, also listing a wide range of considerations.

### Service information

Many respondents asked for information on the service to be provided. Examples included:

- the service area and routes;
- the fleet providing the service, such as vehicle types, number of vehicles, passenger capacity;
- the booking and fare structure;
- how the vehicles would use the kerbside, including pick-up and drop-off points;
- vehicle behaviour when empty and use of parking;
- charging arrangements;
- human involvement, such as use of safety drivers and remote assistants; and
- the use of prioritised road space for buses and taxis.

### Accessibility and safeguarding

Local authorities wanted to know that the APS scheme would provide an inclusive, accessible service which will meet the needs of different communities. One respondent said they would expect APS to demonstrate measures to facilitate:

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*“Access for disabled and older people; people without smart phones; people with children and buggies; as well as respecting cultural and language diversity.”*

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Safeguarding was consistently raised as a high priority area that authorities will need to understand when considering consent. As one authority put it:

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*“Vehicles without drivers present risks to passengers and will be perceived by passengers as presenting a risk. APS providers will need to have a detailed and audited policy to safeguard passengers from harm.”*

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### Safety

Many authorities wanted reassurance that self-driving vehicles would be safe. There was therefore a strong interest in understanding the tests that had been carried out, the implications for other road users and how cyber security would be assured.

Local authorities were particularly concerned about how vehicles would respond to unexpected events or weather conditions, such as road closures, flooding and protests. They also wanted to know how safety would be monitored on an ongoing basis:

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*“We appreciate the DVSA may be responsible for determining if a vehicle on its own is safe, but it is unclear to us how the safety/operation of vehicles within live road conditions would be assessed and by whom.”*

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## Alignment with local objectives

Those responding across all categories, and especially local authorities, emphasised that deployments must align with local objectives. They wanted to know how the new service would integrate with the wider transport network. To this end, one respondent said:

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*“Applicants should set out how the proposed service will physically and digitally connect with, and add value to, the existing transport network.”*

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There was particular interest in understanding the implications for congestion, environmental goals, economic impacts, accessibility and social inclusion. Authorities wanted to know the measures take to prevent services adding to congestion in urban areas

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*“In particular, measures to safeguard against ‘empty running’ and obstructive parking. Measures should include detailed plans for kerbside management, estimates of overall traffic impact and careful consideration of the location of depots. Services should also demonstrate how they will make efficient use of space.”*

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## Operational procedures

Local authorities wanted more information about the permit holder’s operating procedures, especially in the event of an incident. They often had detailed questions about incident response protocols; how passengers would be supported; and how emergency services would be contacted. Local authorities also asked questions about maintenance, cleanliness, and software updates.

More broadly, they wanted to know how permit holders would learn from their experiences by, for example, reviewing performance metrics. One authority asked about communication within the service, including ‘regular’ information to support and enable travel, information to, how passengers can pass on feedback/gain assistance, raise complaints and retrieve lost property.

## Organisational capability to operate a service

Consent will often depend on the local authority understanding and trusting the organisations’ ability to safely operate a passenger transport service. To this end, some authorities wanted more information on:

- The ‘fit and proper’ test, including financial standing, criminal records and record keeping procedures.
- Previous experience of both traditional and/or self-driving passenger transport services.
- Responsibility of staff, vetting, staff welfare and whistleblowing procedures.
- Contractual relationships.
- Locations and permission to use operational sites.

## Co-ordination

**In your view, should we support any: a) co-ordination between authorities; b) information between authorities, c) best practice sharing between authorities**

**If you support, please state how?**

## Background

These questions were targeted at local authorities in understanding their appetite for the government to support discussion and information sharing between them. In total, 19 local authorities answered most of

these questions, with one not answering the second question on information. There were up to 18 responses from other respondents. The questions had fixed responses to indicate support or not, with all responses indicating support.

