

Draft Licensing Policy for Hackney Carriage and Private Hire consultation

CONSULTATION REPORT

Review of the draft hackney carriage and private hire licensing policy which sets out how we propose to regulate hackney carriages (taxis) and private hire vehicles across the South Oxfordshire and Vale of White Horse districts.

MAY 2021



CONTENTS

SUMMARY	3
HOW WE HAVE USED RESULTS OF THE CONSULTATION	7
Summary of changes made to the policy	8
BACKGROUND TO THE ENGAGEMENT	8
ENGAGEMENT METHODOLOGY	10
KEY FINDINGS – QUANTITATIVE DATA	11
Individuals/members of the public	12
All businesses, organisations, community groups, councillors and officers	13
Driver or proprietor licensed by the district council	14
Operator licensed by the district council	16
KEY FINDINGS – QUALITATIVE AND QUANTITATIVE DATA	17
Section A: Proposed changes from Department of Transport's 'Statutory Standards'	17
Suitability to hold a licence (including DBS checks, national register, fit and proper, criminal standards, reporting convictions, etc);	17
Safeguarding	28
Operators requirements	31
Complaints about licence holders	37
Other comments	39
Section B: Other proposed changes to the policy	41
DBS and DVLA checks	41
Driver standards	43
Drivers	47
Enforcement	49
General	51
Operators	53
Vehicle criteria	56
Other comments	60
CCTV in licensed vehicles	61
Anything else	64
And Finally...	68
FURTHER INFORMATION	69

The Appendix for the Consultation Report is a separate document, containing the following two appendices and is available to view on our website pages: [South Oxfordshire](#) or [Vale of White Horse](#):

Appendix for consultation report includes:

APPENDIX A – ENGAGEMENT COMMUNICATION

APPENDIX B – SURVEY AND FULL RESULTS

Note: We only report in percentages when there are more than 100 responses. When stating percentages in the analysis, we are referring to the percentage of respondents that answered the specific question, rather than the total number of responses to the overall survey. Response percentages may not add up to 100% due to rounding up over .5 and rounding down under .5

Words that appear in italics are quotes taken from comments received.

SUMMARY

This report has been produced to analyse the comments received to the Draft Licensing Policy for Hackney Carriage and Private Hire consultation. The survey was designed to help the councils gain feedback on some proposed changes to the policy for South Oxfordshire and Vale of White Horse District Councils.

The survey included 58 questions and asked participants to provide comments on Section A and Section B of the policy. Section A covers proposed changes from the Department of Transport's 'statutory standards' and section B covers other changes to develop and maintain professional and respected hackney carriage and private hire trades and to ensure an efficient and quality local transport service. The survey also asked for views on the possible inclusion of CCTV in licensed vehicles and provided the opportunity for respondents to comment on the proposed changes throughout the survey. The survey was open to all those who live, work or carry out business in and around South Oxfordshire and Vale of White Horse.

The consultation ran for six weeks from 10 February to midnight on 24 March 2021. In total 182 responses were received, specifically 172 online submissions, 9 responses via email and 1 postal response. The email and postal responses were manually added to the online consultation system, Smart Survey.

We thank everyone who took part and gave us comments on the draft Licensing Policy for Hackney Carriage and Private Hire. This consultation report and the appendix will be published online on the [South Oxfordshire](#) or [Vale of White Horse](#) pages of our website.

The key findings from the consultation and a summary of the changes made to the policy after the consultation are below.

Key findings

The consultation highlighted that there is overall agreement for the proposed changes to the Draft Licensing Policy for Hackney Carriage and Private Hire.

There were 52 individual changes being proposed in the Draft Licensing Policy for Hackney Carriage and Private Hire consultation. Most of the 182 responses, 69%, were received from individuals/members of the public and 16% from drivers or proprietors licensed by the district council. The remaining 15% of responders is made up of district, county or town/parish councillors; operators licensed by the district council; district, county or town/parish officers; business or organisation/community groups and respondents who ticked 'other'.

Over half of the individuals/members of the public said they lived in South Oxfordshire (59%), and around a third (35%) lived in Vale of White Horse. 6% said they don't live in either of the districts but use taxis or have other interests in the districts.

30 participants are drivers or proprietors licensed by the district council are licensed by the district council, 26 by South Oxfordshire and 4 by Vale of White Horse. Over half of driver or proprietors, 16, live outside the districts. Of the remaining 13 responses, 12 live in South Oxfordshire and only 1 in Vale of White Horse.

All 8 respondents who said that their operator licences were provided by the district council said they were provided by South Oxfordshire District Council, while none were provided by Vale of White Horse.

Respondents took the opportunity to comment 505 times, and this provided 655 individual comments that are summarised and analysed in this report.

Section A: Proposed changes from the Department for Transport's 'Statutory Standards'

There was very strong agreement overall with the proposed policy changes to the **suitability to hold a licence** section in the policy. We are expected to make these changes unless there is what the government calls 'a compelling local reason not to'.

- A very high proportion of respondents (87%) agreed with the policy change to the national register of refusals and revocations, while 2% of respondents disagreed.
- A similarly high proportion of respondents (85%) agreed with the suggestion of changing the guidance on determining suitability for all licence holders. 2% of respondents disagreed.
- When asked about adding a section to explain fitness and propriety to hold a licence in more detail, a very high proportion of respondents (85%) agreed with the proposed change to the fitness and propriety section, while 2% of respondents disagreed.
- Again, a high proportion of respondents (85%) agreed with the proposal that all licence holders must report all new convictions, cautions, etc in writing within 48 hours. 4% of respondents disagreed.
- When asked about the suggested policy for all licence holders to inform the council if they are arrested, formally interviewed as a suspect or charged with an offence by the Police, 82% agreed with reporting arrests and charges. 7% of respondents disagreed.

- The proposal for the added requirement for vehicle proprietors not currently licensed to provide a basic DBS disclosure on application, 84% agreed, 3% disagreed with the proposal.

There was general agreement overall to the proposed policies around **safeguarding**:

- 74% of respondents agreed that all applicants for a driver's licence will be required to pass safeguarding training before a licence will be granted, and once passed the training must be re-taken every 3 years, while 8% disagreed.
- The proposed policy to add a new section with advice on Safeguarding was well received as 73% of respondents agreed, and 4% disagreed.

When asked about proposed policies around **operator requirements**, respondents generally agreed with the changes:

- 74% of respondents agreed with the proposed policy change on operator DBS checks, 6% disagreed and 13% neither agree nor disagree.
- 84% of respondents agreed with the proposed policy to change to operator staff checks, 5% disagreed.
- 74% of respondents agreed with the proposed change to operator safeguarding training, 8% disagreed and 12% neither agree nor disagree.
- When asked about the proposed policy change to advice on use of public service vehicles (PSVs) and passenger carrying vehicles (TCVs), 72% of participants agree, 2% disagree and 18% neither agreed nor disagreed.

There was agreement overall with the proposed policy changes to the policy around **complaints about licence holders**:

- 76% of respondents agree with the proposed change about providing more information for passengers on complaints, 6% disagree.

Respondents who told us they disagreed with any of the proposals in Section A could provide comments. 85 respondents commented, providing 127 individual comments. There were a variety of views expressed about the proposals. Some respondents felt that too many costs were being passed on to drivers, and that these changes are *pushing drivers' overheads up even more* and should be met by the council. Some said these changes are not needed, while others thought that the taxi industry is under attack and that public safety is being used as a *fig leaf to get diesel cars off the road*. While others felt strongly that some of the proposals, such as enhanced DBS checks, shouldn't apply to company directors.

A further 59 participants provided comments to the 'other comments' question, providing 73 individual comments. There was general agreement that the changes were overdue. Most of the comments were a mix of general points, mainly regarding the importance of local knowledge, customer safety, publishing a fair pricing policy and that taxis should not be allowed to leave their engine idling while stationary.

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local

reason not to' accept this change, therefore we will be including these proposals in our final document.

Section B: Other proposed changes to the policy

There was strong agreement overall with the 'other' proposed changes section in the policy.

- 83% of respondents agreed with the proposed policy changes around Disclosure and Barring Service (**DBS**) checks and Driver and Vehicle Licensing Agency (DVLA) checks overall, 8% disagreed.
- 82% of respondents agreed with the proposed policy changes around **driver standards** overall, 8% disagreed.
- 83% of respondents agreed with the proposed policy changes to **drivers** and new driver licence conditions overall, 6% disagreed.
- 76% of respondents agreed with the proposed policy changes around **enforcement** overall, 4% disagreed.
- In the section about proposed policy changes around **general** changes, 82% agreed with the changes overall, 7% disagreed.
- 83% of respondents agreed with the proposed policy changes around **operators** overall, 7% disagreed.
- When asked about proposed policy changes around **vehicle criteria**, 81% of respondents agreed overall, 10% disagreed.

207 respondents commented on the proposed changes in Section B, providing 243 individual comments. Respondents generally agreed with the proposals and this showed in the comments made with one they are *all excellent proposals*. Some respondents did not agree with certain proposals, for example the change of the time period for a random DBS check from 28 to 14 days. Others disagreed with having to retake the disability awareness training every three years. Respondents also made comments around the idling conditions, one told us *absolutely no engine idling polluting the pavement near shops* while another disagreed saying *a driver can't be expected to sit on the rank for 2-3 hours to wait for a fare in freezing cold weather!*.

39 participants provided comments to the 'other comments' question in Section B, providing 31 individual comments. There was strong agreement overall with the changes, with one respondent telling us *thank you for improving the quality and consistency of the policies* and another in general agreement *except for the proposed tariff changes*. There were also a variety of other responses, ranging from the view that these changes will make it harder to operate a licensed vehicle and that bureaucracy should be reduced otherwise *if drivers are not incentivised they will not apply*, through to doing more spot checks and improving safety through the use of *a standard colour scheme*. Relating to the vehicle emissions proposals, a respondent pointed out that *the emissions restrictions should be made tighter sooner*.

CCTV in licensed vehicles

We have not included any requirements for CCTV to be installed in licensed vehicles in our draft new policy, and we asked what respondents think about this. Nearly half of respondents, 48%, agree that the use of CCTV should not be a mandatory requirement in all licensed vehicles, and didn't have any comments. Nearly a quarter, 23%, have 'no opinion'.

Nearly a third of respondents, 29%, think the use of CCTV should be required in all licensed vehicles and chose to make a comment. 67 respondents commented on these proposed changes, providing 100 individual comments. A very high number of respondents agreed overall with the proposal and of the 39 comments expressing agreement, the majority mentioned that CCTV would *battle crime and also protect both the driver and passenger*. There was a significant minority who were concerned about a potential invasion of privacy and increased cost, while another suggested it could be voluntary, stating *not sure our customers will like to be filmed*.

Anything else

48 participants provided comments to the 'anything else' question, generating 81 individual comments. There was broad overall agreement to the new licensing policy overall expressed by many respondents, with one saying it was overdue, that they *should have been done long ago*. Supporting for the prevention of taxis idling was mentioned by a few respondents, while some wanted taxis to accept credit card payments and require GPS tracking to monitor vehicle location and speed. There were some who disagreed about the policy, seeing as an attack on the trade. However, many commented that they supported making the rules tighter for public safety, with one saying *we feel the increase in consumer confidence outweighs the costs, which should be reflected in the proposed tariff charges*.

HOW WE HAVE USED RESULTS OF THE CONSULTATION

We are very grateful to all those who took the time to respond to the consultation and provide their comments on the proposed changes.

It is encouraging to see many positive comments on the proposed new policy, but there were some concerns raised, and we have taken these into consideration. In some cases where appropriate, we have made some further changes to the draft policy as a result of concerns raised.

Some of the comments received refer to other issues relating to taxi and private hire licensing rather than the policy changes that we had proposed, such as the request for an online system that licence holders could use in order to update contact details, and changing the knowledge test format. The Licensing Team will capture and consider these comments separately or as part of any future review.

All of the comments made have been taken into consideration when creating the final version of the policy which will be put forward to the General Licensing Committees of both councils at

the earliest opportunity. If this is adopted, the new policy will be published on our websites and notification of this sent to licence holders through our regular email newsletter.

Summary of changes made to the policy

Change of details

5.2 has been amended to state that it is recommended that all licence holders notify the council if they are likely to be unable to be contacted for more than four weeks; the original proposal was two weeks.

DBS checks for vehicle licence applicants

7.5 has been amended to clarify who would supply the DBS in respect of partnership applicants.

Hackney carriage tariff

7.27 has been amended to make it clearer that for journeys outside the district, the fare should not exceed the tariff unless a fare is agreed in advance.

Operators

9.11 has been added to clarify who should do the knowledge test in the cases of company/partnership applicants – a nominated person who is either a director, partner or company secretary.

9.16 and 9.19 have been amended to reflect that disability awareness and safeguarding training is to be repeated every three years, rather than five. This mirrors the same requirement for drivers and is as per the consultation survey and summary changes document published.

