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REPLY TO PUBLIC CONSULTATION ON THE DRAFT TAXI AND PRIVATE HIRE LICENSING PENALTY POINTS SCHEME

- 1) In regards to the proposal by the Licensing Committee, we would like to draw to the Committee's attention, the Law regarding the powers of a District Council to suspend or revoke a licence of a Hackney Carriage or Private Hire Vehicle – see attached document 1
- 2) We would like to break down the consultation documents into various sections as follows – See document 2

Items considered Public Safety	4,5,17,18,19,42,45,46,48,35,36
Already powers "stop notice" (deferred)	9,11,12,13,14,22,23,24,25,28,43,49,51,53,54,31
P.A.C.E. interview	1,15,16
Automatic Revocation	34
Police Matter	20,47,57,7
Unnecessary red tape and/or Further explanation required	6,32,37,38,41,50,52,55,56,58
Town Police Clauses Act and local Government (Misc Provisions Act)	2,3,8,10,21,26,27,29,30,33,39,40,44

We would ask the Committee to explain the definition of "operator" in Penalty Point Scheme column

- 3) We would also like to inform the Committee of the Enforcement Table (which includes the offences contained within Town Police Clauses Act 1847. (The local Government Provisions Act 1976) (The Transport Act of 1980) for which provisions are already in place – see attached document 3 – pages 120,122,123 and 124

DOCUMENT - 1

Taxi Penalty Points System

1) Proposal is Ultra Vires:

http://www.localgovernmentlawyer.co.uk/index.php?option=com_content&view=article&id=16667%3Asuspension-of-taxi-drivers-licences&catid=61&Itemid=29

The law

By s.61(1) Local Government (Miscellaneous Provisions) Act 1976 'a district council may suspend or revoke... or refuse to renew the licence of the driver of a hackney carriage or a private hire vehicle' on the grounds (a) that he has since the grant of the licence been convicted of an offence involving dishonesty, indecency or violence or (b) any other reasonable cause.

'Any other reasonable cause' is generally taken to mean something that may lead the authority to consider that the driver is no longer a fit and proper person to hold a drivers' licence – to grant a drivers' licence the authority must be satisfied 'that the applicant is a fit and proper person' (by s.51 for PHVs and s.59 for hackney carriages).

It has been suggested that 'any other reasonable cause' extends beyond a simple consideration of whether the evidence suggests that the driver continues to satisfy the fit and proper person criterion. For example, it may be considered in the interests of public safety that a person who has been charged with a serious criminal offence should not be allowed to continue as a taxi driver. However, in order to be able to conclude that it is against the public interest for a driver to continue to operate as a taxi driver there would need to be a consideration of the risk posed by the driver – in other words a consideration of whether the person is considered fit and proper to hold a driver's licence.

If 'any reasonable cause' was interpreted to mean other than 'fit and proper' it would put a driver facing action under s.61(1) in a worse position than a new applicant for a licence who must satisfy the fit and proper person criterion. The better view must be that 'any other reasonable cause' under s.61(1)(b) simply extends s.61(1)(a) to include matters other than a criminal conviction for the offences specified in that subsection. For example, charges being laid, a failed prosecution or a criminal matter not involving dishonesty, indecency or violence (such as drink-driving).

The practice

Councils may come into possession of information that raises concerns as to whether a person holding a taxi driver's licence remains a fit and proper person. **For example, the council may have been informed that a driver has been charged with a serious criminal offence.** The practice of a number of councils has been to suspend the driver's licence under s.61 in order to allow a full investigation into the matter to be conducted and to consider at a later date what action, including revocation, should be taken.

R (application of Singh) v Cardiff City Council [2012] EWCH 1852 (Admin)

This decision now seems to make **such an approach unlawful as Singh J decided that s.61 does not confer a power of interim suspension**: "it is rather after a considered determination ... a final decision on whether a ground for either revocation, or suspension of a licence is made out"(para.103). So suspension is a sanction and cannot be used as an administrative measure to allow an authority to investigate matters: "it is not, as it were, a protective or holding power. **It is a power of final suspension, as alternative to a power of final revocation"** (para.105). So it is a final determination on the fitness and propriety of the driver and, as such, appealable.

This is the case whether the suspension is made under s.61(1) or if deemed necessary for public safety under s.61(2B) where the suspension takes place with immediate effect rather than 21 days after notice is given. Note also that if a suspension or revocation is made under s.61(1) and an appeal is lodged within the 21 days the suspension or revocation does not take effect until the appeal is abandoned or determined.

