

**PROPOSED CHANGES TO DRIVER APPLICATION PROCEDURES
ON-LINE SURVEY RESPONSES**

Q1. You may be aware of the legal loop-hole that allows taxis licensed by other authorities to work in the Trafford area. Do you think the Council should try to do something to address this issue?		Results	
	Yes	66	95.65%
	No	3	4.35%
Q2. Proposal 1 – Do you think that the above qualifications are appropriate to prove competency in the English Language?			
	Yes	47	68.12%
	No	22	31.88%
Q.3 Proposal 1 – Are there any other qualifications which you think would be acceptable?			
See separate sheet for respondent's comments			
Q4. Proposal 2 – Do you agree with the proposal to remove the requirement to pass a local area knowledge test?			
	Agree	11	16.18%
	Disagree	57	83.82%
Q.5 Proposal 3 – Do you have any other suggestions for topics that should be covered on the induction course?			
See separate sheet for respondent's comments			
Q6. Overall, are you satisfied that these proposals will meet the Council's aim of reducing delays in the application process whilst maintaining standards?			
	Satisfied	16	23.53%
	Not satisfied	40	58.82%
	Don't know	12	17.65%
TOTAL NO. OF SURVEY RESPONDENTS		70	
OTHER (emails etc.)		15	

Boyle, Joanne

From: rea colin <colinrea.transport@ntlworld.com>
Sent: 22 September 2015 11:49
To: Licensing
Subject: CHANGE TO CONDITIONS

Categories: Joanne

Hi all

I strongly object to the removal of the knowledge test as this will have great affect on the standards in Trafford

- 1 Do customers always know the address or post code of where there going ?
- 2 Sat nav does not always take you the shortest route ?
- 3 Im sure a driver who has had to learn the area he intends to work in will have more pride and provide a better service for there customers than one who just turns up pays a fee to get his badge ?
- 4 Do people who passed the knowledge test have to carry a sat nav ?
- 5 I am in favour of any new conditions that will improve the service to Trafford residents ,but in the last few years Traffords standards have dropped so much I am considering moving all my vehicles out of Trafford

Many thanks

COLIN REA
(COLIN REA TRANSPORT CRT)

Boyle, Joanne

From: Max Lines <max.lines@uber.com>
Sent: 18 September 2015 16:18
To: Licensing; Boyle, Joanne
Cc: [REDACTED]
Subject: Uber response to proposed changes to Trafford Taxi and Private Hire Driver applications
Attachments: Trafford Application Consultation - Letter from Uber.pdf

Dear Joanne,

Thank you very much for letting us respond to the consultation regarding the proposed changes to the taxi and private hire driver application process.

Uber is strongly in favour of the suggested changes and it is great to see a progressive proposal like this in Trafford. We have filled in a response via the survey link and provided further comment in the document attached.

Please do get back to us if you have any other questions.

All the best,

Max

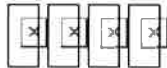
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Max Lines

General Manager - Manchester, Uber

[REDACTED] | e: max.lines@uber.com | w: uber.com/manchester | uber.com/sheffield



U B E R

Suite 4.2, Empress Business Centre
380 Chester Road
Old Trafford
Manchester
M16 9EB

Joanne Boyle
Team Leader, Licensing Section
Regulatory Services, Trafford Council
Trafford Town Hall
Talbot Road
Stretford
M32 0TH

18.09.2015

Dear Joanne,

Thank you for giving us the opportunity to share our views on the proposed changes to the taxi and private hire driver application process. We were very happy to see Trafford taking a progressive step to change their application process in order to reduce barriers for applicants and in turn address the issue of out-of-town hackney drivers working in Trafford, whilst maintaining safety and standard levels for Trafford customers.

The most recent DfT report shows that Rossendale licenced vehicles have grown almost 5 times (from almost 500 to approximately 2,500) in the last 2 years (which is the largest relative increase of any jurisdiction in the UK in that period). We see no let up in the number of vehicles being licensed and we expect to see more and more out-of-town Hackney Carriages working in Trafford in the future unless major changes are made.