The numbering in section 9 has been amended as there were two paragraphs numbered 9.19, two paragraphs numbered 9.20 and no 9.14.

Appendices A and B – vehicle equipment

The requirement to have a fire extinguisher is recommended to be retained. Whilst advice will remain to get away from the vehicle and allow the fire and rescue service to deal with the situation, it is recognised that it may be a crucial item in case of emergency.

Appendix B – Specification for special vehicles

The terminology ‘executive vehicles’ was removed from section 34 as this was unclear and included in error.

Appendix I

One reference to ‘guide dog’ has been changed to ‘assistance dog’.

BACKGROUND TO THE ENGAGEMENT

The council is responsible for licensing private hire vehicles, drivers and operators. We also license hackney carriage (taxi) vehicles and drivers.

The hackney carriage and private hire licensing policy which sets out how we propose to regulate hackney carriages (taxis) and private hire vehicles across South Oxfordshire and Vale of White Horse districts required an update to reflect the changes in legislation and guidance since the policy was last reviewed.

To create the new draft policy, we reviewed and updated our previous policy. The new version includes more robust safety measures as well as changes to help us support our corporate priorities of tackling the climate emergency and building healthy communities. We also considered the Department for Transport's (DfT) Statutory Taxi and Private Hire Vehicle Standards, which were published in July 2020.

The new draft policy aims to promote the highest possible standards to keep the public safe. We aim to:

- protect the public;
- maintain and develop professional and respected hackney carriage and private hire trades;
- ensure an efficient and quality local transport service; and
- encourage environmental sustainability.

The survey asked for views on the proposed new policy. An extra question was included about closed circuit television (CCTV) in licensed vehicles, which includes private hire vehicles and taxis, which is not covered in the policy.

We didn't propose any specific level of tariff for South Oxfordshire (Vale of White Horse already had a tariff). If the General Licensing Committee decides that a tariff is to be introduced, there would be a separate project on this including a consultation with hackney carriage proprietors in South Oxfordshire to ask for their views on setting the new tariff. Any proposed tariff would be advertised before being introduced (in accordance with section 65 of the Local Government (Miscellaneous Provisions) Act 1976).

A summary of proposed changes is below. **Section A** covers proposed changes from the Department of Transport's 'statutory standards'. **Section B** covers other proposed changes to the policy.

There are also some changes we had to make to bring the policy in line with current legislation. We also added a section with general guidance on application processes and determination.

Section A: Proposed changes from the Department for Transport's 'Statutory Standards'

Some of the changes we made to the policy included more robust safety measures based on a document called Statutory Taxi and Private Hire Vehicle Standards, which the Department for Transport (DfT) published in July 2020. We expected to make these changes unless there is 'a compelling local reason not to'.

The proposed policy changes include:

- suitability to hold a licence (including DBS checks, national register, fit and proper, criminal standards, reporting convictions, etc);
- safeguarding;
- operator requirements;
- complaints about licence holders.

Section B: Other proposed changes to the policy

The new version of the policy includes other changes to develop and maintain professional and respected hackney carriage and private hire trades and to ensure an efficient and quality local transport service. It will also help us support the councils' priorities of addressing the climate emergency, improving the local economy and supporting community well-being.

- Disclosure and Barring Service (DBS) and Driver and Vehicle Licensing Agency (DVLA) checks
- Driver standards
- Drivers
- Enforcement
- General
- Operators
- Vehicle criteria

ENGAGEMENT METHODOLOGY

The following summaries the methodology of how we undertook for the consultation.

- 1,668 email notifications were sent to taxi and private hire drivers, operators, district councillors, town and parish councils and statutory consultees such as: local authorities, disability groups and Thames Valley Police.
- Emails were sent to 1,412 consultees on the councils' consultee database, which provided a link to our websites to the following documents: the proposed new policy, summary of changes, changes in legislation and guidance and DfT document, along with details of how to comment. The notification was issued through the online consultation system Smart Survey. A total of 3,080 email notifications were sent out;
- A copy of the email notification can be found in the Appendix.
- A letter was sent to 53 consultees from the taxi drivers and operators database.
- A letter was sent to 319 contacts on the councils' consultee database issued by an external printing company, Hobbs. The letter included links to our websites, online survey and details of who to contact if respondents were unable to complete the survey online, had queries about the consultation process or required any of the material in an alternative format (see the email notification as an example of the text used in the Appendix).
- The websites were updated with the consultation documentation.
- A detailed online survey was used, with 58 questions offering participants a breakdown summary of the proposed policy changes and giving the opportunity to indicate their

level of agreement. A variety of questions were included and an opportunity to provide free text comments throughout. A copy of the survey can be found in the Appendix.

- A six-week consultation period was open for submitting responses from 10 February until midnight on 24 March 2021.
- The consultation was carried out in conformity with the councils' public engagement charter¹.

Reporting methodology

- A total of 182 completed responses were received. 236 partial responses (these are where the survey has been partly completed) were not included in the total. 9 email responses and 1 postal response was manually added to the consultation once the survey closed. An 'email response' option was added to required matrix of choice questions in Section A, this allowed officers to override the skip logic feature and manually input the email responses correctly. When looking at the data charts, the 'email response' should be added when looking at the strongly disagree and disagree results.
- Please note, questions 10 and 11 are part of the same proposal but were split into two separate questions due to the length and size restrictions on the survey.
- 1 response was received a day after the consultation closed and has not been included to the total responses.
- A total of 505 comments were received, and many of these included several points, providing 655 individual comments that are analysed in this report. Some comments received were blank responses.
- A summary of the comments to the consultation is included in this report. Any personal information supplied to us within the comments that could identify anyone has been redacted and will not be shared or published in the report. Further information on data protection is available in our general consultation's privacy statement on our [South](#) or [Vale](#) website.
- Some spelling, grammatical and punctual errors in the original comments raised were corrected in the main body of this report; a full list of unedited comments can be found in the Appendix.

KEY FINDINGS – QUANTITATIVE DATA








The below provides the key findings to the quantitative data in the 'A little bit about you' section within the survey. The key findings to the other qualitative and quantitative data within the survey are talked about later in the report.

All questions in this section required a response. Respondents were provided different questions later in the survey depending on how they responded to the questions in this section.

¹ <https://www.southoxon.gov.uk/south-oxfordshire-district-council/about-the-council/get-in-touch/consultations/> or <https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/about-the-council/get-in-touch/consultations/>

The first question in the survey asked participants to confirm who they were responding as. The council asked this question to help us better understand responses to the survey and see if we are reaching a wide variety of people.

The list of options is provided in the chart below.





Are you responding as:			Response Percent	Response Total
1	an individual/member of the public		69.23%	126
2	a business or organisation/community group		0.55%	1
3	a district, county or town/parish councillor		3.85%	7
4	a district, county or town/parish officer		2.20%	4
5	a driver or proprietor licensed by the district council		15.93%	29
6	an operator licensed by the district council		2.75%	5
7	Other (please specify):		5.49%	10
			answered	182

Other (please specify):

- Chairperson of customer representative group
- 9 x responses received via email

Individuals/members of the public

Only respondents that ticked 'an individual/member of the public' to question 1 were then asked which district they lived in.

Which district do you live in?			Response Percent	Response Total
1	South Oxfordshire		58.73%	74
2	Vale of White Horse		34.92%	44
3	Neither, but I use taxis in the districts		3.97%	5
4	Neither, but I have other interests in the districts		2.38%	3
			answered	126

All businesses, organisations, community groups, councillors and officers

Only participants that responded as a business or organisation/community group, a district, county or town/parish councillor and a district, county or town/parish officer were then asked for the name of the business or organisation/community group or council they were representing.

The list of responses is provided below:

- Thame Town Council x 3
- Swyncombe Parish Council
- Share If Ltd
- SODC (South Oxfordshire District Council)
- Wallingford Town Council
- Not applicable
- Wantage Town Council
- Wheatley Parish Council
- Oxfordshire County Council - Supported Transport Services
- Vale of White Horse District and Cumnor Parish Councils

Participants were also asked to confirm where their business was based.

Where is the business based? Tick all that apply.				
			Response Percent	Response Total
1	South Oxfordshire		58.33%	7
2	Vale of White Horse		33.33%	4
3	Based out of districts (but trade within South and Vale)		8.33%	1
			answered	12




Driver or proprietor licensed by the district council

Only participants that responded as a driver or proprietor licensed by the district council were asked which district council they were licensed by.

Which district council are you licensed by?				
			Response Percent	Response Total
1	South Oxfordshire		89.66%	26
2	Vale of White Horse		13.79%	4
			answered	29

26 of the participants are licensed by South Oxfordshire and 4 by Vale of White Horse. We believe there were significantly more respondents licensed by South Oxfordshire as we have more than double the amount of drivers licensed by South Oxfordshire (930) compared with Vale of White Horse (417).

Drivers or proprietors were then asked which district they lived in. If participants lived outside of the districts, then they were asked to provide the name of the district or local authority, and to provide their name, or operator trading name.

Which district do you live in?			Response Percent	Response Total
1	South Oxfordshire		41.38%	12
2	Vale of White Horse		3.45%	1
3	Neither, I live outside of these districts		55.17%	16
			answered	29

15 of these respondents provided the name of the district or local authority they lived in. The responses to this question are listed below.

If you live outside of the districts, please tell us which district or local authority you live in:

- Oxford City x 4
- Cherwell x 3
- Reading x 2
- Buckinghamshire x 2
- Berkshire
- Slough
- West Berkshire
- We have offices in Didcot, Newbury, and Oxford

The next question in this section asked drivers and proprietors to provide their name or trading name before being routed to Section A: Proposed changes from the Department for Transport's 'Statutory Standards'.


26 participants answered this question and the responses are provided below. Personal information supplied has been redacted.

Please provide either your name, or your operator trading name:

- Go Green Taxis x 2
- 001 taxis x 2
- Henley Taxi
- Chiltern car
- N/a
- Butla cars
- Bobs taxis

Operator licensed by the district council

Only participants that responded as an operator licensed by the district council, were asked which district council provides their operator licence.

Which district council provides your operator licence?			Response Percent	Response Total
1	South Oxfordshire		100.00%	8
2	Vale of White Horse		0.00%	0
			answered	8

All 8 of the operators who responded to this question, said that their licences were provided by South Oxfordshire District Council. None were from Vale of White Horse; this could be because some companies who are based in Vale don't need operator licences – they only 'operate' hackney carriages – so this question wouldn't apply to them.

All respondents also provided their name, or operator trading name. A list of the responses to this question are provided below where a trading name has been provided. Individual names are not included here for data protection reasons.

Please provide either your name, or your operator trading name:

- Ra cars
- Lightway Services Ltd
- Chrissie's Cabs
- Henley cars
- Driving Miss Daisy Didcot
- Pryors Corporate Travel

Operators were then routed in the survey to Section A: Proposed changes from the Department for Transport's 'Statutory Standards'.

KEY FINDINGS – QUALITATIVE AND QUANTITATIVE DATA

The key qualitative and quantitative findings from section A: proposed changes from the Department for Transport's 'Statutory Standards' and section B: other proposed changes to the policy are summarised below.

Respondents were required to answer all the matrix of choice questions in section A, but a 'no comment' option was made available. If participants strongly disagreed or disagreed with any of the proposed policy changes, they then had the opportunity to provide a 'compelling local reason' for the council to consider. These questions included a free text box and were not required.

Section B, and the remaining sections in the survey, included a variety of questions. Respondents were not required to answer these.

The charts below are provided for each section of the consultation. A breakdown of the data is also available in matrix charts. The summary of the comments and suggestions received and how frequently they were mentioned, can be found in the tables below.

Section A: Proposed changes from Department of Transport's 'Statutory Standards'

Respondents were asked to comment on the proposed changes to the policy that came from the Department for Transport's 'Statutory Standards'.

The council is expected to make these changes unless there is what the government calls 'a compelling local reason not to'. If respondents disagreed with any of the proposed policies, then they had the opportunity to tell us their compelling local reason for us to consider.

The proposed policy changes include:

- suitability to hold a licence (including DBS checks, national register, fit and proper, criminal standards, reporting convictions, etc);
- safeguarding;
- operator requirements;
- complaints about licence holders.

Suitability to hold a licence (including DBS checks, national register, fit and proper, criminal standards, reporting convictions, etc);







This section of the consultation asked respondents about the DfT 'Statutory Standards' proposals around suitability to hold a licence (including Disclosure and Barring Service [DBS] checks, national register, fit and proper, criminal standards, reporting convictions, etc).

More information on the consultation was made available via links to our websites.

Participants were asked how far they agreed or disagreed with the proposed policy changes listed in the tables below.

PROPOSED POLICY CHANGE: NATIONAL REGISTER OF REFUSALS AND REVOCATIONS (SECTION 3.11)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to the national register of refusals and revocations (section 3.11). Added reference to the national register of refusals and revocations (NR3) which will be used to share information and check new applicants and existing licence holders.