The final question provided an opportunity to provide any further information or considerations people had on how the government could support local authorities in these three areas. There were 41 responses to this question, which included responses from respondents who had not indicated support or otherwise to the fixed response questions. 18 of these responses were from local authorities, with 23 being from other stakeholders.

## Responses

The support suggested by local authorities and other respondents covered a range of broad and specific examples for co-ordination, information and best practice sharing; these are outlined below.

### Enabling sharing

Many responses provided views on how local authorities could be supported: These views included:

- The importance of commencing as soon as possible;
- Experience sharing events, forums and boards, led by government and / or authorities; where appropriate, these could be organised through existing forums.
- Training events to improve skills and understanding in this area.
- Involvement of service providers, other stakeholders and disabled people, enabling transparent discussions; and
- Cross-boundary consistency.

While some respondents suggested that it should be voluntary for consenting authorities to share information, others thought it should be required.

### Central repositories

Many respondents thought that central government should collect information and make it available to authorities and other stakeholders in a centrally provided resource. Suggestions included:

- Developing a central portal that authorities and other stakeholders could access,
- Collecting and sharing information, such as all APS deployments, international deployments and emerging and established best practice,
- Provision of tools, templates, guidance, requirements, standards and lessons.

## Making the guidance as useful as possible

**What would you expect to see included to make the proposed guidance as useful as possible for your authority?**

## Background

The consultation outlined the intention to make any guidance as useful and practical as possible. The government wanted to understand what local authorities would view as meeting this aim. 31 responses were received in total to this question, with 18 from local authorities and 13 for other respondents.

## Responses

This question produced a wide range of suggestions from authorities and other respondents. All views have been considered together.

## Process

Many respondents wanted clear information about the scheme. There were many calls to use plain English, set out key concepts and explain the legislative requirements. It was said that the guidance should:

- Make it clear how the process will work, including following deployment, and setting out timelines.
- Be clear on the role of local authorities and other stakeholders, including the basis of any engagement and making a consent decision.
- Explain how permit requirements would be monitored and enforced.
- Explain how data sharing and reporting will work.
- Use illustrative examples to help build understanding.

## Understanding deployments

As a new form of transport, responses also focussed on the need to understand what an APS may look like and how it may work. It was suggested that the guidance should:

- Provide examples of what use cases may come forward.
- Explain expectations regarding self-driving capability and testing, the role of safety drivers and the need for supporting infrastructure.
- Explain how to assess deployment impacts, such as congestion, pollution, and economic impacts.
- Respondents also referred to the many issues, discussed previously, on (for example) accessibility, safeguarding and the need for community engagement.

# Emergency Services and Traffic Authorities

**What information do you think would be useful to include in any guidance to support discussions between APS permit applicants and emergency services and traffic authorities?**

## Background

Under section 87(1) of the act, the Secretary of State for Transport must consult any emergency service or traffic authority likely to be substantially affected if the permit is granted. The consultation document strongly encouraged permit applicants to engage with the appropriate emergency services and traffic authorities before submitting their application. The government asked what guidance might be useful to support these discussions.

## Responses

### Emergency Services

Emergency services strongly supported early discussions with applicants. In particular, they wanted applicants to provide the following information:

- How vehicles will behave around first responders who are driving to incidents on blue lights.
- How vehicles will behave around temporary barriers or requests to stop.
- How emergency services can safely override, stop, or redirect vehicles in an emergency.
- Operators' procedures for detecting, reporting, and responding to emergencies.
- Mechanisms for first responders to quickly obtain operator contact details and safety protocols.
- What happens if mobile signals fail. Will connectivity loss lead to vehicles stopping – and possibly delaying first responders from reaching major incidents.
- The applicant's safeguarding procedures, including how and when passengers would contact emergency services.