The main reason for this increase is that the barriers to being licensed in Trafford (and other Manchester councils) are too high which is pushing potential Private Hire drivers to be licenced elsewhere. We believe that there are quite a few changes that can be made that reduces these barriers to drivers, whilst maintaining and improving the safety and standards of the vehicles operating in Trafford.

It is in Trafford's interest to increase the number of Trafford licenced drivers for several reasons:

- It will increase public safety by ensuring that more Trafford vehicles are operating within Trafford - drivers and vehicles that are under the jurisdiction and enforcement of Trafford Licensing.
- It will bring in more licensing revenue to Trafford Council which will create a virtuous circle allowing more funds for the licensing team.
- It will bring up standards by ensuring that drivers are fully compliant with Trafford Driver Conditions and Vehicle conditions.

We have addressed our specific views on Proposals 1 to 3 in the survey provided, but wanted to add additional comment here.

Removal of the local knowledge test

We fully support the proposal to remove the local area knowledge test and believe it is one of the key barriers in the application process that pushes potential applicants to obtain out-of-town licences.

With the huge advancement of technology over the last 10 years and the widespread adoption of GPS navigation and real-time mapping (such as Google Maps and Waze), the requirement to have an extensive local knowledge in order to take the customer on the shortest / quickest route is simply not required. We believe that passing the local area knowledge test is not an indicator of the quality of the trip and our own data supports this: Uber partners licensed without a knowledge test in Newcastle (where since May, no knowledge test is required) have a rating from our customers which is the same as our national average. Furthermore, the proposed requirement to carry a working satellite navigation system will ensure that customer satisfaction in Trafford does not decline. On a side note, it is worth noting that Newcastle has seen applications increase by 4 times since the removal of their knowledge test which was also in response to non-Newcastle vehicles working in Newcastle-upon-Tyne.

We feel that the knowledge test should be removed entirely rather than deferred by a year as has been suggested; deferring the test moves the barrier further down the line rather than removing it and with this risk of uncertainty and stress a year after obtaining a licence, applicants are likely to see the deferred test as a significant barrier and not apply to be licensed in Trafford at all.

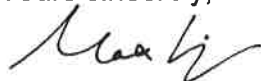
Allowing DBS Processing by 3rd parties

To further reduce barriers in the process, we recommend that Trafford explores either allowing applicants to provide an Enhanced DBS disclosure from a 3rd-party or moving to an electronic DBS provider. The paper-based format that we understand Trafford currently uses can be error prone and is intensive to manage. Many electronic providers are able to turnaround Enhanced DBS checks in less than a week and in the majority of cases within 48 hours which would considerably reduce the current average lead time of 8 weeks for DBS checks in Trafford. We have seen lots of other councils take this initiative; for example, Bury accepts an Enhanced DBS (with update service) that has been produced externally and Liverpool use a 3rd-party electronic provider who are able to turnaround DBS enclosures very quickly.

We are confident that, if approved, the new application process would reduce the number of taxis and private hire vehicles licensed in other authorities working in Trafford and would have a positive impact on all parties involved including drivers, operators, customers and the council.

We look forward to hearing the feedback from the consultation and hope that you have found our views and suggestions helpful. Please do not hesitate to get in touch if you would like to discuss with us the proposal or any of our comments in more detail.

Yours sincerely,



Max Lines

General Manager, Uber Manchester

Boyle, Joanne

From: David Ford <daveford13@googlegmail.com>
Sent: 18 September 2015 11:29
To: Licensing
Subject: Changes to driver application

I David Ford am against all the proposed changes to the three year licence and the proposal for new drivers not to take a knowledge test is a joke sat navigations can be set up to take the longest route not the shortest and lead to abuse and over charging

Sent from Samsung Mobile

Boyle, Joanne

From: [REDACTED]
Sent: 18 September 2015 11:15
To: Licensing
Cc: Boyle, Joanne; Kevin Flanagan GMB
Subject: PROPOSED CHANGES TO THE TAXI AND PRIVATE HIRE DRIVER APPLICATIONS PROCESS

Joanne

Thank you for the opportunity to comment on this consultation.

