TAXI LICENSING TASK GROUP REPORT

November 2020

1. INTRODUCTION

1.1. In September 2019, Cllr Haigh requested to set up a task group with the ambition to explore the economic benefits and make recommendations in respect of adopting a common set of standards, sanctions, fees and guidance for taxi and private hire vehicle licensing for all local authorities in Gloucestershire.

This request was approved by the Economic Growth Scrutiny Committee and the following areas were outlined for consideration:

- The National Revocations and Refusals Register
- The fit and proper persons test
- Environmental concerns, including air quality
- Adaptations for people with disabilities
- The ongoing government review and LGA best practise
- App based taxi services
- The role of taxis and PHVs in rural communities
- School transport
- Training and how training is shared
- Safeguarding and vulnerable users
- The economic benefits to be gained by a common partnership approach between District Licensing Authorities (DLAs)

As noted above, this group was formed and their research completed before the Covid-19 pandemic. The group acknowledge that travel has changed significantly during this time and may continue to do so as patterns of travel settle. What remains however, is that offering a high level of standard across the County will help to increase confidence in residents to use taxi and private hire vehicles, be this during or after the pandemic restrictions.

The report content should be read as up to date pre-March 2020. The group acknowledge some areas of work may now have progressed or experienced unforeseen delays, and this will be reflected in the final recommendations.

1.2 MEMBERSHIP

The membership comprised of both County Councillors and District Councillors most of whom were Chairs of their particular Licensing Committee. Members from Gloucestershire County Council (GGC) were Councillors Kate Haigh, Bernard Fisher, Stephen Hirst and Brian Robinson. District Licensing Committee Chairs were Councillors Clive Walford (Gloucester), David Willingham (Cheltenham), Graham Bocking (Tewkesbury), Mattie Ross (Stroud), Juliet Layton (Cotswolds) and Maria Edwards (Forest of Dean).

Councillor Kate Haigh was appointed as Chair.

1.3 MEETINGS

Groups and individuals were invited to give evidence and information, as decided by the group within a series of meetings.

Meetings focused on different groups and areas which govern and are impacted by licensing; the Integrated Transport Unit, the Gloucestershire Licensing Officers Group, hackney and private hire drivers and members of the public.

2. INTERNAL FINDINGS FROM GCC AND DLA's

At the first two meetings of the task group, Members examined the background of transport and licensing within the Integrated Transport Unit for both the County council and the Districts councils. The following information was noted:

INTEGRATED TRANSPORT UNIT (ITU)

2.1. The Integrated Transport Unit procure transport for specific purposes which included but was not limited to; home to school transport, transport to respite and social care provision and some out of hours transport when required for children's respite breaks and children's social care.

2.2. ITU will only use approved operators, GCC audits operators on an annual basis and where necessary may audit more frequently. The Unit had two full time engineers to ensure that contracts are compliant with vehicle standards.

2.3. On April 23rd 2019, CCTV and General Data Protection Regulations (GDPR) requirements were introduced into all contracts procured after this date. Contracts procured before April 23rd 2019 have subsequently had CCTV & GDPR applied to them.

2.4. In the last 4 years, ITU have issued 1,021 compliance reports to operators. The majority of these were for non safeguarding issues, however 53 did relate to safeguarding. Some were referred to the LADO for further investigation.

2.5. There was a query as to whether GCC is a member of the National Register of Revocations and Refusals (see recommendations 7.1 and 7.6).

GLOUCESTERSHIRE LICENSING OFFICERS GROUP (GLOG)

2.6. The GLOG is made up of licensing officers from all six District authorities in Gloucestershire. Representatives from the GLOG were invited to give the task group an overview of the current licensing policies, standards, arrangements and licensing and taxi demand in their area. Members noted the following points.

2.7. There were similarities and differences between the Districts on different aspects of licensing, standards and enforcement. Gloucester has taken steps to align policies more closely with other Districts, including safeguarding awareness. Gloucester has also introduced an English proficiency test for drivers and Euro 6 Regulations for emissions, which should be implemented by 2023.

