

Day Adrian

From: mohammed qadir [REDACTED]
Sent: 24 April 2013 19:20
To: Licensing Policy Consultation; Chapman Adrian; Gell Peter; Day Adrian; [REDACTED]
Subject: Consultation response
Attachments: 2013-04-24.18.31.00.vnt

PETERBOROUGH HACKNEY DRIVERS FEDERATION

Response to the
Peterborough Taxi and Private Hire Licensing Consultation Document.

This document forms a written representation on behalf of the 92 members of the Peterborough Hackney Drivers Federation, a group which was formed, approximately three years ago, with the purpose of building a working and supportive partnership between the Hackney Drivers of Peterborough, the Police and Peterborough City Council.

As the representative body of the Hackney Carriage profession in Peterborough we wish to forward the views and proposals of our members on the consultation document, with the aim of securing a viable future for the Hackney Carriage profession and the valuable service it offers to the citizens of Peterborough.

We will address the areas of issue in the order that they appear within the consultation document.

Conditions of fitness for Hackney Carriage Vehicles (Peugeot E7)

We are opposed to any changes which would allow the introduction of the Peugeot E7 as a suitable vehicle to ply for trade as a Hackney Carriage in Peterborough on the following grounds:

Liquidation of LTI

Following rumours of liquidation, the future of LTI is, at this present time, secure, following a successful takeover. Whilst we are prepared to concede that were LTI to close there would be no other option than to look to introduce other vehicles to fulfill the role of the Hackney Carriage, however as this is not the case at this time we feel that its introduction to the discussion will only be a distraction.

Issues over the suitability of the Peugeot E7

At the present time all vehicles used as Hackney carriages have to conform to the high standards laid down by the London licensing council, we can see no benefit to users of hackney carriages to lower the standard to allow less well equipped vehicles to ply for trade on the ranks.

The turning circle of the Peugeot E7 is almost 25% greater than that of the LTI meaning that it would need greater space to manoeuvre on and off the already overstretch ranks of the city. Ranks such as Tesco and Broadway are quite narrow and it cannot be stressed enough that the extra manoeuvring required to enter and leave these ranks will put pressure on the drivers performing them, not to mention the obstruction to the public.

The actual boundaries of the city of Peterborough itself covers a large area but the city centre itself is quite small and largely pedestrianised, leaving very few opportunities to introduce new ranks and the addition of vehicles which are larger and require greater manoeuvring space will put added pressure on these already overstretched ranks.

Windows which can be easily opened while seated, this seems a fairly straightforward terminology and we fail to see why this should need further detail you can either open the windows or you can't whilst sitting in a wheelchair.

Headroom, once again as with the turning circle these are quite significant differences and we can see no need or benefit to either the public or the trade to introduce such radical changes at this time.

Overall the Peugeot E7 is an inferior vehicle to the purpose built LTI vehicles and we feel its introduction at this time will have a detrimental effect on the trade and hackney carriage users in general.

Vehicle Testing

We feel that the introduction of option 2 for MOT testing would offer the best option for drivers, allowing them greater access to MOT stations, reducing waiting time for tests and allowing them greater flexibility over schedules and locations, and once again freeing up council staff to assist in other areas.

MOT stations are regulated by VOSA and we feel that this body regulates the profession well and this reduces the chance of abuse due to lack of monitoring etc.

Driver Badge Renewal Frequency

We feel that the introduction of option 3 would be the most acceptable option based on the needs of both the public and the trade and the licensing department.

The present system is cumbersome leading to an ineffective use of council time and staff. By adopting the measures listed in option 3 we feel that the time of council employees could be better used to work with the profession to overcome the problems of touting and illegal flagging, issues which have a direct and detrimental effect on the safety of the public, in addition to the public image and viability of the trade as a whole. Our members would be happy to work with the police and the council to help to alleviate these problems.

We accept that a minority of unscrupulous drivers could take advantage of the longer gap between checks, which could lead to non licensed drivers being on the road however we would propose that the introduction of lengthy bans and swingeing penalties for those who offend would act as a huge deterrent against this problem.

We would also like to propose the introduction of a more stringent application process for those who apply to become both Hackney and Private Hire Drivers. The profession is one which is in constant contact with the public, and we feel that in order to provide them with an exemplary service, those providing the service should have to pass a number of written and practical knowledge based tests in addition to a more vigorous oral exam to establish a good level of spoken English.

We would also like to draw the council's attention to the impact that deregulation has had on the profession as a whole. The majority of our members have seen their income slashed by up to 50% in the wake of deregulation.

It is not only the financial stability of our members that has suffered, the increase in vehicles has led to increased pressure for rank space within the city centre, increased pollution and pressure on the

infrastructure in general.

We understand that the council is reluctant to reintroduce regulation at this time and with this in mind we feel that the introduction of a more in depth and far reaching test for applicants, as mentioned above, coupled with the continuation of the current conditions for fitness for Hackney Carriage Vehicles, would assist in, at the very least, maintaining the current levels of the profession.

We have been led to believe that the survey carried out to look into the levels of vehicles in Peterborough was neutral concerning the levels of vehicles currently operating in the city. We would like to propose that these results be re examined. While there has undoubtedly been a substantial increase in the population of Peterborough as a whole, there has not been a corresponding increase in the number of people using the services of the Hackney or Private Hire professions. Many people have their own vehicles and whereas once there was reluctance for people to partake of soft drinks in licensed premises, this is no longer the case, and indeed there is a greater variety of soft drinks available to the public. These changes have led to an increasing trend for people to take turns at being the dedicated driver on social occasions.

Additional factors which have had a further impact on the trade are the easy availability and relatively low costs of alcohol from supermarkets, which has led to the number of Public houses in Peterborough has decreased dramatically as more people choose to drink at home.

We feel that all these factors should have been taken into consideration.

Limousine and Speciality Vehicles

We have nothing to add to the proposals.

Private Hire Operators.

Overall we are supportive of all the initiatives raised in the current proposal document, however we would like assurances on the councils policy regarding the regulations for establishing a private hire office. One particular area of concern is the requirement for parking spaces, we feel that at present the situation with parking spaces is not being policed and in practice a greater number of vehicles are parking at the offices than was disclosed in the planning application. Not only is this a clear abuse of the regulations but this additional parking often caused increased congestion problems for business and residential occupants of the surrounding areas.