With regards to the consultation if you're looking at getting rid of the knowledge test i think it's a bad idea as it will lower the standard of area knowledge of new Taxi Drivers and they'll forever be relying on a sat nav . We recommend that new drivers are given a licence to work for a probationary period of at least one year and by then they must pass the knowledge test as in this way they will gain the experience from driving in Trafford to pass the test.

I notice nothing is mentioned about maths, I think there should be a basic maths test.

Why not include that the applicant has to complete the Taxi Drivers NVQ level 2 within a year ?

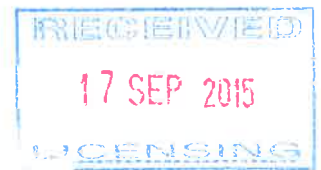
As most of us have completed this on our own without being asked by Trafford as I personally found this very informative and refreshing.

Thank you

Regards

John Connaughton [REDACTED]

Joanne Boyle
Licensing Team Leader
Trafford Council
Trafford Town Hall
Talbot Road
Stretford
Manchester
M32 0TH



4th September 2015

Dear Madam,

Re: Proposed Changes to Driver Application Procedures

Having read through the proposed changes, and with over 20 years continuous experience in the Private Hire Business I should like to respond to your letter of 26th August 2015.

I agree whole heartedly with improving verbal English language skills. I believe a qualification is not necessary - just a clear understanding of the English language.

I strongly disagree with removing the local area knowledge test and feel it would be disastrous to introduce Satellite Navigation:

- a) Not everyone knows their own postcode, let alone the postcode of their destination. This would therefore increase valuable wasted time from an operational point of view
- b) There is barely a week goes by when a 'lost by Sat Nav' story is not reported in the papers. Again, valuable wasted time (and possibly expense) from both an operational and driver situation.

With regard to extending the driver induction course, again I feel it is an unnecessary action. This could potentially delay the application process.

In conclusion:

If the applicant can communicate with the customers in a polite, courteous manner, with a clear command of the English language, and at the same time have an excellent knowledge of the local area there should be no delays in the application process whatsoever. This can be detected immediately by the Licensing Team.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Stephen P. Columbine', with a long horizontal line extending to the right.

Stephen P, Columbine

Boyle, Joanne

From: [REDACTED]
Sent: 15 September 2015 22:44
To: Licensing
Subject: my comment

Dear sir / madam

My point of view is just waste my time because i have been a taxi driver for 4 years so i do not have any problem my knowledge at local area is better and my english is well so please do not waste our time if you would like to take these test i can not say anything whatever your rules .

From: Mohammed Khelil Bonyadi khel

Boyle, Joanne

From: [REDACTED]
Sent: 15 September 2015 08:37
To: Licensing
Subject: Driver application Procedures

I do agree in a relaxation of English qualifications. An essential requisite of the job is to speak the language to a good standard. We may have to help others with a lesser knowledge of the language.

I do not agree with the abolition of a local area knowledge test. Satellite navigation systems have different settings i.e. Shortest/fastest and cannot always be trusted.

I agree with any measure which improves the quality of professionalism offered by the Council/ licensed driver.

E.P.Thornhill

Sent from my iPhone

Boyle, Joanne

From: Chauffeur and Taxi <paul.kinsey@tc-t.co.uk>
Sent: 15 September 2015 15:46
To: Boyle, Joanne; Licensing
Cc: Whetton, Michael; Freeman, Mike; Marriott, Joe; Veitch, Iain; Levy, Graeme; Sharp, Bernard
Subject: proposed changes by Trafford Council with respect to the Hackney Carriage/Private Hire Driver Application
Attachments: proposed changes Hackney Carriage Private Hire Driver Application Requirements.doc

The Association of Trafford Taxi Drivers.