One emergency service suggested preparing a framework for discussion based on these key elements:

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*“This approach provides structure while still allowing flexibility for the discussion to adapt to specific operational contexts and stakeholder needs.”*

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In a detailed response, a representative of the emergency services expressed concern that AVs could impede emergency response operations by failing to interpret and react to temporary hazards:

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*“Unlike human drivers who may slow down, stop, or follow police diversions based on visual cues, AVs rely heavily on geospatial data, digital maps, and programmed logic that may not account for temporary, unplanned events. This could lead to scenarios in which AVs enter a hazardous area, obstruct fire appliances, or behave erratically when encountering barriers or emergency personnel. It is unclear whether AVs can reliably interpret the presence of firefighters, cones, or signage. Worse still, there is currently no universal system for emergency responders to communicate with AVs or take control of the vehicles in these situations.”*

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They referenced international experiences where AVs have obstructed fire stations, blocked emergency routes, and interfered with active incidents. They further highlighted that AVs are likely to be electric vehicles, introducing additional fire safety risks from lithium-ion batteries and the need for extensive charging infrastructure. Therefore, they recommended that engagement between AV permit applicants and emergency services be mandatory, involving formal risk assessments and written mitigation plans. They also asked for national engagement, through a specific forum:

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*“It is critically important that the emergency services are part of the ongoing national-level discussions on the development of AV regulation and pilot schemes prior to the deployment of AVs on UK roads.”*

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A technology developer suggested aligning guidance with the First Responder Interaction Plans required in several U.S. states.

A research organisation suggested that “guidance should make preliminary discussions between APS applicants and emergency services structured, consistent, and aligned with international best practice (e.g., AVSC and SAE J0911 frameworks).”

### Traffic Authorities

Some traffic authorities will also be consenting authorities, while others will not. By and large, the concerns raised by traffic authorities were similar to those given by consenting authorities. Like consenting authorities, they wanted to know:

- What on-demand vehicles are likely to do between rides;
- Where vehicles will pick up and drop off passengers;
- Procedures for handling disabled vehicles;
- Predicted impacts on traffic flow and congestion;
- How road closures are communicated; and
- Contingency plans for system failure or unexpected road conditions.

A London Borough (which is not a consenting authority) asked about how AVs will know about changes to traffic regulation orders. They also asked how parking fines and penalty charge notices will be issued:

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*“Can we issue penalty charge notice for parking and traffic contraventions directly to the operator?”*

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Another respondent suggested that:

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*“Permit holders should supply a ‘Digital ODD<sup>2</sup> Map’ in a machine-readable format that can be integrated with the authority’s traffic management and planning systems, aligning with the act’s objective to digitalise traffic regulation orders. They stated that guidance should require transparent coordination with traffic authorities to ensure APS vehicles operate safely on roads not designed for autonomy. Key elements include:*

*Pre-launch route approvals: local and national authorities must review routes for width, shared spaces, congestion, and vulnerable user areas.*

*Dynamic data sharing: APS operators must share real-time location, route changes, delays, and remote system adjustments.*

*Traffic enforcement integration: confirm APS compliance with temporary orders, diversions, and police instructions during emergencies.*

*Monitoring and review: ongoing input from traffic authorities, especially where AVs interact with buses, cyclists, and pedestrians.*

*Regulatory clarity: APS traffic compliance under UK law; safeguarding aligned with Equality Act 2010 and UK Supreme Court rulings.”*

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It was recommended that traffic authorities should keep systems updated on roadworks and major incidents to prevent AVs from worsening congestion.

A rural authority raised the following issues:

- Many roads lack white centre lines, and some are being removed for safety; if AVs rely on them, this poses challenges, especially in rural areas.
- Clarify how AVs will handle street works (planned or emergency) and make diversions.
- Rural roads often have slow-moving agricultural vehicles: how will AVs respond.
- Winter conditions: not all rural routes are salted: how will AVs identify unsalted roads, and who decides to cancel services on unsafe routes.