Relevance of Convictions and Cautions

We have nothing to add to the proposals

CCTV

We feel that this should remain optional at the present time. The trade is under considerable financial pressure and drivers are finding it increasingly difficult to secure a satisfactory level of income from the trade, so that added financial burden of having to add cctv to their cabs would cause added financial hardship.

We would like to see the council, assist support and encourage drivers to take up the use of CCTV cameras rather than to make it mandatory in these difficult times.

Conclusion

In closing as we have mentioned earlier, we, as a federation, wish to work in partnership with the Police and Peterborough City Council not only to secure a viable future for our members but to give

the public of Peterborough a service it can rely on and be proud off. thank you

Your sincerely

Mohammed qadir
secretary PHDF



Badge Number: [REDACTED]

Hackney Carriage Number Plate: [REDACTED]

Reference number: lpc01/2013

Dear Sir/ Madam

I have been driving hackney carriage in Peterborough for over 15 years with my experience I would like to give you some advice on condition of fitness for hackney carriage vehicles (Peugeot E7). I would like to see black cabs only in Peterborough because I have experienced that the public of Peterborough prefers using black cabs. They are the icon of our city. Regarding Peugeot E7 I would advise if it is not in the law of licensing then it shouldn't be allowed to be a hackney carriage.

Vehicle testing: regarding the vehicle testing situation I would like to be tested by a professional body either city council or someone who has some sort of connection with the city council because going to some carboys we might have some unfit vehicles on the road and get some delays in getting licensed in time.

Drivers badge renewal frequency: I like the idea of three years badge renewal but we must make sure that people are very honest. Very recently I read in the evening telegraph regarding a driver driving a car with no insurance and license in three star ambassadors. I would advise you to have a three year badge renewal and get police check every year.

C.C.T.V.: regarding the CCTV I would like to advise you that with my experience in driving hackney carriage I think it has all the safety that driver require and if you look over the years we have had very little problems regarding black cabs. The problems that we are having are to do with difference in fair prices with private hires. People are getting confused with the prices that are private hire are charging to hackney carriages. During night times when people are drunk they are looking to make excuses with the price of private hire and cause problems with black cab drivers because we use the meter price. For hackney carriages safety we have CCTV police and city council controlled cameras on or near by every taxi rank. So I think we have got lots of safety protection for hackney carriages.

Yours sincerely



Background on Enterprise

In March 2011, Enterprise was awarded a 23-year bundled services contract by Peterborough City Council for a range of front-line services, which also included the running of the vehicle Workshop based at Nursery Lane. The operation was previously managed in-house by PCC.

The Workshop, prior to the commencement of the Enterprise contract, carried out reactive and scheduled maintenance on the Passenger Transport Fleet, the Refuse collection and Street Cleansing Fleet and the Grounds Maintenance Fleet as well as carrying out, on instruction from PCC, MOT exemption tests on Taxis. Following Enterprise taking over control of the Workshop operation as part of the bundled services contract, it continued to provide all of these services.

Part 1 Conditions of Fitness for Hackney Carriage Vehicles (Peugeot E7)

Enterprise has no official position regarding this area of the consultation, as it is not within Enterprise's remit or expertise.

Part 2 Vehicle Testing

1. **Introduce the requirement to have a standard MOT test carried out by any VOSA authorised MOT Testing Station instead of the requirement for an MOT exemption test carried out by either of the Council's 2 Testing Stations.**
 - a. **Remove the requirement for a vehicle to have an MOT exemption test.**
 - b. **Remove the requirement to book a test via the Licensing Department.**
 - c. **Remove the requirement for a vehicle to be tested at the Unity or Enterprise Testing Stations.**
 - d. **Introduce the requirement to have a standard MOT test carried out by any VOSA authorised MOT Testing Station.**
 - e. **Introduce the requirement for the driver to book the MOT test direct with the Testing Station.**

2. **Introduce the requirement to have a standard MOT test carried out by only VOSA authorised MOT Testing Stations which are members of the Council's "Vehicle Testing Centre Scheme" instead of an MOT exemption test carried out by the Council's test stations.**
 - a. **Remove the requirement for a vehicle to have an MOT exemption test.**
 - b. **Remove the requirement to book a test via the Licensing Department.**
 - c. **Remove the requirement for a vehicle to be tested at the Unity and Enterprise Testing Stations.**
 - d. **Introduce the requirement to have a standard MOT test carried out by VOSA authorised MOT Testing Stations that belong to the Council's "Vehicle Testing Centre Scheme".**
 - e. **Introduce the requirement to book the MOT test direct with the Testing Station.**

3. **Retain the current requirement to have an MOT exemption test carried out by either of the Council's 2 Testing Stations**
 - a. **Retain the requirement for a vehicle to have an MOT exemption test**

- b. **Retain the requirement to book a test via the Licensing Department.**
- c. **Retain the requirement for a vehicle to be tested at the Unity or Enterprise Testing Stations.**

Remove/Retain the requirement to have an MOT exemption test

Enterprise feels very strongly that it is in the best interests of all parties for the vehicles to be inspected and reviewed on a six-monthly cycle. From Enterprise's experience of the last two years and the experience of operating the MOT exemption tests under the PCC Workshop at Nursery Lane for the previous seven years, it is vitally important that vehicles are assessed for their roadworthiness by an independent and impartial inspection regime.

The majority of vehicles being presented for an inspection test have already been into a local garage for maintenance work to be prepared for the test at the Enterprise or Unity Workshops. However, despite this, an estimated 25% of vehicles being presented for an MOT exemption test need rectifications performing before the vehicles are deemed safe to be utilised as a passenger carrying vehicles for hire. Approximately 23% require a re-test where the vehicles are removed from site to allow maintenance for an external provider to bring them to standard and, on average, two vehicles per month are issued with prohibition notices.

Without these 6 monthly assessment checks, the majority of these vehicles would spend the latter 6 months of the year in a potentially unsafe and non-roadworthy condition, this in itself presents a safety risk to not only the fare-paying passengers on board the vehicles but also to the general road-going public and pedestrians.

However, in response to the requirement for the vehicle to not have an MOT exemption test, Enterprise acknowledges the system could be changed or improved to allow the vehicle to have a standard annual MOT test with an enhanced criteria for Taxi requirements at 6 monthly intervals.

