

APPENDIX C

Comment from Consultee	Response by Officer
<p>6.1.5 Be no more than eight years of age since the date of first registration. IS THIS THE MAX AGE OF A VEHICLE THAT CAN BE LICENSED OR THE MAX AGE OF THE VEHICLE BEFORE IT HAS TO BE TAKEN OFF FLEET?</p>	<p>The Vehicle can be no older than 8 years of age when you first apply to licence the vehicle.</p> <p>Once the vehicle reaches 10 years of age more frequent testing is required.</p>
<p>6.1.11 Any application for a new Hackney Carriage or Private Hire Vehicle for 8 passengers must be Wheelchair accessible. THIS IS NOT GOING TO WORK FOR US. WE DO SCHOOL WORK AND AIRPORT WORK IN OUR 8 SEATERS AND A WHEELCHAIR ACCESSIBLE VEHICLES WOULD NOT BE SUITABLE OR COMFORTABLE FOR THE WORK WE DO. AS A PRIVATE HIRE OPERATOR WHY SHOULD I BE FORCED BY THE COUNCIL TO BUY A VEHICLE WHICH WILL NOT SUIT MY FLEET?</p>	<p>The team are not asking for all vehicles to be wheelchair accessible just 8-seater vehicles. The vehicles that the trade currently have licensed as 8 -seaters are mostly wheelchair accessible already. The team are aware that several of these wheelchair accessible vehicles are already used to facilitate school contract work.</p> <p>The Licensing Team need to make sure there is sufficient provision of wheelchair accessible vehicles in the district. As part of this policy review the team approached the Suffolk Disability Forum who undertook a Survey with disabled passengers, and it was identified that more disabled people prebooked their journeys with Private Hire vehicles as these were easier to access however, they identified that this provision is sometimes lacking when they approach operators.</p> <p>As Hackney Carriages are now proposed in Babergh to be all types of vehicles no matter what licence number they hold this will have an impact on the wheelchair accessible provisions available therefore this condition is necessary.</p>
<p>6.1.13 Vehicles should have no damage affecting the structural safety of the vehicle and must not have been written off for insurance purposes at any time WHAT CLASS OF WRITE OFF? WHAT IF A VEHICLE WAS CLASSED AS NOT FINANCIALLY VIABLE TO REPAIR BY AN INSURANCE COMPANY AND WRITTEN OFF, BUT BOUGHT BACK REPAIRED, CERTIFIED AND RETESTED?</p>	<p>Once a vehicle has been written off the safety of the vehicle is called into question as once damaged there would be an inherent weakness within the vehicle. The paramount concern here is public safety and a structurally unsound vehicle is not safe for use as a public service vehicle.</p> <p>The Licensing Team would consider relicensing a Category N only and will propose to reword the condition.</p>

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<p>6.8.1 An appliance for extinguishing fires must be carried in such a position as to be readily available for use. Such an appliance must be a minimum of either a 2kg ABC General Purpose Powder or 2 litre AFFF Foam and conform to BSEN 3, showing the appropriate kite-mark and must be securely fixed in a position readily accessible to the driver. Three stickers must be fitted to the vehicle; one on the dashboard facing the front seat passenger and one facing out on each of the rear passenger door windows (on larger vehicles a sticker must be placed on all rear doors) stating a fire extinguisher is carried, all must be clearly visible to passengers. What is it with the council wanting stuff stuck to dashboards? Some of us take pride in our vehicles and we don't want to be damaging our dash with stickers and signs</p>	<p>The Licensing Team agree that the provision of stickers within the vehicle noting the fire extinguisher onboard are unnecessary as it is a condition the vehicle must carry one. It is the responsibility of the driver to maintain and be able to locate their fire extinguisher on board.</p>
<p>6.8.2 All extinguishers must be checked every 12 months, prior to vehicle testing or prior to change of vehicle test. Such a check shall be carried out in accordance with the requirements of BS5306 Part 3 and Part 8, by a registered competent company. The date of the test and signatures must be clearly visible on a sticker attached to the extinguisher. The extinguisher must be marked with the vehicle registration number. Are the garages so incompetent that they cannot see if an extinguisher is either out of date or the gauge is not in the green? I can only speak for my company as I don't know what others do, but if we have an extinguisher that is out of date or low on pressure, we go to halfords and buy a new one. If this was referring to office extinguishers, I could understand the checks by a competent company as large extinguishers are refillable or serviceable, generally car ones are just throw away.</p>	<p>The Team will amend the requirement to have a registered competent company undertake a check on the fire extinguishers prior to the vehicle test as the garages already inspect the fire extinguishers in the vehicle when they test them and are competent to undertake this check.</p>

