

Department for Transport New Best Practice Guidance 2023 – Buckinghamshire Council response

Indicates area recommended for public consultation

Section	Best Practice Guidance recommendation	Buckinghamshire Council policy/approach	Comments	Recommended for public consultation
3	Licensing authorities must consider ways to protect those working in the trade as well as those that use its services	<ul style="list-style-type: none"> Ongoing dialogue with trade representatives and colleagues from Thames Valley Police at Taxi Working Group Policy supports voluntary installation of CCTV 	<ul style="list-style-type: none"> Trade representatives have asked for more support with reporting incidents, particularly at night Licensing Service have been working on rolling out stickers to deter passengers from 'bilking' fares Could more work be done to promote installation of CCTV in licensed vehicles 	Yes
3	<p>Public sector equality duty:</p> <ul style="list-style-type: none"> Maintain body of evidence of impact of services on those with protected characteristics/use as guide for policy decisions Promote equality by consulting users, plan services to meet needs, prioritise actions to eliminate discrimination Promote inclusive approach 	<ul style="list-style-type: none"> Wheelchair passenger user working group set up in 2023 with focus on addressing issues faced by wheelchair users. Group meets with licensing and trade reps every quarter Specific complaint category on taxi licensing webpages to collate complaints specifically relating to Equalities Act 2010 	<ul style="list-style-type: none"> Looking at sources of additional information as suggested through passenger user workshops and wheelchair user group meetings Benefits to: <ul style="list-style-type: none"> Public health Business intelligence NHS/GPs Buckinghamshire Council Equality, Inclusion and Diversity group ASC/CSC Other? 	No

3.4	<ul style="list-style-type: none"> • It is essential to a well-functioning taxi and private hire vehicle sector that those administering and enforcing the regime are well-resourced. • The licensing model is intended to be self-funding through licensing fees and it is expected that licensing authorities seek to provide a well-resourced system at the lowest cost to licensees. • Licensing authorities should regularly review their fees to reflect changes to costs, both increases and reductions. 	Current practice fees reviewed determined on cost recovery basis and reviewed annually	No action is required	No
3.5	<p>Licensing Policy Document:</p> <ul style="list-style-type: none"> • Meets accessibility requirements • Details on how the public can provide feedback on taxis and PHV licenses • A “fit and proper” person test • Licence conditions • Vehicle standards • Taxi tariffs • Licensing fees • Refers to Statutory standards 	Current policy meets this recommendation	No action required	No
3.6	<p>Consultation at local level:</p> <ul style="list-style-type: none"> • Taxi and private hire trade • Customers • Representatives of: 	Current practice is to consult widely with all identified stakeholders	Ensure all these nominated groups are consulted on significant policy changes	These are the groups that will be consulted

	<ul style="list-style-type: none"> - Disabled persons - Chambers of Commerce - Transport User Groups - Transport providers - Women's groups - Local multi-agency safeguarding group - Night time economy (Pubwatch) 			
3.7	Any changes to licensing policy to review existing licence, with proportionate response	This is current practice and retrospective application of policy changes to existing licence holders is determined by the policy issued	<ul style="list-style-type: none"> • Impact of policy changes on existing licence holders will need to be assessed • Assessment as to whether 'grandfather rights' should be applied • Where changes are required, proportionate period of notice needs to be considered 	Yes
4.1	<p>Accessibility barriers</p> <ul style="list-style-type: none"> • Consult with disabled passengers regularly on their experience of using taxi and private hire vehicle services, and ensure that their feedback informs service development • Incentivise update of Wheelchair Accessible Vehicles (WAVs) (if not mandated) 	<ul style="list-style-type: none"> • Regular consultation is happening with wheelchair users through the working group • Limited scope to incentivise WAVs, currently WAVs are permitted to be licensed until 15 years of age rather than the standard 10 	<ul style="list-style-type: none"> • Concern that specifying larger than the reference wheelchair will result in significantly less WAVs, it is also difficult to determine what "larger wheelchair" means in practice • Wheelchairs come in many different shapes and sizes. Requiring local authorities to do so could restrict vehicle type which would minimise choice for the passenger, a large number of 	Yes – seek views on WAV provision

	<ul style="list-style-type: none"> • Consider specifying WAVs should be able to carry larger than reference wheelchair • Work with stations and other locations to ensure disabled passengers can always access/exits vehicles safely and easily • Exercise discretion on other vehicle requirements if barrier to WAVs i.e. no unmet demand limitation policy 	<ul style="list-style-type: none"> • Current WAV specification is the reference wheelchair • Committed to working with user group to review WAV specification • Have met with representatives from Chiltern Railways who have committed to explore various issues raised with respect to accessibility and local taxi/private hire arrangements. Representatives have also been invited to attend working group meetings 	<p>existing vehicles would not comply with requirements, and it would result in huge costs for the trade, which could reduce the number in the market and therefore service and availability to passengers</p> <ul style="list-style-type: none"> • Awaiting response from Chiltern Railways to various issues that have been raised in relation to accessibility. Representatives have also been invited to attend working group meetings. Intention to extend invitation more widely to other operators. 	
4.2	<p>Communication Barriers</p> <ul style="list-style-type: none"> • Operators to provide range of booking methods for customers with limited access to certain forms of technology or communication difficulties • Operators to identify passengers needs to ensure appropriate vehicle is provided • Information provided in hard copy in vehicles and in public places (such as libraries or private hire vehicle offices) is also available in alternative accessible formats, including large print and braille 	<ul style="list-style-type: none"> • Happening in part • Website information in accessible format • Work with organisations such as Guide Dogs • Disseminate best practice information through mailouts and regular newsletters. 	<ul style="list-style-type: none"> • Will continue to disseminate guidance to operators and use operator engagement programme to promote importance of having accessible means of communication for all passengers/customers 	No

	<ul style="list-style-type: none"> • Council information and complaints reporting web pages comply with accessibility requirements 			
4.4	<p>Confidence Barriers</p> <ul style="list-style-type: none"> • Provide information publicly on the accessibility of taxi and private hire vehicle services, and the action that will be taken if they fall short of reasonable expectations • Ensure passengers kept informed of progress of investigations and provided with rationale for any decision • Include in operator and driver facing communications testimonials of passengers who face confidence-related barriers when using taxis and private hire vehicles • Provide handouts explaining how confidence can be undermined by poor service • Support local travel training initiatives to support disabled people to access taxi and private hire vehicle services independently • Invite positive feedback on the accessibility of services, and champion inclusive behaviour, perhaps through communication, awards or other incentives 	<ul style="list-style-type: none"> • List of Wheelchair Accessible Vehicles published on Buckinghamshire Council website, currently under review • All complaints are investigated, and complainants advised of progress • We have discussed the possibility of promoting award or recognition as means of championing inclusive behaviour with WAV user group. Mixed views on the benefits of the approach. • We promote positive feedback following successful test purchase exercises with disabled passenger volunteers 	<ul style="list-style-type: none"> • Arising from the work with the passenger user group, the content of the WAV list is being reviewed and updated to provide additional information for wheelchair users so they can make a more informed choice to ensure the vehicle they book is suitable. The list is also being made more prominent and distributed to key locations and stakeholders so it can be more readily shared and not solely reliant on internet access. <p>As per 4.2, we will look to disseminate information to operators.</p>	No