Practice after *Singh*

A council on receiving information which causes concern over whether a taxi driver is a fit and proper person will need to have delegated powers and a policy framework in place to enable it to take action quickly and without delay. This was good practice even before *Singh*.

The difference post-*Singh* is that the action that is taken by the council can no longer be an interim step pending a fuller investigation with a final adjudicated at a later date. **The council must therefore approach the matter in the same way that it would approach a final determination – because it is a final determination.**

There will have to be a **full consideration of the available evidence and the driver should be given the opportunity to state his or her case. The council must then weigh the evidence and decide how to exercise its discretion. If a period of suspension is imposed, it cannot be extended or changed to revocation at a later date.**

However, while the determination is a 'final' one, it is a determination based on the evidence available to the council at the time it made the determination. New evidence may, of course, become available at a later date.

New evidence may be adduced at an appeal leading the appeal court to a determination different to that reached by the council or an appeal may be settled by agreement between the council and the driver on terms which, in the light of subsequent evidence, becomes the appropriate course.

If, for example, the allegations against the driver were unfounded, a suspension could be lifted and if the licence was revoked, an expedited re-licensing process used (if the council has formulated one).

When to suspend

The pre-*Singh* practice of suspension of a licence pending the outcome of serious criminal charges may have been a reasonable one and was clearly a useful tool for councils to use. Now that suspension can no longer be used in this way when would suspension be an appropriate sanction? **Can suspension be used as a punishment?**

If on a consideration of the evidence the council decides that the driver can no longer be considered a fit and proper person then revocation would seem appropriate. The more serious the conduct, the more likely this will be.

However, *Singh J* suggests that suspension may be appropriate "even if misconduct has been established" if something "**less than complete revocation**" is appropriate and suspension "**will constitute sufficient sanction in the interests of the public**" (para.104). What does this mean?

It is clear that the aim of suspension is to **protect the public** (*Leeds City Council v Hussain* [2002]). It is not to **punish the driver. Punishment in the form of retribution (legally sanctioned revenge)** is therefore not a proper use of suspension. Retribution is backward looking and its aim is no more than to give the driver his or her just deserts for their conduct ('an eye for an eye').

Other purposes of punishment – variously termed utilitarian, reductive or corrective – look to the future and have a **positive aim**. Most appropriate when considering suspension of taxi drivers' licences are 'corrective' measures aimed at the driver. This may entail **the driver attending a driver training course or other improving measure (rehabilitation) or the sanction of suspension operating as an individual deterrent against future misconduct by the driver.**

The public interest is not in seeing a driver punished for his conduct as this is not the function of the licensing regime. The licensing regime is concerned with protection of the public. If a sanction by way of suspension is imposed the aim is to ensure that the drivers' conduct will not be repeated.

Roy Light is a barrister at St John's Chambers, Bristol.

Clearly the proposal suggested by Mr Gaimster in his correspondence dated 9th February 2017 is to "ascertain whether they are a fit and proper person".

This is not in accordance with *R (application of Singh) v Cardiff City Council* [2012] *EWCH 1852 (Admin)*. If a driver is not fit and proper, as per s61 (action i.e. been convicted of an offence involving dishonesty, indecency or violence) of the Local Government (Miscellaneous Provisions) Act 1976, then revocation is the correct course of action.

James Button in his book *Taxis, licensing law and practice* states that it is "difficult to understand how the punishment of a driver by means of suspension actually protects the public" Subsequently "points systems" that punish a driver for misdemeanours do not protect the public. If a driver is a significant threat to public safety then revocation

is the correct course of action i.e. been convicted of an offence involving dishonesty, indecency or violence.

Suspension for a number of **arbitrary misdemeanours** is **punishment** and should have no place in the licensing regime as it **does not protect the public**

2) Evidence Based Practice

No evidence has been included in the consultation to ascertain why such a proposal is actually required.

Best practice would be to **include a tabulation of all the offences/misconduct for each consecutive years over the last 10 years** to determine whether there has been an increase in enforcement activity in relation to declining standards?

Also a **record of all driver licence suspensions and stop notices issued to vehicles over the same period.**

3) Intra Vires & Enforcement Activity

The local authority *already has a suite of powers enshrined by parliament* to enforce all of the misconduct featured in the consultation tabulation. These are all included in the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976. Therefore why not use these powers as intended by parliament and the local authority to enforce the rules that already exist and in accordance with the Regulators Compliance Code adopted by EBC:

<http://www.eastbourne.gov.uk/resources/assets/inline/full/0/246064.pdf>

As James Button correctly points out "as with any criminal investigation and subsequent prosecution, the general rules applicable to such investigations must be followed. These include compliance with the requirements of PACE and RIPA and the right to a fair trial as enshrined in British and European law".