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<p>6.15.4 Self-adhesive identification signs as approved by the Council, indicating that insurance is invalid unless the vehicle is booked by private hire, must be affixed to the drivers' door and front passenger door panels of the vehicle. These signs should not be tampered with in any way and must be displayed at all times whilst the vehicle has current private hire vehicle plate affixed. This is a waste of money and does not work. If a driver picks up of the side of the road, he obviously does not care about the law. I think most of the time when this would be an issue would be late at night, when the public really don't care what the signs say anyway, they just want to get home. A few secret shoppers and fines for drivers caught breaking this law would be better. Also, clarification on booking procedures with regards people who approach drivers kerbside. If the journey is booked in before the passenger gets in the car is it legal? Can the booking be radioed through to control or must it be by phone?</p>	<p>The Licensing Team having taken on board your comments on this matter agree that the stickers are an unnecessary cost that inevitably have no impact on the illegal hiring of Private Hire Vehicles. The team propose to remove this from the policy.</p> <p>Booked is booked no matter how it is undertaken. As long as a record is made with the operating base taking note of all the required details as per the policy this is sufficient.</p>
<p>6.19.4 Testing of the meter will include a run over a measured mile and shall be checked against the Council's table of fares. Where is Babergh's measured mile?</p>	<p>The metered mile location is to be determined. Once the location has been set all drivers, operators, testing stations and meter agents will be informed.</p>
<p>6.22.4 The licensed driver of a wheelchair accessible vehicle must have received suitable and sufficient training to load and convey wheelchair bound passengers. A written record of the training shall be kept by the vehicle proprietor and made available for inspection by an authorised officer of the Licensing Authority upon request. Refresher training shall be undertaken at least once every 36 months, with any new licensed driver undertaking the training prior to their first journey. IF ALL NEW 8 SEATERS HAVE TO BE WHEELCHAIR ACCESIBLE DO THEIR DRIVERS STIILL HAVE TO HAVE TRAINING EVEN WHEN NO WHEELCHAIR WORK WILL BE TAKEN.</p>	<p>All training concerning passengers who require wheelchair assistance will be required to be undertaken by a driver. The sourcing of this training will be a duty for the Operator/driver.</p> <p>The training would only be required for drivers who would be driving wheelchair accessible vehicles. This means even if they are not undertaking wheelchair accessible bookings the vehicle will still be configured as such so therefore the driver must be trained.</p> <p>The onus of organising and booking these tests would also be on the Operator/ driver.</p>

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<p>6.23.1 The front side windows and windscreen of any vehicle shall comply with the current Construction and Use Regulations with regard to the level of tint. Except for stretched limousines (see paragraph 7.3.3 below) the remaining windows may have a minimum VLT of 50%. No self-adhesive material (tinted or clear) shall be affixed to any part of the glass. All vehicles licensed by this Council shall only be fitted with factory tinted glass by the vehicle manufacturer. This should be left as is with the option for the vehicle owners to get rear windows professionally tinted at their discretion but with regard to minimum VLT. Why shouldn't I try to make my car look better just because I can't afford to go out and buy a top spec vehicle.</p>	<p>The current policy is in line with the new policy on this matter. No modifications in regard to vehicle window tinting is permissible beyond the manufacturers original specification.</p>
<p>6.27.1 The proprietor of a private hire vehicle or hackney carriage shall not allow the vehicle to be driven and used for hire by any person who does not hold a current private hire vehicle or hackney carriage driver's licence, as appropriate, issued by Mid Suffolk District Council in respect of Mid Suffolk licensed vehicles or Babergh District Council in respect of Babergh licensed vehicles. AS BABERGH AND MIDSUFFOLK COUNCILS HAVE JOINED AND WE ARE NOW HAVING A JOINT POLICY, WHY NOT COMBINE THE LICENSING AND ALLOW ALL OF BABERGH MIDSUFFOLK TO WORK AS ONE. THIS MAY HELP WITH THE CURRENT SHORTAGE OF DRIVERS IN BABERGH</p>	<p>Babergh & Mid Suffolk are still separate Licensing regimes. The Councils are working together but are not merged. Drivers licensed in Mid Suffolk are not automatically entitled to work in the Babergh District, and this is the same the other way around.</p> <p>The process to be licensed with both is a more streamlined process as the same checks will be appropriate for use for your new badge with the alternative Council.</p> <p>Babergh currently has licensed 200 drivers across the entire district which doesn't appear to the team to constitute a shortage of drivers available.</p>