National register of refusals and revocations (section 3.11) Added reference to the national register of refusals and revocations (NR3) which will be used to share information and check new applicants and existing licence holders			Response Percent	Response Total
1	Strongly agree		48.9%	89
2	Agree		38.5%	70
3	Neither agree nor disagree		3.8%	7
4	Disagree		1.1%	2
5	Strongly disagree		0.5%	1
6	No comment		7.1%	13
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

2 participants provided comments to this question, providing 4 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
taxi drivers are safer than other drivers	1
Costs are being passed on to drivers	1
Public safety is excuse to get diesel cars off the road	1
Most honest drivers suffering for few bad apples	1

Respondents felt that there are a few bad apples causing the council to take stronger measures and there was a sense that drivers are being forced out of the trade by using public safety as an excuse. There was a reference to too many costs being passed on to drivers and that taxi drivers are safer than other drivers and more honest.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being ‘a compelling local reason not to’ accept this change, therefore we will be including these proposals in our final document.

It should also be noted there is no separate charge levied for us to use the national register of refusals and revocations that would need to be passed on to drivers.

PROPOSED POLICY CHANGE: GUIDANCE ON DETERMINING SUITABILITY (SECTION 4.1 AND APPENDIX F)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to the guidance on determining suitability (section 4.1 and Appendix F). Added a section to confirm introduction of new guidance on determining suitability for all licence holders.

Guidance on determining suitability (section 4.1 and Appendix F) Added a section to confirm introduction of new guidance on determining suitability for all licence holders		Response Percent	Response Total
1	Strongly agree	47.3%	86
2	Agree	37.9%	69
3	Neither agree nor disagree	4.9%	9
4	Disagree	1.1%	2
5	Strongly disagree	0.5%	1
6	No comment	8.2%	15
		answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a ‘compelling local reason’ why we should not make this change, for the council to consider.

2 participants provided comments to this question, providing 3 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Don't agree with change, new section not needed	2
Public safety is excuse to get diesel cars off the road	1






Reasons for disagreement with this policy are that a new section isn't needed, the council is going too far with this suggestion and public safety is a *fig leaf to get diesel cars off the road*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

PROPOSED POLICY CHANGE: FITNESS AND PROPRIETY SECTION (SECTION 4.2)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change made to the fitness and propriety section (section 4.2). Added a section to explain fitness and propriety to hold a licence in more detail.

Fitness and propriety section (section 4.2) Added a section to explain fitness and propriety to hold a licence in more detail		Response Percent	Response Total
1	Strongly agree 	48.4%	88
2	Agree 	36.8%	67
3	Neither agree nor disagree 	6.6%	12
4	Disagree 	1.6%	3
5	Strongly disagree	0.0%	0
6	No comment 	6.6%	12
		answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to

consider.

2 participants provided comments to this question, providing 2 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Need to be healthy, not fit	1
Taxi industry is under attack	1







One view given is that taxi drivers *don't need to be fit to drive, just need to be healthy*, while another feels the taxi industry is under attack.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

PROPOSED POLICY CHANGE: REPORTING CONVICTIONS AND OFFENCES (SECTION 4.4)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to reporting convictions and offences (section 4.4). All licence holders must report all new convictions, cautions, etc in writing within 48 hours.

Reporting convictions and offences (section 4.4) All licence holders must report all new convictions, cautions, etc in writing within 48 hours			Response Percent	Response Total
1	Strongly agree		59.3%	108
2	Agree		25.3%	46
3	Neither agree nor disagree		6.0%	11
4	Disagree		3.3%	6
5	Strongly disagree		0.5%	1
6	No comment		5.5%	10

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

5 participants provided comments to this question, providing 9 individual comments and questions. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
48 hours not long enough	4
Time should cover weekend	2
should be 72 hours	1
Should be 7 days	1
If we don't report, do we lose livelihood?	1

There were concerns raised that the length of time given to report a conviction, 48 hours, was not long enough and suggestions were made to give drivers either 72 hours or a week in which to report a conviction or offence. One respondent said that drivers *work long hours and may not have access to or be familiar with online procedures*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.







QUESTION

Q. If we don't report, do we lose livelihood?

A. Breaches of licence conditions and legislation are dealt with in accordance with our enforcement policy.

PROPOSED POLICY CHANGE: REPORTING ARRESTS AND CHARGES (SECTION 4.5)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to reporting arrests and charges (section 4.5). All licence holders must inform the council if they are arrested, formally interviewed as a suspect or charged with an offence by the Police

Reporting arrests and charges (section 4.5) All licence holders must inform the council if they are arrested, formally interviewed as a suspect or charged with an offence by the Police			Response Percent	Response Total
1	Strongly agree		63.2%	115
2	Agree		19.2%	35
3	Neither agree nor disagree		4.4%	8
4	Disagree		3.3%	6
5	Strongly disagree		3.3%	6
6	No comment		6.6%	12
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

6 participants provided comments to this question, providing 11 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Don't agree with arrest part (unless you are convicted and charged)	3
Don't agree with being formally interviewed as a suspect part	3
Innocent until proven guilty	2
Driver should register for update service, or wait for new DBS before licence issued	1
Police may wrongly arrest you	1
Police should inform council using their register, not driver	1

There were concerns raised about the need to inform the council if a driver is arrested and / or interviewed as the *police may wrongly arrest you* and you are *innocent until proven guilty*. If convicted and charged, then responders agreed with this proposal, but not if you are just *interviewed as a suspect*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

PROPOSED POLICY CHANGE: VEHICLE PROPRIETOR DBS CHECKS (SECTION 7.5)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to vehicle proprietor DBS checks (section 7.5). Added requirement for vehicle proprietors not currently licensed to provide a basic DBS disclosure on application.

Vehicle proprietor DBS checks (section 7.5) Added requirement for vehicle proprietors not currently licensed to provide a basic DBS disclosure on application		Response Percent	Response Total
1	Strongly agree	55.6%	100
2	Agree	28.3%	51
3	Neither agree nor disagree	7.2%	13
4	Disagree	2.8%	5
5	Strongly disagree	0.6%	1
6	No comment	5.0%	9
7	Email response	0.6%	1
		answered	180

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

3 participants provided comments to this question, providing 6 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Needless extra overhead for drivers	1
How does this apply to a company renting a vehicle to a driver?	1
How does this apply to drivers renting a vehicle?	1

Impractical for all directors as there may be several	1
Suggest one or two named persons, like other industries e.g. road haulage	1
Directors are not connected to day to day business	1

Providing a basic DBS disclosure on application was viewed as *pushing drivers' overheads up even more*. Comments were made about the policy applying to company directors: one respondent felt that while accepting the checks are required, it was seen as *impractical* for all directors and the company secretary to provide a DBS, especially when *some are often not connected to the day to day management of the business*. The suggestion here is for named persons to take responsibility on behalf of a company, as done in other industries.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

QUESTIONS

Q. How does this apply to a company renting a vehicle to a driver?







A. This would apply to the vehicle proprietor as the applicant. Under section 80 of the Local Government (Miscellaneous Provisions) Act 1976 it is a legal requirement that the proprietor of a vehicle is the one who should apply for and hold the licence. In the same legislation, where a vehicle is the subject of a hiring agreement or hire purchase agreement, the proprietor is defined as being is the person in possession of the vehicle under that agreement. If the company is hiring the vehicle to a driver, that driver would be the proprietor rather than the company.

Q. How does this apply to drivers renting a vehicle?

A. Under section 80 of the Local Government (Miscellaneous Provisions) Act 1976 it is a legal requirement that the proprietor of a vehicle is the one who should apply for and hold the licence. In the same legislation, where a vehicle is the subject of a hiring agreement or hire purchase agreement, the proprietor is defined as being is the person in possession of the vehicle under that agreement. Therefore if the driver has a hire agreement, they will be the proprietor and it would apply to them.

PROPOSED POLICY CHANGE: DRIVER DBS CHECKS (SECTION 8.14)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to driver DBS checks (section 8.14). No driver's licences will be issued or renewed without a current enhanced DBS disclosure or one checked through the Update service.

Driver DBS checks (section 8.14) No driver's licences will be issued or renewed without a current enhanced DBS disclosure or one checked through the Update service			Response Percent	Response Total
1	Strongly agree		60.2%	109
2	Agree		24.3%	44
3	Neither agree nor disagree		5.0%	9
4	Disagree		3.3%	6
5	Strongly disagree		0.6%	1
6	No comment		6.6%	12
			answered	181

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

5 participants provided comments to this question, providing 8 individual comments and questions. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Should be a simple check	1
Council should pay	1
Why is initial DBS just basic and not enhanced DBS?	1
What if there is a delay that is not applicant's fault?	1
Should have full day of Disability Awareness Training	1
Manual handling should be a recognised standard	1
Suggest refresh every 3 years	1
Suggest removal from approved list if driver doesn't attend (DAT) training	1

One comment said there should just be a *simple check*, implying that there should not be an 'enhanced' DBS disclosure. In contrast, another wondered *why is initial DBS just basic and not enhanced DBS?* Another asked what would happen if there was *undue delay on a renewal, not caused by the applicant's error?* Note that one respondent made 4 comments referring to disability awareness training (the last 4 comments in the table above) and we assume the respondent confused DBS with DAT.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

QUESTIONS

Q. Why is initial DBS just basic and not enhanced DBS?

A. We do have enhanced DBS checks for all driver licence applicants. The law does not permit us to carry out enhanced DBS checks on operators or vehicle proprietors.

Q. What if there is a delay that is not applicant's fault?

A. The DBS Update Service is an immediate online check and therefore this should greatly reduce the risk of any delays in this process.

PROPOSED POLICY CHANGE: DBS UPDATE SERVICE (SECTION 8.16)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to DBS update service (section 8.16). All drivers must sign up for and maintain their annual payments to the DBS Update Service. Failure to do so may result in suspension of the licence.

DBS Update service (section 8.16) All drivers must sign up for and maintain their annual payments to the DBS Update Service. Failure to do so may result in suspension of the licence			Response Percent	Response Total
1	Strongly agree		49.5%	90
2	Agree		29.1%	53
3	Neither agree nor disagree		7.7%	14
4	Disagree		3.3%	6
5	Strongly disagree		4.9%	9
6	No comment		5.5%	10
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

9 participants provided comments to this question, providing 10 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Should be able to renew without cost	4
Not everyone will sign up to it	1
Don't agree this should be mandatory, should be a choice	1
Council should pay if they want the DBS	1
Unnecessary	1
Some older drivers not confident with computers	1
Council should issue a warning first, then give time for update to be done	1

There was a general feeling that drivers should not have to pay for the DBS update service, not everyone can afford it, especially as they have had a *difficult year* and felt that *if the council requires a ...DBS check council should pay for it*. Other respondents thought it was unnecessary, not everyone will sign up for it, and that it is *an extreme step to suspend a licence*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

Safeguarding







This section of the consultation asked respondents about the DfT 'Statutory Standards' policies around safeguarding. More information on the consultation was made available via links to our websites.

Participants were asked how far they agreed or disagreed with the proposed policy changes listed in the table below.

182 respondents answered this section of the survey. Overall, the output received tells us that respondents agree with the proposals around safeguarding.

PROPOSED POLICY CHANGE: DRIVER SAFEGUARDING TRAINING (SECTION 8.33-8.34)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to driver safeguarding training (section 8.33-8.34). All applicants for a driver's licence will be required to pass safeguarding training before a licence will be granted, and once passed the training must be re-taken every 3 years.

Driver safeguarding training (section 8.33-8.34) All applicants for a driver's licence will be required to pass safeguarding training before a licence will be granted, and once passed the training must be re-taken every 3 years			Response Percent	Response Total
1	Strongly agree		45.6%	83
2	Agree		28.6%	52
3	Neither agree nor disagree		11.0%	20
4	Disagree		5.5%	10
5	Strongly disagree		2.7%	5
6	No comment		6.6%	12
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

11 participants provided comments to this question, providing 15 individual comments and questions. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Safeguarding is pretty basic, only need training for new applications	5
Don't agree if there is cost to applicant	5
Will this apply to new drivers or all drivers?	1
Retraining makes it complicated and stressful for drivers	1
Suggest every five years	1

The feedback highlighted that once the test has been passed and there is no complaint from members of the public, you *should not have to waste extra time and money retraining*. There were also several comments stating that the cost of retaking the training should not be met by the drivers. Respondents also felt that as the training is *extremely basic* there is no need to repeat it every 3 years, with one suggesting it would be better to retake it every 5 years.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

QUESTIONS

Q. Will this apply to new drivers only? Or all drivers?

A. The proposal is that this will apply to all licensed drivers.

Q. Think the safeguarding training is a good idea but not too happy if this involves so much of an extra cost to the applicant - is it free?

