

Area of Policy	Summary of Comments received	Consideration	Action required within the policy document
<b>Introduction/ General</b>			
General	<p>Reference the relationship we have with other districts. No objection to changes. Changes implemented should be fair for everyone. (NHT)</p> <p>Complaints centre around taxis being late, overpriced, drivers not being presentable and poor customer service. Hopefully the changes will get customers the service they require. (NHT)</p> <p>Welcome updating the policy but some of the changes proposed are needless. Service should not deteriorate because of cost cutting. Increase licensing staff to reflect workload. Don't rush through. (ST)</p>	<p>Comments noted</p> <p>Comments noted.</p> <p>Comments noted.</p>	<p>Relationships with other districts have been included.</p> <p>The policy contains a section on 'code of conduct' which refers to standard of dress, behaviour and customer service.</p> <p>Comments have been addressed individually in the relevant sections.</p>
<b>Vehicles</b>			
Definitions, specifications and conditions	<p>3.10 should read "except when the vehicle is being tested by a garage mechanic or <b>other garage staff to convey it to the testing station</b>" (ST)</p>	<p>Legislation states that a vehicle can only be driven by a licensed driver (except when being tested by a garage mechanic). We are unable to extend the exception as suggested.</p>	<p>No further action.</p>
Smoking	<p>3.11 should include "no vape products to be used in the vehicle at any time" (ST)</p>	<p>Comment noted</p>	<p>The policy has been amended to prohibit vape products</p>
Signage, livery and advertising	<p>3.14 (HCV) I do not agree with vehicles having this logo and wording , unless supplied free of charge (ST)</p> <p>3.15 (PHV) I do not agree with vehicles having this wording on the doors unless supplied free of charge. Suggested wording "No booking- no ride". (ST)</p>	<p>Comments noted.</p>	<p>All comments will be taken into account alongside the corresponding result of the survey.</p> <p>The suggestion of "No booking- no ride" will be</p>

			considered as suitable alternative wording.
Age limit on vehicles	<p>Sensitive – for the Council to decide a fair outcome. Needs to be realistic. Do not compare to cities. Drivers will take the hit and we do not want no drivers as a result. (NHT)</p> <p>Reducing the car age to 5 years old would be good, 15 years is too old.</p> <p>Age limit should not be changed, will lose drivers. If implemented 2-3 years grace should be given to current owners. (DJW)</p> <p>A licensed vehicle should not be more than 12 years of age from date of registration. (RV)</p> <p>The maximum age due to the rugged nature of the job should be 7 years. (ST)</p>	Comments noted	All comments will be taken into account alongside the corresponding result of the survey. Grandfather rights for renewals will be given.
HC livery	Might be an idea for all HCV's to be the same colour as adopted by Newmarket and Bedford. (RV)	Noted	Comment will be taken into account alongside the corresponding result of the survey.
CCTV	<p>No thanks (DJW)</p> <p>Do not agree. No benefit to anyone and causes a paper mountain. (ST)</p>	Comments noted	Comment will be taken into account alongside the corresponding result of the survey.
Hackney Carriage Vehicle specification	HCV's should have a box or light on top that can be illuminated.(NA)	HDC's taxi byelaws require a roof of the vehicle to be fitted with an illuminated sign.	The byelaws will be appended to the final policy.
Door stickers	<p>Magnets instead of stickers. Stickers are messy.(NA)</p> <p>If owner driver and sole vehicle, may wish to remove door signs when using vehicle privately. They should not be permanently affixed. (ST)</p>	<p>Noted</p> <p>Noted</p>	Comments will be taken into account alongside the corresponding result of the survey.
Plate display exemption	There is no issue re displaying a plate rather than obtaining an exemption, but could consideration be given	The provision of a smaller plate was not a part of the policy consultation,	No further action within the policy document.

	to a smaller style type plate as Bedford? (RV)	however the comment has been noted.	
Standards of vehicles	It is possible to switch components for testing, then switch back. It is also possible to obtain one month's insurance for hire and reward, then switch back to social, domestic and pleasure once through the test. There needs to be a more robust methodology for testing and insurance checking to avoid 'cheating'. (RV)	Comments noted. Testing is undertaken to VOSA specifications. Insurance documents are currently verified at time of testing and must be of at least one month's duration.	Consideration will be given as to whether the Council should require evidence of continued insurance throughout the entire period of the licence.
Vehicle testing	3.36 Appointed testing station. A second provider would ease the pressure.	Comment noted. At times of pressure extra slots are allocated to match the need. This is not a matter that was consulted upon within the policy.	No change.
Accidents/ Replacement Vehicles	3.40 Disagree. Operators are responsible for their vehicles. (ST) 3.41 Not necessary. (ST) 3.42 Pointless. Not all accidents involve insurance companies. (ST)	Comments noted.	Comments will be taken into account alongside the corresponding result of the survey
Vehicles or weddings/ stretch limousines (8 or less passengers)	Should be licensed. (RV)	Legislation exempts wedding vehicles. HDC has conditions for stretched limousines.	The conditions for stretched limousines will be appended to the final policy.
<b>Drivers</b>			
3 year driver licence	Too much. Some drivers do not report traffic offences. How will the council know if someone has been banned ? (RV)	Legislation requires the Council to issue 3 year licences. It is a condition of the licence that drivers advise the Council of any conviction within 7 days. Failure to do so may render them before the licensing and protection sub-committee to determine whether they are 'fit and proper' to hold a licence. The Council currently requires a DBS check and	The Council will introduce a 3 year licence in accordance with legislation, but will also offer the option of a 1 year licence.  The conditions for HC & PH drivers will be appended to the final