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<p>6.29 SATELLITE NAVIGATION HACKNEY CARRIAGE</p> <p>6.29.1 The proprietor of a hackney carriage is required to affix within the carriage a satellite navigation system of a type suitable for UK roads (UK mapping) and this is to be used at all times when the vehicle is hired.</p> <p>6.29.2 The satellite navigation system must be fitted in such a position that it does not obstruct the drivers view or in such a way as to distract the driver's concentration from the road. <i>Meter to be started before or after the driver has to program his sat nav for each journey?</i></p>	<p>The Licensing Team feel it would be appropriate to make satnav an optional element of this policy as referenced by the operator in his next point. Satnavs are an outdated and quite costly form of technology that are not as reliable as other forms of Satellite Navigation i.e., google maps used on smart phones.</p> <p>The meter should not be started before the journey is ready to commence. All address programming of the Satnav should be done prior to the meter being started.</p>
<p>6.29.3 The proprietor of a hackney carriage is required to keep the satellite navigation system updated with the latest maps at all times.</p> <p><i>A sat nav system is a drivers tool of the trade if the driver needs one. it should not be the responsibility of the proprietor to supply and update. To take this away from the driver's expenditure is one step closer to being "employed"</i></p> <p><i>Other than that, Sat nav is getting to be very outdated. The simple to use phone apps such as google maps and waze are much more reliable and useful. To force investment in old fashioned equipment would be a waste of proprietor's money. How many drivers don't have a smart phone ?</i></p>	<p>As stated above the Licensing Team are proposing that this is an optional addition if the proprietor of the vehicles chooses to use a Satnav.</p>
<p>9.4.3 Owners of vehicles will be subject to a re-charge fee in respect of vehicles that have to be resubmitted for a second inspection test on the grounds of mechanical/MOT related re-inspections pertaining to the specified requirements for hackney/private hire vehicles.</p> <p><i>Garages have historically included a mot certificate once a hackney or PHV test has been done, will this continue? Historically, retests have been free where any work needed has been carried out at the garage doing the test.</i></p>	<p>Many of the nominated garages within the Babergh District do offer a combined MOT check with the taxi test. This however is an independent arrangement between the garage and the driver and isn't part of the agreement the garages have with the Council.</p> <p>This recharge fee is for the 6 monthly checks and if the vehicle receives safety complaints at any time after your annual taxi inspection. The Licensing Team are proposing to reword this condition as it is ambiguous in its meaning.</p>

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<p>9.5.2 The use of hackney carriage stand/rank is kept under review and may be discontinued in individual instances where a particular stand/rank has fallen into disuse. Conversely, the Council will consider the creation of new stands/ranks where there is a perceived need. Everyone who wishes the Council to consider the creation of new stands/ranks must write to the Licensing Team, at the address set out at the beginning of this document, giving full details of the proposed location(s), and explaining their reasons in full.</p> <p style="color: red;">There are around 76 Hackney plates issued over the two councils with a combined number of 15 hackney stand places. How many times do we need to tell the council more spaces are needed? We have even seen plans (although totally inadequate) Do we need to start this process from afresh again?</p>	<p>Suffolk County Council Highways as of 2019 began the process of consulting relevant parties on a review of the parking and general road infrastructure of Sudbury. The Licensing Team were alerted that a new rank was being determined for King Street. As of February 2020, all drivers were consulted by the team on the creation of the new rank in King Street and the Licensing & Regulatory Committee approved the new rank as of June 2020.</p> <p>However, since the Committee approved this Suffolk County Council Highways have begun the process to review again the infrastructure and the Traffic Regulation Order. The new proposed taxi rank has fallen by the wayside.</p> <p>The Licensing Team are waiting instruction from Suffolk County Council Highways as to the next steps.</p>
<p>10.2.3 Applicants are required to undertake the BTEC Level 2 course in an Introduction to the Role of a Professional Taxi and Private Hire Driver. This training is to be carried out at the applicants expense and a pass certificate presented to the Council prior to acquiring a Private Hire Operators Licence. Have the council not realised how difficult it is to get drivers? now they want to add another expense to getting a license and insist on a prospective driver sitting a btec before they will even be considered for a licence.</p>	<p>The Licensing Team acknowledge this is an extra cost to the driver, however the benefits of the course are that all drivers will be trained to a higher standard and this in turn will ensure that the drivers on the road are fit and proper to hold such a licence.</p>
<p style="color: green;">meter test certificates and fire extinguisher testing, Btecs and refresher courses, more signs, fitting of say nav equipment, etc, etc, all more expense to drivers and operators, are we going to have a licence fee freeze or drop?</p>	<p>The Licensing Team are instigating a full fee review as of 2022.</p>