In reply to the proposed changes by Trafford Council with respect to the Hackney Carriage/Private Hire Driver Application Requirements, dated, 20th August 2015 and Taxi Licence Fees Notice, dated, 27th August 2015.

- 1, The Association of Trafford Taxi Drivers, Accept the English Language Test Skills Assessment, with the change as noted in attached file.
2. The Association of Trafford Taxi Drivers Objects the removal of the Knowledge Test, and the mandatory use of a satellite navigation system.
3. The Association of Trafford Taxi Drivers, Accept the Induction Course, with the addition of wheelchair training.
4. The Association of Trafford Taxi Drivers, Objects to the intended fees for Drivers Licences.

Prepared by Paul Kinsey, Representing, the Association of Trafford Taxi Drivers.

Full details in attached file.

The Association of Trafford Taxi Drivers.

In reply to the proposed changes by Trafford Council with respect to the Hackney Carriage/Private Hire Driver Application Requirements, dated, 20th August 2015 and Taxi Licence Fees Notice, dated, 26th August 2015.

- 1, The Association of Trafford Taxi Drivers, Accept the English Language Test Skills Assessment, with the change as noted below.
2. The Association of Trafford Taxi Drivers Objects the removal of the Knowledge Test, and the mandatory use of a satellite navigation system.
3. The Association of Trafford Taxi Drivers, Accept the Induction Course, with the addition of wheelchair training.
4. The Association of Trafford Taxi Drivers, Objects to the intended fees for Drivers Licences.

Prepared by Paul Kinsey, Representing, the Association of Trafford Taxi Drivers.

Updated 15th September 2015

Proposal 1, English Language Skills Assessment.

We welcome to changes to the acceptable qualifications, these should have been set from the beginning, it seems ridiculous that a person who has been through the UK education system would be required to take an English test in the first place.

The ESOL Qualification at Entry Level 2 would be better if it included all three parts, not just speaking and listening, Level 3 would be a better choice rather than Level 2 as if the driver is required to work on a radio based system, which is one way Private Hire work is assigned and at present on all Hackney Taxi radio circuits, Level 3 ESOL is more suited to this.

There needs to be proper checks to confirm the documents shown are not fakes. Confirmation that the language ability of the applicant is reflected by the documents offered, easily done on meeting and conversing with applicant.

We do have a concern on why Trafford College is not doing the English Language Test, I personally would be rather put out having to travel to Bolton as part of an application for the Trafford area, Why is the test conducted only once a month, so limiting applications into the trade to only fourteen candidates per month.

Proposal 2, Local Knowledge Test.

We are against the removal of the Knowledge Test; this will degrade the Taxi and Private Hire Trade and produce a much poorer service for the travelling public.

I have surveyed personally a large number of Drivers both Private Hire and Hackney and universally they are against the removal of the Knowledge Test, but there is also acknowledgement that the present test is not fit for purpose.

It was also suggested whether a probationary period for drivers could be introduced at the meeting on 16th September 2015, this met with mixed reaction, with support tentatively given for it but the period being no more than six months and preferably being set at three months and then only for Private Hire Drivers. It is believed the probationary period would work within the Private Hire sector, as this reflects the way the Private Hire system works, given that drivers are given their work, rather than seeking it out as with a Taxi Driver. In the case of the probation, a one-year Drivers Licence should be issued and if the applicant fails to pass the knowledge test within that first should be refused the licence, if the applicant passes should then be issued with the further two years of the three-year licence.

Satellite navigation systems cannot be seen as a replacement to good local knowledge and they should be viewed only as an extra aid and should not be made mandatory.

Hackney Taxi Drivers it is felt need at least a basic knowledge from the start and should have a knowledge test before starting, the fact is that a Taxi Driver doesn't require an operator to work through so is more dependent on their own resources. There could be a more detailed test after three months.