	<ul style="list-style-type: none"> To assist passengers wishing to make a complaint operators should be required to provide driver's number and booking details relevant to licensing authorities request. 	<ul style="list-style-type: none"> Not strictly necessary as operator is legally obliged to provide booking information to authorised officers, regardless of whether operator provides the information to the customer 		
4.6	<p>Inclusive Service Plan Develop and maintain an Inclusive Service Plan (ISP), either as a standalone document or as an integral element of their Local Transport Plan. The ISP should describe:</p> <ul style="list-style-type: none"> The demand for accessible services in their area, from wheelchair users and nonwheelchair users, and from people with both visible and less-visible impairments, and an assessment of the extent to which that need is currently being met The authority's strategy for making transport more inclusive generally, and specifically in relation to taxi and private hire vehicle provision The steps that the authority will take to improve the inclusivity of the taxi and private hire vehicle services it supports, including timescales for their completion That the courses or assessments authorities require applicants to 	<p>ISP is a completely new requirement</p> <p>Licensing is currently liaising with passenger user groups and colleagues in transport planning and other service areas to help develop this plan.</p>	<ul style="list-style-type: none"> Licensing is reviewing sources of additional information to help determine what local accessibility requirements are needed and to what extent those needs can be met through the taxi and private hire operations. Sources of information and potential stakeholders have been identified through the WAV user group, passenger workshop sessions and officers which are currently being explored, including: <ul style="list-style-type: none"> Revenues and Benefits Public Health Business Intelligence NHS / GPs Buckinghamshire Council's Equality Inclusion and Diversity group Local Buckinghamshire and national charities 	Yes

	undertake are suitable for a range of participants e.g. including older drivers		<ul style="list-style-type: none"> The licensing service is also exploring alternative transport options as it is recognised that the taxi/private hire model may not always be the most effective or appropriate option. 	
4.6	To support the production and updating of an ISP, authorities should survey existing and potential disabled passengers at least every 5 years, building an understanding of the extent to which the vehicles and services provided by taxi and private hire vehicle fleets adequately support the needs of all passengers and whether driver training needs are being met.	Not currently happening, this is a completely new requirement	The licensing service is currently exploring the practicalities of this recommendation	No
4.6	<ul style="list-style-type: none"> Authorities should consider how the content of ISP's can be made more accessible to the public. They should in any case always be made available on authority websites and in alternative accessible hard copy formats. 		Licensing will explore how this can be best achieved with the passenger user groups once ISP is developed.	No
4.6	Relevant authority staff should complete disability awareness training	Taxi licensing staff are required to attend corporate equality and diversity training, and the safeguarding and disability awareness training mandated for drivers and operators.	No further action required	No

4.6	<ul style="list-style-type: none"> ISP's should also take into account any authority rules on the specification of licensed vehicles, including the east with which they can be converted to convey passengers seated in a wheelchair. We understand that there is a particular challenge with some electric vehicles and authorities should ensure they have considered fully the impact of any decision to require the use of such vehicles before changing licensing requirements. 	New requirement	<ul style="list-style-type: none"> Work in this area is ongoing, further research and engagement required with key stakeholders. Committed to reviewing current WAV specification with Wheelchair User Group. 	Yes
4.7	<p>Assistance for all passengers Drivers should help passengers to stow mobility aids, pushchairs and luggage, to ensure that older, younger or disabled passengers leave the vehicle safely away from traffic, and support customers to use card readers or count their change. Authorities can reinforce this through communications and training but could also include relevant requirements in licensing conditions or byelaws, which can be enforced by the authority.</p>	This is in place already	No further action required	No
4.7	Licensing authorities should provide a straightforward, accessible means of reporting alleged instances of	This is in place via a dedicated online taxi licensing reporting form with specific discrimination complaint category	No further action required	No

	discriminatory behaviour, including a dedicated email address and a telephone number			
4.7	Cases should be prosecuted where there is sufficient evidence to identify the driver and substantiate the claims made	Decision to prosecute is made on a case-by-case basis, in practice the decision to refuse or revoke a licence is often more punitive and effective as a deterrent than prosecution proceedings	No further action required	No
4.7	<ul style="list-style-type: none"> Where a complaint about discrimination is received that will not result in a conviction, licensing authorities should consider a range of outcomes and take appropriate action based on the balance of probabilities. Licensing sanctions should be considered, such as suspension (until the licence holder attends training or assessment) or revocation 	Currently happening	No further action required	No
4.8	Assistance Dogs Licensing authorities should: <ul style="list-style-type: none"> Remind operators and drivers regularly of their duties under sections 168 to 171 of the Equality Act 2010 and of the authority's intention to prosecute those that refuse to comply Make it simple for passengers to report alleged instances of illegal 	Majority of this is in place already	Service working on the exemption process and exploring the use of braille cards for exempt drivers.	Yes

	<p>discrimination relating to the carriage of assistance dogs</p> <ul style="list-style-type: none">• Investigate all such alleged instances, and prosecute drivers where sufficient evidence is identified• Where drivers are legally exempt from carrying assistance dogs, provide them with a card confirming this in large print and Braille, in addition to the statutory exemption notice• Invite operators and drivers to meet with assistance dog owners and learn about the role that they play• Work with organisations, such as the Guide Dogs for the Blind Association, to produce hand out material which can be provided to operators and drivers• Encourage drivers to accept the carriage of trainee assistance dogs, which can benefit service accessibility by familiarising operators and drivers with the role of respective dogs and by helping the dogs to learn to behave appropriately when travelling by taxi or private hire			
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	<ul style="list-style-type: none"> • Build relationships with private hire vehicle operators to encourage proactive reporting of drivers alleged to have discriminated against passengers with assistance dogs, and provision of relevant evidence to support the authority's investigation. • Consider implementing policies at a local level which provide for categories of assistance dogs other than those prescribed at S.173 of the Equality Act 2010 to travel in vehicles where this is deemed appropriate. 			
5	<p>Enforcing the licensing regime Implementing an effective framework for licensing authorities, to ensure that a full range of information is made available to suitably trained decision makers who are supported by well-resourced officials, is essential to a well-functioning taxi and private hire vehicle sector.</p>	This is in place. Officers are delegated to make decisions according to experience and training, supported by a programme of ongoing training.	No further action required	No
5.1	<p>Setting expectations and monitoring Licensing authorities should ensure that licensees are aware of the policies to which they must adhere, are properly informed of what is expected of them,</p>	This is in place. All new operators and drivers are tested on knowledge as part of their application and approval process. They are also regularly reminded by newsletters and periodic reminders of key aspects of the policy	No further action required	No

	and the repercussions for failing to do so.			
5.1	<ul style="list-style-type: none"> • The provision of a clear, simple and well-publicised process for the public to make comments and complaints about drivers, vehicles and operators will enable authorities to recognise and promote excellence and target compliance and enforcement activity. • This will provide a further source of intelligence when considering the renewal of licences and of any additional training that may be required. 	This is in place	No further action required	No
5.1	<ul style="list-style-type: none"> • Authorities should note that it can be particularly difficult for disabled passengers, including those who are visually impaired, to provide evidence of incidents. • They may not, for instance, always be able to identify a driver visually. • Authorities should still investigate such reports thoroughly, including taking statements from passengers, drivers and witnesses, accepting video or audio recordings as evidence where appropriate, and seeking evidence from partner 	This is in place already	No further action required	No