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<p>Can we have some clarity about the carriage of pushchairs with children in them? It is a regular occurrence that we get calls "have you got a big vehicle that I can just push my pram into?" It seems to be the norm on the rank to allow this, I personally refuse every time as I don't think it is safe to have a pushchair or pram with a child in unsecured in the back of a vehicle whilst in motion.</p>	<p>All passengers should be secured with the appropriate restraint, and this includes pushchairs/prams/buggies/strollers.</p>
<p>Luggage and charges, what is the councils view on charging mutiseater rate (when it comes into force) for less than 4 passengers but with luggage or objects that would clearly not fit in a normal saloon car ?</p>	<p>The fare review would have encompassed extra charges for luggage. Unfortunately, the opportunity to put forward the question regarding extra charges for luggage has passed as the consultation concluded for Hackney Carriage Fares on the 12 July 2021. The tariff as it stands details no extra charges can be made for luggage.</p>
<p>WEDDING AND FUNERAL VEHICLES are not mentioned, what is the new policy regarding these vehicles?</p>	<p>Wedding and Funeral vehicles are not licensable if you are purely transporting the bridal party/mourners directly to the event. If you were transporting general guests or you were hired to carry the passengers from wedding to reception venue, then you would be required to be licensed.</p>

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After receiving the consultation letter today, i have been online and reviewed the documents Can I have clarification... Is Btec level 2 , are you stating you want this to be compulsory?	The course will be compulsory for all new applicants and existing drivers on renewal.
Does this start once my licence expires Dec2022 or you wanting this done before?	You will be required to undertake this on renewal
Expense for this course is around an average of £250... is any or the other expenses we pay yearly is being reviewed at a lower cost to help towards the cost of the course?	The course will be £150. The fees are due for review next year
Does the council have plans to arrange courses?	The driver will approach the appropriate provider and ensure they book with them for the next available training days. To note this will not be implemented until the policy is adopted to take effect from 31 January 2022.
Tax check on 4th April 2022, can this be sent earlier as you can now send you returns earlier, as mine have already been sent for 2020-21 , or is this a different check?	The tax checks don't come in until April 2022. It will be a check that is undertaken to ensure self-employed drivers are registered with HMRC.
My thoughts.... I have been driving now for 40 years, and I don't need to be told to have a btec at my age!!! Is there any other increases you have planned in the cost structure we should be aware off for next year?	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p> <p>The fees, will as the policy is currently doing, go through a full and targeted consultation with both the trade and the general public.</p>