2.8. Cheltenham has also introduced an English proficiency test and offers safeguarding training in house to its drivers and drivers licensed by the other Districts are also able to take part in. Some licensing committee Chairs have also taken part. Cheltenham and Gloucester are also both members of the National Register of

Revocations and Refusals (NR3). A policy for all hackney vehicles to be wheelchair accessible by 2021 has also been introduced in Cheltenham, which has proved contentious. In Cheltenham and Gloucester, applicants can appeal against license refusals (which is an officer process, based on the policy) which then goes to the sub-committee.

2.9. Stroud introduced an age policy for vehicles three years ago and is awaiting guidance issued by central government next year to implement anything around emissions. Some appeals decisions can be delegated to officers rather than the licensing committee. Stroud is also signed up to NR3 but has yet to be implemented. As with other areas, safeguarding training is compulsory for all drivers.

2.10. In the Forest of Dean and Cotswolds, NR3 is also yet to be implemented though both Districts have signed up. It was noted that taxis were struggling for consistent business in these areas and so it was noted that care needed to be taken on looking at aligning policies- too many restrictions may put drivers off licensing in areas which are already struggling with availability. Committee members have also been invited to take up training. The Cotswolds have had only 1 appeal lodged this year.

2.11. Tewkesbury has yet to sign up to NR3 but have communicated their intention to do so. Similarly to Stroud, appeals decisions can often be delegated to officers before going to licensing committee. Tewkesbury has also implemented an English test for drivers and safeguarding training is compulsory.

2.12. The following table shows the areas of policy alignment across the six Districts:

	English test	Euro 6	Safeguarding training	NR3	Wheel Chair accessible	Vehicle age policy
Gloucester	Yes	2023	Yes	Yes		Yes
Cheltenham	Yes		Yes	Yes	2021	Yes
Forest			Yes	In progress		Yes
Stroud			Yes	In progress		Yes
Cotswold			Yes	In progress		Yes
Tewkesbury	Yes		Yes	In progress		
GCC				No		

3. TAXI DRIVERS SURVEY

3.1. In order to understand the views of taxi drivers in Gloucestershire, the task group worked with GLOG officers to produce a questionnaire (copy attached at Annex A).

3.2. The questions focused on views of current and any changes to policies and their enforcement, views of current training offers and what potential gaps there were that drivers felt should be addressed. This was to enable the group to consider drivers and the sustainability of the trade within its recommendations.

3.3. The group received forty responses from Gloucester, thirty from Stroud and eight from the Forest of Dean/Cotswolds. No responses were received from Cheltenham or Tewkesbury.

3.4. Members reviewed the feedback under give main topic headings as follows:

POLICY ALIGNMENT AND OUT OF DISTRICT ENFORCEMENT

3.5. Respondents from Stroud and Gloucester were less likely to be in favour of policy alignment, with twenty two respondents out of forty from Gloucester and nineteen respondents out of thirty in Stroud responding negatively. Common reasons for this were the emphasis of different needs and requirements between Districts. Those who responded positively gave reasons such as simplifying enforcement and administration and giving passengers a better idea of what to expect. Responses from the Forest of Dean/Cotswolds were mixed, with some respondents being unsure of how well their current policy aligns with others.

3.6. Respondents from all areas were generally in favour of officers carrying out enforcement on taxi and private hire drivers who were from out of District. A concern raised frequently by respondents from Gloucester is that drivers from other Districts use vehicles which are not the same standard but are still able to pick up work in the Gloucester area.

3.7. It was noted that mutual agreement is needed between licensing authorities as to what can be jointly enforced. The easiest place to start with a transition to uniformity may be vehicle standards. A comparison of the current standards across Districts would be useful to begin to examine where transitions could be made to joint enforcement (see recommendation 7.2).

ELECTRIC AND GREEN VEHICLES

3.8. Only one respondent said that they currently used an electric vehicle. Feedback from all areas presented the concerns of drivers around the costs of moving to electric vehicles and that the costs would be too great to remain in business. Some respondents said that subsidies or development of infrastructure prior to any changes in policy would be needed to encourage them to move to electric vehicles or any policy changes should be held back until such a time where electric vehicles became more affordable.

