

Appendix A - Summary of actions considered necessary and discretionary.

Topic/ proposal	Comment	Actions
Actions considered necessary		
To introduce new elements of training for drivers on child sexual exploitation (CSE), safeguarding and disability awareness.	<p>There are a range of training methods including BTEC qualifications (Bury St Edmunds), local college courses (Peterborough) and 'in house' training. All these would attract a considerable additional cost for applicants and require a staff resource to set up/ review. There could be significant time gaps in getting sufficient numbers to run a course, which would delay the application procedure.</p> <p>The preferred method would be the introduction of E-learning modules which are more cost effective to the applicant and are available from a variety of providers.</p>	<p>Further work will need to be undertaken to investigate the most appropriate and cost effective provider of these services. Once set up, would 'run themselves'. The packages could be installed on the PC's in reception. Investigation can also be undertaken to establish whether these could be undertaken from the applicant's home via a link.</p> <p>The instigation of this additional training element would need to be consulted upon with the trade and could be incorporated into the policy.</p>
To introduce 3/5 year licences for drivers/operators, with the option for 1 year licences if appropriate.	<p>The Deregulation Act 2015 requires a standard duration of 3/5 years for drivers/operators with the option of a lesser period, if appropriate.</p>	<p>The implementation of this has been delayed until full recharge figures for providing this service have been agreed. We currently operate one year renewals. This will be implemented on 1st April 2018.</p>
To discontinue the existing penalty point system.	<p>The penalty points system was introduced in June 2011 but is complex, its application has been inconsistent, is confusing to drivers and no noticeable benefit has resulted in its application. It also has no legislative basis and could be challenged.</p>	<p>The existing system will be discontinued. However, should this not be supported, then options of reviewing, simplifying or leaving could be considered.</p>

<p>To review the conditions for Drivers, Hackney Carriage Vehicles, Private Hire Vehicles, Stretch Limousines and Private Hire Operators.</p>		<p>This will be undertaken as a part of the scoping project. These will then form an appendix to the new policy document.</p>
<p>To adopt and include in the policy the new statutory provisions relating to Section 167(6) of the Equality Act 2010 regarding wheelchairs in taxis.</p>	<p>New legislation came into force on 6 April 2017.</p>	<p>A separate report is being submitted to the Licensing and Protection Committee on 5 July 2017 regarding the implications and a section will be included within the new policy document.</p>
<p>To include the new statutory provisions relating to the Immigration Act and right to work in the UK.</p>	<p>New legislation came into force on 1 December 2016.</p>	<p>The council is now required to ensure that all driver applicants and renewal drivers have a right to work in the UK. A National Fraud Initiative matching exercise has already been undertaken. Adjustments have already been made to our forms and application procedure to include the provision and a section will be included within the new policy document.</p>
<p>To update the Council's guidelines relating to the relevance and treatment of convictions.</p>	<p>There is a need for some minor updating to reflect both recent changes and the LGA's new guidance document published in February 2017.</p>	<p>The latest version was approved by the Licensing and Protection Committee in March 2015 and is currently on our website. Minor adjustments are needed to reflect recent changes in legislation e.g. reclassification of mobile phone use as a major offence. This will be updated as a part of the scoping exercise with the updated guidelines being appended to the new policy.</p>
<p>To alter the delegations of authority.</p>	<p>Delegations need to be appropriate and smart with the ability for decisions to be quickly arrived at.</p>	<p>This is currently being looked at by officers. Some delegations for suspension/ revocation could be more appropriately delegated to the Licensing Manager and/ or Licensing Officers. E.g. to suspend a licence for minor matters e.g. defective lights, or where a vehicle is found to be unsafe at the garage during testing and the plate is taken off as a result. The impact of the Community restructure will also be taken into account.</p>

Actions considered to be discretionary		
The introduction of a Local Knowledge test for new drivers.	This could be incorporated as an additional e-learning module together with the safeguarding training above. It would involve an additional cost of £50-£65 for drivers but would raise standards and deter drivers from outside the area driving HC's as PH vehicles many miles distant with possible enforcement issues.	Until 2012 a practical local knowledge test was undertaken as a part of 'in house' driver testing. Since 2012, driver tests have been undertaken by the DSA and the Blue Lamp trust. There is no local knowledge test as a part of these examinations. A local knowledge test could be re- introduced as a theory module in conjunction with any safeguarding training. This would need to be consulted upon. The additional cost and extra requirement may cause resistance from the trade. If introduced, this would also feature in the policy. Councils are increasingly introducing these to prevent applications for Hackney Carriage drivers who operate away from our district with resultant enforcement difficulties. Cambridge City, ECGD, SCDC, Peterborough and Fenland all operate knowledge tests.
The introduction of an english and/or mathematics test for new drivers.	Drivers are expected to have a good understanding of English and have the ability to write a receipt and calculate change from fares.	A test and method of delivery would need to be formulated. E-learning modules are unlikely to provide this element. Introduction would need to be consulted upon and be included in the policy. We currently have no standard requirement to demonstrate this.
Consideration to impose an age limit on vehicles.	We currently have no age policy. Vehicles are tested annually for compliance. The implementation of an age policy would impose an increased hurdle to cross and additional cost to drivers.	If implemented, an age limit would likely meet with resistance from the trade An exercise would need to be undertaken to determine a suitable age policy upon first licence and final renewal which would need to be consulted upon and detailed in the policy. SCDC currently require newly licensed Hackney Carriage Vehicles to be under five years old, Cambridge City Hackney Carriages up to 4 years old (renewed up to 9 years) and Peterborough Hackney Carriages up to 3 years old (renewed up to 15 years old).
Consideration of a more uniform appearance for Hackney Carriage and Private Hire vehicles.	We currently do not have a livery for Hackney Carriages or require door stickers on Private Hire Vehicles.	Some Councils have a livery for their HC vehicles e.g. Forest Heath is black/yellow. The driver would need to bear the cost of any livery imposed. Our conditions would need to be varied. Some Council's also require PH vehicles to display door stickers with the council logo and wording stating 'Private Hire Vehicle No booking- no insurance' or 'pre booked only'. We currently issue window stickers with logo and wording, but as it is not a mandatory condition, the majority choose not to use/display. Door stickers would be of a minimal extra cost to the drivers e.g. £6-£10 for a pair. If either are to be adopted, they would need to be consulted upon, conditions changed

		and included in the policy.
<p>Consideration of a sliding scale for Operators fees.</p>	<p>A sliding scale could more correctly reflect the amount of work undertaken/generated and would avoid smaller companies subsidising the larger ones.</p>	<p>The current annual fee of £118 takes no account of the number of vehicles operated. HDC, Cambridge City and Peterborough levy a single fee, SCDC, Fenland and ECDC operate sliding scale of fees based upon the number of vehicles operated. Banding levels vary within districts, ranging from £80 p.a. for 1 vehicle to £298 p.a. for 20+ vehicles.</p> <p>A robust and suitable scale would need to be determined which may be difficult owing to a lack of evidence to date on time spent etc. A time and motions study would need to be undertaken before implementation. It would likely receive resistance from the larger operators within the trade. It would be more complex to administer and monitor compliance, but this could be reflected in the cost of the licence. It could not be used as a means of gaining additional income as taxi licensing must be cost neutral. Would need to be consulted upon and included in the policy.</p>