

Taxi Licensing Policy Response from Trade

The following are areas on concern for the trade.

1) Reducing 8 Seat MPV vehicle capacity:

The trade feels there is no need to reduce the capacity. As asked in the meeting with the Licensing team, there have been no complaints from the public to the Council or the operator(s).

Although the leg room available to the seat in question is slightly less than others (Peugeot Expert/Scudo/Euro cab), the difference is a small amount. Unless the passenger is of a large build there is little chance of any hindrance. Considering the overwhelming number of these journeys is for a short distance, it is even less of an issue.

Licensing was unable at the time of the meeting to clarify which vehicles are suitable.

Considering the majority of these vehicles are VW Transport, Mercedes Vito or Eurocabs.

Licensing should thereof examine these vehicles in the first instance.

2) Tinted Windows:

The trades view on tinted windows is that this policy is unnecessary in 95% of the vehicles that are likely to be licensed. Unless the vehicle is fitted with aftermarket, very dark tints there is no issue. Licensing was asked if there is any known complaints/crime in relation to tints i.e. where tints played a contributing factor. Licensing was not aware of issues across the whole country.

It was discussed there is a real issue to obtaining aftermarket clear windows. Be this a brand new vehicle or nearly new vehicles. Tiger Taxis cited their own issue presently where they have paid for 10 Brand New Toyota Prius's . These vehicles are currently parked at the Toyota dealership as they do not meet the tint threshold set by WDC. Premier also has a similar issue. It is important to point out 99% of all vehicles for a number of years now, come with standard manufactured tinted glass.

Due to reasons listed above the trades view is that the tint policy needs to be removed. Or at the least those vehicles with very dark tints are restricted.

Other councils are in the process or have already removed their objections to tinted vehicles.

3) Age Limit:

Concern is related to the age reduction of Wheel Chair access vehicles from 14 Years to 10 Years old. WCV are very expensive to purchase. These vehicles in private hire trade particularly are primarily used for WC requirements. Licensing concerns are at the potential condition of these vehicles at 10 years old. However under current rules a vehicle can be refused a license if the condition is of a poor nature. Therefore there is no need to change the current rules. The current set of rules regarding this area is sufficient.

4) 72 Hour notification:

The trade feels the need to inform the council within 72 hours of 'any' offence is too stringent. Although certain offences (Murder/Sexual Assault) need to be informed quickly as

possible. Other minor offences i.e. SP30 (speeding) should be reported when convicted and not at the point of allegation. As allegations can be retracted before court/conviction.

5) Knowledge Test:

The current knowledge test is very difficult and too expansive in its coverage. Licensing stated there are typically 5 people in any test sitting. Only one person passes the test per sitting. This is pass rate of 20%. Which in itself shows the test is not fit for purpose. It was suggested by the trade that the test needs to be reduced in the number of questions, to approx. 15-20 questions (currently 60 questions, pass required mark is 48). Certain types of questions need to be removed i.e. which village is in the district. The trade also suggested a simplified version of rules and regulations be produced. As the current document is worded in legal terminology which many do not grasp.

6) Medical test:

The medical test should be allowed to be completed by a General Medical Council registered practitioner. This is the case when applying for a Bus or Lorry licence with VOSA. Some surgeries are charging nearly £200 for this examination. And have a wait time of up to 2 Months. Whilst the same examination can be done for £50.00, and an appointment available within a couple of days. An applicant can request a copy of his/her notes from their surgery and take them to a doctor who is conducting the examination. It is clear the applicants' surgery looks at the same notes when conducting the examination. Medical records are also available via the NHS computer network to any doctor who is provided with the applicants NHS number.

7) Driving standard test:

Driving Standard Authority no longer run the test for Taxis. The trade feels these tests were unnecessary to begin with, as they only tested general driving, the same as when passing the normal driving test.

8) Bus Lane Use:

Current rules state only taxis with a large sign can use bus lanes. Any taxi with a small sign is not allowed to use bus lanes. Trades view on this is that all taxis and private hire vehicle be permitted to use bus lanes. Although WDC does not have the power to determine who uses the bus lane (Bucks County Council has jurisdiction), WDC should lobby Bucks CC for this change of use.