A. The course is not free, but it is charged to ensure that we cover the costs of the training only.

PROPOSED POLICY CHANGE: ADVICE ON SAFEGUARDING (APPENDIX H)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change on advice on safeguarding (Appendix H). Add a new section with advice on Safeguarding.

Advice on safeguarding (Appendix H) New section added with advice on Safeguarding			Response Percent	Response Total
1	Strongly agree		42.3%	77
2	Agree		30.2%	55
3	Neither agree nor disagree		15.9%	29
4	Disagree		2.2%	4
5	Strongly disagree		1.6%	3
6	No comment		7.7%	14
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

4 participants provided comments to this question, providing 4 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Common sense is all that is needed, drivers are already aware	2
Don't agree if there is cost to applicant	1
Not necessary every 3 years	1

The suggestion to add a new section with advice on safeguarding was met with a couple of respondents commenting that *common sense* is all that is needed, and that the drivers already know this information. Other points made were about disagreeing if there is a cost to drivers, and that the retraining isn't needed every 3 years.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

Operators requirements








This section of the consultation asked respondents about the DfT 'Statutory Standards' policies around operator requirements. More information on the consultation was made available via links to our websites.

Participants were asked how far they agreed or disagreed with the proposed policy changes listed in the table below.

Overall, the survey output tells us that respondents agree with the proposed policy changes to the DfT 'Statutory Standards' policies around operator requirements.

PROPOSED POLICY CHANGE: OPERATOR DBS CHECKS (SECTION 9.3-9.5)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change on Operator DBS checks (section 9.3-9.5). Amend basic DBS requirement for private hire operators to confirm the DBS disclosure is valid for 1 month. Those operators who are already licensed drivers are exempt from the requirement to provide a basic DBS. In the case of companies, we may also require the directors and company secretary to provide a basic DBS each.

Operator DBS checks (section 9.3-9.5) Amend basic DBS requirement for private hire operators to confirm the DBS disclosure is valid for 1 month. Those operators who are already licensed drivers are exempt from the requirement to provide a basic DBS. In the case of companies, we may also require the directors and company secretary to provide a Basic DBS each			Response Percent	Response Total
1	Strongly agree		40.1%	73
2	Agree		33.5%	61
3	Neither agree nor disagree		12.6%	23
4	Disagree		3.3%	6
5	Strongly disagree		2.7%	5
6	No comment		7.1%	13
7	Email response		0.5%	1

Operator DBS checks (section 9.3-9.5) Amend basic DBS requirement for private hire operators to confirm the DBS disclosure is valid for 1 month. Those operators who are already licensed drivers are exempt from the requirement to provide a basic DBS. In the case of companies, we may also require the directors and company secretary to provide a Basic DBS each	Response Percent	Response Total
	answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

10 participants provided comments to this question, providing 9 individual comments and questions with 1 n/a. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Disagree that already licensed drivers are exempt from providing basic DBS	3
More costs, admin and paperwork for no real benefit	2
Don't agree directors and company secretary should provide basic DBS - we have no contact with customers	2
If director or secretary was convicted, would all employees be out of work?	2
Please provide reasoning or examples of why you would need to DBS check a company director?	2
Operators should take enhanced DBS	2
Don't understand what this means, need to use plain English	1
Delivery company doesn't need this, why does taxi company?	1
Council interference under guise of public safety causes increase in mental health stress and anxiety	1

Three respondents commented that licensed drivers should not be exempt from providing a basic DBS, with one stating that *this leaves a loophole*. In other comments, respondents feel this just seems like *more unneeded nonsense*, while another responder commented *we strongly believe that the licenced operator should be subject to an enhanced DBS*. The inclusion of directors and company secretaries in the requirement to provide a basic DBS brought several comments around the relevance of this policy, given that one director has *zero contact with any of our customers*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

To clarify, the only reason that licensed drivers would be exempt from providing a basic DBS is because they would already hold an enhanced DBS, which could be checked through the Update Service. It would also not be legal for the council to do an enhanced DBS on an operator as we are only permitted to carry out enhanced checks on drivers.

QUESTIONS

Q. If director or secretary was convicted, would all employees be out of work?

A. Each case would be considered on its own merits and in accordance with our enforcement policy.

Q. Please provide reasoning or examples of why you would need to DBS check a company director?








A. The DfT Statutory Standards document contains a section on operator licensing which explains why they feel such checks are necessary. Please refer to section 8.

Q. Delivery company doesn't need this, why does taxi company?

A. The DfT Statutory Standards document contains a section on operator licensing which explains why they feel such checks are necessary. Please refer to section 8.

PROPOSED POLICY CHANGE: OPERATOR STAFF CHECKS (SECTION 9.6)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to operator staff checks (section 9.6). Private hire operators should keep a register of all staff who have access to booking information, must obtain basic DBS disclosures for all such staff and must have a written policy on employing ex-offenders.

Operator staff checks (section 9.6) Private hire operators should keep a register of all staff who have access to booking information, must obtain basic DBS disclosures for all such staff and must have a written policy on employing ex-offenders			Response Percent	Response Total
1	Strongly agree		54.4%	99
2	Agree		29.1%	53
3	Neither agree nor disagree		5.5%	10
4	Disagree		2.2%	4
5	Strongly disagree		2.7%	5
6	No comment		5.5%	10
7	Email response		0.5%	1
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a ‘compelling local reason’ why we should not make this change, for the council to consider.

8 participants provided comments to this question, providing 14 individual comments and questions. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Is there a local problem or is this just red tape?	2
Not practical as operators are outsourcing telephone service	2
Operators moving to app based booking service - how would this fit in policy?	2
These checks should be responsibility of operators, not the council	1
Most private hire operators are one man bands, so not relevant	1
Seems like the council singling out the taxi industry	1
More costs, admin and paperwork for no real benefit	1
Council interference under guise of public safety causes increase in mental health stress and anxiety	1
Don't agree that booking staff needs DBS as they don't have contact with clients	1
Agree with written policy for ex-offenders	1
Don't agree with annual DBS when 3 years is acceptable for drivers	1

For operators who are now outsourcing telephony services, either to overseas providers or out of hours call centres, for one respondent this policy is *not...practical* and for another, they point out that *technology has moved on massively from the laws governing our trade...will you want the software engineer to do a DBS?* A respondent mentioned that this *just seems like yet more admin, costs and paperwork*, and another queried whether this is a local problem or just *red tape*. A wide variety of other comments were made about this policy, including the view that operators should decide who to employ, not the council as it will be operators *helping people back from their previous lifestyle*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being ‘a compelling local reason not to’ accept this change, therefore we will be including these proposals in our final document.

QUESTIONS

Q. Is there a local problem or is this just red tape?







A. The [DfT Statutory Standards document](#) explains their reasoning behind their recommendations in detail. We are expected to implement the proposals in order to improve consistency in the licensing system as a whole.

Q. Operators moving to app based booking service - how would this fit in policy?

A. If an operator cannot comply with any of the policy requirements, this can be considered on a case by case basis.

PROPOSED POLICY CHANGE: OPERATOR SAFEGUARDING TRAINING (SECTION 9.18-9.20)

Participants were asked to indicate how far they agreed or disagreed with the proposed change to operator safeguarding training (section 9.18-9.20). All applicants for a private hire operator's licence and all staff taking bookings and dispatching work will be required to pass safeguarding training before a licence will be granted, and once passed the training must be re-taken every 3 years

Operator safeguarding training (section 9.18-9.20) All applicants for a private hire operator's licence and all staff taking bookings and dispatching work will be required to pass safeguarding training before a licence will be granted, and once passed the training must be re-taken every 3 years			Response Percent	Response Total
1	Strongly agree		48.4%	88
2	Agree		25.8%	47
3	Neither agree nor disagree		11.5%	21
4	Disagree		3.8%	7
5	Strongly disagree		3.8%	7
6	No comment		6.6%	12
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

9 participants provided comments to this question, providing 16 individual comments and questions with 1 n/a. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Waste of time and money	3
Council is creating jobs at the expense of taxi drivers	2
Don't agree if operator has extra cost	2
Is there a local problem or is this just red tape?	1
Does council have evidence of local issues?	1

Council is adding to an already heavy workload, making it harder to serve the public	1
Council interference under guise of public safety causes increase in mental health stress and anxiety	1
Operators moving to app based booking service - how would this fit in policy?	1
We should have level playing field with large international tech companies like Uber	1
Don't agree with safeguarding training every 3 years	1

There is a general feeling amongst these respondents that this policy is a waste of time and not needed and adding more red tape. One responder says it's *yet more red tape and wasted tax payer money...pointless policy adds to your already ridiculously long waiting times to get a private hire operators licence*. Another doesn't agree that the cost should be met by operators, asking *Would all members of Ubers' staff also be required to undertake this...we just want a level playing field*. There is also a query over whether this is a local issue and if so, *has the council got evidence to this effect*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

QUESTIONS

Q. Is there a local problem or is this just red tape?

A. The [DfT Statutory Standards document](#) explains their reasoning behind their recommendations in detail. We are expected to implement the proposals in order to improve consistency in the licensing system as a whole.

Q. Does council have evidence of local issues?






A. These recommendations come from the Department for Transport.

Q. Operators moving to app based booking service - how would this fit in policy?

A. If an operator cannot comply with any of the policy requirements, this can be considered on a case by case basis.

PROPOSED POLICY CHANGE: ADVICE ON USE OF PSVS (SECTION 9.26)

Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to advice on use of PSVs (section 9.26). Advice for private hire operators about use of PSVs (public service vehicles – these are vehicles with nine to 16 passenger seats) and PCV (passenger carrying vehicle) drivers.

Advice on use of PSVs (section 9.26) Advice for private hire operators about use of PSVs (public service vehicles – these are vehicles with nine to 16 passenger seats) and PCV (passenger carrying vehicle) drivers			Response Percent	Response Total
1	Strongly agree		44.0%	80
2	Agree		27.5%	50
3	Neither agree nor disagree		18.1%	33
4	Disagree		0.0%	0
5	Strongly disagree		1.6%	3
6	No comment		8.8%	16
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a ‘compelling local reason’ why we should not make this change, for the council to consider.

1 participant provided comments to this question, providing 2 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
More costs, admin and paperwork for no real benefit	1
Council interference under guise of public safety causes increase in mental health stress and anxiety	1

This respondent feels that this policy will bring *more unneeded nonsense*.

Licensing team response:








We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being ‘a compelling local reason not to’ accept this change, therefore we will be including these proposals in our final document.

Complaints about licence holders

This section of the consultation asked respondents about the DfT 'Statutory Standards' policies around complaints about licence holders. More information on the consultation was made available via links to our websites.

Participants were asked to indicate how far they agreed or disagreed with the with the proposed change to information for passengers on complaints (section 6.5, Appendix A para 12 and Appendix B para 15). Added new requirement for vehicles to display information for passengers on how to complain directly to the licensing authority.

Overall, the survey output tells us that respondents agree with the proposed policy changes to DfT 'statutory standards' policy around complaints about licence holders.

Information for passengers on complaints (section 6.5, Appendix A para 12 and Appendix B para 15) Added new requirement for vehicles to display information for passengers on how to complain directly to the licensing authority			Response Percent	Response Total
1	Strongly agree		45.1%	82
2	Agree		32.4%	59
3	Neither agree nor disagree		8.8%	16
4	Disagree		2.7%	5
5	Strongly disagree		3.3%	6
6	No comment		7.1%	13
7	Email response		0.5%	1
			answered	182

Where a respondent has disagreed with the proposed policy change above, they were asked to provide a 'compelling local reason' why we should not make this change, for the council to consider.

10 participants provided comments to this question, providing 17 individual comments and questions. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
More unnecessary paperwork, waste of time	5
Customer could ask driver or find out another way how to make a complaint	4
Could be used to make fake or unfair claims	3
Agree if the driver is a sole operator	1
Open to fraud without recording equipment	1
More information needed about the display information	1
Will Executive service licensed private hire vehicles be exempt (linked to plate exemption?)	1

There is a feeling being expressed throughout the comments in this section, including this question, that the proposed polices are a waste of time and will create more unnecessary paperwork. Some respondents don't see the need for displaying information on how to complain, as *anyone who has a real grievance already gets in contact with you*, with the concern here around getting a deluge of complaints e.g. for taxis that are 5 minutes late. Some also suggested that this policy could be used by *opportunistic customers to make fake claims*.

Licensing team response:

We considered the comments above by respondents who disagreed with any of the proposed policy changes. They do not fit the condition set by government of being 'a compelling local reason not to' accept this change, therefore we will be including these proposals in our final document.

QUESTION

- Q. Will Executive service licensed private hire vehicles be exempt (linked to plate exemption?)
 A. We would apply this requirement to all licensed vehicles.

Other comments

The final question in section A asked participants if they had any additional comments on the proposed new policies in section A ('statutory standards' changes) that they would like the council to consider.