	agencies and from private hire vehicle operators (where relevant).			
5.1	<ul style="list-style-type: none"> We therefore recommend that cases are prosecuted where sufficient evidence exists and doing so would be in the interest of the inhabitants of the area. Blanket policies on not prosecuting offences may be incompatible with authorities' wider equalities duties. 	This is in place. As stated previously, in practice the decision to refuse or revoke a licence is often more punitive and effective as a deterrent than prosecution proceedings.	No further action required	No
5.1	<ul style="list-style-type: none"> Well-directed compliance and enforcement activity by the licensing authority benefits not only the public but also the responsible people in the taxi and private hire vehicle trades. Indeed, it could be argued that public safety depends upon licensing authorities having effective compliance and enforcement mechanisms in place. This includes actively seeking out those that operate outside the licensing system, not just those who come forward seeking the appropriate licences. 	This is already in place	No further action required	No
5.1	But it is desirable to ensure that taxi and private hire vehicle enforcement effort is at least partly directed to areas where there is an evening or late-night	This is in place	No further action required	No

	economy, when problems such as touting and illegal standing or plying for hire tend most often to arise			
5.2	<p>Test purchasing</p> <ul style="list-style-type: none"> • Authorities have used disabled staff volunteers to run such exercises, targeting locations or particular operators linked to complaints about discrimination, with enforcement officers on hand to take evidence to support potential future prosecutions. • Publicising the use of such approaches may act as a deterrent to licensees considering refusing carriage to an assistance dog owner or wheelchair user. 	This take place in part. Enforcement exercises have been conducted in collaboration with Guide Dogs Association	Aim to increase frequency and also to look to recruit volunteers with various disabilities, including wheelchair users, to assist with future test purchase exercises	No
5.3	<p>Joint authorisation of enforcement officers</p> <p>Licensing authorities should, where the need arises, jointly authorise officers from other authorities so that compliance and enforcement action can be taken against licensees from outside their area.</p>	In place currently with Milton Keynes and West Northants Councils.	Exploring options to widen, for example include Wolverhampton	No
5.4	<ul style="list-style-type: none"> • The Community Safety Accreditation Scheme (CSAS) is a voluntary scheme under which chief constables can choose to accredit employed people already working in 	Advisory	No further action required	No

	<p>roles that contribute to maintaining and improving community safety with limited but targeted powers.</p> <ul style="list-style-type: none"> • These roles include neighbourhood wardens, hospital security guards, park wardens, shopping mall guards and train guards and local authority enforcement officers. • For more information about CSAS in your area, please contact your local force through www.police.uk. 			
5.5	<p>Points based enforcement</p> <ul style="list-style-type: none"> • Where a points-based enforcement system is in operation points incurred should remain on the record for a fixed period. • The usual duration of a driver and private hire vehicle operator licence is 3 and 5 years respectively. • To ensure that all past behaviour is taken into account when considering whether to grant a new licence, the department recommends that points should remain on the record from the date of the incident for a minimum of 3 years for drivers and a minimum of 5 years for private hire vehicle operators. 	<ul style="list-style-type: none"> • Currently in place for drivers, operators and vehicle licence holders, but points stay in place for 18 months. • If the threshold is reached within 18 months a review of the licence is triggered 	<ul style="list-style-type: none"> • Recommend that points policy for vehicle licence holders be removed as not used in practice as an enforcement tool. • Recommend that 18 month period remain in place as it has proved effective • 3/5 year period is arguably too long a period to wait to review 	No
5.17	Licensing authorities should be aware of the Sentencing Council's guidelines that	No action required	No further action required	No

	specifically consider taxi touting/soliciting for hire and ensure those considering cases are aware of these and further guidelines on offences committed for 'commercial' purposes.			
5.6	<ul style="list-style-type: none"> Re s.61(2B) and revocation/suspension with immediate effect: it should be stressed that this power can only be used where safety is the principle reason for supervision or revocation and where the risk justifies such an approach. It is expected that, in the majority of cases, drivers will continue to work pending appeal and that this power will be used in one-off cases. But the key point is that the law says that the power must only be used in cases which can be justified in terms of safety 	Currently in place	No further action required	No
5.6	Further info coming to light following a revocation: Alternatively, an appeal may be settled by agreement between the licensing authority and the driver on terms which, in the light of new evidence, becomes the appropriate course.	Currently in place, can reapply and do an extradited application	No further action required	No
6.1	Duration of driver licences	Partly in place	<ul style="list-style-type: none"> We do this for visas/right to work. 	No

	<ul style="list-style-type: none"> The standard length is 3 years for taxi and private hire vehicle driver licences. Any shorter duration licence should only be issued when the licensing authority thinks it is appropriate in the specific circumstances of the case. For example, where the licence holder's leave to remain in the UK is time-limited, the licensee has requested a shorter duration, or the licence is only required to meet a short-term demand. 		<ul style="list-style-type: none"> We think that 1 year licence should be by exception. This requirement goes against current legislative requirements and the new statutory standards – is not in line with these and onerous for the authority and for the trade No significant savings Recommend that no further action is required 	
6.2	<p>Fit and proper test</p> <ul style="list-style-type: none"> The Statutory Taxi and Private Hire Vehicle Standards sets out the approach licensing authorities should take in respect to the fit and proper test. However, in addition to those checks provided in the Statutory Standards, as a minimum, the Department would expect all applicants to undergo an assessment of their medical fitness. 	In place	Awaiting outcome of IOL consultation on safe and suitable guidance (fit and proper test).	Yes, at a later stage once IOL guidance is released.
6.3	<p>Disability Awareness</p> <p>Drivers should be trained in disability awareness or have their knowledge and skills assessed:</p>	In place within current safeguarding and disability training which all drivers attend every 3 years	No further action required.	No

<ul style="list-style-type: none">• The features of an inclusive, high quality service.• Appropriate attitudes, behaviours and skills.• Assistance that can be provided to all passengers.• The protected characteristics, and related Equality Act 2010 duties.• Understanding the different barriers that disabled people face when using taxis and private hire vehicles, and how they might be identified.• The role of taxis and private hire vehicles in enabling disabled people to be independent and the role of drivers and operators in facilitating this.• How to communicate with people with different communication needs. Taxi and Private Hire Vehicle Licensing• How to assist people with a range of visible and less visible impairments.• Supporting wheelchair users to board, alight and travel in safety and comfort whilst seated in their wheelchair.• Legal obligations towards disabled passengers and the consequences of not complying with them.			
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	<ul style="list-style-type: none"> • An assessment of the trainee's knowledge and skills • The REAL disability equality training programme created on behalf of the DfT, ... should be considered when assessing disability awareness training needs. 			
6.3	Licensing authorities should encourage drivers to learn British Sign Language, including contributing to related costs	Not currently in place	<ul style="list-style-type: none"> • Large number of drivers (55%) speak English as a second language, and if you don't routinely use it, it will be forgotten so for the majority this will be difficult and costly for minimal benefit. • If a driver was working on a school contract with passengers with a specific need, then perhaps may be appropriate. This could be dealt with within the personal transport plan when required on a case by case. • Can promote awareness through website and trade newsletter. Not aware of any sources of additional funding 	No
6.4	Driver proficiency Licensing authorities should require taxi and private hire vehicle drivers to undertake training and/or assessment focussed on attitudes and behaviours,	Currently drivers only new drivers required to be assessed. Occasionally, drivers who are subject to investigation for poor	Appears overly onerous, particularly for drivers with clean history. Recommend no further action required.	No