Therefore any enforcement activity must be conducted in accordance with the above Acts and code. Deviation renders the investigation (and hence any points awarded) void and would not stand in court.

The proposal blurs the differentiation between the vehicle, operator and the drivers licences. These are different licences with varying sanctions should an infringement occur as stipulated by parliament. Lumping them together under a "points system" is not in keeping with parliamentary intent and would therefore be *ultra vires*. The powers already exist, use them as necessary!!

Who is the legal officer who cleared the proposal prior to consultation?

DOCUMENT 2

Eastbourne Borough Council - Penalty Points Scheme

	Details of the misconduct	Points Applicable	Driver	Vehicle Owner or Operator
1	Providing false or misleading information on licence application form / failing to provide relevant information or pay the relevant fee (including dishonoured cheques)	6	✓	✓
2	Failure to notify, in writing, the Council of a change of address within 7 calendar days	3	✓	✓
3	Refusal to accept hiring without reasonable cause	6	✓	
4	Unreasonable prolongation of journeys or any misconduct regarding the charging of fares	6	✓	
5	Plying for hire by Private hire drivers or Hackney Carriage drivers plying for hire outside the district	9	✓	✓
6	Private hire vehicle parking or waiting on a taxi rank	9	✓	✓
7	Inappropriate behaviour at a taxi rank,	1-12*	✓	
8	Leaving a taxi unattended at a rank	4	✓	
9	Using unlicensed vehicle or using a licensed vehicle without insurance or without a valid VCT	12	✓	✓
10	Failure to produce relevant documents within timescales when requested by an Authorised Officer	4	✓	✓
11	Unsatisfactory condition of vehicle, interior or exterior	4	✓	✓
12	Failure to undergo the 6 monthly VCT on time	6		✓
13	Failure to provide proof of insurance cover when requested	6	✓	
14	Failure to produce Hackney Carriage or Private Hire vehicle for re-testing when required	4		✓
15	Using a vehicle subject to a suspension order issued by an Authorised Officer or a police officer	12	✓	✓
16	Using a vehicle for which the licence has been suspended or revoked	12	✓	✓
17	Failure to report, in writing, within 72 hours, accident or damage to licensed vehicle, which would cause the vehicle to breach licence conditions	4	✓	✓
18	Carrying more passengers than stated on the vehicle licence	12	✓	
19	Failure to display external/internal licence plate in a fixed position or failure to display appropriate door signs	6	✓	✓
20	Carrying an offensive weapon in the vehicle	12	✓	
21	Failure to notify a transfer of Private Hire or Hackney Carriage vehicle licence within 14 days of transfer	4		✓
22	Failure to carry fire extinguisher	4	✓	✓
23	Failure to carry first aid kit	3	✓	✓

	Details of the misconduct	Maximum* Points Applicable	Driver	Vehicle Owner or Operator
24	Displaying unsuitable or inappropriate sited signs or unauthorised advertisements in or on the vehicle	3	✓	✓
25	Failure to use authorised roof light	4	✓	
26	Failure to maintain records in a suitable form of the commence and cessation of work of each driver each day	4		✓
27	Failure to produce on request records of drivers' work activity	4		✓
28	Using a non-approved or non-calibrated taximeter (HC)	6	✓	✓
29	Obstruction of an authorised officer or police officer wishing to examine a licensed vehicle	12	✓	✓
30	Evidence of smoking in vehicle	3	✓	✓
31	Displaying any feature on private hire vehicle that may suggest that it is a Hackney Carriage	6	✓	✓
32	Using a vehicle, the appearance of which suggests that it is a Taxi	6		✓
33	Failure to carry an assistance dog without requisite medical exemption certificate	12	✓	✓
34	Driver not holding a current DVLA licence	12	✓	✓
35	Failure to have the driver's badge clearly displayed	4	✓	
36	Failure to notify, in writing, a change in medical circumstances	6	✓	✓
37	Unsatisfactory appearance of driver	4	✓	
38	Failure to observe rank discipline (HC)	3	✓	
39	Failure to maintain proper records of private hire vehicles	3		✓
40	Failure to keep or produce records of Private Hire bookings or other documents required to be kept or produced	6		✓
41	Misleading use of the words 'Taxi' or 'Cab' on advertising materials	3	✓	✓
42	Failure to issue receipt on request .	6	✓	✓
43	Using a licensed vehicle in a dangerous condition	9	✓	✓
44	Failure to return vehicle licence plate within 7 days after due notice following expiry, revocation or suspensions of such licence	4		✓
45	Unsatisfactory behaviour or conduct of a driver.	1-12*	✓	
46	Failure to notify the Council in writing, of any motoring or criminal convictions within 21 days or conviction or cautions during period of current licence	6	✓	✓
47	Failure to behave in a civil and orderly manner, or bringing the trade into disrepute.	1-12*	✓	✓