Many of the garages which are preparing the vehicles for the current MOT exemption tests, chosen by the drivers under their own agreements, prior to them being presented to Enterprise and Unity, are also MOT Test Centres. However, a percentage of these vehicles do then need rectifying before they are deemed to have passed their MOT exemption tests and Enterprise would offer caution to Peterborough City Council that it is essential to the safety of the fare paying passengers and the general public and it is crucial, therefore, that these tests are carried out by an impartial and Council appointed Workshop that does not also carry out general running repairs and reactive maintenance to these vehicles.

As detailed above, Enterprise does not foresee an issue with introducing the standard MOT test, so long as this was not the sole annual check on the vehicles.

The removal of the 6 monthly checks for vehicles over 6 years old would potentially raise safety risks and acts as an incentive to encourage the operators to ensure regular maintenance to be carried out on these vehicles.

The standard MOT test alone is not sufficient to check all requirements for Taxi safety, so even on the MOT test there would need to be an enhanced additional Taxi check, following the MOT inspection, to ensure the safe operation of the following items; first aid kit, fire extinguisher, reversing lights, tail lifts and wheelchair ramps amongst others.

Wheelchair ramps and tail lifts users are amongst the more venerable members of society, and if the Council were to opt for a single MOT test only, this would fail to ensure safety of a group of people for whom it is most crucial.

Also the compliance and adequacy of the first aid kit and fire extinguishers are paramount and need to be checked on a regular basis to ensure that in a situation where required they operate functionally.

The key advice that Enterprise would offer in this area is that it is vitally important that the vehicles' roadworthy condition is assessed on a 6-monthly basis but also that the assessment is carried out by an impartial and on Council appointed premises, but that it would be possible to change the nature of the current MOT exemption tests to allow a different scheduled test structure.

Remove /Retain the requirement to book a test via the Licensing Department

Enterprise can be extremely flexible with regard to the booking procedure for the tests. Enterprise has the facility, capability and capacity to assist PCC with the administration of this process.

Using Enterprise's asset management and scheduling software, Key2, Enterprise could hold the database of all vehicles along with their compliance status and could provide the Council with automated reports in e-mail form on a monthly, weekly or daily basis to inform the Council of any vehicles which are no longer within the boundaries of the scheduled inspection regime.

Enterprise has the ability to allow the drivers to book directly with the Workshop for their tests and Enterprise can also manage the distribution of the work between Enterprise and Unity to allow maximum availability of testing. Even work carried out at Unity can be recorded against the vehicles on Enterprise's system to show compliance and testing status without the need for Unity to be on the same system and all reporting would be inclusive of all vehicles.

If the booking were to be made directly with Enterprise it would allow Enterprise to schedule the work in a more flexible manner to provide a more efficient service to the drivers, as well as allow Enterprise more internal flexibility, and potentially could reduce the costs of the tests and the hourly rate to PCC for the Taxi tests.

A key consideration that Enterprise feels is crucial to maintaining the current compliance of the Taxi fleet is that all vehicles should be held on a central database or system which is fully reportable and can be interrogated and is updated on a regular and reactive basis.

Remove/Retain the requirement for a vehicle to be tested at the Unity or Enterprise Testing Centres

Enterprise feels very strongly that to remove the need for an independent and impartial test centre may compromise the safety of the drivers, passengers and general road-using public.

Many of the garages which are preparing the vehicles for the current MOT exemption tests, chosen by the drivers under their own agreements, prior to them being presented to Enterprise and Unity, are also MOT Test Centres. However, a percentage of these vehicles do then need rectifying before they are deemed to have passed their MOT exemption tests and Enterprise would offer caution to Peterborough City Council that it is essential to the safety of the fare paying passengers and the general public it is crucial that these tests are carried out by an impartial and Council appointed Workshop that does not also carry out general running repairs and reactive maintenance to these vehicles.

Many of the drivers and operators of taxis would prefer not to use these testing centres as they are motivated against their use by the costs involved. However, this is a key supportive factor for maintaining this structure since a prime reason for having these exemption tests is to prevent the operators from minimising costs with their repairs and ultimately leading to a non-roadworthy vehicle condition.

Enterprise would offer a solution of having a network of several independent and impartial Testing Centres, all of which do not carry out running repairs on any of the vehicles up for these tests, and audited on a 6 monthly basis, where the scheduling could be controlled by Enterprise, as detailed in Section 2. These garages could all be on a set fee matrix, to prevent cost undermining, for which garages were paid a set amount per test and all compliance was fed back to Enterprise to maintain the vehicle database.

Enterprise could issue prohibition notices, which would remove additional administrative burden from PCC. However, on issue of a notice Enterprise would immediately inform PCC and all relevant parties.

The key advice that Enterprise would offer in this area is that it is vitally important the assessment is carried out by an impartial and on Council appointed premises that do not carry out running repairs and reactive maintenance to the vehicles and testing is on a set fee schedule.

Part 3 Driver Badge Renewal Frequency

Enterprise has no official position regarding this area of the consultation, as it is not within Enterprise's remit or expertise.

Part 4 Limousine and Speciality Vehicles

Enterprise would like to make the PCC aware that VOSA permit the Workshop at Nursery Lane to accommodate limousine for MOT and inspection purposes.

Part 5 Private Hire Operator Conditions

Enterprise has no official position regarding this area of the consultation, as it is not within Enterprise's remit or expertise.

Part 6 Relevance of Convictions and Cautions

Enterprise has no official position regarding this area of the consultation, as it is not within Enterprise's remit or expertise.

Part 7 CCTV

Enterprise has no official position regarding this area of the consultation, since it is not within Enterprise's remit or expertise.

If anyone from Peterborough City Council would like to contact Enterprise further to discuss our opinions or considerations, Enterprise would be happy to receive any communications and would recommend dialogue sessions to arrive at the best overall solution to ensure safety and compliance of the Taxi fleet in Peterborough, as well as the most cost effective and efficient way to administer this service. Enterprise, through the bundled services it currently provides for Peterborough City Council, can offer administrative help to PCC and is flexible with its capabilities and functionality and would welcome the chance to discuss potential opportunities further.