59 participants provided comments to this question, providing 74 individual comments. Of these, 26 responders said they didn't have any further comments.

A summary of the key themes emerging from the comments can be found in the table below and the full list of comments is in the appendix.

Table: frequency of comments raised

Comment type	Frequency
No further comment	26
Agree with proposals	9
Drivers should have better area knowledge	3
Customer safety should be a priority	2
Taxis should switch off their engines while stationary	2
Need a published fair pricing policy	2
Should be applied to existing drivers not just new	1
Safeguarding training shouldn't be essential	1
Council should help drivers more	1
Drivers need Covid financial grants	1
Need Covid safety requirements	1
Drivers should pass an advanced driving test	1

Co-ordinate training with County Council to avoid need for duplicate attendance	1
Factory fitted tinted windows should be allowed	1
Specify "in writing" to include email	1
Good that requirements are placed on operators as they have equal duty of care	1
2 weeks absence notification too onerous	1
Operators should have phone area code local to their drivers knowledge	1
Subsidies or more competition required to reduce fares	1
Should use enhanced DBS checks throughout	1
CCTV needed	1
equal opportunities needed	1
Taxis use up P&D car park spaces	1
Don't add more red tape	1
Remove roof boxes from taxis outside of area	1
Stop attacking taxi industry	1
Licence holder details should be visible to passenger	1
Spot checks to confirm driver ID	1
Strict checks around safety for young female passengers	1
Local drivers should be enforced	1
Change to EVs needed	1
Driver good behaviour important	1
Taxis should be parked on private land	1
Records needed of which vehicle driver used at which time	1
Drivers should hold UK drivers photo licence	1
More efficient training system needed	1

The responses to this question covered a wide variety of topics, and very few of them were making the same point, as expected for an “any other comments” question.

9 respondents explained that they agree with or endorse the proposals. One respondent explained that they thought the proposals were overdue and that *any firm/individual has a 'duty of care', so should already be well down this path already.*

Local knowledge was an important issue for three respondents, with one explaining *the amount of times I have had to direct drivers to my destination is not acceptable. I pay for a service and experience which sometimes I do not get.* Related to these comments, another respondent wanted a rule ensure drivers on the ranks in their town should be local as it made them feel safer.

A handful of comments came up twice, like customer safety, which the relevant respondents felt strongly about. One stated that it *should be the number 1 priority*, although this was not mentioned with any reference to a specific policy or process. One respondent was specific that there should be strict safety checks to ensure the safety of young female passengers.

The other comments that came up twice were the need for a published fair pricing policy, and that taxis should not be allowed to leave their engine idling while stationary.

The other comments were a mix of general points about respondent's experiences with taxis in the districts as members of the public, along with specific policy points and suggestions from people who work in the industry.

Section B: Other proposed changes to the policy

The next sections in the survey for respondents to comment on was section B: other proposed changes to the policy.

The new version of the policy included other changes to develop and maintain professional and respected hackney carriage and private hire trades and to ensure an efficient and quality local transport service. It will also help us support our corporate priorities of tackling the climate emergency and building healthy communities.

The proposed policy changes include:

- DBS and DVLA checks
- Driver standards
- Drivers
- Enforcement
- General
- Operators
- Vehicle criteria

More information on each proposed policy, including the reasoning for introducing it, was made available on our websites.

DBS and DVLA checks

This section of the consultation asked respondents about the proposed policy changes around Disclosure and Barring Service (DBS) checks and Driver and Vehicle Licensing Agency (DVLA) checks. More information on the consultation was made available via links to our websites.

Participants were asked to indicate how far they agreed or disagreed with the proposed policy changes listed below overall.







DBS registered body requirements (section 8.15): Applicants must obtain their DBS disclosure through the relevant council. If an applicant provides a DBS disclosure from another registered body, that body is unable to pass on any 'soft information' disclosed under separate cover, and such information is also not available through the DBS Update Service.

Random DBS check (section 8.17): If a driver is given notice to undertake a random DBS check by the council, they must provide all relevant documentation within 14 days of the

request. Failure to do so may result in suspension of the licence. This is being reduced from the current requirement which is 28 days.

DVLA checks (section 8.18): Updated section in respect of DVLA checks to reflect change in check procedure, clarify that DVLA photocard must be current and valid and introduce ability for council to undertake random DVLA checks to identify any undisclosed offences.

How far do you agree or disagree with the proposed policy changes above overall? If you agree with any of the changes more than others, you can let us know using the comment box below.

			Response Percent	Response Total
1	Strongly agree		42.44%	73
2	Agree		40.70%	70
3	Neither agree nor disagree		6.98%	12
4	Disagree		5.23%	9
5	Strongly disagree		2.33%	4
6	No comment		2.33%	4
			answered	172

If respondents agreed with any of the policy changes above more than others, then they had the opportunity to provide comments in a free text box and asked to include the name of the policy change they were commenting on.

25 participants responded to this question, providing 24 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Agree with all changes	6
I do not agree with reducing random DBS time to 14 days (8.17)	5
Agree with DVLA checks (section 8.18)	2
Agree with Random DBS checks (8.17)	2
Passenger safety and protection is paramount	1
CCTV (is comment in right place?)	1
Reduce random DBS check to 7 days	1
Council lacks empathy for honest drivers	1

Will a two week holiday be taken into account? (8.17)	1
Random DBS checks should be funded by council	1
I do not agree with providing transparent 'soft' information as could be prejudicial (8.15)	1
Emissions standards need updating	1
Agree with safeguarding checks on previous convictions (DBS)	1

Respondents had generally agreed with the proposals overall in the first part of the question. When asked to comment on specific measures they particularly agreed with, the following responses were received (NB: Not all respondents raised comments, some commented on more than one policy and 2 respondents answered with either no, none, N/A or no comment)

6 respondents commented that they agreed with all the proposed changes. One respondent commented: *The checks that are proposed are needed to protect both public and drivers.* Another commented that *these changes seem to be essential and I was surprised they were not current requirements. Well done.*

5 respondents commented that they did not agree with the time period for a random DBS check be reduced from 28 days to 14 days. (Section 8.17). Some said that this would cause delays and possible suspensions for drivers and queried what the issue was with keeping it at 28 days. One respondent suggested that this could be 7 days. Another provided the following: *ultimately reducing time limits etc may focus minds, if there is a legitimate reason why this may not be possible (holiday for 2 weeks for example) I would hope this would be taken into consideration. If not I would disagree and say 28 days seems reasonable.*

Driver standards

This section of the consultation asked respondents about the proposed policy changes around driver standards. More information on the consultation was made available via links to our websites.

Participants were asked to indicate how far they agreed or disagreed with the proposed policy changes listed below overall.

Drivers revoked or refused elsewhere (section 4.3): Any applicants who have had a licence revoked or application refused by any local authority will not be licensed for a minimum of 5 years after the date of revocation or refusal.

Diabetes and medicals guidance (section 8.8-8.9): Drivers with diabetes managed by insulin, a sulphonylurea or a glinide will require a specialist annual medical. Licence holders must advise the licensing team in writing within 7 days of any change in their medical condition that may affect their driving capabilities.

Failure to declare matters on applications (section 8.12): Applicants must declare any







pending court cases or hearings, and the details of any licences previously held, suspended or revoked. Failure to disclose any information and the making of false declarations will be considered to be an act of dishonesty and may result in the application being refused or licence revoked.

DVLA disqualifications (section 8.22): New driver licence applicants who have been disqualified from driving due to motoring offences must have held a full clean licence for 12 months before they can apply.

Practical driving assessments (section 8.23-8.24): Requirement for all new driver licence applicants to pass a practical driving assessment before a licence is granted.

Disability awareness training (section 8.31-8.32): All applicants for a driver's licence will be required to pass disability awareness training before a licence will be granted. Once passed, the training must be re-taken every 3 years.

How far do you agree or disagree with the proposed policy changes above overall? If you agree with any of the changes more than others, you can let us know using the comment box below.

			Response Percent	Response Total
1	Strongly agree		50.00%	86
2	Agree		31.98%	55
3	Neither agree nor disagree		9.30%	16
4	Disagree		4.07%	7
5	Strongly disagree		4.07%	7
6	No comment		0.58%	1
			answered	172

If respondents agreed with any of the policy changes above more than others, then they had the opportunity to provide comments in a free text box and asked to include the name of the policy change they were commenting on.

36 participants responded to this question, providing 48 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Agree with changes	8

Disagree drivers have to re-take disability awareness training (DAT) every 3 years	6
Agree with DVLA practical test before licensing a driver	5
Disagree on set time period that driver revoked elsewhere should be allowed to apply	4
Disagree with practical driving test	4
Disagree with 12 month period after DVLA disqualification	3
Agree with Disability Awareness Training	3
Query why diabetes has been specifically mentioned	2
Holding licence for 10 years should protect me (give 'grandfather' rights)	1
Concerned that 1 test at start is not sufficient	1
Concern over cost and procedure of driver practical test	1
Agree with DVLA disqualification policy	1
Ref accessibility of vehicles	1
Agree with Section 4.3 ref drivers revoked or refused elsewhere	1
Ref council penalty points and ability to work	1
Disagree with DVLA disqualification period before getting licence - should be longer	1
Applicants not UK citizen or indefinite leave to remain should pass spoken English test	1
It is vital that taxi drivers are good drivers as assessed by the police	1
Disagree with additional tests	1
Concerned with additional costs	1
Would like to see practical training for drivers of accessible vehicles	1

Respondents generally agreed with the proposals overall in the first part of the question. When asked to comment on specific measures they particularly agreed with, the following responses were received (NB: Not all respondents raised comments, some commented on more than one policy and 2 respondents answered with either no, none, N/A or no comment.)

Most respondents who provided comments agreed to all of the proposed changes to the policy, saying they are *all excellent proposals* and *very good updates to the existing policy*. One respondent told us *as a potential passenger I will feel reassured that my taxi driver has met stringent standards*.

Some respondents disagreed with the requirement to undergo disability awareness training every 3 years, stating that *After the initial training I should imagine that on-the-job encounters with disabled passengers would be sufficient*.

5 respondents agree with the proposal that new applicants should have to take and pass the DVLA practical driving assessment before being licensed. 4 respondents commented that applicants and drivers should not have to take a practical driving test. One stated that *The DVLA has already passed the driver. Why do they need to be tested again by the Local Authority.* One comment raised questions about the cost; procedure and any right of appeal of taking the practical driving test, while a further comment questioned whether just one initial practical test would be sufficient to maintain standards of driving. Another comment was received stating that the test had little value other than to *simply give another third party the opportunity to profit from the trade.*

There was disagreement from 4 respondents about having a set period of time before an application would be considered after the applicant was revoked with another council: *If someone has refused and revoked a licence elsewhere and they apply for a licence to another council they should be allowed to have the licence if they fulfil the new council requirements for a new licence.* Another said *To ban an applicant because another council has refused them a licence, without looking at the evidence is against the principle of natural justice.*

In relation to the proposal that any applicant who had previously been disqualified by the DVLA for motoring offences should have to have a clean driving licence for 12 months, 3 agreed with this idea, 2 participants thought an applicant should not have to wait 12 months, and 1 that they should be able to apply the next day after their disqualification ends. Another commented that 12 months was too short a period and that it should be longer.

3 respondents agreed that Disability Awareness Training should be included, with one respondent stating *Disability awareness I strongly agree with...discrimination against those with disabilities, including hidden disabilities, simply isn't acceptable.*

The retaking of the training every 3 years was debated, with 6 respondents saying that they disagreed with having to take the training that often, and one saying that taking it every 3 years would be *a waste of time and money.* Suggestions were made for it to be retaken every 5 years with one commenting that this should only occur every five years if the council provides it for free.

QUESTIONS

Reference: accessibility of vehicles

Q The above where requirements of the drivers. What about the vehicles?

A. Vehicle requirements are detailed in a separate section of the policy, there are no proposed changes to those sections.







Reference: council penalty points and ability to work

Q Not clear on section involving revocation if you tot up 12 council points does this mean you cant work for 5 years

A. A total of 12 points issued on a hackney carriage/private hire licence in any 12 month period will result in consideration of suspension or revocation of the licence.

Drivers

This section of the consultation asked respondents about the proposed policy changes around drivers. More information on the consultation was made available via links to our websites. Participants were asked to indicate how far they agreed or disagreed with the proposed policy change to new driver licence conditions (Appendix E): Updated driver licence conditions to reflect policy changes, not to allow vehicle engines to idle, not to 'tout' for business and to detail requirements in respect of assistance dogs and wheelchair users.

How far do you agree or disagree with the proposed policy change above?			Response Percent	Response Total
1	Strongly agree		47.37%	81
2	Agree		35.67%	61
3	Neither agree nor disagree		10.53%	18
4	Disagree		3.51%	6
5	Strongly disagree		2.34%	4
6	No comment		0.58%	1
			answered	171

If respondents had any comments on the policy change above, then they had the opportunity to provide comments in a free text box provided.