	such as those provided by IAM Roadsmart and the Royal Society for the Prevention of Accidents (RoSPA), at first application and renewal (typically every 3 years).	driving standards may be required to undertake reassessment.		
6.5	Acceptance of non-UK driving licences Individuals can drive legally in the UK with non-UK car and motorcycle licences for up to 12 months etc	In place.	No further action required.	No
6.6	Medical and vision assessment Licensing authorities should apply the Group 2 medical required for an entitlement to drive lorries (category C) and for buses (category D).	Currently in place	No further action required.	No
6.6	<ul style="list-style-type: none"> It is therefore suggested that the DVLA's Medical Examination Report (D4) is used as a template for licensing authorities to gather relevant information. Medical form does not need to be completed by own GP. DVLA recommends access to full medical history. 	<ul style="list-style-type: none"> Currently in place, although Buckinghamshire Council also has own medical form. Current policy stipulates that own GP required to complete, but exceptionally another GMC registered doctor may complete the assessment. 	<ul style="list-style-type: none"> Recommend considering as part of consultation on driver medicals that D4 form used for all medicals and requirement for own GP to complete form be relaxed to allow any GMC registered doctor to complete. Trade representatives have reported inconsistency in availability of doctor appointments and large discrepancies in costs charged between surgeries. 	Yes
6.6	<ul style="list-style-type: none"> It is the responsibility of licensing authorities to assess the medical information they receive and decide 	Currently in place.	No further action required.	No

	<p>whether a taxi or private hire vehicle licence should be issued.</p> <ul style="list-style-type: none"> Detailed guidance on assessing medical fitness to drive is available in DVLA's Assessing fitness to drive – a guide for medical professionals. 			
6.7	<p>Immigration checks Licensing authorities are prohibited from issuing a licence to anyone who is disqualified by reason of their immigration status, and they discharge their duty by conducting immigration checks</p>	Currently in place	No further action required.	No
6.17	<p>Age limits It is not appropriate to set a maximum age limit for drivers.</p>	Currently in place	<ul style="list-style-type: none"> Minimum age limit, current policy requires minimum 3 years continuous driving experience, statutory requirement is 12 months. Recommend consulting on relaxing Buckinghamshire Council requirement. 	Yes
6.9	<p>Language proficiency</p> <ul style="list-style-type: none"> Recommend that a licensing authority's test of a driver's proficiency should cover both oral and written English language skills Written proficiency is relevant because this could affect a driver's ability to understand written 	Partly in place, no written test carried out.	<ul style="list-style-type: none"> Licensing Committee agreed not to require written English language proficiency for our drivers. Safeguarding training is delivered verbally/face to face to ensure comprehension. A written test would exclude many of the current trade who would not meet the requirement to 	No

	documents, such as policies and guidance relating to the protection of children and vulnerable adults and applying this to identify and act on signs of exploitation.		<p>understand in English written policies.</p> <ul style="list-style-type: none"> • It is understandable why a driver undertaking SEN contract work may need to have a good level of written English, but this can be managed for those individuals via the contract appointment process. • Recommend no further action required. 	
6.10	<p>Vocational training Given the need for driver knowledge and awareness to evolve and the potential need for periodic assessment, licensing authorities should not require applicants for a licence to have obtained a vocational qualification.</p>	In place – not required.	No further action required.	No
6.11	<p>Topographical knowledge Taxi drivers need a good working knowledge of the area for which they are licensed because taxis can be hired immediately, directly with the driver, at ranks or on the street and so drivers are not able to prepare a route. Licensing authorities should therefore require prospective taxi drivers to pass a test of</p>	All drivers (taxi and private hires) tested on navigational skills as part of driver assessment.	<ul style="list-style-type: none"> • Not clear why this guidance is required, 'sat nav' technology readily in place and widely used to enable drivers to navigate easily, relying on real time information including traffic flows and latest road closures. • Buckinghamshire Council has a large geographic area, and a 	No

	local topographical knowledge as a pre-requisite to the first grant of a licence.		<p>topographical knowledge test would appear overly onerous.</p> <ul style="list-style-type: none"> • The service receives almost no complaints on this issue, and little tangible benefit. • Recommend no further action required. 	
6.11	Given the availability, reliability and ease of use of sat nav systems, licensing authorities should not require any topographical knowledge or navigational tests for private hire vehicle drivers.	As above.	No further action required.	No
6.12	<p>Intended use policies</p> <ul style="list-style-type: none"> • Licensing authorities should require an applicant for a taxi driver licence to declare that they intend to work predominately within the licensing authority's area. • The residential address provided by the application should be considered in assessing the likelihood of this declaration being adhered to when assessing an application for a taxi driver licence. 	Not currently in place	Taxi/hackney carriage drivers have asked for this policy and recommend include in consultation.	Yes
6.13	<p>Vehicle condition check</p> <p>The driver of a vehicle is always legally responsible for its condition while in use. Licensing authorities should</p>	Already in place	No further action required.	No

	therefore require drivers to conduct a daily walkaround check as part of a driver's core role.			
6.13	Where more than one driver will use the vehicle during the day's running, the driver taking charge of a vehicle should make sure it is roadworthy and safe to drive by carrying out their own walkaround check.	Already in place	No further action required.	No
6.13	Drivers should be required to retain the vehicle checklist as proof that they have undertaken the required vehicle check	Already in place	No further action required.	No
7.1	Private hire vehicle operator licensing Sources of information Checking open source information, cross checking information with Companies House and requesting financial records can help licensing authorities assure themselves that the company is suitable to be licensed.	Already in place	No further action required.	No
7.2	Disability awareness training All staff in customer facing roles should be trained in disability awareness, or have their knowledge and skills assessed. Content broadly as per driver training in 6.3.	Not in place	Requires a policy change, recommend inclusion for consultation.	Yes
7.3	Private hire vehicle operators – duration of licences <ul style="list-style-type: none"> The standard length of licence is 5 years for private hire vehicle 	Already in place- We offer a 1-year licence in exceptional circumstances	No further action required.	No

	<p>operators. Any shorter duration licence should only be issued when the licensing authority thinks it is appropriate in the specific circumstances of the case.</p> <ul style="list-style-type: none"> For example, the licence holder's leave to remain in the UK is time-limited, the licensee has requested a shorter duration, or the licence is only required to meet a short-term demand. 			
7.4	<p>Insurance It is appropriate for a licensing authority to check that appropriate public liability insurance has been obtained.</p>	Already in place, we do this for operators with bases open to the public.	No further action required.	No
7.5	<p>Health and Safety responsibilities In the Department's view, although it may not be the role of licensing authorities to enforce Health and Safety legislation, it is reasonable for any breaches of this to be considered as part of the 'fit and proper' test. As stated in this guidance, the primary and overriding objective must be to protect the public.</p>	The service would consider any reasonable concern that pertains to the fit and proper test, including health and safety concerns that come to light.	No further action required.	No
7.6	<p>Compliance with employment law It is not within the scope of this guidance to offer an opinion on the employment status of private hire</p>	Guidance not strictly correct as Immigration Act requires licensing authorities to check right to work status.	No further action required.	No

	vehicle drivers, nor is it for licensing authorities to decide on these matters			
8.1	<p>Vehicle licensing Specification of vehicle types that may be licensed</p> <p>Normally, the best practice is for licensing authorities to adopt the principle of enabling as many different types of vehicles as possible to be licensed</p>	Current policy accepts a broad range of vehicles.	No further action required.	No
8.2	<p>Motorcycles See guidance.</p>	No comment.	No action required.	No
8.3	<p>Pedicabs For info.</p>	No comment.	No action required.	No
8.4	<p>Vehicle age limits</p> <p>Licensing authorities should not impose age limits for the licensing of vehicles instead they should consider more targeted requirements to meet their policy objectives on emissions, safety rating and increasing wheelchair accessible provision where this is low.</p>	Not currently in place - Our age limits are closely linked to the Euro emissions standards which are referred to at point 8.6 as good practice.	Recommend that this matter be subject to consultation.	Yes
8.5	<p>Vehicle safety ratings</p> <p>Euro NCAP is an independent, not-for-profit, organisation which is widely recognised by the motor industry and road safety professionals as providing motorists with objective information on the crash safety of passenger cars. The 1–5-star rating helps consumers</p>	Not currently in place.	<ul style="list-style-type: none"> • Reservations about this recommendation. • The safety rating scheme is voluntary and doesn't cover all vehicles and manufacturers, it also appears to contradict the guidance at 8.1 to enable as many vehicle types as possible to be licensed. 	Yes

