

	Policy change	Reason for change or retain
1	Knowledge test for existing drivers	<p>Consultation response and inability to deliver over 400 knowledge tests within current team resource. The knowledge test will be reviewed to make simpler the section on roads and routes. The revised test will remain in place for all new drivers and include all other sections. The need for existing drivers who have not taken the test previously will be removed. The authority retains the right to request drivers take and pass the knowledge test if there is a breach of licence condition or complaints from members of the public regarding drivers not knowing how to get to destinations.</p> <p>The current test has been reviewed and sections on roads have been removed. Routes has been simplified to only include destinations such as hospitals, railway stations etc.</p>
2	Vehicle age for new vehicles	<p>Consultation response and officer recommendation. The ages of the vehicle at first registration will revert to what is in the existing policy, 2 for new private hire and 5 for hackney carriage WAV vehicles. All vehicles manufactured before April 2020 must meet or exceed euro 5 emission standards, vehicles manufactured after 1 April 2020 must meet or exceed Euro 6 emission standards.</p> <p>Amended wording in vehicles to include 5 or more seated vehicles. Included them in the 15 year replacement category.</p>
3	Vehicle age for replacement	Consultation response and officer recommendation. The age of a non WAV vehicle for replacement shall be 10 years and for a WAV vehicle 15 years.
4	Length of time to comply with the age rule	Consultation and officer recommendation. The time given to comply with this condition is 2 years from the date of policy implementation.

5	MOT frequency	<p>Consultation and officer recommendation. The age and frequency of testing will revert back to the existing conditions. Age of vehicle 1-6 annually, 6-12 x 2 and any over 12 by the exceptional standard rule will be x 3.</p> <p>The due date on interim MOTs will remain as an anniversary date. This has been amended in vehicles.</p>
6	CCTV	<p>Consultation and officer recommendation. CCTV will be mandatory in all licensed vehicles. The current systems are likely to comply, except for the audio switch. 12 months will be given for compliance. All licensed vehicles will be required to have systems installed including private hire. Funding for any amendment or new system will be met by the vehicle proprietors to whom the licence is attached. The Local Authority does not subsidise business.</p> <p>However, grant funding will be explored. CCTV is a complex issue and the local authority will seek specialist advice regarding the development of policies and procedures to become the RA for the systems. The systems themselves will also need research. The condition relating to this can be put on hold if this cannot be undertaken by October 2022.</p>
7	Tyre depth	<p>Consultation and officer recommendation. Returned requirement to statutory minimum.</p>
8	Consultation process	<p>Consultation has been extended twice and once the responses have been fully considered, the revised document will be re-consulted upon with the trade.</p>
9	Door signage	<p>Consultation and officer recommendation. The adhesive door signs will remain on the front door of the hackney carriages as per the current policy.</p>
10	Medical Certificate	<p>Occupational Health Specialist and evidence. Medical certificates will continue to be referred to Occupational Health due to on-going evidence that</p>

		<p>medicals are not fit for purpose. Other Authorities employ the services of an occupational health expert to assist with reviewing medicals.</p> <p>This has been amended to give the local authority the option not to refer all medicals, so it will not be done routinely but only in circumstances where there are identified issues with the form or content. The additional fee will only be charged if required and a fee must be paid before the referral. Any additional costs on top of the referral will be paid by the applicant. Officers will return all medicals which have identified issues to the applicant who can chose to pay the fee for Occupational Health review or take up any issues with the person who completed the form directly. No licence will be issued until the matter is satisfactorily resolved.</p>
11	Medical carried out by other Dr's not own GP.	Medicals can be carried out by other Doctors, as stated in the current policy.
12	Officer Panel	<p>Government guidance and best practice. Consideration of Fit and Proper and 'out of policy' decisions will move to a Committee structure. This will take place after the policy is adopted, when the Council's constitution is amended and when the scheme of delegation is changed to reflect this change. In the interim the Officer Panel will continue to operate.</p> <p>As agreed at the meeting, the decision regarding Officer Panel will be taken at the earliest opportunity and it is hoped the change in scheme of delegation can be undertaken at the October meeting at the same time as the adoption of the policy.</p>
13	Electric taxis – do they need to be replaced at 10 years old also?	Officer recommendation. Electric taxis will be subject to the same age restriction as other vehicles. They can achieve the exceptional condition specification if they meet these standards.
14	Penalty points scheme	Consultation and officer recommendation. This is being reviewed in light of the new policy but will retain the same format. Appeals will go to Committee for consideration.

		The scheme is under review and once completed this will be circulated to the attendees of the meeting with a copy of an example of a matrix method of enforcement which could be used as an alternative.
15	Road Atlas kept in vehicle	Consultation responses. This requirement has been removed.
16	Selling alcohol and cigarettes	Consultation, this cannot be undertaken from the vehicle and purchasing it for customers is not advised in view of age restricted sales etc. If purchases are made care should be taken that the recipient looks age 25 or over.
17	Length of time to hold a driver licence before application	Consultation and officer recommendation. This has been amended to reflect the national minimum standards of 21. The conditions were checked and it reflects the requirement to have held a driving licence for 12 months.
18	Eating in vehicles	Consultation and officer recommendation. This has been amended to read not to eat or drink when the vehicle has passengers in.
19	Seat belt wearing	This is a national standard. The recommendation to wear a seatbelt is guidance from Cllrs only.
20	Use of plastic steps on non WAV	Consultation and officer recommendation. No steps can be used other than the fixed steps securely fitted to the vehicle.
21	Low emission vehicles	Government guidance and Council recommendation. An emissions policy for taxi and private hire vehicles will be developed which will indicate how the Council intends to work towards a zero emissions position for its licensed vehicles.
22	Annual self-declaration fee	Legislation. All fees must be charged at the time of application, therefore, the annual cost of administering and ensuring compliance of a 3 year licence will be charged at the application stage.