A key concern for traffic authorities was where vehicles will park/wait between rides, and how far they would cruise empty. A local authority said:

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*“Space in [this city] is very limited in terms of parking, and we would also not wish empty vehicles to add to congestion in the city. In [this city] all licensed vehicles are able to use bus lanes, if empty vehicles utilised bus lanes this would impact in the bus network, especially if the marketplace was flooded with autonomous vehicles.”*

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<sup>2</sup> An ODD is an ‘Operational Design Domain’. This sets out the specific conditions in which a self-driving vehicle can operate, including aspects such as geographical area, if it can work in day and/or night, and if it can only work in certain weather, e.g. where it can’t, for example, operate in snow.

## Guidance: Government response to feedback

The government is grateful for the many thoughtful and comprehensive responses on what the guidance should include and how it can be made as useful as possible. The response is set out below.

### The need for guidance

A significant majority of respondents agreed that guidance should be published to support any proposed deployments coming forward. Based on this feedback, guidance has recently been published<sup>3</sup>. It is targeted mainly at organisations looking to deploy a service, at consenting authorities, with inclusion for traffic authorities, and for emergency services

### The legislative background

Guidance sets out the appropriate legislation that applies to self-driving pilots and explains what it means in a clear manner. It also captures how APS sits alongside the licensing schemes for existing forms of passenger transport.

### Consent decision making by local authorities

Guidance covers areas that authorities outlined as wishing to consider in making their decision on consent.

The act does not place parameters on what can be considered by a licensing authority or bus franchising body in making a consent decision. However, as with any decision made by public bodies, it must be legal, fair, and reasonable. The act does not allow for the government to provide grounds on which consent may be refused or given. This is entirely a matter for the appropriate authorities to consider as they deem appropriate. The guidance itself will also not hold any statutory basis for authorities or applicants to take it into account.

The guidance suggests areas that authorities may have a particular interest in considering. This includes:

- Alignment with existing policies;
- How the proposed number of vehicles would impact the existing taxi and PHV market;
- How the service addresses gaps in current transport provision; and
- The impact on the local road network.

Consideration may also be given to any proposed fare structure and acceptance of any local concessionary travel arrangements. Depending on local governance, consenting authorities may wish to engage with other local stakeholders to secure their views in shaping their decision on consent.

Guidance also outlines how authorities may choose to make a decision on any proposed deployment and providing consent or not. It is, however, a matter for the local authority to decide as the act does not provide a process that has to be followed.

### Safety testing

For a vehicle to be legally self-driving, it requires being 'listed' under the Automated and Electric Vehicles Act 2018 or, when fully implemented, 'authorised' under the Automated Vehicles Act 2024. Broadly, this means that a vehicle has to be able to safely and legally operate without a human monitoring it with a view to immediate intervention in the driving of the vehicle. This capability will be assessed by the Vehicle Certification Agency (VCA) against the draft United Nations (UN) Automated Driving System Regulation (ADS), in advance of full implementation of the act and UN ADS regulation.

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<sup>3</sup> Three non-statutory guidance documents have been published and can be found at the following weblinks:  
Information for applicants - [www.gov.uk/government/publications/self-driving-vehicle-pilot-scheme-information-for-applicants/self-driving-vehicle-pilot-scheme-information-for-applicants](http://www.gov.uk/government/publications/self-driving-vehicle-pilot-scheme-information-for-applicants/self-driving-vehicle-pilot-scheme-information-for-applicants)  
Local authority and transport bodies - [www.gov.uk/government/publications/automated-passenger-service-permits-local-authority-and-transport-body-roles](http://www.gov.uk/government/publications/automated-passenger-service-permits-local-authority-and-transport-body-roles)  
First responders - <https://www.gov.uk/government/publications/self-driving-vehicle-pilot-scheme-information-for-first-responders/interacting-with-self-driving-vehicles-first-responders>

As the UK's type-approval body, VCA has 40-years' experience of assessing vehicles and has played a leading role in the development of international regulations for self-driving vehicles. VCA is therefore uniquely placed to undertake this role. Vehicle safety assessment is not a role required of consent authorities.