3.9. The group noted this feedback and noted that sensitivity would be needed in the implementation and enforcement of any potential changes to policy of moving to electric vehicles. Charging points and the overall infrastructure requirements were noted as an area of development to make any new policies on the use of electric vehicles successful (see recommendation 7.5).

SAFEGUARDING AND DISABILITY AWARENESS TRAINING

3.10. From the Districts that were represented by the feedback, responses showed a majority of their drivers had completed safeguarding training. Responses varied however, on how useful it was and how often the training should be repeated. Less had completed disability awareness training and there was mixed views on how useful drivers found it, with some respondents saying there was no need to take it or repeat it as it was 'common sense'. Very few respondents used Wheelchair

Accessible Vehicles (WAVs), with some respondents saying they had not experienced demand for WAVs.

3.11. Reflecting on these points, Members considered that every four years could be a reasonable timescale for repeating safeguarding training, in order to keep up with legislation and technology changes. In addition, the group noted that accessibility is a legal requirement however this can be difficult for officers to enforce, some have started to use CCTV in their vehicles to ease enforcement and ensure the safety of drivers and passengers. It was also noted that any training should take into account 'invisible disabilities' such as autism and how drivers can support people with these (see recommendation 7.3 and 7.5).

APP BASED SYSTEMS

3.12. Whilst respondents in Gloucester, the Forest of Dean and the Cotswolds were more in favour of cooperating on an app based hailing system, most respondents from Stroud in contrast responded negatively or were unsure. Some private hire drivers reported already utilising app based systems and others when asked how local authorities could support development said there would be a need for funds and training. There were respondents in all areas who felt that an app was not relevant or would not be beneficial to their business if they did not typically take short journeys, such as guided tour companies.

3.13. The group explored the idea of a County wide app based system, which could be a potential option for the future, depending on how national guidance may develop.

PUBLIC AWARENESS

3.14. Respondents from Gloucester, the Cotswolds and the Forest of Dean held a general consensus that greater public awareness of the differences between hackney and private hire would help to safeguard both drivers and passengers, whilst respondents from Stroud were balanced for and against on this need.

3.15. Suggestions of how local authorities could help achieve greater awareness included information and advertising via social media, websites and posters at taxi ranks. Another common suggestion was stronger enforcement. Most responded across all areas that they would support an awareness campaign in Gloucestershire similar to the 'Cabwise' campaign run by Transport for London.

3.16. The group noted the consensus and discussed the possibility of an awareness raising campaign similar to the videos created by Transport for London, using Gloucestershire residents and settings. This was also something which could be raised with the Local Government Association (see recommendation 7.7).

4. PUBLIC SURVEY

4.1. A second consultation process was carried out in order for the group to understand how the public felt about the current service and look at how any particular concerns or issues raised by the public could be addressed through the group's recommendations (copy attached at Annex B).

4.2. This was promoted through District social media and communications channels and Members received 85 responses in all, with 46% from Gloucester, 18% from the

Cotswolds, 15% from the Forest of Dean, 14% from Cheltenham, 5% from Stroud and 1% from Tewkesbury.

4.3. The group noted that 73% of respondents feeling that they had a good experience with using taxi services, 95% felt that affordability was important and overall the comments received supported the idea of installing CCTV in taxis particularly for the safety of both the driver and passengers. Some respondents commented that they felt CCTV was 'intrusive and not necessary' or that people should have the opportunity to opt out of being filmed.

4.4. When discussing responses within the group, an idea emerged of whether it would be beneficial to run similar surveys on a more regular basis and for these to be fedback to the DLC's, GLOG and the ITU within the County Council (see recommendation 6). Members felt this would allow effective monitoring of the success of any changes and would in turn help to support the trade as it changes in the coming years.

4.5. The top three alternative methods of transport used by respondents were car, walking and buses. Members also noted that 85% of respondents used their own car, 38% used a taxi on a monthly basis and 32% only used one approximately once every three months.