		A full fee review will take place. Comments made during the meeting have been taken on board and any calculations will be retained and available for inspection when requested.
23	Driver assessments	Consultation and officer recommendation. At this time the Council is not introducing a driving standards test. However, this will be kept under review.

24	Taxi zones and limit on numbers	<p>Previous research and results of the unmet demand survey. Herefordshire is not considering limiting the number of taxis or introducing separate licence zones. The council is a unitary authority and taxi and private hire licencing will remain as it has been since 1998.</p> <p>Comments regarding holding areas and ranks have been understood and all possible improvements will be considered, although this falls outside of the policy.</p>
25	Licence plates on vehicles	Consultation and officer recommendation. The condition will remain as the current policy with one licence plate required on the rear of the vehicle.
26	Dual driver licences	Consultation and officer recommendation. The authority will only issue a dual driver licence. Separate licensing is not being considered due to resource implications of enforcing different types of licence.
27	Certificate of lawfulness	Legal advice. There is no such provision within the legislation for licensing a temporary vehicle, therefore this has been removed.
28	Drink/drug drive convictions	Legislation and guidance. The time limits for considering applicants after convictions is taken from the national standard.
29	Expecting revisions to existing policy, not a new more oppressive one.	The decision was taken to employ an external expert to provide advice on the policy following a request made by taxi association members at a meeting with the Council. Legal advice cannot be ignored once sought, therefore, any legal requirements cannot be disregarded or have any subjectivity to amend, therefore, the proposed draft policy will be used as a basis for the new policy.
30	Taxi and Private Hire income	Consultation. Taxi and private hire income is kept separately from any other budget. Money is not used to support other areas.
31	Retention of driver licences by Operator	Consultation and officer decision. This has been amended to state that copies of the original licence must be retained by the proprietor and not the originals.

32	Charge for referral at officer panel	<p>Legislation and legal advice. Historically the cost of officer panel was met by the person being referred. The fee for this was stopped some 12 months ago. This will now be amended to be averaged out and added to the new and renewal cost at application.</p> <p>The charging system for referrals is no longer used. Costs of this will be spread out amongst all applications. Historically the charge was made directly to individuals as the trade did not think it was fair for all to pay for individual breaches.</p>
33	Safeguarding training	This is already mandatory and all drivers have undertaken it over the past 24 months. New drivers at application and existing drivers have taken it. It is available as an on-line course and will continue for new drivers.
34	Deposit for plate	Consultation and officer recommendation. This has been removed as we do not collect expired plates.
35	Age of applicant for first application	Consultation and officer recommendation, this will revert to the legal minimum age of 21 and held for 12 months.
36	Byelaws	Consultation. Confirmation of the adoption by Secretary of State of the Byelaws has been raised to legal services. We have been assured that they were.
37	Social Media	Consultation and officer recommendation. Use of social media is appropriate in some circumstances to determine fit and proper, for example in the instance of a complaint or harassment.
38	DBS for vehicle proprietors	Consultation. Amended to state that not needed if they have one as part of the dual driver application.
39	Intercom in vehicles	Consultation and officer recommendation. This provision has been added in.
40	Swivel seats	Consultation and officer recommendation. Further opinion being sought.
41	Marking of first aid kit and fire extinguisher	Consultation and officer recommendation. Amended to permanently marked

42	Exits in vehicles facilitated to facilitate access and egress	<p>Consultation and officer recommendation. All seats to have access to a door without moving other seats has been in since 2012 and is key to passenger comfort</p> <p>Added in wording that only vehicles designed to have removable seats in original manufacture can remove seats.</p>
43	Age of MOT certificate	Consultation and officer recommendation. Amended to four weeks from 2.
44	Maintenance and servicing of vehicles	Consultation and officer recommendation. Amended to state than the council can consider an acceptable explanation if this is not done by a garage etc.
45	Interim MOT tests	Consultation and officer recommendation. This has been amended to include any garage
46	Complaints process	Consultation and officer recommendation. This has been amended to include compliments
47	Capability of audio in vehicles	Consultation and officer recommendation. Amended to state when vehicle is plying for hire
48	Incident logs	Consultation and officer recommendation. Removed some sections not relevant to vehicle proprietors
49	Use of trailer	Consultation and officer recommendation. Amended to state for personal use
50	Use of child locks	<p>Consultation and officer recommendation. Left that they should be engaged when in use</p> <p>Amended in vehicles to reflect appropriate use, i.e. not all the time.</p>
51	Amending Byelaws	Consultation and officer recommendation. Unable to amend Byelaws in anyway
52	Exceptional condition criteria	Consultation and officer recommendation. Decision to leave in as the age of vehicles and time to comply has been increased.
53	Convertible vehicles	Consultation. Convertible vehicles can have full rear seats so condition is being left in.

54	Separate driver types	Consultation. This has been rejected as the dual driver licence has worked well for many years. Enforcement would be more difficult and there is no advantage to having one licence type
55	Frequency of safeguarding training	Consultation. We will consult with safeguarding on this matter for their advice.
56	Consideration on no conviction information	Consultation. It is clear that non conviction information can be considered and is left in.
57	Speed awareness	This has been removed from the requirement to notify list as it is not a conviction. It is also recognised that this can only be undertaken once so is not a significant consideration on non-conviction information which can be used to determine fit and proper.