	Details of the misconduct	Maximum* Points Applicable	Driver	Vehicle Owner or Operator
48	Failure to provide reasonable assistance to a passenger	1-12*	✓	✓
49	Failure to display a correct up to date fare card (HC)	3	✓	✓
50	Carrying two or more separate fares without the appropriate consent	9	✓	
51	Failure to carry a legal spare wheel (or appropriate alternative) and the necessary tools to fit the spare wheel	4	✓	✓
52	Failure to attend punctually at appointed time and place without sufficient cause	4	✓	✓
53	A licensed vehicle with a bald or dangerous or defective tyre	4 per tyre	✓	✓
54	Failure to submit licence renewal application including documents and attendance at a vehicle inspection	6	✓	✓
55	Failure to display an applicable fare card AND the Councils valid fare card together	3	✓	✓
56	Waiting or stopping on a double yellow area, bus stop or private land (without the owner's permission) unless requested by a paying customer present in the vehicle	3	✓	
57	Driving whilst using a mobile phone	9	✓	
58	Appeal of points by way of Licensing Sub-Committee	4-12*	✓	✓

Notes:

*- discretionary points up to a maximum of 6 points can be issued by officers, but greater awards of points can only be issued by the Licensing Sub-Committee.

Officers may refer any mandatory award of points to Members where there are aggravating features to any case.

The Maximum points applicable refers to points issued by Officers. If the matter is referred to the Licensing Sub-Committee the Sub-Committee may impose up to 12 points.

Ticks indicate potential recipients of points for infringements, but are not limited to those only. Certain cases may result in drivers and/or proprietors and/or operators receiving penalty points. Points may be awarded to one or several persons depending upon the circumstances of the case, but each case will be considered on its individual merits.

Table 6.2 Enforcement table – Town Police Clauses Act 1847

Section	Offence	Maximum penalty
40	Giving false information on application for HC proprietor's licence	Level 1
44	Failure to notify change of address of HC proprietor	Level 1
45	Plying for hire without HC proprietor's licence	Level 4
47	Driving a HC without HC driver's licence	Level 3
47	Lending or plying with HC driver's licence	Level 3
47	HC proprietor employing unlicensed driver	Level 3
48	Failure by HC proprietor to hold HC driver's licence	Level 1
48	Failure by HC proprietor to produce HC driver's licence	Level 1
52	Failure to display HC plate	Level 1
53	Refusal to take a fare	Level 2
54	Charging more than the agreed fare	Level 1
55	Obtaining more than the legal fare	Level 3 and 1 months' imprisonment until the excess is refunded
56	Travelling less than the lawful distance for an agreed fare	Level 1
57	Failing to wait after a deposit to wait has been paid	Level 1
58	Charging more than the legal fare	Level 3
59	Carrying other person than the hirer without consent	Level 1
60	Driving HC without proprietor's consent	Level 1
60	Person driving another to drive HC without proprietor's consent	Level 1
61	Drunk driving of HC	Level 1
61	Wanton or furious driving or wilful misconduct leading to injury or danger	Level 1
62	Driver leaving HC unattended	Level 1
64	HC driver obstructing other HCs	Level 1

HC: hackney carriage.

Notes: The number for breach of law is made under TPCA 1847 s. 60 and the Town Police Clauses Act 1847.