4.6. 65% of respondents felt that they didn't know how to raise a concern or make a complaint. However, 93% have reported concerns about poor service, with comments on these highlighting themes of unreliable service and aggressive drivers.

4.7. On the question of further feedback, the three themes raised were poor service in rural locations, taxis being too expensive and experiences of poor service where the drivers did not stick to the speed limits, spoke very little English, were not familiar with the area or parked their taxis inappropriately.

5. SUPPLEMENTARY INFORMATION

5.1. Contributions to the group's understanding of the wider context of public transport and the place of taxis and Private Hire Vehicles had also been presented at meetings. This included a brief on the review of the Local Transport Plan and a Community Transport pilot scheme.

5.2. Members heard that the Local Transport Plan review aimed to consider taxis and private hire vehicles as part of the wider transport network. As the government also had ambitions to remove petrol and diesel vehicles from the roads by 2040, the review would also consider the development of infrastructure to support any such transition. Air Quality Management Areas would also be considered and may include the option of an air quality hotspot approach in some areas, for example Barton Street in Gloucester. The full review is taking place from 2020-2022.

5.3. The group also noted that GCC were currently planning for a community transport pilot to be run in 2020. Proposals are being developed to explore a demand responsive service, which would run between 7am and 7pm and would aim to be fully accessible to those with disabilities. The service would act as a support and a transfer service to regular buses. A portal would be launched for advance bookings via email and a call centre for bookings was also being explored. The pilot is aiming to run in two areas; the North Cotswolds and South Forest of Dean. These areas have a low population density which means there are not as many commercial services run and they can be harder to access because of distance. ITU have

submitted an expression of interest to the Department for Transport for funding to run a 2 year pilot scheme.

5.4. Officers who had developed the proposals made clear that they are open to conversations with the taxi trade to see how these services could work together (see recommendation 7.5).

6. ECONOMIC BENEFITS

6.1. One of the group's objectives was to understand the economic benefits of offering a high level of standard and common approach for the County's taxi and private hire vehicle sector.

6.2. Members acknowledged through their research that simply offering a safer, better standard of vehicle hire locally would in itself improve consumer confidence in using these services and in turn, create a more stable job market for local drivers and support local hire businesses.

7. RECOMMENDATIONS

In response to the above evidence gathering, the task group have concluded to make the following recommendations:

Recommendations to District Licensing Committees and the Gloucestershire Licensing Officers Group

7.1. To sign up to and implement the National Register of Refusals and Revocations (NR3) for the respective authorities if they have not already done so.

7.2. To draw up a comparison of policies and licensing standards across all authorities and explore how vehicle standards and enforcement can be aligned and organised jointly. This may be done through a transition period of implementing new standards gradually.

7.3. To agree and implement a joint training offer on safeguarding and disability awareness for licensing committee members and drivers.

7.4. To work towards a common approach to the use of CCTV in taxis and private higher vehicles across the County by 2024. The group note the recent Statutory Guidance that has been published on this which identifies the benefits of using this technology and of a common approach to adopting changes to the licensing regime.

(Please refer to paragraphs 7.7 – 7.13 at the following link for further information: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachm ent_data/file/904369/statutory-taxi-and-private-hire-vehicle-standards-english-28-07-2020.pdf).

Recommendations to Transport Planning and Integrated Transport Unit

7.5. To work together with District licensing committees and the GLOG to ensure that planned changes to infrastructure such as electric charging points and projects such

as the community transport pilot take taxi and private hire vehicles into account, particularly for those operating in rural areas.

7.6. To sign Gloucestershire County Council up to and implement the National Register of Refusals and Revocations (NR3) if they have not already done so.

7.7. <u>Recommendations to District Licensing Officers and the GCC ITU</u> To collaborate on a County wide awareness raising media campaign to improve public awareness of the differences between hackney and private hire vehicles.

7.8. To run annual County wide surveys for drivers and the general public via the District licensing authorities to monitor progress and effectiveness of recommendations. The responses from this are to be discussed between District Licensing Committees, GLOG and ITU at a joint annual meeting.