	<p>compare the safety potential of different models and is based on assessment in 4 important areas:</p> <ul style="list-style-type: none"> • adult occupant protection (for the driver and passengers) • child occupant protection • vulnerable road user protection (pedestrians and cyclists) • Safety Assist, which evaluates driver assistance (for example, lane keeping and autonomous emergency braking) and occupant status (for example, seat belt reminders and driver monitoring) technologies <p>Licensing authorities should consider the safety benefits to passengers, drivers and pedestrians of vehicles which have received a higher NCAP rating, where these have been assessed, alongside the potential impacts on the availability of vehicles for passengers. Any requirements should be kept under review as the range of vehicles changes.</p>		<ul style="list-style-type: none"> • Potential additional financial burdens on the trade as those of vehicles is more limited, increasing potential costs to passengers. • Additionally, the rating essentially reflects the safety of the vehicle at the point of manufacture. • The vehicle's safety conformity could be compromised over time, eg if involved in an accident, leading to risk of misplaced trust. • Recommend that this matter be subject to consultation. Allied to this recommend current cat S insurance write off policy be maintained. 	
8.6	<p>Environmental considerations</p> <ul style="list-style-type: none"> • The UK is committed to a 2050 net zero target. Government is phasing out the sale of new petrol and diesel cars and vans, from 2035 all new 	<ul style="list-style-type: none"> • Current policy states that the council's aim is that all licensed vehicles will have ultra-low or zero emissions by 2030, and this policy will be kept under review with this target in mind. 	<p>It is recommended that this area of the policy be subject to consultation.</p> <p>Firstly, to seek views on the aspirational target of all vehicles to be ultra-low or zero emission by 2030. It</p>	Yes

	<p>cars and vans must be zero emissions at the tailpipe.</p> <ul style="list-style-type: none"> Licensing authorities should carefully and thoroughly assess the impact of vehicle emission requirements to enable the sector to plan for the future. The short-term objective should be to mitigate the harm from internal combustion engines through the setting of high EURO emission standards for example, EURO 6 but, in the long-term, the trade will need to be fully prepared for the end of the sale of new petrol and diesel cars and the need to transition to zero emission vehicles. Licensing authorities should set out their own long-term plan in good time. 	<p>The original policy set a minimum age limit of 5 years for newly licensed vehicles.</p> <ul style="list-style-type: none"> Vehicles registered since September 2015 must meet Euro 6 emissions standards thereby the intention was that all newly licensed vehicles would comply with Euro 6 standards. However, this aspect of the policy was put on hold to assist the trade recover from the covid-19 pandemic. Therefore, new vehicles can be licensed up to the age of 10 years, 15 in the case WAVs. Consequently, new vehicles are potentially still being licensed that only meet Euro 5 standards and in the case of older WAVs even Euro 4 standards (those registered before January 2011). 	<p>should be noted that the 2030 target mirrored the Government's policy position on the sale of new cars and vans at the time the policy was adopted, which has now changed to 2035.</p> <ul style="list-style-type: none"> Secondly, to seek views on whether all newly licensed vehicles should be required to meet Euro 6 emission standards as a minimum. This would mean all newly licensed vehicles must be registered since September 2015. Consideration will need to be given WAVs, prestige/classic cars. (Age limits introduced that older vehicles more likely to fail MOT – on emissions, less likely now if Euro 6). 	
8.7	<p>Imported vehicles</p> <ul style="list-style-type: none"> It may be that, from time to time, an authority will be asked to license a taxi or private hire vehicle that has been imported independently (by somebody other than the manufacturer). 		<p>Policy wording requires updating to reflect current requirements.</p>	No

	<ul style="list-style-type: none"> • Such a vehicle might meet the authority's criteria for licensing, but the authority may nonetheless be uncertain about the wider rules for foreign vehicles being used in the UK. • Such vehicles will be subject to the 'type approval' rules. • For passenger cars up to 10 years old at the time of first GB registration, this means meeting the technical standards of either a GB vehicle type approval or an individual vehicle approval. 			
8.8	<p>Tinted windows</p> <ul style="list-style-type: none"> • The department considers that licensing authorities should not require the removal of windows rear of the B-pillar if they have a minimum light transmission of 30% or above. This should maintain passenger confidence whilst ensuring a wide range of vehicles may be licensed. • The department recognises that a minimum light transmission of 30% for windows rear of the B-pillar might impact on executive hire vehicles, where passengers demand 	<p>Buckinghamshire Council policy was amended to have a minimum light transmission of 25% with discretion to have lower levels with council agreement providing the level of tint doesn't prevent clear vision into the vehicle.</p>	<ul style="list-style-type: none"> • Recommended no change is necessary to the policy. • Officers have found that tint levels do not always accord with visibility and in some exceptional cases even with higher tint levels it remains possible to see clearly through windows. • It is all important to be aware that ULEV and zero emission vehicles are more likely to be fitted with tinted windows to help reduce need for running air conditioning. • Importantly since the Buckinghamshire Council policy 	No

	<p>a higher degree of privacy. Some licensing authorities already grant executive hire vehicles plate exemptions, and they could determine that an exemption from the 30% minimum light transmission level for these vehicles is appropriate. Authorities should be assured that those vehicles are not used for 'normal fares'.</p> <ul style="list-style-type: none"> • Authorities should carefully consider the views of the public and the trade when considering the acceptance of 'after-market' tinting and should be assured that any after-market window tinting does not negatively affect the safety features of the glass it is applied to. 		<p>was introduced in September 2021 the service has received no concerns or had concerns raised in relation passenger safety and tinted windows</p>	
8.9	<p>An accessible fleet Licensing authorities should understand the demand for mixed fleets in its area and ensure that, when issuing licences, it has the right mix of vehicles. They should recognise that some designs of wheelchair accessible vehicles may not be suitable for some ambulant disabled passengers.</p>	<p>Current policy is that all newly licensed hackney carriage vehicles are required to be WAV. Grandfather rights still apply to existing saloon hackney carriages.</p>	<ul style="list-style-type: none"> • The service recognises the desirability of a mixed fleet but not clear how legislation can be applied, or policy adopted that ensures that when issuing licences there is the right mix of vehicles. • The current system of "grandfather rights" for some legacy saloon hackney carriage vehicles promotes this objective to a 	Yes