The assessment will cover a range of areas, including cyber security as based on the UN Regulation 155 (Cyber Security Management Systems). This requires organisations to show their approach to cyber security, including what their vehicle will do in the event of a cyber-attack and how it will make itself safe should there be any risk to other road users.

Guidance sets out the VCA's role in listing and authorising vehicles and DVSA's steps in considering whether to grant an APS permit on behalf of the Secretary of State as the appropriate national authority.

### Guidance on preliminary discussions

Guidance does not set out a formal check list that must be followed in any discussion between permit applicants and local authorities, as the act does not provide authority for this. However, it does list the issues which are likely to be of interest to authorities to support discussion. The effectiveness of the guidance will be evaluated at different points in the pilot period and consider amendments as required.

### Issues for traffic authorities

In some cases, the consenting authority will be the relevant traffic authority. In other cases, applicants will need to engage with a different body. The guidance sets out areas that may be of interest for applicants to discuss with traffic authorities.

### Accessibility and safeguarding

Many local authorities raised accessibility and safeguarding as major concerns. The guidance recommends applicants provide consenting authorities with full details of their approach on these issues in preliminary discussions.

DVSA will require applicants to set out their approach to accessibility and safeguarding as part of their application. In particular, the application will be expected to include their staff verification process (such as DBS checks). As explained in an earlier section, safety drivers will be required to hold a TPH driver's licence and therefore undergo the enhanced DBS check. This will require an enhanced DBS check and verification through the NR3S.

In the chapter on accessibility, it was explained that the government is also establishing an Accessibility Advisory Panel to guide the Department for Transport's policies relating to the APS. The Panel's work will inform the development of non-statutory guidance and reporting expectations and provide feedback to operators on published reports.

### Vehicle markings

Guidance does not state how permitted services should be marked for the pilot period. It is not necessary to be prescriptive at this stage, given the limited nature of deployments. Furthermore, having different approaches on a case-by-case basis is likely to lead to a greater understanding of how to proceed. This will continue to be reviewed alongside any emerging best practice.

### Objectives and performance monitoring

One of the objectives of the initial pilot deployments is to help the government and other stakeholders build an understanding of how to regulate APS, while supporting industry to develop a pathway to larger-scale commercial deployments. Guidance sets out the objectives of the pilot and consideration of how to embed emerging best practice and lessons.

### Stakeholder engagement

The act requires the Secretary of State to consult traffic authorities and emergency services; guidance describes this process. In addition, local authorities and emergency services may wish to consult a range of stakeholders, including affected communities. Guidance also sets out the points at which engagement may

be beneficial, who may be beneficial to engage with, and possible matters to discuss, including continued engagement when services are operational.

### Process and timelines for application and deployment

Guidance provides an overview of the permitting process. While the process will be the same, the timescales are likely to significantly vary on a case-by-case basis depending on a variety of factors. As understanding of timescales is strengthened, guidance will continue to be reviewed for where additional information can be provided to guide stakeholders.

### Experience-sharing and training

The government acknowledges the need to organise opportunities to share experiences from early deployments with local authorities; this will be on a voluntary basis. That said, the areas that local authorities may have most interest in are those where they already hold expertise: namely the effect on local transport strategies. As greater experience is built of deployments, the requirement for any specific training will be reviewed.

### Information to be shared with local authorities

Guidance stresses the importance of applicants engaging with consenting authorities at the earliest opportunity and lists some of the information that should be shared initially, based on the feedback received. Although issues will be set out individually, the broad intention is that an applicant should provide the authority with a clear understanding of the proposed service and how it will work as a whole. This will include aspects such as the impact on congestion, responses to planned and unplanned road closures, and use of kerbsides, particularly for pick-ups and drop-offs. The government would expect applicants to share information on these issues at an early stage.