Table 6.3

Enforcement table – hackney carriage provisions – Local Government (Miscellaneous Provisions) Act 1976

Section	Offence	Maximum penalty
49	Failure to notify transfer of HC proprietor's licence	Level 3 (by virtue of s 76)
50(1)	Failure to present HC for inspection as required	Level 3 (by virtue of s 76)
50(2)	Failure to inform local authority where HC is stored if requested	Level 3 (by virtue of s 76)
50(3)	Failure to report an accident to local authority	Level 3 (by virtue of s 76)
50(4)	Failure to produce HC proprietor's licence and insurance certificate	Level 3 (by virtue of s 76)
53(3)	Failure to produce HC driver's licence	Level 3 (by virtue of s 76)
57	Making false statement or withholding information to obtain HC driver's licence	Level 3 (by virtue of s 76)
58(2)	Failure to return plate after notice given after expiry, revocation or suspension of HC proprietor's licence	Level 3 plus daily fine of £10
61(2)	Failure to surrender drivers licence after suspension, revocation or refusal to renew	Level 3 (by virtue of s 76)
64	Permitting any vehicle other than HC to wait on a HC stand	Level 3 (by virtue of s 76)
66	Charging more than the meter fare for a journey starting outside the district, without prior agreement	Level 3 (by virtue of s 76)
67	Charging more than the meter fare when a HC is used to operate a vehicle	Level 3 (by virtue of s 76)
69	Proprietor obstructing a journey	Level 3 (by virtue of s 76)
71	Failure to use a taximeter	Level 3 (by virtue of s 76)
73(1)(a)	Obstruction of authorised officer or constable	Level 3 (by virtue of s 76)
73(1)(b)	Failure to comply with requirement of authorised officer or constable	Level 3 (by virtue of s 76)
73(1)(c)	Failure to give information or assistance to authorised officer or constable	Level 3 (by virtue of s 76)

Table 6.4

Enforcement table – private hire provisions – Local Government (Miscellaneous Provisions) Act 1976

Section	Offence	Maximum penalty
46(1)(a)	Using an unlicensed PH vehicle	Level 3 (by virtue of s 76)
46(1)(b)	Driving a PH vehicle without a PH driver's licence	Level 3 (by virtue of s 76)
46(1)(c)	Proprietor of a PH vehicle using an unlicensed driver	Level 3 (by virtue of s 76)
46(1)(d)	Operating a PH vehicle without a PH operator's licence	Level 3 (by virtue of s 76)
46(1)(e)	Operating a vehicle as a PH vehicle when the vehicle is not licensed as a PH vehicle	Level 3 (by virtue of s 76)
46(1)(e)	Operating a PH vehicle when the driver is not licensed as a PH driver	Level 3 (by virtue of s 76)
48(6)	Failure to display PH vehicle plate	Level 3 (by virtue of s 76)
49	Failure to notify transfer of PH vehicle licence	Level 3 (by virtue of s 76)
50(1)	Failure to present PH vehicle for inspection as required	Level 3 (by virtue of s 76)
50(2)	Failure to inform local authority where PH vehicle is stored if requested	Level 3 (by virtue of s 76)
50(3)	Failure to report an accident to local authority	Level 3 (by virtue of s 76)
50(4)	Failure to produce PH vehicle licence and insurance certificate	Level 3 (by virtue of s 76)
53(3)	Failure to produce PH driver's licence	Level 3 (by virtue of s 76)
54(2)	Failure to wear PH driver's badge	Level 3 (by virtue of s 76)
56(2)	Failure by PH operator to keep records of bookings	Level 3 (by virtue of s 76)
56(3)	Failure by PH operator to keep records of PH vehicles operated by him	Level 3 (by virtue of s 76)

Chapter 6

Section	Offence	Maximum penalty
58(2)	Making false statement or withholding information to obtain PH driver's or operator's licence Failure to return plate after notice given after expiry, revocation or suspension of PH vehicle licence	Level 3 (by virtue of s 76) Level 3 plus daily fine of £10
61(2)	Failure to surrender driver's licence after suspension, revocation or refusal to renew	Level 3 (by virtue of s 76)
67	Charging more than the meter fare when HC used as PH vehicle	Level 3 (by virtue of s 76)
69	Unnecessarily prolonging a journey	Level 3 (by virtue of s 76)
71	Interfering with a taximeter	Level 3 (by virtue of s 76)
73(1)(a)	Obstruction of authorised officer or constable	Level 3 (by virtue of s 76)
73(1)(b)	Failure to comply with requirement of authorised officer or constable	Level 3 (by virtue of s 76)
73(1)(c)	Failure to give information or assistance to authorised officer or constable	Level 3 (by virtue of s 76)

PH: private hire.