			<p>limited extent. However, those legacy vehicles continue to operate in the main in their legacy area so there has been little migration, resulting in a distinct lack of Hackney Carriage WAVs in certain areas.</p> <ul style="list-style-type: none"> It is recommended that consultation on this area be carried out, with consideration of phasing out existing grandfather rights for saloon vehicles. Statistics indicate that there are few new Hackney Carriage WAVs coming online. 	
8.9	Licensing authorities should assess the demand for wheelchair accessible vehicles in its area on a 5-yearly basis and publish the results. If demand is not currently met, it should also provide an explanation about how the licensing authority plans to meet this demand.	Not currently in place.	Work in progress through meetings WAV user group and transport planners. (As detailed above).	No
8.9	Licensing authorities should consider ways to incentivise an increase in wheelchair accessible vehicle provision. This may consist of licence fee rebates, access to bus lanes where agreed with the local highways authority, relaxation of other licensing requirements where it would otherwise be difficult to source	<ul style="list-style-type: none"> Currently WAV incentivised through 15-year licence, rather than usual 10 years. Ongoing discussions with wheelchair user group how provision can be increased. 	<p>Recommend this area be consulted on.</p> <p>Unlikely that fee rebates will be an option without external finance – fees set on strict cost recovery basis.</p> <p>Options to consider include:</p>	Yes

	appropriate wheelchair accessible vehicles, priority roadway access and, in the case of taxis, rank access.	<ul style="list-style-type: none"> Discussions ongoing with Chiltern Railways about potential provision of additional ranks/stand for WAVs. 	<ul style="list-style-type: none"> Exemption for bus lanes and other traffic restrictions? Emission standards/age limits? Appoint dedicated WAV ranks/waiting areas at key locations? Could be both on public highway, other council land (council carparks) and private land (railway stations, private carparks)? 	
8.10	<p>Inclusive vehicle specifications</p> <p>When setting minimum criteria for newly licensed vehicles, authorities should consider factors which could influence the accessibility of vehicles to disabled passengers, including:</p> <ul style="list-style-type: none"> the ease with which passengers can enter and leave the vehicle, including the height of steps and the positioning of seats the space available for assistance dogs to remain with their owner in the vehicle the space available for folded mobility aids in addition to other items of luggage the comfort and safety with which disabled people can use them wheelchair accessible vehicles (WAVs) 	<p>Not in place. Council received vehicle specifications, other than for WAVs, to help trade source sufficient number of vehicles.</p> <p>Current WAV specification uses “reference wheelchair” as standard for determining WAVs.</p>	<p>Since removing minimum specifications, the service has received no complaints from passengers regard vehicle size/design to indicate that this is an issue.</p> <p>Recommend no action required other than ongoing work to review WAV specification at this stage.</p>	No

	<p>The government's 2022 statutory guidance 'Access to taxis and private hire vehicles for disabled users' recommends that WAVs large enough to accommodate a passenger seated in a "reference wheelchair" should be designated formally as being "wheelchair accessible" for the purposes of section 167 of the Equality Act 2010.</p>			
8.10	<p>Licensing authorities should adopt policies on the minimum standards for WAVs, noting that some passengers need to use wheelchairs larger and heavier than the reference wheelchair.</p>	Complies	WAV specification under review with wheelchair user group.	No
8.10	<ul style="list-style-type: none"> Licensing authorities should assess the demand for wheelchair accessible taxis and private hire vehicles within their jurisdiction at least every five years, aligning with the production of the local transport plan where possible, and take appropriate steps to ensure that the supply of suitably accessible vehicles meets the demand for them. The assessment, targeted proportion, and details of the steps that will be taken to achieve it should be documented in the authority's inclusive service plan. 	Not currently in place.	<p>Work in place as stated above.</p> <p>Discussions through wheelchair user group how Private Hire Operators could be encouraged to make WAVs more widely available e.g. WAVs used solely for school transport, could these also be used outside of school time for general public?</p>	Yes

8.11	<p>Accessibility equipment Authorities should, as a minimum, require the installation of hearing loops in vehicles where an internal screen is fitted, to support passengers who are deaf or hard of hearing to communicate with drivers.</p>	Not currently in place.	Few vehicles have internal screens. Ongoing discussion with trade reps and passenger user group on this topic.	No
8.11	<ul style="list-style-type: none"> • Authorities should also investigate options for making the payment process more accessible for visually impaired passengers. • Whilst not widely used in the UK, 'talking' meters are used in other countries, and some payment card readers are more accessible than others. Implementing such interventions could support more disabled passengers to use taxi and private hire vehicle services with confidence. 	Not currently in place.	To be researched and discussed with local experts responsible for installing and calibrating meters.	No
8.12	<p>Vehicle identification and signage Licensing Licensing authorities should not permit roof signs of any kind on private hire vehicles and should require all taxis to display a 'taxi' roof sign/box that can be illuminated when available for hire.</p>	In place	No action required.	No
8.12	<ul style="list-style-type: none"> • LAs should not impose a livery requirement on private hire vehicles. 	No 'livery' requirements in place, taxis and private hires can be any colour.	Subject for consultation.	Yes

	<ul style="list-style-type: none"> The more distinctive a private hire vehicle is made to appear, the greater the chance that this might be confused with a taxi. To assist the distinction further, licensing authorities should prevent private hire vehicles from being the same colour as its taxis, unless they are easily identifiable i.e. they are purpose-built vehicles as is the case in many of our cities. 			
8.12	Licensing authorities' private hire vehicle signage requirements should be limited to the authority licence plate or disc and a "pre-booked only" door sign.	In place	Pre-booked plus vehicle licence number and authority's name. Subject for consultation.	Yes
8.12	Where an exclusive relationship exists between the vehicle proprietor, driver and operator, a licensing authority should consider permitting the display of operator details in a discreet manner to not undermine the overall objective of enabling the public to differentiate easily between taxis and private hire vehicles. This might, for example, be through small branding on the rear of the vehicle.	Advertising policy in place – doesn't include rear?	Subject for consultation.	Yes
8.12	Restrictions should be applied to all signage on private hire vehicles; signs which include the word "taxi" or "cab", whether singular or plural, or any word	The advertising policy doesn't permit the use of "taxi", "cab" or similar on Private Hire Vehicle's but previously this was permitted in some legacy areas	NB: We have established Private Hire companies with trading names including these which have been given "grandfather rights".	No

	of similar meaning or appearance to any of those words, whether alone or as part of another word should not be permitted			
8.12	<ul style="list-style-type: none"> Licensing authorities should only exempt the display of a licence plate by a private hire vehicle in exceptional circumstances. 'Executive hire' services are licensed as private hire vehicles and licensing authorities should assure themselves that there is sufficient justification to exempt these vehicles from a requirement to display a plate or disc and that there is an effective means to prevent the vehicle being used for 'normal' private hire work. 	In place	Supportive	No
8.13	<p>Passenger capacity</p> <ul style="list-style-type: none"> Whilst the Vehicle Registration Certificate (V5C) issued by the Driver and Vehicle Licensing Agency states the seating capacity of a vehicle, licensing authorities are entitled to restrict the passenger carrying capacity in the interest of convenience and comfort. It may however be unreasonable, undesirable or even a safety risk for passengers to have to operate 	<p>V5 document is used as primary basis for Determining passenger capacity.</p> <p>In place in part - Covered in conditions: "it has an acceptable means of getting into and out of all parts of the vehicle and which does not require the passenger to climb over other seating or luggage"</p>	Recommend that no further action needed.	No

