Taxi and Private Hire Licensing Consultation

**Consultation on proposed changes affecting taxis and private hire drivers and vehicles**

Date: 5 May 2023

**1 Background**

1.1 The strategic objective for Oldham Council regarding taxi licensing is to ensure safe passenger journeys in safe licensed vehicles with safe licensed drivers.

1.2 In addition to our strategic objective, we seek to consult and work with the trade on key decisions and matters that will affect their role.

1.3 The Licensing Service works proactively to ensure measures are in place to protect the public, but also takes on board the varied and valuable suggestions and comments made by members of the trade, particularly when reaching and reviewing decisions.

1.4 The landscape of the taxi and private hire trade has changed significantly in recent years. The introduction of App based operators and the role technology plays has had some negative implications due to primary legislation not keeping up with the advancements, but it has also led to many positive changes and increased accessibility to, and the use of, taxis for many people.

1.5 The Licensing Service has listened to reports of ongoing issues and has reviewed the ways in which it can adapt and change to assist taxi and private hire drivers, whilst maintaining its strategic objective and ensuring public safety.

1.6 The proposals in this document are believed to address the most important concerns at this time, and as a service we are consulting on the proposals so we can ensure the right decisions are made.

**2 Proposals**

**2.1 Front Plates**

2.1.1 Licensing have recently worked to reduce the size of front plates on licensed vehicles due to ongoing anti-social behaviour issues in the Borough. However, whilst this is seen a positive step forward, it is recognised that national guidance, due to be released later this year, does not mandate the need for front plates on licensed vehicles. In addition to this, it is widely known and accepted that many other licensing authorities do not impose this requirement and see no detriment to the visibility and enforcement of licensed vehicles due to this.

2.1.2 It is therefore proposed that front plates be removed from licensed vehicles altogether, and replaced with a window sticker, to be placed in the top left of the vehicle windscreen.

**2.2 VRQ/NVQ Courses**

2.2.1 The VRQ and NVQ courses have provided new applicants and recently licensed drivers to gain a free of charge qualification, enhancing their skills as taxi and private hire drivers.

2.2.2 The current offer in respect of these courses has changed since this was introduced, and there are now other restraints on applicants accessing the course due to being over the maximum earning threshold.

2.2.3 In addition to this, the Licensing Service have drastically improved and widened their driver awareness training which is a mandatory requirement for all applicants prior to sitting their knowledge test and gaining a licence.

2.2.4 It is therefore proposed that the requirement to complete the VRQ & NVQ courses be removed.

**2.3 Vehicle Age Restrictions**

2.3.1 Recent changes to our Taxi & Private Hire Licensing Policy have seen updates to our vehicle age requirements. It currently stipulates that oncoming vehicles must be under 5 years of age when first licensed, and the maximum age a vehicle can be licensed to is 10 years of age.

2.3.2 The Licensing Service recognises the current cost of living crisis and the slow recovery from the Covid pandemic. These issues alongside Brexit have seen significant delays and price rises in acquiring vehicles.

2.3.3 To assist applicants, it is proposed that the coming on age of vehicles be removed, however, the age limit of 10 years will remain in place at this time. In practical terms, this means you can licence a vehicle at any age, but it will only remain licensed until it reaches 10 years of age.

2.3.4 The grandfather rights applicable to those vehicles that were already licensed at the time the age restrictions changed will still apply.

2.3.5 The extended age limits applicable to Wheelchair Accessible Vehicles & purpose-built taxis will still apply.

**2.4 Executive Hire Age Restrictions**

2.4.1 In line with the review of private hire & taxi age restrictions, the Licensing Service also proposes to increase the minimum age for Executive Hire vehicles to 5 years. We appreciate that many high specification vehicles will hold their value and appeal for longer than average vehicles and therefore this new minimum age reflects that.

**2.5 Vehicle Testing**

2.5.1 Linked with the above proposal relating to vehicle ages, the Licensing Service recognises that younger vehicles may not require the existing level of compliance checks per year, providing they are maintained properly by vehicle owners.

2.5.2 It is proposed that vehicle testing breaks down as follows:

* + 0-3 years – 1 test per year
	+ 3-10 years – 2 tests per year

2.5.3 The benefit of this proposal aims to reduce the burden on vehicle owners by eliminating one test per year, but also to free up test slots to ease access to appointments, as we are aware this is also an ongoing concern for the trade.

2.5.4 There will be no changes to the requirement for brand new vehicles to be tested prior to being issued a licence.

**2.6 First Aid Kits / Fire Extinguishers**

2.6.1 A review of the requirement to mandate first aid kits and fire extinguishers in licensed vehicles has been undertaken, and consideration given to the recommendations and comments made within national guidance on the practicalities around these two areas.

2.6.2 It is therefore proposed that mandating these two items is removed, and instead vehicle owners use their own discretion to decide whether they will have the items in their vehicle.

**2.7 Mandatory Door Signs**

2.7.1 In line with the review of front plates, the Licensing Service also recognises that large door signs may play a contributing factor in anti-social behaviour. Whilst this is acknowledged, it is also important to mention that door signs also play a huge role in identifying a licensed vehicle for customers.

2.7.2 Whilst the Licensing Service is not proposing to abolish door signs, we are open to comments and suggestions on the size and format of door signs to inform future decisions.

**2.8 Driving Standards Assessment (DSA)**

2.8.1 We are currently seeking comments and views on the impact of removing the requirement to undertake the DSA test prior to be licensed.

2.8.2 The Licensing Service recognises that much of the assessment is covered in different areas and ways in other parts of the application process, and therefore, we seek your comments on the removal of this requirement in the future.

**2.9 Knowledge Test – Geographical Element**

2.9.1 A review of the necessity for a geographical knowledge test has been undertaken, and we seek your comments on the risk and benefits of removing the requirement for applicants to undergo this part of the test.

2.9.2 The proposal would be for the removal of the geographical element only. A knowledge test would still be required to cover other topics which are relevant to the role i.e., licence conditions, child sexual exploitation, road signs etc.

2.9.3 Your comments and views will assist the Licensing Service when reviews of the knowledge test are undertaken, and update material is used.

**2.10 Re-application (breaks in licence for any reason)**

2.10.1 The Licensing Service currently require applicants who have had a break in their Dual Driver licence to meet certain criteria before being able to be re-licensed. This includes a conditions test if the break is between 0-6 months, and a full knowledge test if the break is over 6 months.

2.10.2 We are seeking your views on what you think should form part of that criteria so we can use this to form future decisions on policy requirements.

**3 Responding to Proposals**

**3.1 How to respond**

3.1.1 We have created an online form for you to submit your comments on the topics above. This form is available to complete at [www.oldham.gov.uk/taxi-consultation](http://www.oldham.gov.uk/taxi-consultation).

3.1.2 Alternatively, responses can be submitted via email to licensing@oldham.gov.uk or in writing to the following name/address:

 **Nicola Lord**

 **Sir Robert Peacock House**

 **Vulcan Street**

 **Oldham**

 **OL1 4LA**

3.1.2 Responses to the proposals in this consultation should be submitted no later than **Wednesday 24 May 2023.**