

Appendix A Consultation Comments
Councillor Comments
Support totally.
<p>Re. your Licensing Consultation, I assume what is proposed is similar to that being considered by other Licensing Authorities. That being the case, one is inclined to go with the flow. But I offer the following comments.</p> <ol style="list-style-type: none"> 1. I am not sure how much children at risk will be helped by awareness training for drivers. Perhaps recent court cases have shown that if vehicles are picking up clients - who it turns out are grooming vulnerable young people - in a specific area, then more mindfulness could be useful. And advice on how and where to report suspicions. 2. Perhaps the same goes for trafficking of adults, especially but not exclusively women. And escaping slaves on the run. (What a society!) 3. Disability awareness. Don't forget guide dogs. It is quite unacceptable that guide dogs for the blind, or deaf or whatever have been refused access into vehicles for hire.
<p>This is all good and I support it. I would ask that the fees for renewals with these new requirements be the same as the new licenses</p> <p>Can the driver assessment, or some other part of the new regulations, include an English language competency evaluation? Not being able to understand the instructions or requests of a passenger or not being able to communicate safety instructions to a passenger could lead to problems</p>
I support these new additions and I would also like an add on to include understanding people with dementia.
<p>I think the suggestions make perfect sense and would fully support their introduction.</p> <p>One or two questions on this subject - who will be carrying out the training and assessments and will TRDC incur additional costs? If so, from where are the funds to be found?</p> <p>Are neighbouring Councils planning to implement similar requirements? If they do not , does this not dilute the effort of TRDC as drivers from these Districts they may be driving/operating within our District?</p> <p>Does the driving assessment not repeat some content of the driving test? Maybe this is not needed if the applicant has passed their test recently but may be valuable for drivers of longer standing.</p> <p>Should there be periodic checks on those licenced individuals that their knowledge is kept up to date?</p> <p>The introduction of these amendments should enable drivers to provide an enhanced service to their customers and ensure they are working in the safest environment possible.</p>
Parish Council Comments
<p>The Council met and discussed the proposed new guidelines for Taxi Drivers who want to obtain/renew their licence. They are broadly in agreement with all of these though would ask that costs be looked at closely to ensure that drivers are able to comply without overburdening themselves.</p>
<p>The applicant has held a UK or EU licence for at least 12 months and has at least two years driving experience;</p>

I cannot see that holding a full UK or EU licence for at least 12 months can give the minimum 2 years driving experience; you cannot gain driving experience until after you have passed the driving test and can go out alone. This should be raised to holding a full drivers licence for at least 2 years to warrant "at least two years driving experience".

Secondly, I feel that ANY licensed Taxi/Hackney/School Pick Up should only be licensed once they have passed a UK Driving Test, the merest of issues is we drive on the wrong/other side of the road and everything is in MPH not KPH, let alone the rules of the highway code, and of course those things we call roundabouts. I say this from experience of hiring EU personnel as drivers in a previous life as the Operations Manager for Hallmark Executive Cars and having 154 drivers. I also have close friends in the industry, formerly working for PTS and the reports back he recieved in both "scared" patients and the accident data heavily fell to those with EU licences.

Passes a knowledge test.

Experience in the area a taxi or hackney carriage works should be taken in to consideration before allowing them to charge for a journey that effectively could be a lot shorter. Again we hear complaints the taxi driver had no clue where they were going, some knowledge would be good to know the driver does know the quickest and safest way to get to the destination.

An applicant completes an Enhanced Disclosure from the Disclosure and Barring Service and meets the Three Rivers District Council Hackney carriage and private hire driver and private hire operator suitability policy;

Absolutely mandatory.

Also the MOT and road worthiness for a taxi and condition, it seems in the past a taxi driver has got very annoyed in the rank where a customer, me included has tried to choose a car I wish to spend my money with and directed by an argumentative driver that he was first. The difference in the cars was the first driver had invested NO care or money in his car, it was old a mess and frankly I would question its road worthiness, albeit it would probably have an MOT? The other was a much newer cleaner and looked after car, certainly one he had invested money in, but didn't want to take on the other taxi drivers in the rank in him taking the fare. I think all taxis should be of a minimum standard, and their fuel emissions checked, outside of the MOT.

This consultation was brought before Chorleywood Parish Council Planning Committee - the Committee had no problem with this consultation.

Local Authority Responses

I sent this to the local Social Work Team and the manager suggested that the only other training that would be suggested is the drivers have a basic knowledge of Safeguarding Adults from Abuse.

Comments from the trade

I currently hold a Hackney Carriage Licence. I drive with Radio Taxis based in South Oxhey. I received your letter with the proposal of additional prerequisites that are being considered. I think the training regarding Child Sexual Exploitation and Disability Awareness are a good idea. However I do have a few concerns with this.