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<p>Further to my previous email, I want to stress how much I am against the new policy 6.1.11 Any application for a new Hackney Carriage or Private Hire Vehicle for 8 passengers must be Wheelchair accessible.</p> <p>To bring this policy into force will mean that should I want to Increase my private hire 8 seater fleet or replace any of the vehicles I will have a very limited number of options for purchase and a far higher expense per vehicle.</p> <p>As most wheelchair accessible vehicles are Hackney carriages, these vehicles are usually past their usefull life when they come onto the secondhand market and very expensive to buy new, with long waiting times for purchase.</p> <p>We do a lot of work for Suffolk County Council on school runs where 8 seaters are requested as part of the contract. To limit our fleet to wheelchair accessible vehicles will have a serious detrimental effect on our buisness and our ability to service our current and possible future contracts with Suffolk County Council.</p> <p>Needless to say if we cannot do the contracts this will have a knock on effect to how many drivers will be required.</p> <p>In summary, if this part of the policy is put in to force there would be...</p> <ol style="list-style-type: none"> 1) Unfair control of Private enterprise 2) Forced higher expenditure by the council 3) Reduced availability for Suffolk County Council or other contracts 4) Loss of airport and long distance travel 5) Possible loss of jobs for drivers. 6) Loss of income to Bmsdc as vehicles would not be replaced. 7) Less drivers, means less availability on evenings and weekends. 8) Companies closing down due to the financial burden forcibly imposed upon them to be able to carry on their normal business. <p>Please email me back to discuss any points raised in this email.</p>	<p>The team are not asking for all vehicles to be wheelchair accessible just 8-seater vehicles. The vehicles that the trade currently have licensed as 8 -seaters are mostly wheelchair accessible already. The team are aware that several of these wheelchair accessible vehicles are already used to facilitate school contract work.</p> <p>The Licensing Team need to make sure there is sufficient provision of wheelchair accessible vehicles in the district. As part of this policy review the team approached the Suffolk Disability Forum who undertook a Survey with disabled passengers, and it was identified that more disabled people prebooked their journeys with Private Hire vehicles as these were easier to access however, they identified that this provision is sometimes lacking when they approach operators.</p> <p>As Hackney Carriages are now proposed in Babergh to be all types of vehicles no matter what licence number they hold this will have an impact on the wheelchair accessible provisions available therefore this condition is necessary.</p> <p>The Licensing Team had a phone conversation with the consultee on the 1 September 2021 at around 12:30. The team gave the above comments to the consultee, but they still wished to raise this matter as an issue for their business.</p>

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<p>If one of our existing 8 seaters was to be involved in an accident and written off, and we needed to replace it, by your new rules this would have to be replaced with a wheelchair accessible vehicle. This would mean that the financial burden put on us by your policy could in effect cripple our company. An insurance company will only ever pay out what they have to. They would be paying out for a used, 8 seater private hire vehicle, probably with high mileage, You would be insisting it's replacement would be an expensive or hard to come by (or both) wheelchair accessible vehicle. Where at the moment we can pick up a suitable vehicle between £8000 - £14000 usually within a few days, we would have to be looking at New vehicles that are £30000 + and still have to wait weeks for delivery. This policy change will bring financial hardship to companies that are put in this position</p>	<p>The type of vehicle is not a consideration for insurance companies as the value they pay out will never completely cover the cost of a replacement vehicle whether it be an 8-seater or a wheelchair accessible vehicle.</p> <p>The costs for Wheelchair accessible vehicles varies. The maximum age when first licensing the vehicle is proposed now to be 8 years of age therefore the driver can purchase a second-hand vehicle that was registered in 2014.</p>
<p>We also do 8 seater work to and from airports and for long distance work. Wheelchair accessible vehicle seats are by design far less comfortable than standard 8 seater seats. A 10 or 20 minute ride is one thing but a few hours on a rear facing fold down seat is not something I would want my customers to endure and in fact is not something my customers would put up with.</p> <p>With this policy change, eventually all 8 seaters in the district would be wheelchair accessible either due to replacement through age or accident or by new additions to the fleet.</p> <p>We have built up our companies over years through hard work and the supply of decent and comfortable vehicles for our customers. A service that we would no longer be able to provide due to the restrictive policies of the the council.</p>	<p>The Licensing Team on researching Wheelchair accessible vehicles found that Wheelchair vehicle passenger seats do not appear to be any different to those found in an 8-seater vehicle. Most that were located through research had forward facing seats rather than rear facing.</p>