		DVLA check every three years. It is not proposed to change this practice.	policy.
Certificates of good conduct	4.28 Why insist on 5 years when TfL require 3 years? Referring back the extra time can cause delays and is unnecessary (ST)	5 years is standard practice so is stated in the policy document to reflect our current practice. No change is proposed to this requirement.	No further action.
Introduction of a knowledge test	Not a good idea. Trying to get young people into the trade by more tests and more fees is ludicrous (DJW) HC drivers should have a local knowledge test, but PH drivers do not. (RV) 4.42 Not necessary. Sat Navs are more reliable. Should be tested on ability to enter a postcode into a Sat Nav. Important that they be tested on road signs and signposting e.g. hospitals. All applicants should have a knowledge of the Highway Code and it should be given as a part of the application pack. Cost prohibitive. An obstacle to gaining employment. Will prevent people from applying. (ST)	Comments noted. Knowledge tests generally include a section on the highway code. The highway code is available to view on the internet. <a href="http://www.highwaycodeuk.co.uk/">www.highwaycodeuk.co.uk/</a>	Comments will be taken into account alongside the corresponding result of the survey.
Introduction of a maths test	Not a good idea. Trying to get young people into the trade by more tests and more fees is ludicrous (DJW) Applicants should pass a maths test (RV) 4.43 Discriminatory. Being able to write a receipt and give correct change does not require the same level of English comprehensions as having to read and understand the Council's licensing conditions. What if someone is dyslexic or cannot read or write at all?. Are they not allowed to be a taxi driver because of this? Cost prohibitive.(ST)	Comments noted	Comments will be taken into account alongside the corresponding result of the survey.
Introduction of an English test	Not a good idea. Trying to get young people into the trade by more tests and more fees is ludicrous (DJW) An english test must be mandatory (RV) 4.43 Discriminatory. Being able to write a receipt and give	Comments noted	Comments will be taken into account alongside the corresponding result of the survey.

	correct change does not require the same level of English comprehensions as having to read and understand the Council's licensing conditions. What if someone is dyslexic or cannot read or write at all?. Are they not allowed to be a taxi driver because of this? Cost prohibitive. (ST)		
Driving Proficiency	Blue Lamp Trust test works and is quick.(RV)  4.45 Website needs updating. (ST)	Noted. There are no proposals to change this.  Noted.	No action necessary.  Website will be updated.
Introduction of a first aid test	Not a good idea. Trying to get young people into the trade by more tests and more fees is ludicrous (DJW)	Comment noted	Comment will be taken into account alongside the corresponding result of the survey.
Code of Conduct	Needs spelling out and needs to be detailed (DS)	Comment noted.	The policy contains a dedicated section on the code of conduct of drivers
Medical	Is the most expensive element of the application. There is an organisation that provides a medical for £50. (RV)	Noted. The Council requires a Group 2 medical signed by a registered practitioner. Applicants are free to choose their own provider with regard to cost.	No action necessary.
Residence	All HDC licensed drivers should live in the district and be on the electoral role (RV)  Driver's who do not reside in the area. Why so many? There has to be control over a driver's need to be licensed away from where they reside or work. (RV)	Comment noted. Legislation precludes the Council from implementing this suggestion. Comment noted, but the Council is bound by the provisions of the Deregulation Act.	No action can be taken.
Application Pack	Suggests a licensing application pack be made available to collect from HDC containing: application form, medical, Blue Lamp Trust info, how to register on the DBS	This is a procedural matter rather than policy, but the comments are welcomed and have been noted.	The policy will continue to be updated in line with any applicable changes..

	update service, Carecheck info, form D796, copy of highway code and frontsheet with instructions. This could be achieved at a reasonable cost of £3. (ST)		
Delegated authority	Operators have problems recruiting. For a matter needing to go before the Licensing Sub-Committee a member of staff started his application in August and it is now nearly December. This is not acceptable. An officer should be able to deal with these issues. (RV)	Delegations form a part of a separate exercise being undertaken and comment will be noted as a part of that exercise.	No action necessary in formulating the policy.
<b>Operators</b>			
General	5.1 To reduce poor housekeeping by operators , applicants should be able to prove their ability to run such an operation e.g. by having sufficient funds available and to pass an operators competence test. Would cut out cross border types and other who might bring the industry into disrepute. (ST)	Comments noted. The requirements for operators are set out in the draft policy. Having sufficient funds and the passing of a competence test are not currently criteria upon which we are consulting.	No action required.
Planning permission	It appears that anyone can set up as an operator from their home with any amount of vehicles and without planning permission (RV)	This is a planning matter and is subject to planning legislation and procedures.	No action necessary. Applicants are advised to check the planning portal as to whether they need planning permission to operate from the address.
Criteria	Operators should have as DBS, a HC/PH drivers licence, be resident in HDC district, have a command of the English language and have the right to work in the UK (RV)	Noted. The policy states that operators are subject to a DBS check and must have a right to work in the UK. We cannot require that they are a resident of the district, or that they hold a HC/PH drivers licence.	There is a section in the policy setting out the requirements for obtaining an operator's licence.
5 year operator licence	5 years is too much. 3 is more sensible. (RV)	Legislation requires that we offer a 5 year licence.	The Council will introduce a 5 year licence in accordance with legislation, but will also offer the option of a 1 year licence.