Table 6.5

Enforcement table – private hire provisions – Transport Act 1980

Section	Offence	Maximum penalty
64(2)(a)	Driving a PH vehicle with a roof sign which contravenes s 64(1)	Level 3
64(2)(b)	Causing or permitting a PH vehicle to be driven with a roof sign which contravenes s 64(1)	Level 3

In conclusion we the undersigned feel that this proposal by the Licensing Authority is totally unnecessary, unlawful, no evidential support and suspension of drivers is only meant to protect the public not to be used as a method of punishment. We also feel that there are enough rules and regulations in force already to supervise the Trade.

Print Name	Hackney Carriage/PH Number	Signature
K.R. LECKIE	HC 58	K.R. Leckie
K.J. KEMP	P.H. 619	K.J. Kemp
M.BARRETT	HC 182	M Barrett
K. COLEMAN	P.H. 06	K Coleman
K. MOLLONONG	HC 99	K Mollonong
C. MUSK	PH 802	C Musk
M. DIVALL	H 130	M. Divall
A BALWAT	PH 623	A Balwat
E.M. BURKE	PH 114	E.M. Burke
NICHOLAS DAWES	PH 200	Nicholas Dawes
TOBIAS ALLCHORN	PH 489	Tobias Allchorn
Paul Weller	PH 316	Paul Weller
Bill Stovall	PH 157	Bill Stovall
BARRIE WOOD	PH 155	Barrie Wood
PAUL DONOGHUE	PH 627	Paul Donoghue
PAUL DOLAN	PH 269	Paul Dolan
CAROL YOUNG	PH 94	Carol Young
STEVE HOPKINS	PH 300	Steve Hopkins
SMOKE CHITALL	PH 424	Smoke Chitall
DARREN SAMWAYS	HC 5	Darren Samways
STUART YONNIE	PH 117	Stuart Yonnie
MARK HAYNES	PH 502	Mark Haynes
LEE GATTAN	HC 111	Lee Gattan
PAUL HOFFMANN	PH 50	Paul Hoffmann
JANET SARGENT	PH 112	Janet Sargent
MARK BIGGSBY	PH 212	Mark Biggsby
NASSER FOTOONI	PH 78	Nasser Fotooni
JAMES MURRAY	P.H. 254	James Murray
MARTIN WRAXALL	PH 406	Martin Wraxall
JANE LEE	PH 363	Jane Lee
ROBERT A. HOLLAND	PH 241	Robert A. Holland
CK HADLAND	HC 61	CK Hadland
PAUL PRIX	HC 74	Paul Prix
G. BROWN	HC 63	G. Brown
LUCASZ SKIBA	276 PH	Lucasz Skiba
M.M. ROUE	418 PH	M.M. Roue
MARVIN SCULLON	304 PH	Marvin Scullon
CLIVE CONNELL	299 PH	Clive Connell
Steve Donoghue	228 HC	Steve Donoghue

In conclusion we the undersigned feel that this proposal by the Licensing Authority is totally unnecessary, unlawful, no evidential support and suspension of drivers is only meant to protect the public not to be used as a method of punishment. We also feel that there are enough rules and regulations in force already to supervise the Trade.

Print Name	Hackney Carriage/PH Number	Signature
STEVE MORRIE	PH 143	
JAY HIGGINS	PH 351	
TREVOR SLATER	443 PH	
ROBERT SHERS	170 PH	
MUN DAVIES	498 HX	
DARRELL OWEN	61 PH	
GORT EUBNS	PH 31 PH	
THOMAS HARNER	166 H/C	
SCOTT VIRGO	211 PH	
Imah Arllami	PH 296 PH	
STEVE ADAMS.	PH 363	
JUSTIN LEATHAM	PH 730	
LIONEL WARD	HC 803	
RANJEEV SHARMA	65 PH	
Per Baxter	512 PH	
AR Whitby	96 PH	
AMANDA CHAPMAN.	617 PH	A Chapman.
IAN COOKE	PH 625	
JARREN PELLEGRINO	PH 302	
Sokol Guma	H. 445	
Gentian Coco	PH 410	
ABDUL QUDDUS	PH 504.	
J.F. CAPOCCI	PH	
D. R. CARR	PH	
OILY BIST	H 91	
KLOPP HIRNAYE	PH 421	
KLEIN PATRICK	PH 412	
NOI MACREADIE	PH 525	
T. WELLS	107 PH	
S. PARKS	PH 323	
T.H. THOMSON	315 PH	
RITW ABRAHAM	PH 161	
BARBY MORRIS	H. 02	
TONY KIRKAGE	H 130	
TRACEY SUMMERS	PH 452	
HEITH WILLIAMS	PH 188.	
BRIAN FIELDS	264	
JAY VIRGO	388	