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<p>This is the third review, but we have been unaware of the earlier reviews and their outcome</p>	<p>Babergh Policies have always remained separate and reviewed and updated accordingly. When collating this combined policy, it appeared this had been the third review of the different elements of the policy.</p> <p>The Council are unable to make changes without first consulting all interested parties so all drivers and operators would have been aware if any changes were being made to the Hackney Carriage Policy, Private Hire Vehicle Policy, Private Hire Operator's Policy and the Combined Hackney Carriage and Private Hire Driver's Policy.</p>												
<p>2.19.2 Training: I have been driving a taxi in the Sudbury and surrounding area since 1973. I suspect that I am the longest serving driver in the Sudbury area. I have driven daily, both in the UK and Europe, taking all types of clients including many with disabilities and according to Suffolk County Council am extremely qualified to do this and have merited my work. I am 65 years old and don't wish to be trained or educated to be a taxi driver. I had planned to continue to work until I was 70 for various reasons including, but not exclusively, due to the last 18 months of little or no earnings due to COVID. I don't feel I need to tick a box just because the licensing team wants me to. 38% of taxi drivers nationally are over 60 years old and there is a good chance this forced qualification will mean the loss of many drivers prematurely.</p>	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p> <p>The Licensing Team understand the concerns that testing may discourage drivers but the team currently since 2016 have undertaken a knowledge test and many new applicants range from 20's to their 60's.</p> <p>Since 2020 to September 2021 the following highlights the number of new applicants the team have received in their relevant age bracket who have undertaken the knowledge test:</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tbody> <tr><td style="padding: 2px 5px;">20's</td><td style="padding: 2px 5px;">2</td></tr> <tr><td style="padding: 2px 5px;">30's</td><td style="padding: 2px 5px;">2</td></tr> <tr><td style="padding: 2px 5px;">40's</td><td style="padding: 2px 5px;">4</td></tr> <tr><td style="padding: 2px 5px;">50's</td><td style="padding: 2px 5px;">11</td></tr> <tr><td style="padding: 2px 5px;">60's</td><td style="padding: 2px 5px;">3</td></tr> <tr><td style="padding: 2px 5px;">70's</td><td style="padding: 2px 5px;">1</td></tr> </tbody> </table>	20's	2	30's	2	40's	4	50's	11	60's	3	70's	1
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<p>Finally, could you advise why have you decided not to enforce number 20 to be wheelchair accessible in the future? This will devalue plates 1 to 20 and will surely mean you will be financially compensating their owners.</p>	<p>Babergh Drivers for plates 1-20 have incurred an unfair revenue as this plate belongs to the company/proprietor until they wish to transfer. On transfer the individual sells the plate number on at a high price. This has led to a monopoly by certain operators and individuals which is unfair to other members of the trade. The removal of plates 1-20 removes this financial advantage others have held that other operators have not.</p>
<p>Clause 2:19 You refer to training to a BETEC Level 2 ‘Role of a Professional Taxi and Private Hire Driver’ course. I would question whether this training includes safeguarding training? I know that previously, Mid Suffolk/Babergh did not include any safeguarding training for new and existing taxi drivers, and this is the ideal opportunity for this to change. <i>It is essential that taxi drivers have a good understanding and awareness of safeguarding both to protect their customers and to ensure they do not put themselves in a vulnerable situation.</i></p>	<p>The Licensing Team have contacted the course provider and the slides indicate that the course does cover safeguarding as well as Child Sexual Exploitation, Grooming and PREVENT. The Course will soon be updated to include County Lines information as well.</p>
<p>Clause 5.3 I welcome the intended consultation on mandatory CCTV in licensed vehicles. We deal with incidents where licensed drivers have complaints made against them, and if CCTV were available, this could help resolve the complaint potentially with more accuracy within a faster timeframe.</p>	<p>The Licensing Team are yet to do a full consultation on this matter however the earlier talks with the trade in 2020 did highlight that they were not keen on the provision being made mandatory as it is an additional cost for them.</p>

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<p>The main points I should like to make relate to Section 2.19 Training:</p> <p>I have been driving for over 40 years including the last 7 years as a Hackney Cab Driver.</p> <p>I understand the need to raise and maintain standards, however the expectations of this section are onerous.</p> <p>I am 65 years old, I have a clean driving licence and clean DBS check. I also took the Safeguarding test when asked to do so.</p> <p>Your proposal ignores the time and financial implications of attaining BTEC Level 2 ‘An Introduction to the Role of a Professional Taxi and Private Hire Driver’.</p> <p>My online research suggests that there are inconsistencies in approach across many adjacent licencing authorities. Most authorities have their own testing and many require it only for new drivers.</p> <p>Even Ipswich Borough Council, Section 6.7 of their ‘Hackney Carriage & Private Hire Licencing Policy’ 2019-2022, refers to their own test, for new drivers, and only on renewal in exceptional circumstances.</p> <p>The BTEC Level 2 Courses I have found vary from 2 Full days to up to 150 hours learning and testing, with costs between £150-£280. In addition I would earn no money during this period.</p> <p>There will be drivers who are unwilling or unable to undertake this training and I suggest to you that what you are proposing is like ‘Taking a Sledge Hammer to Crack a Walnut’.</p>	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p> <p>The Licensing Team are aware that 2 out of the three other Councils in Suffolk undertake the BTEC Level 2 Course. This is detailed under 6.9 of Ipswich Borough’s Policy and 2.29 of West Suffolk District Council’s. East Suffolk Council are currently looking to implement this course in their district.</p> <p>The course is over 2 days and comes at a cost of £150. The Licensing Team will inform you which colleges will be hosting the course.</p> <p>The Licensing Team understand the concerns that testing may discourage drivers but public safety is a paramount concern.</p>