Day Adrian

From: Sharon Burgh [REDACTED]
Sent: 24 April 2013 11:50
To: Licensing Policy Consultation
Cc: Day Adrian
Subject: LPC01-2013 PCC Taxi Consultation - Representations from Enterprise
Attachments: LPC01-2013 Taxi Consultation for Peterborough City Council - Enterprise Representation.docx

Please find attached Representations from Enterprise Peterborough regarding the Peterborough City Council Taxi Consultation 2013. Should you have any further queries, then please do not hesitate to contact Andy Prowting [REDACTED] or myself on [REDACTED]

Sharon Burgh
Fleet & Plant Hire Limited
Enterprise Peterborough – Caring for your environment

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Day Adrian

From: Dan Vajzovic [REDACTED]
Sent: 02 April 2013 10:48
To: Day Adrian
Cc: Iain Clark
Subject: Taxi consultation response from Cambridgeshire Constabulary ~[PROTECT]~
Follow Up Flag: Follow up
Flag Status: Completed
Attachments: Cambridgeshire Constabulary response to PCC Taxi and Private Hire Licensing Consultation.doc

Dear Adrian,
Please find attached our response to your consultation.

Regards,
Dan

Superintendent Dan Vajzovic
Peterborough Area Commander

To visit Cambridgeshire Constabulary's website please follow this link:

<http://www.cambs-police.co.uk/index.asp>

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Thank you for your cooperation. (c) Cambridgeshire Constabulary

Cambridgeshire Constabulary response to PCC Taxi and Private Hire Licensing Consultation

Cambridgeshire Constabulary is the local police service covering the Peterborough Unitary Authority area. In daily business we have regular interaction with the taxi and private hire community as victims, witnesses and offenders. Our responsibility is to ensure the safety of all persons and, where possible, ensure that effective investigations can take place to resolve crimes and anti social behaviour.

The Police recognise the valuable service the taxi and private hire community provides, indeed acknowledging the significant contribution that effective service provision can have on managing the night time economy and improving the public's feeling of safety and well being.

The below feedback is from professional judgement and experience from officers on the Peterborough District.

Part 1. Conditions of fitness for Hackney Vehicles

In relation to the choice of vehicle to be used there are a number of concerns to raise:

1. With the proposal to use the Peugeot E7 will the increased turning circle exacerbate traffic congestion issues in some of the, already bottlenecked locations in the city (e.g. Broadway near Tesco). The result will be a delay in traffic flow and a potential increase in "road rage" problems.
2. As the vehicle is longer will this cause capacity issues in the existing taxi ranks in that not as many vehicles will fit in the ranks, displacing them to park elsewhere, even illegally.
3. Some private hires already use the E7 and use of this as a hackney taxi may be perceived by some as a removal of the taxi driver's status v private hire. Could a specific livery for taxis be considered as is done in many other cities and towns.
4. The TFL conditions for fitness are a good guide for maintaining the standard of taxis and should remain the basis for taxis in Peterborough.

Part 2. Vehicle testing

The mechanical fitness and integrity of the testing is vital to maintain the confidence and safety of the public and partners. It is therefore considered that any dilution of the current testing regime would reduce the high levels of safety currently enjoyed. There is also a risk of reputational damage PCC were the options described to be implemented. The local authority is responsible for licensing vehicles and ensuring appropriate testing is undertaken. The current system ensures that vehicles are roadworthy and kept in a suitable state to ensure passenger and driver safety.

Option 1 appears to abdicate responsibility from PCC in relation to vehicle testing and places all the onus on the driver, this essentially reverts to the same standard as used by private motorists, who do not have the responsibility of carrying fare paying passengers.

Option 2 is a halfway house between the current system and the proposal in option 1. This option requires some buy in from approved service providers and an agreement to provide information to the licensing authority, this may not be practical. It is concerning that there are acknowledged issues around whether continuity of audit trails may be affected. How would the standards be maintained

and checked to satisfy licensing officers that these standards were being maintained and consistently applied.

Option 3 is the current process and provides the best option as the system has integrity, it is a standard test, the licensing authority has access to the information and immediate access to prohibit unfit vehicles. This may be slightly more costly but where the safety of the public and drivers is concerned then the investment is worthwhile. The integrity and reputation of the licensing process would also be retained.

It is vital that the vehicle checking is robust to ensure safety and maintain public confidence.

Part 3. Driver Badge Renewal Frequency

Suitable, timely and transparent checking systems for drivers are vital to the public's confidence in the driving community. Drivers come into contact with vulnerable members of the community and much of their trade comes through the night time economy where members of the public are under the influence of drink and/or drugs and render themselves more vulnerable. To this end there are serious reservations about moving to a system where drivers are checked every 3 years. It is far safer for each driver to be subject to a CRB check and a DVLA check on an annual basis, this is vital for public confidence and the integrity of the drivers. The risks are that those who commit offences or are involved in criminality will go unchecked for a period of time which allows them to do so. The basis of the Bichard report centres round the sharing of information and what happens when the relevant information is not shared appropriately, a system of tri-annual checking heightens those risks significantly. It is acknowledged that "taxi driver" is a notifiable occupation however this is not always disclosed and offenders/suspects are not always processed through custody.

It is also acknowledged that there is a desire for reform and that option 2 would provide a balance of risks against a modernisation of the current system however there would be no support to move to Option 1 or 3. Option 4 would be acceptable.

Part 4 Limousine and Speciality Vehicles

The introduction of the regulation of vehicles and operators in this category is welcomed and supported.

Part 5 Private Hire conditions

These conditions are supported

Part 6 Hackney conditions

These conditions are supported

Part 7 CCTV

The installation of CCTV in private hire and hackney vehicles is fully supported and endorsed by the police. CCTV is widely used as a crime prevention and detection tactic. The use of CCTV protects both the driver and passengers. It allows for greater investigation of crime and potentially an increase in the detection of offences involving the trade in all areas. There are numerous examples where CCTV would have directly influenced the outcome of police investigations. The installation of CCTV would also protect drivers against malicious allegations.

It is acknowledged that this is an area that has been discussed at length for some years now and that there are strong views in relation to installing CCTV much of it relating to the cost of the right system and where that is funded from.

As the options stand Option 1 would be preferable however there may be further options which could be explored to make the policy more workable.

Being cognisant of the recent ruling in the Southampton case regarding the recording of audio on taxi CCTV, it is suggested that, if possible, the CCTV condition is targeted at those times or journeys where there is the greatest risk/threat be that perceived or real. This would cover the night time economy Thursday to Saturday 2000-0600, all school journeys or those where children are travelling in hackneys or private hire. The visual cctv will record continuously and the driver has the ability to activate audio recording in response to an incident. This may have issues of its own but may represent a compromise between full implementation and no installation of CCTV at all.