Operators fee to be on a sliding scale	Not happy paying a premium for the number of vehicles operated (RV) 5.21 Should be a flat fee regardless of number of vehicles operated. (ST)	Comments noted.	Comments will be taken into account alongside the corresponding result of the survey – flat fee recommended..
Operating base/ residence	I cannot see why all operators and drivers must live in the HDC area and be on the electoral role. I cannot see why the council cannot implement this (RV)	Comment noted, however legislation precludes us from applying a criteria of residence.	No action can be taken.
Record keeping	5.27 Needs clarification. (ST)	Comment noted	To be clarified.
Disability awareness	Equality Act (not Equalities Act) 5.41 The reference to disability awareness training is welcomed. Extend training to all drivers as well as operators. We recommend that all drivers undertake disability equality training when obtaining their licence. Recommend changing disability awareness training to disability equality training State that any refusal to carry assistance dogs will be investigated with a view to prosecution. 4.59 we welcome that exemption certificates will only be issued where medical evidence is provided by a specifically trained professional 4.57 should be strengthened to include the specific duties placed on drivers from S168 & 170 to carry the disabled persons dog and allow it to remain with that person and not to make a charge for doing so. 4.51 Comment welcomed and should be strengthened to drivers being required to undertake disability equality training Enforcement – refusals should be investigated with a view to prosecution/ revocation of licence. Suggested wording provided 4.58 clarify to include “due to a medical condition which	Noted Noted  Considered  Considered Considered  Noted  Noted  Noted  Considered  Considered	Amended in policy No action necessary  Amended in policy  Amended in policy Amended in policy  No action necessary  Added to policy  Amended in policy  Similar suitable wording added to policy  Amended in policy

	<p>is aggravated by exposure to dogs”</p> <p>4.60 It is not permissible for licensing authorities to issue exemption certificates incorporating tactile features as it would render it invalid, but recommend that licensing authorities issue certificates accompanied by distinguishable features to vision impaired passengers. (GD)</p>	Considered	Government legislation does not require this. The form of the exemption certificate is prescribed in the legislation.
<b>Safeguarding</b>			
Safeguarding	<p>A key area (DS)</p> <p>6.6 Who will bear the cost of safeguarding training. Would it be better to issue a brochure rather than introducing mandatory training and adding cost to an already expensive process. (ST)</p> <p>6.6 How can you implement the policy document until these matters are sorted. Cost will impact upon recruitment which is already difficult. (ST)</p>	<p>Agreed.</p> <p>Comments noted.</p>	Comments will be taken into account alongside the corresponding result of the survey. It is envisaged that Safeguarding training will be mandatory for new drivers and will also be arranged for existing drivers. The most effective method of delivery, taking into account cost and the ability to recruit drivers will be considerations.
<b>Enforcement, compliance and range of powers</b>			.
Enforcement	<p>The two licensing officers should be out on our streets every day, not in the office answering phones and dealing with paperwork. (ST)</p> <p>Weak. At 4.25 include if driver has been subject to action elsewhere that it should be brought to the attention of</p>	<p>Comment noted. Officers duties were not a part of the consultation, but the policy has a section on compliance/enforcement.</p> <p>The Guidance relating to the relevance and treatment of convictions sets out</p>	<p>No action required</p> <p>The guidelines relating to the relevance and</p>



	the licensing panel (DS)	the criteria that determine appearance before the licensing sub-committee. This includes non-declaration of matters. Paragraph 4.25 refers to the DBS which would not show actions taken by other authorities, but can be added to 4.12 in the driver section.	treatment of convictions will be appended to the policy. The policy will be amended to include actions by other authorities in the driver section.(4.12 of draft)
<b>Fees, charges and refunds</b>			
3 year licence for drivers	Keep fees reasonable, no more than £120. (NA)	Noted.	The fee imposed will be cost neutral for the provision of the service.
<b>Other matters raised</b>			
Electric and Hybrid eco vehicles	Cambridge and Peterborough are looking at introducing electric and hybrid eco vehicles for the taxi fleet. Don't get stuck in the past. (DJW) What provisions have the council allowed for electric cars and how will they be tested? (RV)	Comment noted. Will form part of a separate exercise.	The Council will look into this further.

Committee/PH & Taxis/ Policy/ Consultation responses/ Summary of written consultation responses