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<p>Section 1.2.3 - Assessing the suitability of an applicant. In this you list 7 key factors, Period of holding a driver's licence, Criminal History, Medical Fitness, Number of endorsed penalty points on the drivers licence, Knowledge of the local area, General Conduct, Right to work?</p> <p>How are these weighted when deciding on who is suitable or not?</p>	<p>All factors contribute to the fit and proper person test therefore they are all weighted equally. If any are in question this is when the matter is taken to the Sub-Committee to make the determination.</p>
<p>Section 2.18.2 - Knowledge Test. Having been a taxi driver in the Babergh District for nearly 9 years, I never had to take a knowledge test when I first gained my licence. I'd be interested in seeing what the knowledge test comprises of to assess whether or not it is suitable? I hear regularly from some passengers complaints that they are being taken the long way round to certain destinations.</p>	<p>The Licensing Team have undertaken knowledge tests since 2016. The reason for these tests is to ensure there is a consistent standard across Suffolk and ensures drivers are well aware of their responsibilities.</p>
<p>Section 2.19 - Training. - I'm sorry, but I've been doing this job as mentioned above for nearly 9 years. Why do I need training on a job that hasn't changed in the past 9 years. I've checked the prices of these courses and they range from £250-£420. Add into the equation a lost days wage and any travel costs to the training centre. The fact that you're asking drivers in a trade that has been decimated over the past 18 months to pay for this training is scandalous and unfair. I can understand the potential need for someone new in the trade to give them the introduction to how things work, but feel that the council should be subsidising this rather than making them mandatory for everyone. If this is brought in as mandatory you will potentially lose drivers and as there is already a local shortage. A lot of cab drivers do this as a 2nd job to bring in a few extra pounds each week by working weekends. Asking them to fork out £400 for a course is ludicrous.</p> <p>Section 6.22.4 - Please see above under Section 2.19</p>	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p> <p>The course is over 2 days and comes at a cost of £150. The Licensing Team will inform you which colleges will be hosting the course.</p> <p>All training concerning passengers who require wheelchair assistance will be required to be undertaken by a driver. The sourcing of this training will be a duty for the Operator/driver.</p> <p>The training would only be required for drivers who would be driving wheelchair accessible vehicles. This means even if they are not undertaking wheelchair accessible bookings the vehicle will still be configured as such so therefore the driver must be trained.</p> <p>The onus of organising and booking these tests would also be on the operator/ driver.</p>

APPENDIX C

Comment from Consultee	Response by Officer
Section 3.4.2 - If I want to have a drink of water whilst I am driving I will not be seeking permission to do so from any hirer at any time. Driving when dehydrated is as dangerous as someone who has been drinking alcohol as it can effect a persons reaction time and become dangerous. This was documented in a RAC article from February 2020 - From dehydration to Jet Lag: Four everyday things that are almost as bad as drink driving.	The Licensing Team are proposing to reword this condition.
Section 5.3.1 - CCTV - Is this solely for cameras operating facing out of the vehicle or for internal cameras? Continuously recording inside a vehicle is unlawful and could have ramifications with GDPR	<p>The Licensing Team are happy for dash cams to be in licensed vehicles as long as there is no audio function. If there is audio then a licence holder will have to be registered with the Information Commissioner's Office (ICO) and comply with all GDPR rules and requirements.</p> <p>CCTV is for internal monitoring of the vehicle and as per the policy the team will review each case on its merits. A stipulation of having CCTV is that you are registered with the ICO as a data controller and in doing so you must comply with all GDPR rules and requirements.</p>
Section 6 - Is there no longer to be any specifications on vehicle size? There is no mention if LWB WAV's are now allowed as opposed to SWB which we have been previously forced to purchase. SWB WAV's are becoming harder to purchase.	This is correct there will no longer be any specifications on vehicle size. As the team are proposing to remove the requirement to make all Hackney Carriages over plate 21 wheelchair accessible this will reduce the risk of rank space being occupied by larger vehicles.
Section 6.1.8 - Electric/hybrid Vehicles - Will the council be subsidising when people require a new car. Currently a Vauxhall Vivaro WAV equivalent to what I have now will cost £34,645. No guarantee that it will be side loading and to have it converted into a proper cab could cost in excess of another £10,000. These vehicles currently only have a range of 140 miles. On a Saturday I regularly do between 230 & 280 miles in a shift. These new vehicles will not be practical. Will the council also put up charging points for local drivers outside their properties. I live on a terraced housed cul-de-sac with no off street parking and putting a charging point outside my home will cause trip hazards and open me up to litigation if someone was to fall an injure themselves and I'm not planning on moving!	There are currently no incentives available from the Council. The Licensing Team are engaging with the dedicated EV/Infrastructure officer at Suffolk County Council to find out how Babergh can help facilitate some of these proposed changes.
Section 6.16 - Advertising - There is no mention of advertising inside the vehicle. Is this allowed?	Advertising is not permitted internally or externally, and the team are proposing to amend this in the policy.

