

Licensed Private Hire Car Association

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Ms Lindsey Vallis

Transition Head of Licensing, Cemeteries & Crematoria Services
Communities Directorate
Buckinghamshire Council

BY Email

28 June 2021

Dear Lindsey,

Buckinghamshire Council 'Taxi & Private Hire Vehicle Drivers:

English Language Assessment' Report to Licensing Committee (30th June 2021)

I am writing to request clarification from Buckinghamshire Council ("BC") on aspects of the 'English Language Assessments' report to be considered by the Licensing Committee on 30th June 2021.

Following your kind notification of its publication on 22nd June 2021, the Licensed Private Hire Car Association ("LPHCA") convened a meeting with its local membership last week. Feedback on the provisions has been, for the most part, positive. The reduction of the standard to B1 Level, dropping of a written requirement and setting of a manageable first-time test fee have been well-received. Questions do however remain on details, both present and absent, within the report.

Accordingly, in conveying those queries, I wish to raise the below concerns and invite clarification on the respective points:

- (1) **Compliance Deadline for Current Licence-Holders:** The report does not provide clarity for licence-holders on the exact date for compliance. It merely states "*from September 2022*" (at para. 3.19). A specific deadline, in order to enable future planning, is sought.
- (2) **Policy Review Deadline/s:** The report does not commit to a timeline for scrutiny over the effects of the policy. It merely states that matters will "*be kept under review*" (at, for example, paras. 3.11 & 3.20). A specific deadline, or timeframe commitment, is sought.
- (3) **Test Pass / Fail Results Review Deadline/s:** The report, subject to (2) above, does not provide a definitive timeline for the production of test results and scrutiny on the effects of the initial pass mark levels (etc). A regular, periodic deadline for assessment of results is sought.
- (4) **Medical Exemption/s:** The report does not accommodate medical exemptions for individuals with learning and speech difficulties (E.g., dyslexia, etc) (at paras. 3.21-3.23). Additional information is sought on the exemptions or measures (incl. reasonable adjustments) to be made for these individuals.
- (5) **Acceptable Alternative Qualification/s:** The report provides a limited list of example qualifications which will be considered suitable (at para. 3.22). More comprehensive information is sought, insofar as possible, on acceptable qualifications.
- (6) **Pearson Assistance on Test Failure:** The report indicates Pearson will "*...take responsibility for re-testing arrangements...*" (at para. 3.20). No details are offered, for example, on re-test fees (etc). This could prove highly onerous on applicants / licence-holders and, in the interest of transparency, should be subject to scrutiny. Additional information is sought on such arrangements.
- (7) **Pearson Testing Capacity:** The report indicates up to 3000 of 3500 current licence-holders will require a test (at para. 3.18). Assurances are sought that Pearson will be able to meet this need and, if delays due to high demand occur, that BC will not take punitive action against licence-holders for matters outside their control.
- (8) **Proof of Compliance:** The report does not appear to confirm applicants and licence-holders are only required to present proof of compliance on a single occasion. Whilst it is understood BC will digitally record such information, and thereby not require repeated presentation of certificates, confirmation is requested of this practice.

(9) Trade Representatives & Workshops: The report states, in respect of 'Consultations & Communication', that "...[t]rade representatives attended workshops..." (at para. 8.1). For the avoidance of doubt, the LPHCA did not attend nor was invited to or aware of such workshops.

(10) LPHCA & Pearson Engagement: The report implies Pearson will have a degree of discretion over the determination of the supply and performance of the test system (at para. 3.20). The LPHCA seeks confirmation that you would be happy for us to engage with Pearson in liaison with you on the test, not only for Buckinghamshire Council, but more widely for the industry beyond. To that end it would also be useful to be tested myself.

The LPHCA wholly recognises, and appreciates, the helpful endeavours of your goodself and BC in its open dialogue on this subject. It is hoped this may continue and we welcome BC clarification on the matters raised above.

In light of the limited time, the LPHCA requests this letter, and any subsequent response, be presented for consideration before the Licensing Committee on 30th June 2021.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Steve Wright', is written over a faint blue line.

Steve Wright MBE – Chair LPHCA