ENDS

Cllr Kate Haigh (GCC)
Cllr Bernard Fisher (GCC)
Cllr Stephen Hirst (GCC)
Cllr Brian Robinson (GCC)
Cllr Clive Walford (Gloucester City Council)
Cllr David Willingham (Cheltenham Borough Council)
Cllr Graham Bocking (Tewkesbury Borough Council)
Cllr Mattie Ross (Stroud District Council)
Cllr Juliet Layton (Cotswolds District Council)
Cllr Maria Edwards (Forest of Dean District Council)

SURVEY FOR TAXI AND PRIVATE HIRE DRIVERS

1. Type of vehicle

   - Do you drive a hackney carriage vehicle or a private hire vehicle?

2. Gloucestershire policies

   - Do you think that the different policies in Gloucestershire should be more aligned and if yes why?

3. Cross Border hiring

   - Do you think there is an issue with vehicles licensed by other Districts working in your District and if so how does it affect you?

4. Safeguarding training

   - Have you had safeguarding training and if yes did you find it useful?
   - How often do you think safeguarding training should be repeated and what do you think should be included in safeguarding training?

5. Disability awareness training

   - Have you had disability awareness training and if yes did you find it useful?
   - Do you think all drivers should have disability awareness training and how often?
   - What do you think should be included in disability awareness training?

6. Electric vehicles

   - Do you have a licensed electric vehicle? If not, what would encourage you to licence an electric vehicle?
   - What is your view on local authorities bringing in a policy to make all hackney vehicles and or private hire vehicles electric or using an alternative fuel by a particular date?
   - How long is a reasonable time to replace vehicles should such a policy be introduced? a. For new vehicles b. To take existing vehicles off the road
   - Would you be willing to trial an electric taxi for 30 days as done in Nottingham? (https://www.transportnottingham.com/driving/electric-taxi-trial/)

7. WheelChair accessible vehicles (WAV)
   - Do you have a licensed WAV? If not, what would encourage you to licence a WAV?
   - What is your view on local authorities bringing in a policy to make all hackney vehicles WAVs by a particular date?

8. App based systems

- Would you be willing to cooperate on an app based hailing system for Taxis/Private Hire Vehicles?
- What can local authorities do to help you develop your own app based system?

9. Public awareness of difference between taxis and private hire

- Do you think that the public should have better awareness of the difference between taxis and private hire? If yes, how could local authorities help to achieve this?
- Would you support a Gloucestershire version of Cabwise adverts that Transport for London ran to highlight the risks of unlicensed vehicles? (https://www.youtube.com/watch?v=8b2eR1E6mJs)

10. Enforcement

- Do you think that licensing Officers should be able to enforce taxis and private hire that are from out of District?

SURVEY FOR MEMBERS OF THE PUBLIC

1. How often do you use taxis?

   Once per year or less

   Less than once per 3 months

   Approximately monthly

   Approximately weekly

2. Which area are you responding from?

   Gloucester

   Cheltenham

   Tewkesbury

   Stroud

   Cotswolds

   Forest of dean

3. What other methods of transport do you use as well as/instead of taxis? (Please tick all that apply) include an option for other and then an open ended text box, also is walking not an option?

   Car

   Buses

   Trains

   Cycling

   Walking

   Other

4. Where are your main areas of travel? (Please tick all that apply)

   Gloucester

   Cheltenham

Tewkesbury

Stroud

Cotswolds

Forest of Dean

Other (please specify in text box)

5. How important to you are the following considerations for taxi use and regulation?

Affordability   Very Important/Not important at all
Accessibility   Very Important/Not important at all
Environmental Impact   Very Important/Not important at all

6. How would you rate your experiences of taxi services overall if you have used them?
   Very good – Not good at all

7. Do you know how to report concerns or make complaints about a taxi service? Yes/No

8. Have you ever reported concerns or poor service when using taxis?
   Yes/No

9. Please tell us about your experiences of reporting

10. Do you think installing CCTV in taxis is a good idea?
    Yes/ No/Not sure

11. Please tell us why

12. Would you like to give any further feedback?