	<p>folding seats to exit the vehicle: the ease of this in an unfamiliar vehicle in an emergency situation should be considered.</p>			
	<ul style="list-style-type: none"> • Licensing authorities are responsible for deciding how many passengers a taxi or private hire vehicle is licensed to carry. Whilst the Vehicle Registration Certificate (V5C) issued by the Driver and Vehicle Licensing Agency states the seating capacity of a vehicle, licensing authorities are entitled to restrict the passenger carrying capacity in the interest of convenience and comfort. When considering limiting the passenger carrying capacity on the grounds of comfort, authorities should consider the principles set out in the Competition and Market Authority's guidance. • Licensing authorities should consider whether there may be a safety risk for passengers in terms of 'third row' seats, if passengers must move other seats with which they are unfamiliar to enter or exit the vehicle in an emergency situation. Should these seats be included in 	<p>Not in place.</p>	<ul style="list-style-type: none"> • Recommend that operator conditions be updated to include this condition as a proportionate response. • Recommend that it also be a condition of the vehicle licence that the holder informs their operator if seats have restricted access so operator is aware. 	<p>No</p>

	<p>the licensed seating capacity, licensing authorities should require operators to advise passengers in advance that some seats have restricted access and so may be unsuitable for those with mobility difficulties.</p>			
8.13	<p>Given the benefits of seatbelts, the department considers that taxis and private hire vehicles should not be licensed to carry more people than the number of seatbelts available. Though rear-facing seats do not require a seatbelt, they often are equipped with one. Vehicles that have a designated space for the carrying of a wheelchair should have this space considered in the vehicle's licensed capacity.</p>	<p>In place.</p> <p>In place - Covered in conditions: "all seats within the vehicle, front and rear must be fitted with working seat belts. It is the driver's responsibility to ensure that all passengers under the age of 14 are using appropriate seat belts"</p>	No action required.	No
8.14	<p>Carrying children</p> <ul style="list-style-type: none"> It is however unreasonable and impractical for a taxi or private hire vehicle to carry a range of seats to meet the possible needs of all passengers. If the correct child car seat has not been provided, the law allows children to travel in taxis and private hire vehicles, but only if they travel on a rear seat; children under 	<p>Buckinghamshire Policy wearing of seatbelts for children under 12 years/under 135cm height at the discretion of adults. NB contrary to regulations, essentially require child over 3 years to wear seatbelt.</p>	Need to revisit this policy.	Yes

	<p>three can travel in a rear seat without a seat belt, and children who are three or older must wear an adult seat belt.</p> <ul style="list-style-type: none">• Children aged 3 and over should always count towards the licensed capacity of the vehicle because if an appropriate car seat is not available, they must wear an adult seat belt. Children under the age of 3 do not need to wear an adult seatbelt when an appropriate car seat is not available, so they do not need to count towards the licensed capacity. Licensing authorities should provide advice to licensees on its policy on the carriage of children under three years to provide certainty in terms of overloading and refusal of carriage in such situations.• Further information on the carriage of children safely in taxis and private hire vehicles has been published by the Royal Society on the Prevention of Accidents (RoSPA) with the support of the Department for Transport. Drivers and operators should be made aware of this			
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	guidance to ensure compliance with the law and to protect passengers.			
8.15	<p>Personal security</p> <p>To emphasise the reciprocal aspect of the taxi and private hire vehicle services, licensing authorities should make available signs or notices which set out not only what passengers can expect from drivers, but also what drivers can expect from passengers who use their service. Two sample notices have been provided for illustrative purposes but licensing authorities are encouraged to formulate their own, in the light of local conditions and circumstances.</p>	Not in place.	Working with trade representatives and Thames Valley Police to produce appropriate signage to promote driver safety and deter “bilking”.	No
8.16	<p>Partitions in vehicles</p> <p>Licensing authorities may wish to ensure that such modifications are present when the vehicle is tested and not made after the testing stage.</p>	In place.	No further action required.	No
8.17	<p>CCTV</p> <ul style="list-style-type: none"> The statutory standards state that all licensing authorities should consult to identify if there are local circumstances which indicate that the installation of CCTV in vehicles would have either a positive or an adverse net effect on the safety of taxi and private hire vehicle users, 	Current policy allows CCTV at the discretion of the vehicle proprietor.	<p>Recommend consult on this.</p> <ul style="list-style-type: none"> Previous consultation indicated mixed views. Should Buckinghamshire Council mandate CCTV or stipulate requirements in terms of specification or access then 	Yes

	<p>including children or vulnerable adults, and taking into account potential privacy issues.</p> <ul style="list-style-type: none"> The department's view is that CCTV in vehicles can enhance both drivers' and passengers' safety and consideration of the merits of CCTV by licensing authorities must include both aspects. 		<p>Buckinghamshire Council assumes role of data controller.</p> <ul style="list-style-type: none"> Consultation on this subject will help provide an indication whether further review is required i.e. initial data impact assessment, etc. 	
8.18	<ul style="list-style-type: none"> The National Fire Chief Council (NFCC) recommend that licensing authorities require fire extinguishers to be provided in vehicles, should ensure that suitable and sufficient training is received by the drivers. The NFCC's advice is that if a licensing authority elects not to require drivers to undertake training on the safe way to tackle a vehicle fire, vehicles should not be required to carry fire extinguishers and drivers advised to get out and stay out of the vehicle and call 999, rather than attempting to firefight. 	<p>Partly in place. We require fire extinguishers but don't require or provide training this requires some thought and consideration.</p>	<p>Recommend that this is subject to consultation.</p> <ul style="list-style-type: none"> No evidence to indicate that these are necessary. Providing training is very onerous and costly for the trade. Arguably a matter for fire risk assessment on case by case basis depending on vehicle design. Recommend that similar approach be take in respect of first aid kits and this also be subject to consultation. 	Yes
8.19	<p>Vehicle testing Frequency of vehicle tests An annual test for licensed vehicles of whatever age (including vehicles that are less than three years old) seems</p>	<p>Currently all vehicles require annual test.</p> <p>Additional tests may be required following accident, complaint or enforcement activity.</p>	<ul style="list-style-type: none"> Will need to define parameters for more frequent testing. Arguably setting a fixed age for additional testing is akin to a vehicle age limit? 	Yes

	<p>appropriate in most cases, unless local conditions suggest that more frequent tests are necessary. More frequent tests may be appropriate for older vehicles which may be more prone to mechanical defects or for vehicles owned by proprietors that persistently present vehicles that do not meet the standards required by the authority.</p>		<ul style="list-style-type: none"> • Additional testing equals additional cost burdens for trade but will allow older vehicles. • Older vehicles however tend to be more polluting, although mitigated by improving emission standards e.g. Euro 6 for vehicles registered since 2015. • Additional testing will place significant burden on licensing service, additional resources would be needed to ensure compliance. • Likely to require additional enforcement activity as well. <p>Recommend subject to consultation.</p>	
8.19	<p>Vehicle testing Monitoring diligence</p> <ul style="list-style-type: none"> • Licensing authorities should, where possible, obtain details of the test, including failures. • A vehicle proprietor should ensure that a vehicle is in a safe and satisfactory condition, frequent failures can be raised with the proprietor and authorities can consider whether they are content 	<p>In place, test results provided by designated garages as part of procurement/contract arrangements.</p> <p>In place, partly. Applicants/operators are reported. Formal monitoring not in place, however vehicle owners/operators who come to note for repeated presenting/possessing vehicles in poor standard are investigated.</p>	<p>Recommend no further action required.</p>	<p>No</p>