It was also suggested a more area specific Knowledge Test be introduced, which would be welcomed, with the addition of main roads, how to get to other areas within Trafford, i.e. Urmston to Sale.

You might want to check the Messenger Newspaper Letters Page for 21st July 2015, The driver in question is likely to be an "out of area Taxi Driver" working as Private Hire, who rely on a Satnav to do their jobs, in this case he didn't know how to get from Sale to Timperley. There is anecdotal evidence from Trafford Private Hire drivers and the staff in there officers being frustrated by those drivers who solely rely on a Satnav, because they don't learn or don't want to learn the area, and cannot find anywhere with out a Postcode. It is also disturbing that the licensing department at Trafford intend to force all drivers to have a Satnav, will the Council be paying for them, I personally don't have a purpose made Satnav and don't intend getting one.

It must be noted that the Law Commission statement is a suggestion and not a recommendation.

Re; section 2;3, the truth is those who go to Licensing Authorities such as Rossendale have little or no intent on learning the area they intend to work in, it is an easy way of obtaining a badge, in the knowledge that there will be little or no follow up with enforcement and they are working well away from the issuing Authority, there is one Rossendale Licensed Vehicle working in Southampton.

Yet the biggest problem with the removal of the Knowledge Test, is how Private Hire Trade will be able to operate from the 1st October 2015, the removal of the test sets Trafford Council up to be the new Rossendale Council for the Private Hire Trade. The Deregulation Act 2015, Provision 11, Private Hire vehicles, sub-contracting, section 55A. Under this provision what is to stop a Private Hire Operator who has a Trafford Licence, but also say has an Operators Licence for Manchester, plating all his vehicles in Trafford, then sub-contracting his Manchester work to them, the wording is such that it refers to where the Operators are licenced and not to where the vehicle being used is licenced, so in this case by-passing the need for their drivers to do a Manchester Knowledge Test.

sources

The Deregulation Act 2015, Provision 11, Private Hire vehicles, sub-contracting, section 55A
<http://www.legislation.gov.uk/ukpga/2015/20/section/11/enacted>

Do Drivers Know the way

[http://www.messengernewspapers.co.uk/yoursay/letters/13477378.Do_taxi_drivers_know_the_way_/_](http://www.messengernewspapers.co.uk/yoursay/letters/13477378.Do_taxi_drivers_know_the_way/)

Proposal 3, Induction Course.

We welcome the induction course which especially the Wheelchair access part which the Council had dropped from the application process, new drivers who intend to work as Hackney Drivers need to know how to put a Wheelchair passenger in properly before they begin work. I assume there will be a test on the Licensing conditions and legislation framework, as there is now.

Proposed 4, Three-year Drivers Licences.

We welcome the 3 year licences as an option, there are many drivers who would still prefer a 1 year licence due to the uncertain nature of the job at present, though you have identified that some may want to retire so the length of licence can be adjusted, but do you intend that this has to be a single years notice on the licence and no more. We feel that the driver should have a choice between a one-year or a three year licence.

Now here is the thing that all drivers don't understand and that is why is a three year licence so expensive, it surely doesn't cost much more to issue a one year licence as it does a three year one, we need to know exactly how the licensing Department at the Council have come up with this figure. A survey of the Licensing Authorities that border Trafford shows the following costs for new/renewal of a three-year licence,

Authority	New		Renewal	
	HC	PH	HC	PH
Salford	£220	£251	£108	£125
Cheshire East	£180		£118	
Cheshire West	£179		£179	
Warrington	£100		£175	
Stockport	£67		£158	

Excludes DBS and Medical costs, Salford have different cost for Hackney and Private Hire

Manchester has an artificially low cost of £36 at present, after they overcharged their drivers, so has not been included here, though a new application for a Hackney Taxi Driver is £144.

All substantially cheaper than the proposed amount Trafford wants to charge.