The cost of the training. Is this going to be absorbed by the Council?

The duration of the training?

Who will be delivering the training?

Regarding the Wheelchair Assessment.

Would it be more practical to have this as part of the Disability Awareness Training and deliver it more as a training session and have Risk Assessing and Moving & Handling involved within this?

The Driving Assessment seems a little difficult to deliver with Hackney Carriages as the driver will need to have his licence to be insured to drive a Hackney Carriage.

As you may be aware it is becoming increasingly difficult to find good drivers. I am concerned this may discourage drivers from renewing their licences let alone encourage new drivers.

Communities are becoming increasingly isolated with the cuts in the buses and residents are suffering as their services are also being cut.

Our Taxis are a lifeline to these people. If we are unable to recruit or keep drivers what are they to do?

I hope these changes will be thought through with these people in mind.

Just a quick one to say we think the idea for extra training for WAV drivers is a welcome inclusion in your prerequisites. As you may know, as a CQC-registered company, all our drivers are obligated to go through mandatory WTOR and Safeguarding Level 2 training (Children and Vulnerable Adults) in order to provide services for our company.

Whilst we welcome the move, we would ask the training cost is not overly punitive for drivers. Licensing costs for both PHV and Hackney Carriage drivers are already substantial and proving to be a barrier to entry for some drivers - especially Hackney carriage. This is due to there being only one rank in the council area and so potential for earnings is limited. This means we are already struggling to find drivers in order to fulfil vacancies on our fleet and are considering licensing our replacement wheelchair accessible vehicles as PCO PHV's in order to improve our potential for driver recruitment on those vehicles.

Whilst I can understand the need to make sure wheelchairs are locked in place safely (which is also for our benefit as well as safety of passenger!!) I cannot understand all your changes?? Every shopkeeper provides a service as well as ourselves and many other businesses but to make us aware of CSE is taking it too far!! This is political correctness gone mad. The enhanced disclosure is a great move forward but CSE really?? I have to whole heartedly disagree with all of your proposals. Please do not forget that we are a service to the local community as is every shopkeeper/busdriver/ ticket collector/ road sweepers/ bin men etc. etc. Remember that to fund this the ratepayer will have to pay more yet again or will it come out of our pocket??

I think we pay enough for our 3 year licence as it is, with also another cost every year for the CRB check and driving license check, who will be covering the cost of this new training ? and for how long would the training last for. ie would it need to be done just once or every year or every three years

A lot of drivers including myself have already completed a NVQ level 2 training which covered disability training

Who would be doing the assessments/training? How long would the course take?

Would there be a pass or fail rate on the training?

I can foresee problems occurring with the driving tests for new drivers; everyone who has a driving license has already had to pass these assessments and would have already had an eye test on their medical. who would be carrying out the driving assessment and at what cost again ?

I believe these are not before time.

Recently I have witnessed drivers licensed by your selves performing a three point turn on Whippendell Road in heavy traffic (rule 200 if the Highway Code refers), reversing out of the Red House car park onto Watford Road (rule 201 of the Highway Code refers) and at arrival at destination remaining seated in the vehicle whilst the passenger unloads luggage. In the latter case I understand as a licensed driver you are required to assist.

Mindful of these instances it is my belief that your assessments prior to granting a new license should be extended be applied at renewal and should include the ability to communicate in good English thus enabling the individuals to understand the Highway Code

I hope these observations will be food for thought.

Staff to be licensed for school run purpose only without test as they will not be covering anything but their school runs only with TRDC private hire badge.

Our competitors have around 50 drivers with Lucketts and 24*7 (based in Essex) around 150 and more drivers being licensed by the Uttlesford Council when the staff work and mainly live in and around TRDC area and actually has nothing to do with that particular Council.

The staff will only do school run and they will have a clear sticker at the back of the vehicle reading a follow "FOR SCHOOL RUN PURPOSES ONLY. THIS VEHICLE CANNOT BE USED FOR ANY OTHER PURPOSE BUT ONLY SCHOOL RUN".

This would also not have any financial impact on any private hire drivers/company within TRDC area as the "school run drivers" will not and cannot take part in covering any other work but school runs.

There daily school run will be logged and all schools they cover will be kept on our system just like other drivers record. All vehicles will only be allocated to a driver to keep the system clear and easily accountable by the TRDC council. Any changes will be emailed with an updated schedule to the TRDC council.

This would allow around 30 plus drivers to be able to obtain licenses from the Local Council.

As a company we believe in maintaining clear record keeping and it is much easier and better due to communication and regulations to work with our local council but a council, which is 2 hours away almost.

I look forward to hearing from you in the near future as this matter is of the most importance and time is limited due to contracts starting in a months' time.