9) Door Stickers:

Current door stickers are of a poor quality and disintegrate. With the cost met by the operator. Considering majority of operators have their own company stickers on the same vehicle. Is there a need for these stickers? The benefits of having stickers are questionable in the modern day. Where customers are sent text messages of the vehicle (Make Model Reg Colour). This allows customers to have peace of mind that they are getting into the correct vehicle. In any case the quality of the stickers needs to be improved and any further costs as a result of poor quality need to be met by the authority.

10) Executive Plate:

In order to obtain an executive plate an operator needs to provide confirmation of work. This has to be in written form from the client(s) on headed paper. This process has to be repeated each time any extra licences are required. Also only account work can be carried out in these vehicles. No cash paying customer can use executive vehicles. This seems absurd as there are customers who wish to make sure of executive cars. There are vehicles with executive plates from outside of WDC jurisdiction operating in Wycombe District. Clearly operators/customers are not happy with the current regulation. Thus them operating/using out of area vehicles.

11) Change of vehicle/variation of licence

Currently if a vehicle licence has 11 months to run, and an operator needs to replace the vehicle. The operator is required to pay an admin charge and the licence is transferred to the replacement vehicle. However recently licensing has changed the rule (without consultation with the trade) where the operator is only reimbursed £30. And is expected to submit for new 12 month licence. Currently the cost of annual licence is £242.00.

Any remaining time (number of months) of the licence needs to be refunded to the operator accordingly or deducted from the new licence.

12) CCTV/Audio recording

Proposals to prohibit voice recording unless in distress are unworkable. As it is not reasonable to assume drivers will have time to turn on sound recording in the event of an attack/abuse. The licensing department cite the Information Commissioners ruling. The ICO guidelines allow the use of sound recording in certain circumstances. Taxi trade surely would fall into this category. Where drivers are expected and indeed pickup rowdy/drunks and at times dangerous individuals. This recording would of course give the driver a greater degree of assurance that if something untoward does take place, there is clear evidence available to law enforcement. ICO guidelines require a clear sign stating video and sound recording are in operation. These signs would of course be displayed in all vehicles which have this facility.

13) Complaints Procedure

It is unfair to all licensed drivers that any complaint without proof is held on file. This system is open to abuse where a person can write to the council under multiple names or even ask friends etc. to write. Even single complaints from members of the public can be sinister i.e. there is no real complaint but could be made up if the person perceives the licensed driver was not conducting themselves in a manner contrary to what they believe. Any complaints need to be investigated on their own individual basis.

Drivers' current perception is that they are guilty at the point of the complaint and need to prove themselves innocent. This flies in the face of any democracy where an individual is

innocent until proven guilty. In any outcome currently, all complaints are held on file and used against the driver in further complaints.

14) Conduct certificate from abroad

Requesting a person who spends 3 months out of the UK to provide a character reference from the host country. This is an unreasonable request. Obtaining anything from any embassy/police station is at their discretion, and if they are to provide one, they are under no time obligation. Furthermore if the licensee has spent time in multiples countries this process is very troublesome and time consuming. And can result in loss of employment for the driver. We are not aware of any similar rule in any industry in the UK.

15) Advertising

Any licensed vehicle should be allowed advertising. Be this inside the vehicle i.e. visual display or outside in the form of stickers (rear bumper, windscreen edge, panels). We envisage the majority of adverting will be for local businesses, which obviously will have a direct positive effect on the District.

The council needs to be made aware there has been a massive influx of out of district licensed taxis/phv into Wycombe District. The trade believe this is due directly to the strict policy of governance of the taxi/phv trade. Nearly all of the points listed above are not applicable to these out of area vehicles. The number of these vehicles is likely to grow. WDC officers have no jurisdiction over these drivers of their vehicles.

The trade would like to request an opportunity to discuss/present their concerns directly to the licensing committee before it is discussed in the committee meeting.