29 participants responded to this question, providing 31 individual comments. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Agree with idling condition	8
Disagree with idling condition as engine needed to keep driver warm	7
Agree with conditions on carriage of disabled persons	5
Agree with changes	4
Comment to include Highway code refresher training	1
Poor Highway code compliance in Abingdon	1

What constitutes 'touting'	1
Ref council support for assisting drivers to keep warm in cold weather	1
Touting is an issue that needs preventing	1
Improving environment a key target for council and residents	1
Concerned how touting will be policed	1

Respondents generally agreed with the proposals overall in the first part of the question. When asked to comment on specific measures they particularly agreed with, the following responses were received (NB: Not all respondents raised comments, some commented on more than one policy and 2 respondents answered with either no, none, N/A or no comment.)

8 respondents commented that they supported the addition of a condition to prevent idling vehicles. The comments highlighted this issue in Abingdon, Thame and Henley. One responder told us *absolutely no engine idling polluting the pavement near shops*, and another *no idling is essential*.

However, 7 respondents commented that they did not agree with the proposed idling condition, with 6 of them stating that they disagreed as keeping the engine running was necessary to keep the car warm in cold temperatures: *driver can't be expected to sit on the rank for 2-3 hours to wait for a fare in freezing cold weather!* Another respondent made reference to requiring it to 'run' air conditioning.

4 respondents commented that they agreed with all of the proposed changes which are described as *common sense, all excellent proposals and all equally important*. One of the comments stated that *all of these things must be in place before any driver is in contact with the public*.

4 respondents agreed with the updated conditions around carriage of disabled passengers. One respondent commented *disabled passengers should get the best possible experience when travelling, the proposed policies should include detailed instructions for taxi drivers so that passengers inside the taxi and other road users outside the taxi stay safe at all times*.

3 respondents commented on 'touting'. One respondent stated that *you will not be able to police the touting of business...this happens now and there will nothing you can do about it*. and one respondent stated the following: *'Please define "tout" for work, is asking a person that comes near your taxi if they would like a taxi "touting" for work?* One commented that more should be done to stop people from doing it – although this leads to aggression.

QUESTIONS

Q. Please define 'tout' for work, is asking a person that comes near your taxi if they would like a taxi "touting" for work? What if you are parked on a taxi rank?

A. Under section 167 Criminal Justice and Public Order Act 1994, it is an offence, in a public place, to solicit persons to hire vehicles to carry them as passengers. This is touting. It applies

to both licensed and unlicensed vehicles and whether they are on a rank is not relevant. The passenger will approach the vehicle if they want to take a taxi.

Q. If the driver is sitting in the coke in his car how is he to keep warm what are you doing to help them ?

A. Our understanding is that if a vehicle has been running and is warmed up, there will be enough residual heat in the system to run the heating for approximately 30 minutes.

Idling wastes fuel and burns up oil (longer time leaving your engine running causes more motor oil to be circulated and burned up, so it needs to be replaced more frequently) but on top of the waste of money, it's also an issue since it damages cars:

- idling can cause your head gasket, spark plugs, or cylinder rings to deteriorate and stop working.
- idling does not allow your battery to charge and causes it to strain.

Idling also [damages the health of drivers](#):

- Pollutant levels are often higher inside because cars take in emissions from surrounding vehicles and recirculate them. Levels of some pollutants and toxic compounds can be as much as 10 times higher inside vehicles than alongside the road, and overall air quality can be 15 times worse (especially when they won't be having the windows open since the reason for idling was to keep warm in the first place).

Drivers should be suitably clothed to take account of periods when their vehicle might be stationary for longer periods of time and they can also refer to [this forum for ideas to keep warm when the engine is off](#), for example the possibility of fitting an additional heater into their car to have heating with the car switched off.

Enforcement

This section of the consultation asked respondents about the proposed policy changes around enforcement. More information on the consultation was made available via links to our websites.







Participants were asked to indicate how far they agreed or disagreed with the proposed policy changes listed below overall.

Immediate licence revocations (section 4.6): Added a section to clarify the types of situation where a licence may be immediately revoked.

Guidance on enforcement (section 6.3 and 6.4): Updated enforcement section with examples of the scale of actions and detail the responsibilities of licence holders to comply with requests from authorised officers.

Updated penalty points system (Appendix G): The penalty points system has been expanded and updated so that it now applies to all licence holders. A system for review of points without the need to refer to the Taxi Licensing Panel has been added. This is to ensure that the Panel can address more serious matters.

**How far do you agree or disagree with the proposed policy changes above overall?
If you agree with any of the changes more than others, you can let us know using the comment box below.**

			Response Percent	Response Total
1	Strongly agree		40.70%	70
2	Agree		35.47%	61
3	Neither agree nor disagree		17.44%	30
4	Disagree		1.16%	2
5	Strongly disagree		2.91%	5
6	No comment		2.33%	4
			answered	172

If respondents agreed with any of the policy changes above more than others, then they had the opportunity to provide comments in a free text box and asked to include the name of the policy change they were commenting on.

16 participants responded to this question, providing 17 individual comments. 1 respondent answered with none. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Agree with changes	2
Would like to see more visible enforcement	1
Want more information on revised points system	1
Agree with restrictions of drivers convicted of drink/drug driving	1
Guidance doesn't go far enough	1
Agree but panels should not be bypassed	1
Worried regulations turn taxis into a mobile union	1
Penalty points should be subject to a review system	1
Penalty points only to be issued if there was wrongdoing	1
Any endorsement must debar any driver from contact with general public	1
Agree with points system	1
Root out the bad drivers to be left with the honest drivers	1
Points system unfair as doesn't take into account abusive passengers	1
Concerned over additional costs in light of current hardship	1
Disagree with English test despite having a CRB	1
Too many points given to drivers	1

There were a wide variety of responses in this section, however, in general there was agreement with the use of a points system for enforcement. Only one respondent thought the points system was unfair, stating *it doesn't account for people who are under the influence of alcohol or drugs who abuse drivers*. Others did not disagree with a points system but wanted to ensure there was a *review process to ensure consistency and a level playing field* and that *points should only be placed on a licence if there was wrongdoing*.

One respondent stated that *drivers convicted of driving under the influence of drink or drugs should not be able to obtain a licence at all*.

General

This section of the consultation asked respondents about the proposed policy changes around general changes. More information on the consultation was made available via links to our websites.

Participants were asked to indicate how far they agreed or disagreed with the proposed policy changes listed below overall.

Guidance on incomplete applications (section 3.3): Any application that is not completed within 6 months may be treated as withdrawn. This is to ensure all evidence and checks (e.g. DBS and medical) remain valid.

Updating email addresses (section 5.1): Add a requirement for all licence holders to update any changes of email address to allow greater use of email contact.

Notification of holidays (section 5.2): Recommendation that licence holders confirm if they are going away for more than 2 weeks, to help avoid unnecessary suspension of licences where items expire while licence holders are away.

Guidance on knowledge tests (section 8.27-8.30): Amendments to knowledge test section to allow for use of third party providers for delivery of tests, reduce the number of times an applicant may sit a test in a 12 month period to prevent repeated failures blocking spaces for new candidates, introduce a minimum cancellation period, and add guidance for candidates with a disability.







E-cigarettes and vaping (Appendix A para 17 and Appendix B para 18): Drivers and passengers will not be allowed to use electronic cigarettes or so called 'vaping' equipment in licensed vehicles. The risks from 'vaping' are still unknown and unnecessary exposure can be avoided.

Lost property (Appendix A para 34 and Appendix B para 41): The proprietor or driver of a licensed vehicle must report any lost property found in the vehicle to Thames Valley Police in accordance with current procedures, if they are unable to contact the passenger directly. Change in lost property procedure at Thames Valley Police.

HCs (hackney carriages) to record pre-booked journeys (Appendix A para 39-40):

Introduce requirement for hackney carriage proprietors to record all pre-booked journey details and make such details available for inspection. This is to ensure checks can be made that vehicles are operating in line with policy and to assist in respect of investigations into complaints and similar matters.

**How far do you agree or disagree with the proposed policy changes above overall?
If you agree with any of the changes more than others, you can let us know using the comment box below.**

			Response Percent	Response Total
1	Strongly agree		41.28%	71
2	Agree		40.70%	70
3	Neither agree nor disagree		9.88%	17
4	Disagree		4.07%	7
5	Strongly disagree		2.91%	5
6	No comment		1.16%	2
			answered	172

If respondents agreed with any of the policy changes above more than others, then they had the opportunity to provide comments in a free text box and asked to include the name of the policy change they were commenting on.

23 participants responded to this question, providing 25 individual comments and questions. 1 respondent answered with none. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: Frequency of comments raised

Comment type	Frequency
Disagree with notifying holidays over 2 weeks	6
Agree with all	5
Disagree with hackney carriages recording bookings	4
Agree with banning vaping/e-cigs	3
Agree with notifying holidays over 2 weeks	1
Agree with reporting lost property to police	1
Disagree with banning vaping/e-cigs	1
Strongly disagree with all	1
Licensing should have a time frame for processing applications	1
Application not complete within 3 months should be treated as withdrawn	1
Reduce time limit for completing applications to less than 6 months	1

The most responses in this section were in respect of the suggestion drivers should contact the council when going away for more than two weeks with one stating, *this is going to be another worry added before going anywhere*. 6 respondents disagreed with this while only one agreed with it. A couple of the respondents made a suggestion that the time period should be extended so that drivers should notify the council if away for more than 4 weeks as *more realistic*, and another suggested *perhaps make this 6 weeks*.

Although 3 respondents agreed with banning vaping/e-cigarettes in licensed vehicles, one respondent was quite firmly against the banning, and stated *“Have you actually researched vaping? Can you show the evidence to show it is harmful and thus should be banned? Is this just based on the fact it looks like smoking?”*

A couple of respondents were in favour of a set time period lower than six months for an applicant to complete their application, and one pointed out that the Licensing Team should also have a target time frame for processing applications.

Four respondents disagreed that hackney carriages should keep a record of pre-bookings, one pointed out this was not a legal obligation and one felt that they could not do this as *“not everyone has an email address or access to a computer”*.

QUESTION

Q Have you actually researched vaping? Can you show the evidence to show it is harmful and thus should be banned? Is this just based on the fact it looks like smoking? Sugary drinks have certified research that shows they are bad for your health, will these also be banned from taxis? Surely children being exposed to the brands in the vehicle could tempt them to try one and thus be bad for their health. Where is this nanny state going to end?!

A. The aim of this proposal was to make the licensed vehicle a pleasant environment for the customer, without the strong smells that can be associated with vaping. In addition, there is a danger that exhaled vapour could obstruct the driver’s view and distract their concentration and focus from the road.

Operators

This section of the consultation asked respondents about the proposed policy changes around operators. More information on the consultation was made available via links to our websites.

Participants were asked to indicate how far they agreed or disagreed with the proposed policy changes listed below overall.

Knowledge test for operators (section 9.9): Requires all new private hire operator licence applicants to pass the knowledge test (except those already licensed as drivers who have taken the test). This aims to ensure operators have sufficient knowledge of the area, laws and legislation.

Disability awareness training (section 9.15-9.17): All applicants for a private hire operator's licence and all staff taking bookings and dispatching work will be required to pass disability awareness training before a licence will be granted. Once passed, the training must be re-taken every 3 years.







Public liability insurance requirements (section 9.22): Add requirement for private hire operators with a premises open to the public to have minimum £5m public liability insurance.

Guidance on moving to new base (section 9.24): Private hire operators who propose to change their base must obtain, prior to commencing taking bookings, a licence to operate from the new address.

Trading names (section 9.27): A private hire operator shall only use trading or company name(s) that are included on the operator licence, or other trading name(s) approved by the council in writing.

New operator licence conditions (Appendix D): Added a separate section for private hire operator licence conditions. This includes new requirements to report complaints to the council, guidance on bookings with assistance dogs and the use of approved trading names.

How far do you agree or disagree with the proposed policy changes above overall? If you agree with any of the changes more than others, you can let us know using the comment box below.

			Response Percent	Response Total
1	Strongly agree		45.56%	77
2	Agree		37.87%	64
3	Neither agree nor disagree		8.28%	14
4	Disagree		3.55%	6
5	Strongly disagree		2.96%	5
6	No comment		1.78%	3
			answered	169

If respondents agreed with any of the policy changes above more than others, then they had the opportunity to provide comments in a free text box and asked to include the name of the policy change they were commenting on.