Day Adrian

From: Robinson Ian
Sent: 18 April 2013 11:59
To: Licensing Policy Consultation
Subject: lpc01/2013 - Hackney Carriage & Private Hire licensing consultation

As one of the council Regulatory Officers, working in the Licensing Department, I would like to take the opportunity offered by the consultation process to express my views concerning the proposals (**lpc01/2013**).

In my opinion the proposals I have chosen to comment on, if adopted, could compromise passenger safety. In addition, the removal of current safety processes, the report repeatedly states, "would reduce the administrative burden on the council". Safety processes should not be seen as a burden, they are yet another tier to ensure the public are safe, which is of course, the primary role of licensing. If adopted, in this current climate, we could also potentially see the changes in policy lead to further reductions in staff. With staff levels reduced, there would be further demands placed on those officers remaining, which would undoubtedly affect their ability to investigate complaints, confine them more to the office and impact on enforcement operations, once again potentially impacting on public safety.

All of these processes, which could be removed if some proposals are adopted, allow officers to check if a vehicle or driver is still eligible for licensing, inspect vehicles for unreported accident damage, check driving licences, criminal records and insurance documents.

1. Conditions of Fitness for Hackney Carriage vehicles (Peugeot E7).

In moving away from the Public Carriage Office Conditions of Fitness, the Peugeot E7 would not be the only vehicle eligible for licensing. If the E7 is approved, then any wheelchair accessible vehicle would be eligible to be licensed as a hackney. The Taxi Federation has already highlighted concerns that there are too many licensed taxis in Peterborough, this was corroborated by the recent survey, which clearly demonstrated that there was no unmet demand.

Allied Vehicles, the E7 Converter indicate that our hackney fleet does not cater for all wheelchair passengers. Even with the addition of the E7, we would still not be able to accommodate every possibility. In order to do that, every vehicle on the rank would need to be capable of carrying everyone from a passenger in a standard sized wheelchair, to someone who needs to be conveyed in a fully recumbent position i.e. a fleet of ambulances.

In reality we provide a larger fleet of wheelchair accessible vehicles than most other authorities. Other authorities have only a small percentage of wheelchair accessible vehicles on their hackney fleet, with the majority of the fleet being saloon or people carrier type vehicles. All of our hackneys are wheelchair accessible and have hearing loops, additional steps or swivel seats fitted as standard, to accommodate other passenger's needs.

If a passenger has more specific needs, we have many adapted vehicles, considerably larger than a London Cab or E7 on our private hire fleet, fitted with tail lifts, which can accommodate any passenger. If a passenger had specific needs that could not be met by a London Cab, they would ordinarily make the necessary travel arrangements when planning a journey.

We currently license a large number of wheelchair accessible vehicles on our private hire fleet, including a number of E7s. These vehicles would be immediately eligible for licensing as a hackney. This, coupled with the fact that a 3 year old E7 and other non-PCO approved vehicles can be purchased relatively cheaply, could cause a sharp rise in hackney numbers, causing further difficulties for the trade.

The cost of a new / used hackney appears to have reduced the amount of new vehicles from entering the trade, we currently licence around 198 hackneys. Five years ago, we had around 210 hackneys, which fell to around 185, when the recession took hold. We have already had to fund additional ranks in the city centre to alleviate the illegal parking issues we were encountering. Any increase in the size of the fleet could send us back to square one.

The E7 is not a purpose built vehicle, it is a conversion. It does not have the same turning circle as our hackneys. No matter how much this aspect is downplayed, it would cause a considerable problem in the city.

Currently the main rank on Broadway requires the taxi driver to perform two u-turns, one when leaving the Imperial Bento filter rank to join the Tesco rank, the other when leaving the Tesco rank with a customer. This

is a busy road, with a great deal of traffic and pedestrians.

The E7 and any other non-approved wheelchair accessible vehicle cannot perform the necessary u-turns on this stretch of road. They would have to perform a three point turn, which would cause unacceptable delays and pose potentially dangerous issues. In order for the E7 and other non-approved vehicles to operate from Broadway, we would need to redesign the ranks and the way they operate.

In addition, I doubt that any of these vehicles have the necessary manoeuvrability to use the Bus Station rank.

Allowing other vehicles to be licensed as a hackney would also dilute the recognition factor of the fleet, which could also prove to be a public safety issue. We would have E7s licensed as both taxis and private hire vehicles. We currently have over 20 Peugeots on the private hire fleet, a mixture of E7, Eurobus and Express, all look the very similar. It would be difficult for a passenger, often after a few drinks to ascertain which Peugeot could legally pick them up.

We are regularly running operations to target and prosecute private hire drivers for unlawfully plying for hire. Even though it is likely to end in prosecution, fine and the loss of a licence, many private hire drivers are willing to pick up unlawfully. Any driver willing to unlawfully ply for hire would find it considerably easier if his private hire looks the same as a hackney.

If a private hire driver picks up without a booking, firstly it is against the law, secondly it generally invalidates the vehicle's insurance cover and thirdly, there is no record of that journey taking place. Therefore, if a passenger is indecently assaulted or a private hire driver assaulted, it would be very difficult for the police to establish driver or passenger details. Diluting the visible appearance of the fleet would make it more difficult to identify whether a vehicle was a hackney or a private hire.

From watching an E7 demonstration, the length of the ramp, coupled with the height of the floor requires the vehicle to be parked further from the kerb to facilitate the loading of the wheelchair; this pushes the vehicle further into the carriageway.

When sitting in a wheelchair in the vehicle, visibility for the passenger appears to be reduced as the windows sit below eye level. The vehicle is also fitted with sliding doors, which provide a degree of difficulty for anyone with mobility issues trying to close it from the front facing passenger seats.

I have no issue with the licensing of the E7 or any other non-approved wheelchair accessible vehicle as a private hire, but foresee a number of issues if we allow the vehicle to be licensed as a hackney.

2. Vehicle Testing.

Testing of our licensed vehicles is undertaken by two approved testing stations, **Unity** (formally Conder's Garage), and **Enterprise** (formally the Council Depot). The current testing procedure includes additional criteria, which are not covered in a standard M.O.T. inspection. Vehicles, on passing the test, are issued with a Certificate of Compliance, not an M.O.T. Certificate. To state the obvious, the licensed vehicle's role is to convey the public from A to B as safely as possible and any decision impacting on safety, should be approached with great care.