However, it is important that authorities are not overburdened. Information sharing should help decision-making, without swamping authorities with information. The guidance will be kept under review, following feedback about how to achieve this balance. Authorities and other stakeholders can ask for more information as they believe appropriate.

### Minimum standards and best practice

Guidance sets out key areas that applicants will be expected to address, but it is not in the form of formal minimum standards. The basis is instead on expectations for what a service should provide, adopting a flexible approach as to how this can be achieved on a case-by-case basis. As greater understanding is gained of best practice, guidance will be updated to reflect this. As the market matures, introducing minimum standards will be considered in the future.

### The role of infrastructure

Guidance does not contain information on infrastructure requirements. This is because a core component for a vehicle to be deployed as self-driving is that it must be able to operate on the road network as it currently exists, without the need for supporting infrastructure.

### Potential deployment models

Guidance does not set out potential deployment models as it is uncertain what models may emerge at this moment in time. Consent need only be given if the service falls within the definition of a taxi or private hire-like service, or (in franchised areas) a bus-like service. As a greater understanding is developed of potential business models, guidance may be updated to provide illustrative examples.

### Understanding the impact on jobs

Due to the size and scope of any potential pilot deployment that may come forward, it is unlikely to have significant impact on the jobs of existing taxi, PHV and bus drivers.

Any pilot deployment that comes forward will enable government to build an understanding of any potential future impacts, and to continue to support engagement with trade unions to develop this understanding.

Pilots will build a greater understanding of the roles related to automated passenger services, which are still likely to require people to assist passengers; to test, maintain and clean vehicles; and to update software.

#### In-use monitoring and enforcement

In-use monitoring and enforcement of vehicles will be undertaken by the DVSA, who currently undertake this role for heavy goods vehicles and PSVs. DVSA also oversees MOT stations, ensuring that current vehicles used on the UK's roads continue to be safe and legal. These current roles mean that DVSA is well-placed to undertake monitoring and enforcement of automated passenger services.

While robust process will be in place to assess the safety and capability of self-driving vehicles before and while they are deployed on roads, self-driving vehicles may be involved in incidents. A core component of the process is to enable government and emergency services to learn from early smaller-scale deployments and to have the processes in place to take appropriate action.

#### Non-statutory guidance

The guidance will continue to evolve to reflect our growing understanding of the application of the APS permitting scheme. As it is non-statutory, this will enable it to be easily updated to reflect the lived experience of any proposed deployment going through the process.

The role of the guidance and its effectiveness as a non-statutory document will continue to be reviewed, but there are no current plans to give it a statutory basis. Nor are there any legal mechanism to provide a statutory basis, without new primary legislation.

#### Terminology

Through the guidance and other opportunities, the government will look to set out a clear approach in the use of terminology. This will include the clear difference how the government views 'trials' of safety driver-led automated driving systems and 'pilots' of self-driving services.

#### Changes to devolution and taxi/private hire licensing authorities

The requirement for consent is established through the act; there is no intention to amend this legislation. Where there are any changes to powers, for example through a Mayoral Combined Authority being established and having bus franchising powers, this body would hold the consent power. Where consent is given, a permit continues to remain valid where the consenting authority changes following a change in powers.

#### Emergency services

The government has published guidance for applicants to encourage engagement with emergency services and traffic authorities before applying for an APS permit.

## Other comments received

### Issues raised

Respondents used this question to voice their concerns and share wider views on AVs. While some supported the introduction of new services in the UK, others were sceptical that it is required or that it would be used successfully. The following issues were raised:

- Concerns around whether the technology would be able to manage roads in London as they differ from the wider roads in the U.S.,
- Road signage, road markings etc have to be clear and easily seen - which is certainly not the case on a lot of roads in the UK,
- Cyber security and the potential for a vehicle to be used as a weapon,
- The speed of the introduction of this new tech and a general lack of trust in AI,
- A general dislike of self-driving technologies,
- Traditional taxi and bus drivers' jobs,
- Detection of other road users e.g. cyclists and motorbikes.