25 participants responded to this question, providing 29 individual comments. 1 respondent answered with none. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: Frequency of comments raised

Comment type	Frequency
Disagree with disability awareness training being renewed every 3 years	4
Local knowledge covered by SatNav	3
Disagree with operators/staff doing awareness training	3
Agree with proposals	3
Liability insurance coverage level too high	2
Disagree with local knowledge test for operators	2
Disagree having to pay for awareness training	1
Agree with all trading names needing to be named on licence	1
Liability insurance coverage level too low	1
Agree with proposals for disability awareness training	1
Disagree with all proposals	1
Disability awareness training should not be a requirement	1
Content of training should be set by district council	1
Anyone handling passenger details should have enhanced DBS	1
Want a different method of ensuring disability awareness	1
Measures should be in place to avoid phoenixing of companies	1
SatNav should be required equipment	1
Query over who would sit knowledge test in a large limited company	1

4 responders disagreed with the proposal for disability awareness training to be re-taken every three year. Comments included, *what are the new disabilities discovered in the last 3 years?* Another thought *It was so basic it's not required every 3 years*. One responder went further stating *I also think disability training is pointless*".

3 responders disagreed with operators or office staff needing to undergo safeguarding training or the knowledge test, with comments such as *I feel only drivers must be the ones taking knowledge test as well as disability & safeguarding training leaving out admin staff*" and "What is your justification for booking staff to undertake these two courses?".

However, one person stated they agreed with disability awareness being a requirement, another agreed with it being a requirement but *the training should not have to be at the operator's cost*.

In respect of knowledge tests, a number of people suggested that there should be no requirement for local knowledge of the district as this is easily accessible via smartphones and SatNavs. Comments included, *can you please remove map reading from the knowledge test. The rest should be reflective of the actual job. I don't know a single taxi driver who carries a map and Sat nav equipment renders local knowledge redundant*. Another stated that a SatNav should be a required piece of equipment in licensed vehicles.

Two responders thought the proposed amount of coverage for operators with a public premises was too high, while one thought it was too low.

Vehicle criteria

This section of the consultation asked respondents about the proposed policy changes around vehicle criteria. More information on the consultation was made available via links to our websites.

Participants were asked to indicate how far they agreed or disagreed with the proposed policy changes listed below overall.

Vehicles licensed elsewhere (section 7.4): Clarify that vehicles will only be considered for licensing if they are not already licensed by another licensing authority. A vehicle will only be licensed by one authority at a time as two plates would be confusing for the public.

Vehicles that have been written off (section 7.13): The councils will not license vehicles that have been classified as category 'A' (whole vehicle to be crushed), 'B' (body shell to be crushed) or 'S' write offs (structural damage). This is to ensure all vehicles are of a high quality and meet the original, statutory safety standards.

Vehicle emissions requirements by 2022 and 2026 (section 7.17): From 1 April 2022 proprietors will be required to have vehicles of at least Euro 4 standard to renew their licence; and Euro 4, Euro 6 or zero-emission capable to receive a new licence. From 1 April 2026, proprietors will be required to have vehicles of at least Euro 6 standard to receive a new or renewed licence. This is with a view to the aspiration for all licensed vehicles to be zero carbon by 2030 at the latest in response to the Climate Emergency declared by both councils.

Approval of adverts on vehicles (section 7.31 and Appendix J): Allows for the councils to introduce an approval system for advertisements on licensed vehicles, with a fee to cover the cost of considering any such applications.

Compliance test requirements (section 7.47): Where a temporary vehicle licence has been granted due to the original vehicle being subject to accident damage or mechanical breakdown, a new compliance certificate will be required for the previous vehicle. This is to ensure vehicles returning to use after repair are mechanically fit to be used as licensed vehicles.

Removal of minimum engine capacity (Appendix A and Appendix B para 1): Removed minimum engine capacity to reflect modern automotive technology and reduced vehicle emissions, allow for solely-electric vehicles to be licensed.







Clarification of tinted windows requirements (Appendix A and Appendix B - Para 2): Amended tinted windows specification and require all licensed vehicles (except PHVs with a plate exemption) to comply with the tint requirement. Existing licensed vehicles with factory/manufacture tinted glass will be allowed to continue being licensed, but those with a tinted film fitted will need to have the film removed from the vehicle.

Taximeter requirements (Appendix A para 5 and Appendix B para 6): Clarify that meters should be tested for two tariffs over the measured mile, waiting time charge tested when the vehicle is stationary, and all meters to have an intact tamper proof seal.

Items to be carried in the vehicle (Appendix A para 6 and Appendix B para 7): The requirement to carry a bulb kit and fire extinguisher have been removed. All equipment must now be marked with the vehicle plate number to ensure that it remains in the nominated vehicle at all times.

Setting a tariff in South Oxfordshire (Appendix A para 18): Both councils will set a maximum hackney carriage tariff. Setting a maximum tariff protects the public and ensures consistency while still allowing competition between companies. New style meters reduce fraud risks. Only four councils in the country do not set a tariff.

How far do you agree or disagree with the proposed policy changes above overall? If you agree with any of the changes more than others, you can let us know using the comment box below.

			Response Percent	Response Total
1	Strongly agree		45.35%	78
2	Agree		35.47%	61
3	Neither agree nor disagree		8.14%	14
4	Disagree		5.23%	9
5	Strongly disagree		4.65%	8
6	No comment		1.16%	2
			answered	172

If respondents agreed with any of the policy changes above more than others, then they had the opportunity to provide comments in a free text box and asked to include the name of the policy change they were commenting on.

53 participants responded to this question, providing 69 individual comments. 1 respondent answered with none. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Higher emissions standards should be brought in quicker	6
Agree with emissions proposals	5
Agree with proposals	4
Disagree with council setting tariff	4
Concerned over tariffs, how they will be set and managed	4
Disagree with emissions being a factor	3
Disagree with bulb kits being needed	3
Agree with idling restrictions	3
Disagree with council reviewing advertising on vehicles	3

Want fire extinguishers to be mandatory	3
All factory fitted tints should be accepted	2
Should be incentives to switch to more efficient vehicles	2
Agree with council setting tariff	2
Disagree with vehicles that have been written off not being considered for licensing	2
Disagree with vehicles that are licensed elsewhere not being considered for licensing	2
Operators should be allowed to operate either side of a district border	2
Concerned over additional costs of meeting emissions requirements	1
Disagree with requirement to mark equipment	1
Taximeters should be tested monthly	1
Vehicles with tinted windows should have CCTV	1
Should have subsidised fares in areas with no other public transport	1
Disagree with fire extinguishers being mandatory	1
Bulb kit should be carried	1
Spare wheel or puncture kit should be carried	1
Tariff should be regularly reviewed if brought in	1
Should be an appeal system for taxis overcharging	1
Need clarification on what types of damage warrant vehicle getting compliance tested	1
Agree with drivers revoked elsewhere not being considered for licensing	1
Need charging points in suitable locations to encourage electric vehicle switch	1
Agree with changing to newer vehicles	1
Vehicles should carry high-viz clothing	1
Not all vehicles capable of carrying a spare wheel	1
Taximeters should be set and sealed at council set tariff	1
Want to see more enforcement	1
Getting bored now	1

This question received a wide variety of comments to the many proposed policy changes around vehicle criteria. 4 people indicated they agreed with all the proposals in this section.

11 responders agreed with the proposals in relation to **emissions** with 6 of them thinking the requirements could be brought in even quicker than proposed. Comments made include, *Euro 6 requirement should be mandatory by 2024 for all vehicles* from one responder. Those who thought the policy should go further said: *Vehicle emissions requirements don't go far enough. All licensed vehicles must meet the euro 6 requirement by April 2022* commented one, and *The vehicle emissions criteria should be tighter and come in at an earlier stage for diesel vehicles, in particular, owing to their generation of significantly worse air pollution.*

Another responder praised the emissions policy saying *Very happy to see you responding to the climate emergency with the change to vehicle emissions and removal of min engine capacity to allow for electric vehicles.*

3 responders mentioned engine idling, agreeing that there should be restrictions to aid in meeting pollution targets. 2 responders mentioned incentives in respect of encouraging a switch to efficient vehicles, with lower fees being suggested.

In contrast, 3 responders did not think emissions should be considered a factor, with a comment from one saying *“Vehicle emissions requirements should not be increased. The validity of a climate change emergency is disputed”*. One responder also mentioned that costs of a vehicle meeting the emissions standard was a concern.

In respect of **tariffs**, 4 responders disagreed with the proposal to introduce a tariff in South Oxfordshire, and a further four expressed concerns about setting and managing a tariff should one be brought in. Comments made include, *I don't agree with the Council setting a maximum tariff. Market forces will determine what customers will pay* from one respondent, and from another, *For a council to start to start dictating to local businesses the maximum that they can charge for a service is a massive imposition on the business owner and their employees.*

Two responders agreed with setting a tariff stating *It's about time the council sets a fare tariff for the meter and Setting maximum tariffs is essential as there are some operators currently in Thame who will take advantage of vulnerable people and charge more accordingly.*

Further comments on tariffs include that they should be tested monthly, that any tariff set should be regularly reviewed and that if a tariff is set all meters should be set and seals at the council tariff level. One person said there should be a system of subsidised fares in areas with no other public transport.

In respect of required **equipment** there were some contrasting opinions provided. Some responders disagreed with certain equipment being mandatory, *The matter...of spare bulbs and fire extinguishers should, surely, be left to common sense* and from another, *A high percentage of modern vehicles no longer come with storage for a spare wheel.* Others agreed, saying *I think a fire extinguisher should still be carried and I think all should carry bulb kit fitting tools fire extinguisher and spare wheel/ puncture kit and we believe that a licenced vehicle should carry at least three Hi Viz items of clothing, allowing the driver and at least two passengers some protection.*

3 responders disagreed with the proposal for the licensing authority having approval of **advertising** on licensed vehicles. Responders questioned why the local council needed to be involved: *why should the council be approving adverts? they just need to comply with normal advertising standards.*

QUESTIONS

Q. Who is even moaning about this? Who actually wants a tariff? Is this just another exercise for the council to increase red tape where none is required?”

A. The council made this proposal as it has received complaints about fares in the South Oxfordshire area and the lack of clarity this provides to customers.

Q. How would any proposals cover a call out fee? Would this be calculated from the nearest VOWH area or would the bookings system need to overlook those drivers which would have a disastrous impact on dead miles and therefore carbon footprint and driver earnings.

A. If the council decides to implement a tariff, a separate consultation will be carried out to capture views on what needs to be taken into consideration.

Other comments

The final question in Section B asked participants if they had any additional comments on the proposed new policies that they would like the council to consider.

39 participants responded to this question, providing 31 individual comments. 11 respondents answered with either no, none, N/A or no comment. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Agree with changes	4
If requirements are too strict drivers will not apply	3
Too much bureaucracy	3
Disagree with tariff change	2
Agree with driver holding current licence	1
Driver licence should have photo and be visible	1
Taxis should have a standard colour scheme	1
Restrict the number of taxis	1
No changes are needed	1
More spot checks are needed	1
Agree with disability awareness training	1
Need infrastructure for electric vehicles	1
Taxis should take more care when overtaking cyclists	1
Make the emissions changes happen earlier	1
Drivers with more than one name should be banned	1
Disappointed with the policy document	1
Policy review should not be done during lockdown	1
Passenger safety paramount	1
Does not feel comments will be taken into account	1
Requirements should apply to all licensed drivers	1
Guidance on covid should be included	1
Too many changes	1
Cannot afford a newer vehicle	1

There were a wide variety of responses in this section, as is to be expected by an 'any other comments' box. These range from a suggestion there should be some guidance on the policy

on Covid-19 requirements, and one that the policy review should not be taking place during a period of national lockdown. One respondent felt that their comments would not be taken into account as *no one listens so it will be pointless*.

3 respondents were of the view that the policy may make it harder to operate a licensed vehicle and suggested that bureaucracy should be reduced, *My feeling is that you are trying to reduce the amount of new entrants and current drivers by extreme policing of the system , Getting a Taxi in Abingdon is difficult at the best of times , if drivers are not incentivised they will not apply*.

1 respondent suggested the council should also consider a single livery for licensed vehicles, suggesting *For added safety, could all taxis operating in the area have a standard colour scheme. As a female, I then know that I am getting into an authorised taxi*. Another suggested that more spot checks should be done.

Relating to the vehicle emissions proposals, 1 respondent pointed out *Regarding electric cars by 2030 there needs to be the infrastructure in place to support such a network and this needs to be thought out* and another respondent said *the emissions restrictions should be made tighter sooner, with only Euro 6 or better allowed to renew or obtain a new licence, from April 2022, and with only zero-emissions vehicles able to renew or obtain a new licence, from April 2026*.

CCTV in licensed vehicles

This section of the consultation asked respondents their views about CCTV in licensed vehicles. The consultation did not include any requirements for CCTV to be installed in licensed vehicles in the draft new policy and the council wanted to know what respondents thought of this.