In the case of Enterprise, the team at the location do not undertake repairs resulting from test failures. Unity, the former dealership for the LTI London Cab, was only permitted to undertake testing on taxis, once they had ceased to hold the LTI dealership and on the understanding that they no longer undertook any of the warranty repairs. These measures were taken to ensure the testers are independent and allay any fears that vehicles could be failed in order for the garage to generate additional income from any repairs.

New proposals could see the removal of our current testing procedure and the introduction of the standard M.O.T. test. From evidence gathered, I believe adopting the standard M.O.T. could lead to potential issues that would compromise the public's safety.

We currently have a close relationship with both Testing Stations. As a result, we are notified of any vehicle the testers deem is unsafe. This enables officers to issue Immediate Suspension Notices and remove the plate, preventing the vehicle from working as a taxi/private hire until the faults have been rectified and the vehicle re-tested.

If the responsibility of testing vehicles passes to any VOSA approved M.O.T. Testing Station, we could lose this relationship, communication and the additional safety net of being able to issue an immediate suspension before the vehicle leaves the testing station. We could not maintain a relationship with testers, if vehicles could be tested at any M.O.T. Testing Station.

We could also lose valuable information concerning poorly maintained vehicles, regular test failures and companies who are not investing money in the maintenance of their fleet.

In removing the requirement for the proprietor to book the mechanical test via the licensing department, we

again run the risk of losing a degree of control. We would have no way of confirming a vehicle had passed the test, until we were in receipt of the Pass sheet / Test certificate. As it stands, if we have concerns, we can check the test booking spread sheet to ascertain when the test was booked and then make enquiries with the relevant Testing Station.

In booking the tests ourselves, we send out paperwork, therefore giving the proprietors reminders and can spread tests throughout the month. This also spreads out the subsequent plate fitting appointments. In allowing proprietors to book their own tests at any M.O.T. Test Station, we could find ourselves in a position where proprietors delay the test until the last possible moment. This could have a knock on effect of drivers being unable to book a test appointment before the plate expires, putting officers in a position where it actually increases workload as a result of them having to locate vehicles to remove plates and chase proprietors.

In addition I am concerned that adopting the M.O.T. Test itself also has issues. On making a Freedom of Information request to VOSA, I am able to state that in the last 24 months:

- One VOSA authorised Examiner was prosecuted for fraudulently issuing an M.O.T.
- Ten nominated testers have been prosecuted for fraudulently issuing an M.O.T.
- VOSA have taken ten cases involving 13 defendants in connection with forged M.O.T. certificates.
- 101 Authorised Examiners had their authorisation withdrawn.
- 620 Authorised Examiners received a warning.
- 162 Nominated Testers were disqualified.

A search on the internet also leads to a number of media stories concerning forged, or the fraudulent issuing of M.O.T. certificates.

One of these articles related to a Peterborough Garage, where the owner received a 50 week suspended prison sentence. Whilst under surveillance, the garage was seen to issue a number of M.O.T. Certificates, despite some of the cars not even entering the garage. Whilst under surveillance on a particular day, ten vehicles were tested, 9 were ascertained not to have been tested properly. During the court case, in mitigation he admitted breaking the law because his business was "under great financial pressure."

From personal experience I am also aware of a Peterborough Garage being implicated in mileage clocking, where a number of Peterborough private hire vehicles allegedly had the milometer's wound back, to enable them to have warranty work undertaken. To put it simply unfortunately, there are some dodgy garages out there.

I would have some real concerns if we lost the current M.O.T. Exemption Test and allowed any M.O.T. Testing Station to test licenced vehicles. The M.O.T. Exemption provides an independent test, undertaken by VOSA approved testers, with no concerns that a tester could fail a vehicle in order for his garage to benefit from potential repair work.

3. Driver Badge Renewal Frequency.

I believe it is incredibly dangerous to consider moving from the annual criminal record check and adopt a 3 year renewal check. The report indicates there would be a "slim possibility of some offences going unnoticed for a period of time"; in my experience this statement is incorrect. As it currently stands, we often discover on an annual check that drivers have been convicted during the licensing year. Despite it being laid down in the conditions of licence that any conviction should be reported within 7 days, drivers still fail to advise of a conviction.

The role of taxi driver is classed as a notifiable occupation and any arrest / charge should result in a disclosure from the police notifying our office. However in reality this regularly does not happen. In reality drivers are convicted, we are not advised by the driver or the police and we subsequently only find out when the driver submits his annual renewal.

Given, the issues we currently have, if criminal record checks are now moved to every three years, a driver could be arrested, convicted, even imprisoned and back out driving again, before we would even be aware of the conviction.

In reality, an annual criminal record check should be the bare the minimum requirement. It may be in the interests of the driver to move to 3 yearly licensing, but in my opinion it isn't in the public interest.

7. C.C.T.V.

These days there are very few branches of the public transport system that do not provide protection to the driver and passenger by installing C.C.T.V. in vehicles.

Given the nature of some of the incidents we are now regularly investigating, there is an even more pressing need for the introduction of C.C.T.V. In recent months we have seen a number of safeguarding issues, allegations against some drivers for inappropriate comments or behaviour, which have led to increased joint working with Social Services and Police. Some of these allegations have involved licensed drivers engaged on local authority contracts.

C.C.T.V. is generally a condition of licence in other aspects of licensing, for example on & off licenses, with licenses not being granted, or premises being shut down if the C.C.T.V. is not working. In all of these cases the CCTV is fitted at the owner's expense.

Much has been said re the current financial climate and the cost to the driver if the mandatory requirement for CCTV is retained. If the vehicle owner is registered, the cost of CCTV can be offset against tax and VAT claimed back, it also leads to reductions in insurance costs offered by some companies.

C.C.T.V. is an important public safety tool and given the number of driver revocations and suspensions for alleged inappropriate behaviour towards females in recent months, I feel it is the only appropriate way to attempt to reduce these issues.

From scanning FLARE, since June 2012 we have had 10 allegations of inappropriate behaviour towards females or children. As a result:

- Two driver's licences have been revoked, one after three separate allegations of inappropriate conversation with female passengers, the other after a licensed driver picked up a 15 year old girl in his taxi and gave her alcohol in return for her performing a sexual act on him.
- One driver was initially suspended after an allegation of indecent assault against a female passenger in his vehicle. The case against him was subsequently dropped due to insufficient evidence. CCTV would have immediately established if the allegation had in fact occurred, proving or disproving the allegations against him.
- Three complaints related to alleged inappropriate comments made to female passengers, again if CCTV had been fitted this could have proved or disproved the allegations towards the driver.
- One driver is currently suspended following an allegation of trying to incite a young female passenger into child prostitution. The alleged incident took place in the vehicle and again, CCTV could have proved or disproved the allegation against the driver.
- One allegation relates to a driver allegedly stalking a female customer and one driver allegedly drove his vehicle at young students who had previously travelled in his vehicle. In both cases, CCTV may have assisted the investigation.