	that the proprietor is taking sufficient action to monitor and maintain the safety of their vehicle.			
8.19	<p>Vehicle testing</p> <p>Criteria for tests</p> <ul style="list-style-type: none"> • MOT tests ensure that vehicles comply with roadworthiness and environmental standards which contribute to the government's road safety strategy. • It seems appropriate to apply the same criteria to taxis and private hire vehicles. • However, taxis and private hire vehicles provide a service to the public, so it is also appropriate to set criteria for assessing the internal condition of the vehicle, for example, wheelchair fixings and restraint straps, though these criteria should not be unreasonably onerous. 	<p>In place, all vehicles subject to annual MOT and additional compliance check.</p> <p>In addition, do not licence cat S insurance write offs.</p>	No further action required.	No
8.19	<p>Vehicle testing – number of testing stations</p> <ul style="list-style-type: none"> • As the application of the MOT standards is considered appropriate to ensure the mechanical safety of a vehicle it should be accepted that any DVSA approved testing centre is able to conduct this assessment in 	Partly in place, vehicles must be presented to council designated garage for MOT and compliance.	<p>Recommend do not change. Sufficient garages to meet capacity. System works well.</p> <p>Allows council to maintain relationship/share test results.</p>	No

	<p>this respect and that any recent MOT will evidence the fact the vehicle is roadworthy.</p> <ul style="list-style-type: none"> • This approach maximises the testing capacity available to vehicle proprietors and allows licensing authorities to focus their testing capacity on any additional criteria that they consider necessary for taxi and private hire vehicles. • Licensing authorities should ensure that their testing standards are publicised and easily obtainable by applicants for vehicle licences. 	<p>In place, standards/requirements published in policy.</p>	<p>For trade improves efficiency and helps keep cost of compliance down. Approved garages share MOT test information with LA to save time.</p>	
9	<p>Quantity restrictions of taxi licences outside London</p> <p>Most licensing authorities do not impose quantity restrictions. The department regards that as best practice. Where restrictions are imposed, the department would urge that the matter should be regularly reviewed. The matter should be approached in terms of the interests of the travelling public:</p>	<p>No quantity restrictions in place.</p>	<p>Recommend don't impose.</p> <ul style="list-style-type: none"> • Costly to maintain, requires demand survey to establish evidence and determine level. Cost £10,000s and should be reviewed at least every 5 years. • Little evidence that limits are needed. Could change depending on decisions relating to taxi design specification. 	<p>No</p>
10.2	<p>Setting taxi fare rates</p>	<p>In place, fares regularly reviewed in discussion with the trade and proposals</p>	<p>No action required.</p>	<p>No</p>

	<ul style="list-style-type: none"> • Maximum fare rates should be designed with a view to practicality and reviewed regularly. • The Department recommends that in reviewing fare rates, authorities should pay particular regard to the needs of the travelling public, with reference both to what it is reasonable to expect people to pay but also to the need to give taxi drivers the ability to earn a sufficient income and so incentivise them to provide a service when it is needed 	considered by Licensing Committee prior to referral to the Executive for decision.		
10.2	Licensing authorities should however make it clear that published fares rates are a maximum.	In place	No action required.	No
11	<p>Taxi ranks and roadside infrastructure</p> <p>There are several aspects that should be considered when assessing the number and location of taxi ranks, including how ranks contribute to a wider transport policy and its success in delivering accessible transport as disabled users are less able to seek alternatives.</p>	Working with trade representatives and passenger groups to explore rank provision.	Work ongoing.	Yes
11	When providing new taxi ranks or redesigning areas of the built environment in which existing ones are located, authorities should seek to locate ranks as close as possible to transport interchanges and other key	Would ensure that this is considered.	Will ensure guidance considered in ISP.	No

	destinations that they serve in order to minimise walking distances for passengers and follow the Department for Transport's Inclusive Mobility guidance and other sources of best practice in accessible street design. As well as the taxi trade, licensing authorities should seek the views of residents and other interested parties such as businesses in the night-time economy and transport hub operators.			
11	The provision of taxi ranks should be subject to regular review.	Working with trade reps and passenger groups to explore rank provision.	Need to consider proportionality. Formal rank reviews are both time consuming and proportionately expensive.	No
11	If feasible, a short-term waiting area for drivers of taxis picking up disabled passengers should be considered. This could be an area of the footway with a kerb assigned as a setting-down/picking-up point for people using taxis that have ramps designed for transfer directly to the footway	Not currently in place but have discussed possibility with Hackney Carriage trade representatives and parking.	Will continue to explore.	No
11	Where taxi ranks are being designed or redeveloped, they should be designed to facilitate access into all vehicle types without creating safety risks for either customers or drivers.	Would ensure that this is considered.	Will ensure guidance considered in ISP.	No
11	Licensing authorities should work with local authority partners to ensure that	In place as part of ongoing discussions.	Will continue to explore.	No

	vehicle priority measures, parking and waiting restrictions do not prevent disabled passengers from being picked up and/or dropped off close to their origin or destination. Care should also be taken to ensure that facilities for cyclists do not prevent access to the kerbside for long distances			
11	Consideration should also be given to how disabled people relying on taxis and private hire vehicles will gain access to the kerbside on roads where access is prevented, such as areas where bus priority is implemented.		Will ensure this is considered in ISP.	No
11	Authorities should also work with the operators of facilities served by a high volume of private hire vehicles to ensure that safe spaces are provided for drivers to collect passengers, without requiring them to navigate busy car parks alone.	Not in place.	Will highlight and share best practice through private hire operator engagement programme.	No
11	Where information is provided at taxi ranks, authorities should consider including directions to nearby public toilet facilities.	Not in place.	Will consider how this can be implemented.	No
12	Taxi zones The Department recommends the abolition of these zones where they exist.	In place	No action required.	No
13	Flexible transport services	Currently exploring this.	Work ongoing.	No

	<p>It is possible for taxis and private hire vehicles to provide flexible transport services in several different ways. Such services can play a valuable role in meeting a range of transport needs, especially in rural areas – though potentially in many other places as well.</p>			
14	<p>Local transport plans and strategy All modes of transport including taxi and private hire vehicle services have a valuable part to play in overall transport provision, and so local licensing authorities have an input into delivering the LTPs. The key policy themes for such services could be availability and accessibility. LTPs can cover: Quantity controls, if any, and plans for their review;</p> <ul style="list-style-type: none"> • Licensing conditions, with a view to safety but also to a good supply of taxi and private hire vehicle services; • How passengers can access services, such as the provision of taxi ranks and safe areas for pick-up and drop-off points • Vehicle suitability and availability for people with disabilities; • Vehicle emission standards and the location and capacity of electric 	<p>Ongoing liaison with transport planners working on LTP 5.</p>	<p>Work ongoing.</p>	<p>No</p>

	<p>vehicle charging infrastructure to support taxis and private hire vehicle to contribute to air quality objectives</p> <ul style="list-style-type: none"> • Encouragement of flexible services. 			
15	<p>Tax checks in taxi and private hire vehicle licensing</p> <p>HMRC introduced a tax registration check (tax check) for renewed applications in England and Wales to drive taxis and private hire vehicles and to operate a private hire vehicle business in April 2022.</p>	Required measures in place	No action required.	No