The Department for Transport has concerns about CCTV being made a mandatory requirement because of the potential privacy issues for passengers. We would therefore need strong reasons to make it a requirement to have CCTV in all licensed vehicles. Respondents were asked to let us know if they believed there were any specific reasons in our districts that CCTV in licensed vehicles would have a positive or a negative effect on the safety of taxi and private hire vehicle users.

We have not included any requirements for CCTV to be installed in licensed vehicles in our draft new licensing policy and we would like to know what you think about this. The Department for Transport has concerns about CCTV being made a mandatory requirement because of the potential privacy issues for passengers. We would therefore need strong reasons to make it a requirement to have CCTV in all licensed vehicles. Can you please let us know below if you believe there are any specific reasons in our districts that CCTV in licensed vehicles would have a positive or a negative effect on the safety of taxi and private hire vehicle users.

			Response Percent	Response Total
1	I don't have any comments (and agree that use of CCTV should not be a requirement)		47.90%	80
2	I would like to comment on why I think the use of CCTV should be required		29.34%	49
3	I have no opinion on this		22.75%	38
			answered	167

67 participants responded to this question, providing 100 individual comments.

1 respondent answered with none. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised to CCTV in licensed vehicles question

Comment type	Frequency
Agree with CCTV	39
Concerned about invasion of privacy	13
Concern about cost	6
Could assist police	5
Should be optional to fit	5
Not concerned about invasion of privacy	5
Should be passenger choice to use it	3
Disagree with CCTV	2
Council should pay	2
Only police and council to access footage	2
Use outward facing dashboard camera with audio	2
Use dashboard camera	2
Only police to access footage	2
Could be a USP for taxi	2
Need a printed warning if fitted	1
Concern over GDPR compliance	1
Could protect vulnerable	1

Mandatory for school transport to protect driver	1
Should not be able to be switched off if present	1
Should be audio and video	1
Implement for new and stagger for renewals	1
Should be managed by licensed third party	1
Could be advantages but needs more detail	1
Safety	1

Although a high number of respondents agreed overall with the proposal, there were no specific local reasons or examples given in any of the responses. Of the 39 respondents who expressed agreement, reasons given included 25 who mentioned that CCTV would protect both driver and passenger, 7 who stated it would protect passengers, and 2 who mentioned it would protect drivers.

13 respondents were concerned about a potential invasion of privacy and 1 felt it should be able to be switched off; whereas 5 respondents stated they were not concerned about invasion of privacy and 1 said it should not be able to be switched off.

A few of the comments raising concerns about the use of CCTV included references to both cost and passenger privacy, *it's just another added cost to what is already an expensive process to get a license. I think CCTB would make the public very uncomfortable, and breach their privacy.* Another commented that they it could be voluntary: *not sure our customers will like to be filmed. Some have already commented on the dash cam filming them. Voluntary CCTV maybe*". Another felt it might be like spying: *I do not wish to be spied on if I am using a taxi or private hire vehicle.*

Some of the comments which were more positive include: *Although the presence of CCTV would raise privacy issues for passengers, I feel these would be outweighed by the increased safety that CCTV would afford to both passengers and driver alike and we would like to see that over the next 5 years CCTV monitoring inside and outside of taxis be made mandatory to battle crime and also protect both the Driver and Passenger...We propose that this be mandatory for newly issued plates and staggered for existing renewals.*

Some of the respondents were more in favour of encouraging it as an option, which could be a selling point for customers to use that particular firm or vehicle. One comments on the lack of audio when filming, *It's silent, so cannot record conversations...I do think recordings have the potential to make it safer.* Another commented that some passengers would prefer to use taxis that had CCTV installed, *there seems no reason why all taxis should be required to have CCTV, but if individual passengers prefer it...it could be provided in some vehicles as an option, and the passenger's preference stated at the time of booking.*

Anything else

This was the last opportunity for respondents to provide any additional comments on the proposed new policy that they would like the council to consider.

46 participants responded to this question, providing 81 individual comments. 11 respondents answered with either no, none, N/A or no comment. A summary of the key themes emerging from the comments can be found in the table below. The full list of comments can be found in the appendix.

Table: frequency of comments raised

Comment type	Frequency
Agree with policy	7
Stop taxi idling	3
Accepting card payments should be mandatory	2
Reduce licence fees for electric and hybrid vehicles	2
Consider age limit for vehicles	2
Review Vale tariff	2
Process should be simple and free of red-tape	2
Should make GPS mandatory to track speed/location	2
Licensing team have not engaged with trade	2
How would tariff cover call out fee?	1
Consider importance of taxis as public transport when setting tariff	1
Tariff needs to have clear policy and ensure minimum wage after costs	1
Policy should have Covid guidance	1
Taxis should be able to carry cycles	1
Disagree with CCTV	1
Taxi companies should have an office in local area	1
Courses achieve nothing and are unnecessary cost	1
Removing tinted windows is unnecessary cost and may damage vehicle	1
Taxis in car parks should pay for a parking ticket	1
Remove map reading from knowledge test	1
Changes may create more work for drivers and council officers	1
Feels policy is an attack on the taxi trade and pointless	1
Make it cheaper for passengers to use energy efficient vehicles	1
Supports making rules tighter for passenger safety	1
Public need to know how to make complaints	1
Council should have system to send out info and drivers can log in and report changes online	1
Policy is making life easier for officers	1
Extending powers and trade unable to challenge	1
Are we doing enough to increase standards	1
CCTV should become mandatory	1
Increase in consumer confidence outweighs costs to operators	1
Driver phones should divert to voicemail when vehicle in motion	1

Should be mandatory dress code for drivers	1
Should have notice in vehicle identifying driver	1
Councils should have public list of drivers and vehicles	1
Agree with practical driving assessment	1
Agree with DBS checks for operator staff	1
Agree with safeguarding training but consider online or only when changes made	1
Emissions changes to happen sooner	1
Clear operator inspection programme should be introduced	1
Amend wording where it mentions guide dogs	1
Council should publish number of medical exemptions from carrying assistance dogs	1
Licensing team has lost sight of policy aim to provide good quality taxi service	1
Merging councils would benefit the trade and customers	1
Council should consider having a solely private hire (PH) driver badge	1
The council should be prepared to help protect drivers from abusers	1
Where in the policy does the council address supply and demand? No public taxi rank in Didcot	1
Council should support service providers who offer services in rural locations and disabled access	1
Is there a right of appeal for licensees when council departs from policy	1
Is the council obliged to inform all licence holders of changes that will affect them?	1
Policy does not set out how the costs of licensing are calculated or specified	1
Enforcement should look to target unlicensed persons	1
Is the enforcement policy a public document?	1
What is the councils record on enforcement?	1
How many illegal, unlicensed operators has it prosecuted in the last five years?	1
How can limited companies who rent out vehicles be vehicle licence holder?	1
Objects to private hire vehicle plate exemption, all vehicles should display plate	1
All medicals should be done by driver's own GP with access to medical records	1
Operator base should not be only location where bookings are accepted (home working better for environment)	1
Tape should be able to be used to attach plates	1
Trailer use should be banned	1
Consider an approved list of wheelchair accessible vehicles (WAV) modifiers	1
Remove 'executive vehicle' from section on 'special vehicles' in Appendix B	1
Support trading name on roof sign	1
Policy takes no account of impact of major changes	1

Policy gives no consideration to service quality, driver safety/livelihood, environmental impact	1
--	---

7 responses in this section expressed broad agreement to the new licensing policy overall, stating they are *very good, sensible proposals*, that they *should have been done long ago* and one said *glad to see these updated policies, thank you*.

Other responses in this section that received multiple responses were 3 supporting prevention of taxis idling, and 2 each for making it mandatory for taxis to accept card payments, reducing licence fees for electric and hybrid vehicles, considering an age limit for vehicles, reviewing the Vale tariff, reducing red tape, and introducing a requirement for GPS tracking to monitor vehicle location and speed if complaints are received.

All other responses were unique, although some of the responses mentioning the tariff mention the minimum wage and the need to consider the driver ability to make a living which are clearly related.

There were some responses that were negative about the policy, seeing it as an attack on the trade, and one said there had been no engagement over the proposed policy. There were however comments of a different view that supported making the rules tighter for public safety, that the changes do not go far enough and suggest additional proposals such as a driver dress code, and making GPS in licensed vehicles mandatory – the latter of these responses states *We are aware that updating technology does come at a cost to the Operator, as we have experienced in the past when improving our systems. However the benefits have also seen us secure more customers as they feel safer and there is more transparency in the way in which we operate. We feel that the increase in consumer confidence outweighs the costs, which should be reflected in the proposed tariff changes*.

In addition, one suggested the current exemption from displaying the plate for some vehicles should be abolished for safety reasons, with the following comments given as reasoning, *Contract is a vague description. Very few customers provide a written contract with suppliers (unlike in the 1970s/80s); This is mainly an ‘aesthetic’ wish on behalf of certain operators rather than being driven by client demand; The policy makes it far harder to identify unlicensed vehicles, particularly now other operators are no longer able to freely consult the council register of licences; the vast majority of unlicensed operators/vehicles in the trade focus on executive work, making less visible than local service providers; and It allows a licenced vehicle to do regular taxi work for 25% of the time in a fashion deemed not acceptable to other licenced vehicles*.

There was a suggestion the councils should find ways to support those service providers who offer services in rural locations and provide disabled access. There was also a request that the councils should publish the number of drivers with medical exemptions from carrying assistance dogs.

One suggestion was that the council should have an online system through which they could send out information to drivers, and that the drivers could use to log in and make changes online.

One respondent raised that the policy should set out how the costs of licensing are calculated for the purpose of fee setting.

QUESTIONS

Q. Is the council obliged to inform all licence holders of changes that will affect them? Does this also include third party policies that the council states that it will follow under its own policy?

A. Any changes which would be likely to impact on licence holders can be communicated through our regular email newsletter.

Q. Is the enforcement policy a public document?

A. Yes, this is available on both council websites. It was published in October 2015.

Q. What is the councils record on enforcement?

A. We would need clarification of what information is requested in order to answer this question.

Q. How many illegal, unlicensed operators has it prosecuted in the last five years?

A. We have not taken any prosecutions in the last five years for persons for unlawfully accepting bookings without a private hire operator licence. We have prosecuted for other licensing offences.

Q. How can limited companies which rent out vehicles be vehicle licence holder?

A. Under section 80 of the Local Government (Miscellaneous Provisions) Act 1976 it is a legal requirement that the proprietor of a vehicle is the one who should apply for and hold the licence. In the same legislation, where a vehicle is the subject of a hiring agreement or hire purchase agreement, the proprietor is defined as being is the person in possession of the vehicle under that agreement.

Q. How can you monitor and assure safe usage of trailers? Where would you get the trailer inspected?

A. The policy would require the vehicle to meet the Road Vehicles (Construction and Use) Regulations 1986. We have not outlined a requirement for trailers to be inspected.

Q. How would you define an 'executive vehicle' that does not fall into the standard licensing class?

A. This terminology shall be removed from the section on 'special vehicles' as it does not have a clear definition and the other examples provided in the section are sufficient.

Q. How do you define 'post manufacture' regarding accessible vehicle specification?

A. We would define this as being modifications made at a later stage, i.e. not during the process of manufacturing the vehicle, for example a vehicle that was not originally designed for the carriage of wheelchair users.

Q. Where in the policy does the council address supply and demand? No public taxi rank in Didcot

A. If we became aware of demand for an additional rank – such as a request from residents for an additional rank or more rank spaces, this would be something we would work on with Oxfordshire County Council Highways.

Q. Is there a right of appeal for licensees when council departs from policy?

A. Where the council makes a decision on a licence, the applicant is advised of their right of appeal in the notice confirming the decision. The specific rights of appeal vary, depending on the type of decision made. There is also the right for a claimant to challenge the lawfulness of a local authority decision by way of judicial review.

And Finally...

The final question in the survey asked respondents how they heard about the consultation.

How did you hear about this consultation? Tick all that apply.			Response Percent	Response Total
1	District council website		6.98%	12
2	Email		69.77%	120
3	Facebook		6.40%	11
4	Read it in the newspaper (online or hard-copy)		4.07%	7
5	Twitter		0.58%	1
6	Via town or parish council		6.40%	11
7	Word of mouth		2.91%	5
8	Other (please specify):		6.98%	12
			answered	172

Other (please specify):

- Letter from South Oxfordshire and Vale of White Horse x 8
- Taxipoint website
- On line local newspaper
- Email invite from 'have your say'

FURTHER INFORMATION

For information about the consultation or the results presented in this report, please contact:

Consultation and Community Engagement Team
South Oxfordshire and Vale of White Horse District Council
01235 422425
haveyoursay@southandvale.gov.uk

To enquire about the council's work on licensing of hackney carriages and private hire vehicles, please contact:

Laura Driscoll
Licensing Team Leader
South Oxfordshire and Vale of White Horse District Council
01235 422561
licensing@southoxon.gov.uk or licensing.unit@whitehorsedc.gov.uk

END