Also the new application price are equally much higher than elsewhere, with an average of £150, (trimmed mean £153), which doesn't encourage new drivers to apply.

We believe that the fees Trafford Council are proposing need to be lower, the average for a renewal about £155, (trimmed mean £150), which is £60 below the proposed fees.

Also the fees charged need to be more competitive to encourage new drivers, since 2011 there has been a drop in Hackney Taxi Drivers of 41 and Private Hire Drivers of 43, with an increase over that period of out of area vehicles working the area, believed to over 100 at present.

We would welcome to introduction of being able to pay for the three-year driver licence fees via direct debit, as there is concern about the scale of the upfront costs involved.

We also suggest that all Hackney Taxi Drivers Licences all be made into dual licences, thus removing a layer of administration and fees payable required by the driver to hold both a Hackney and Private Hire Licence, figures at present show 47 drivers with both licences.

sources

Salford,

<https://www.salford.gov.uk/hire-vehicle-driver.htm>

Cheshire East,

http://www.cheshireeast.gov.uk/business/licensing/taxi_and_private_hire/joint_driver_licence.aspx

Cheshire West,

http://www.cheshirewestandchester.gov.uk/business/licensing_and_permits/taxi_licensing/hackney_and_private_hire_fees.aspx

Warrington,

http://www.warrington.gov.uk/info/200146/licensing/712/taxi_and_private_hire_licensing

Stockport,

http://www.stockport.gov.uk/2013/2994/19672/19716/19718/taxilicensingfees2015_2016

Statistical Data set. Taxis, private hire vehicles and their drivers (TAXI01)

<https://www.gov.uk/government/statistical-data-sets/taxi01-taxis-private-hire-vehicles-and-their-drivers>

Operators Licence

I have also been contacted by perspective Operator Licence Application's, which are worried by the five-year licence, and feel that a one-year should be offered to new applicants, which would help enable them to get established before the large outlay on a five year licence. It has also be put forward that the need for planning permission on operators who operated no more than two vehicles should be removed, also in a view to help them get established.

Operators licences should also benefit from being able to pay by direct debit, this already available to Operators in Stockport.

Boyle, Joanne

From: [REDACTED] >
Sent: 14 September 2015 18:48
To: Licensing
Subject: Proposed changes to driver application procedures

Dear Joanne

Badge No: PD0156

Thanks for the invite to offer my input into licensing changes that are being considered.

- to extend the range of acceptable qualifications to prove English language skills:

If this is an attempt to improve the standard then it can only be a positive as an integral part of the job is communication. We have many senior members of our community that rely on taxis not only as a form of transport but as an important form of social interaction and that forms a main part of what the industry is, or should be all about, and good clear English should be a standard, as at least 99% of customers have English as their native tongue in my opinion.

- to remove the requirement to pass a local area knowledge test but introduce a condition that all drivers must carry a working satellite navigation system:

I am staggered that this is even being considered. Surely a toughening up of the test and compulsory sat nav requirement should be considered, as one of the biggest customer feedback issues of late is the actual lack of local area knowledge displayed by some drivers, coupled with their reliance on sat navs that could also lead to road safety issues if the screen is constantly being stared at if used as a necessity. When a customer calls for a taxi the minimum requirement is excellent communication and a good local knowledge. Surely it should not be down to customer directions or some piece of technology for reliance, it has to be 'that' good local area knowledge and of course the use of a sat nav as an aid but not as the default.

- to extend the length and scope of the driver induction course:

I am all for improvements to the industry and this sounds like a sensible proposal to attain higher standards.

I hope this input is of use to yourselves in coming to the decisions that you eventually make. All I will add is that I would hope that these decisions will improve the industry and not set it back. As I've already pointed out above, a relaxing of the knowledge test is in my opinion a step back and not forward. It could be seen as a lack of forward thinking on how to make the industry more professional, and considered a dumbing down by those outside the industry and could leave us all open to criticism at an opportunity missed.

Best wishes

PAUL ASHWORTH