I acknowledge that there has been a downturn in the economy, however this does not appear to be adversely affecting the trade, as the number of licensed vehicles and drivers have increased.

I acknowledge that the Information Commissioner's Office served notice on Southampton council as a result of their mandatory requirement for vehicles to have CCTV, but this was purely due to the recording of conversation, not the recording of images.

The I.C.O. would have no issue if the sound recording was removed from the specification. The City Centre CCTV and most other systems fitted to pubs, clubs and other premises provide a suitable deterrent and evidence of an offence, without the need for sound recording. Southampton would not have been challenged by the I.C.O. if the CCTV in question did not have sound recording.

In addition, making CCTV optional rather than mandatory is in my opinion a complete waste of time. If CCTV is optional, there would be very few willing to spend money they didn't have to.

In my opinion, in the interests of driver and passenger safety CCTV should be a mandatory requirement and at the very least it should be a condition of any of our council Passenger Transport contracts, that any vehicle used to undertake a PCC school contract should be fitted with CCTV. We have a real opportunity to improve passenger and driver safety by fitting CCTV to our licensed vehicles, it would be a crying shame if we allowed unreasonable threats, pressure and politics to make a u-turn

Kind regards

Ian Robinson
Regulatory Officer
Taxi Enforcement Office
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Peterborough
PE1 1HZ



To find out more about Peterborough City Council please go to: www.peterborough.gov.uk
Please consider the environment before printing this email



24th April 2013

Licensing Consultation Officer
The Licensing Team
4th Floor
Bayard Place
Broadway
Peterborough
PE1 1HZ

Dear Sir/Madam

**PETERBOROUGH TAXI AND PRIVATE HIRE
LICENSING CONSULTATION DOCUMENT**

I attach my response to the Peterborough Taxi and Private Hire review document now in consultation.

My qualification in submitting this document is that:

- I have been involved with the industry for the past 47 years one way or another as both a Hackney and Private Hire driver and also as a Taxi Fleet company owner.
- For two years I was the Secretary of the Peterborough Hackney Drivers Federation.
- I am the Peterborough Disability Forum Lead for Taxi and Private Hire.
- I have physical disabilities and I am a frequent user of both Hackney and Private Hire vehicles in Peterborough.

For ease of reference I have reprinted the original consultation and placed my comments in box format under the appropriate option, section or statement.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "B Gascoyne".

Brian W J Gascoyne

Part 2 – Vehicle Testing

Depending on the outcome of the consultation, a combination of the following may be adopted.

1. Remove the requirement for a vehicle to have an MOT exemption test.
2. Remove the requirement to book a test via the licensing department.
3. Remove the requirement for a vehicle to be tested at the Unity or Enterprise testing centres.
4. Introduce the requirement to have a standard MOT test.
5. Introduce the requirement to book the MOT test direct with the test centre.
6. Introduce a "vehicle testing centre scheme" consisting of VOSA authorised MOT testing stations that can meet additional criteria as set by the council.
7. Retain the requirement for a vehicle to have an MOT exemption test.
8. Retain the requirement to book a test via the licensing department.
9. Retain the requirement for a vehicle to be tested at the Unity or Enterprise testing centres.
10. Other options deemed suitable as suggested through the consultation process.

1. Introduction and Objectives

Introduction

There are currently 185 Hackney Carriage and 500 Private Hire vehicles licensed in Peterborough. All vehicles are currently required to pass the MOT exemption test prior to being licensed, and then on an annual basis at the time of the renewal of the vehicle licence. On reaching 6 years of age from the date of first registration as indicated on the V5 document the vehicle is required to be tested every 6 months.

The MOT exemption test covers additional items including, the spare tyre, wheelchair ramp where appropriate, airbag lights, first aid kit, fire extinguisher, reversing lights and the fare card.

This document sets out options for the Hackney Carriage and Private Hire Vehicle testing arrangements in Peterborough. It is a consultation document and comments are invited from all those who could be affected by the proposals.

Objectives

This consultation has the following main aims.

1. To fulfil the councils commitment to ensure that its policy for Hackney Carriage and Private Hire licensing is current and fit for purpose.
2. To ensure the licensing service is efficient and cost effective offering value for money to its service users.
3. To simplify arrangements and reduce the administrative burden on drivers and the council without compromising safety standards or reducing the quality of licensed vehicles.

2. Background and Present Arrangements

Fees

The council has the delegated powers to set fees in relation to Hackney Carriage and Private Hire Vehicle licensing functions, they cannot be used to raise revenue or to make a profit for the council; they can only be set to cover the cost incurred by the licensing function.

Currently the annual renewal fee for a Hackney Carriage Vehicle licence is £210 including the annual test, the annual renewal fee for a Private Hire Vehicle licence is £180 including the annual test. The current fee for the 6 month test for both Hackney Carriage and Private Hire Vehicles is £65. Where a vehicle fails a test there is a fee of £21 for the 3rd and subsequent re-tests if tested within 14 days, and £42 if tested after 14 days.

Current Process

As part of the vehicle licence renewal process reminder packs are sent out to vehicle licence holders 1 month in advance of the renewal date. Licence holders are advised to contact the taxi licensing team in order to make an appointment for the vehicle to attend one of the two designated testing stations in order for the MOT exemption test to be carried out.

3. OPTIONS

Option 1:

Introduce the requirement to have a standard MOT test carried out by any VOSA authorised MOT testing station instead of the requirement for an MOT exemption test carried out by either of the councils 2 testing stations.


- a. Remove the requirement for a vehicle to have an MOT exemption test.
- b. Remove the requirement to book a test via the licensing department.
- c. Remove the requirement for a vehicle to be tested at the Unity or Enterprise testing stations.
- d. Introduce the requirement to have a standard MOT test carried out by any VOSA authorised MOT testing station.
- e. Introduce the requirement for the driver to book the MOT test direct with the testing station.