Positive benefits outlined by respondents included the ability for self-driving services to reduce the number of collisions and opportunity to save lives. A further highlighted benefit was the UK as a global leader in allowing this technology to be commercialised and deployed, while also being proactive in ensuring that it is safe and dependable.

One individual praised the introduction of APS, expressing that:

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*“Self-driving vehicle technology enhances road safety, accessibility, and efficiency. Rapid implementation drives innovation, economic growth, and quicker benefits for all, especially elderly and disabled.”*

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Referencing the acceleration of the APS scheme to enable pilot deployments, an insurer said:

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*“It is vital that mechanisms are in place to facilitate the swift progression of well-understood and low-risk deployments. Those demonstrating strong safety protocols and transparency should proceed through the process efficiently. This approach avoids unnecessary delays while maintaining robust oversight for higher risk entities. By enabling trusted providers to advance quickly, the scheme can encourage responsible development and the deployment of APS without compromising public safety or confidence.”*

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A technology industry association summarised:

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*“We commend the Government for prioritising this legislation and for creating a national APS permitting scheme. A uniform, national framework will prevent a patchwork of laws and replace the fragmented framework for taxis and PHVs, ensuring consistency across regions and providing the certainty needed for the safe and scalable deployment of APS. By adopting these principles, the APS permitting scheme can unlock the benefits of APS, improve safety, accessibility, and sustainability while driving economic growth and innovation across the UK.”*

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## Challenges ahead

Alongside the general support for automated passenger services, many respondents pointed to the challenges that may emerge. This point was made across different stakeholder groups.

A legal respondent said:

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*“The APS trials could provide an excellent way of increasing public exposure to ADS, though if the safety points discussed elsewhere are not followed rigorously, this would be likely to set acceptance of the technology back. A number of studies have shown that humans distrust ADS more than they do human drivers, even when AVs perform to the same standard as human drivers. Proponents of AVs, therefore, face an uphill battle in getting the public onside. This is further proof that clear, consistent and transparent safety provisions need to be in place from the outset and followed throughout the pilots. Failure to do so could cause public backlash.”*

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A local authority said:

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*“The APS scheme must be:*

*Safe: Public safety and security must be the paramount consideration, with standards that are clear, high, and rigorously enforced.*

*Accessible: Services must be inclusive by design, meeting the needs of all users, particularly older and disabled people, from the outset.*

*Integrated: APS must function as a coherent part of the wider public transport network, complementing and enhancing existing bus, rail, and tram services rather than undermining them.*

*Nationally Consistent: The regulatory framework must establish strong national minimum standards to avoid the fragmentation, inconsistency, and safety gaps that currently plague the taxi and PHV licensing system.”*

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To meet future challenges, respondents stressed the need for the DVSA to be adequately resourced, to ensure timely, fair and transparent regulatory oversight and decision-making.

It was also thought to be important to establish clear distinctions between pilot/trial phases and full commercial operation, with corresponding risk management expectations at each stage. A traditional PHV

operator raised the pilot status of micromobility situation, which has remained in a permanent trial state without moving to full deployment. This has led to restricted opportunities for new market entrants.

Finally, respondents stressed the need for continued engagement as new challenges arose. As one individual put it:

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*“It is vital that the regulatory framework remains flexible and adaptive to keep pace with rapid technological advancements and evolving community needs. Continued engagement with operators, passengers, local authorities, and emergency services will be key to identifying challenges and opportunities as the scheme develops.”*

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A representative from the emergency services strongly recommended that the Department for Transport convenes a regular, ongoing stakeholder forum that brings together representatives from AV developers and operators, road safety organisations, emergency services, groups representing vulnerable road users, disability groups, and Government officials.