Advantages

1. Will simplify current arrangements and partially reduce the administrative burden on both the driver and the council.
2. Will help to reduce the number of routine interactions between the driver and the council and hence help reduce any inconvenience or loss of income by avoidable contact with the council.
3. Will contribute to a more cost effective service freeing up resources enabling issues to be dealt with in a more timely fashion.
4. Encourage competition and therefore generate a more competitive pricing structure and market place.
5. Will provide flexibility for drivers offering an increased availability of test appointments.

Disadvantages

1. The council will not have access to analytical data in regards to MOT failures in order to identify where specific vehicles fail tests frequently.
2. Additional vehicle test requirements that are currently subject to testing under the councils MOT exemption test regime are not tested as part of a standard VOSA MOT test requirements; these items whilst not being considered crucial to the mechanical safety of the vehicle, for safety purposes are deemed appropriate for passenger and driver safety. They include the certification of the fire extinguisher, first aid kit, fare card, and the safety testing of the wheelchair ramp where appropriate.



Comment: A very unsuitable option. The risk of some Hackney owners or drivers taking their vehicle to an 'acquaintance' or a 'friend of a friend' is too higher risk to countenance and may leave the council open and at risk to litigation. The council have a responsibility to ensure that vehicles that are underwritten and licensed by them are fit for purpose and that they have shown 'due diligence' in providing the licence.

Option 2:

Introduce the requirement to have a standard MOT test carried out by only VOSA authorised MOT testing stations which are members of the councils "vehicle testing centre scheme" instead of an MOT exemption test carried out by the councils 2 test stations.

- a. Remove the requirement for a vehicle to have an MOT exemption test.
- b. Remove the requirement to book a test via the licensing department.
- c. Remove the requirement for a vehicle to be tested at the Unity and Enterprise testing stations.
- d. Introduce the requirement to have a standard MOT test carried out by VOSA authorised MOT testing stations that belong to the councils "vehicle testing centre scheme".
- e. Introduce the requirement to book the MOT test direct with the testing station.

As option 1 above, however the MOT test must be carried out by VOSA authorised testing stations which are members of the councils "vehicle testing centre scheme". In order for a testing centre to become a member of this scheme they must be able to demonstrate, agree to, or meet the requirements listed below.

Proposed Vehicle Testing Centre Scheme Requirements

- a. The testing centre and the technicians conducting the tests must be VOSA authorised.
- b. When conducting an MOT test the test centre must be able to carry out some additional safety checks (these are to be confirmed following the consultation and will be no more than are required at present). These items must be documented by the test centre and evidence provided to accompany the MOT certificate.
- c. Where a vehicle fails on major faults the test centre must notify the council immediately so that a decision can be made in relation to suspending the licence plate.

- d. They must have in place a documented customer service policy detailing their complaints procedure and complaints handling process.
- e. Records must be kept of customer complaints received. To include the outcome of the investigation in to the complaint.
- f. They must offer competitive prices and ensure value for money.
- g. They must be able to communicate with the council via email and telephone.
- h. Any enquiry from the council must be responded to within a reasonable timescale according to the nature and urgency of the enquiry, with a maximum response time of 2 working days.
- i. Statistical information and vehicle data should be made available on request and on a monthly basis.
- j. Monthly statistics and data should be in spreadsheet form (ms excel or compatible) and in the agreed format.
- k. Data must be provided via email.

It should also be noted that Peterborough City Council:

- a. Will not be entering in to a contract with any MOT test station that is a member of the councils "testing centre scheme".
- b. Is not by way of entering any MOT testing station on its "testing centre scheme" guaranteeing, endorsing or promoting the quality of work or the integrity of that MOT test station.
- c. Will not accept responsibility for handling any test related issues or complaints arising from any tests or re-tests undertaken by the MOT test station, such disputes remain between the customer and the MOT test station. However we will monitor complaints to ensure that they have been dealt with according to the individual policies provided by the testing centres and that the driver has been treated accordingly.
- d. Will not be involved / responsible for the booking of vehicle tests.
- e. Will not be responsible for any payments to any test centre for testing, and likewise will not be responsible for any refunds in relation to testing.
- f. Will reserve the right to remove an MOT testing station for the scheme where it is deemed appropriate to do so.

Advantages

- 1. Will simplify current arrangements and partially reduce the administrative burden on both the driver and the council.
- 2. Will help to reduce the number of routine interactions between the driver and the council and hence help reduce any inconvenience or loss of income by avoidable contact with the council.
- 3. Will contribute to a more cost effective service freeing up resources enabling issues to be dealt with in a more timely fashion.
- 4. Encourage competition and therefore generate a more competitive pricing structure and market place.
- 5. Will provide flexibility for drivers offering an increased availability of test appointments.
- 6. The council will still have access to analytical data in regards to MOT failures in order to identify where specific vehicles fail tests frequently.
- 7. Additional vehicle test requirements that are currently subject to testing under the councils MOT exemption test regime will continue to be tested and monitored.

Disadvantages

1. There may be a perception that where testing is available through the open market that audit trails on continuity may be affected.



Comment: This option in my view makes perfect sense, and will reduce the time wasted by Regulatory Officers checking what items could and should be checked when the vehicle is undergoing its' mechanical and safety inspection by the Testing Centre. This will enable the Regulatory Officers to be freed to perform their vital role in the field pro-actively ensuring that both the Hackney and Private Hire Vehicles as well as drivers and companies are abiding by the regulations that govern both trades in a regulated environment.

Option 3:

Retain the current requirement to have an MOT exemption test carried out by either of the councils 2 testing stations.

- a. Retain the requirement for a vehicle to have an MOT exemption test.
- b. Retain the requirement to book a test via the licensing department.
- c. Retain the requirement for a vehicle to be tested at the Unity or Enterprise testing stations.

Advantages

1. The council will continue to have access to analytical data in regards to MOT failures in order to identify where specific vehicles fail tests frequently.
2. Additional vehicle test requirements that are currently subjected to testing under the councils MOT exemption test regime will remain in place. They include the certification of the fire extinguisher, first-aid kit, fare card, and the safety testing of the wheelchair ramp where appropriate.

Disadvantages

1. The administrative burden on both the driver and the council will continue.
2. The number of routine interactions between the driver and the council will continue and hence the benefits of the reduction of any avoidable any interactions will not be achieved.
3. Will not contribute to a more cost effective service freeing up resources enabling issues to be dealt with in a more timely fashion.
4. Will not encourage competition and therefore will not generate a more competitive pricing structure and market place.
5. The flexibility for vehicle test appointments will remain limited with the current testing regime.

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