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Comment from Consultee	Response by Officer
<p>Section 6.29.1 - Sat Navs - Ridiculous to have to use a sat nav for every journey. This is what having local knowledge is supposed to be about. I use Waze for longer journeys which is a free app on my phone and is updated regularly.</p>	<p>The Licensing Team feel it would be appropriate to make satnav an optional element of this policy. This is an outdated and quite costly form of technology that isn't as reliable as other forms of Satellite Navigation i.e., google maps use on smart phones.</p>
<p>Section 9.4.2 - Steam Cleaning my engine before it's plate test. Another additional cost, normally around £50. People may be tempted to do it themselves which can then cause damage to their engine. Even done properly it would have the effect of potentially masking any oil leaks or other issues which would not then be picked up by the mechanic.</p>	<p>The Licensing Team acknowledge the comments made regarding the steam cleaning of the engine. The Team are proposing to remove this condition.</p>
<p>1) BTEC Level 2 for existing drivers. Drivers have been leaving the industry across the country during the pandemic, there is now a national shortage of taxi/private hire drivers! Introducing a policy whereby a driver with multiple years in the business is mandated to take time out to "learn the basics" for a job they have been doing will drive more of the experienced drivers out. Yes, we agree, there should be a need for "new" drivers to take the course prior to obtaining their license, but for drivers with over 5(?) years' experience, "Grandfather" rights should be granted.</p>	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p>
<p>2) Refresher training for the above - is it online or classroom? Why the need? What will have changed within the three years? Can you tell me who runs a course as we can't find one!</p>	<p>Legislation in regard to safeguarding is adapted all the time and drivers need to be aware of the updated information to protect both themselves and the passengers.</p> <p>The Licensing Team are developing the refresher training programme so are unable at this juncture to confirm how this will be facilitated. This will be in conjunction with our neighbouring Suffolk Licensing Authorities</p>
<p>3) HMRC Tax Check. What is this?</p>	<p>The Licensing Team are only required to check that the applicant (new or renewal) have undertaken the HMRC tax check. The Licensing Team are yet to be informed how this check will be undertaken. This is an external check via the HMRC and will be mandatory.</p>
<p>4) 3.1.2 If a fixed fare is agreed prior to hiring why the need to drive on the shortest route? The quickest route may be greater in distance but save additional costs. E.g. the shortest route to Heathrow airport goes through the centre of London.</p>	<p>The Licensing Team are proposing to reword this condition to include quickest alongside shortest so as to prevent drivers from prolonging journeys and incurring higher fares.</p>

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Comment from Consultee	Response by Officer
5) No description of what a wheelchair vehicle should be (side or rear loading, wheelchair facing forwards or backwards etc).	The Licensing Team have taken on board your concerns and have proposed an amendment to the policy.
6) 6.1.5 implies that the maximum age of the vehicle is eight years, not that the vehicle can only be initially licensed by the council if it is younger than eight.	The Vehicle can be no older than 8 years of age when you first apply to licence the vehicle.
7) Brand new 7 seat Peugeot 5008 could be only 1.2l so would be excluded by 6.1.7, engine size alone should not be a restrictive policy.	The Licensing Team on review of this comment have proposed an amendment to the Policy.
8) New LEVC "London Cab" only has a range of 80 miles on electric (it has a petrol engine which tops up the battery). 6.1.8 would seem to discount this "purpose-built" hackney vehicle!	The Licensing Team on review of this comment have proposed an amendment to the Policy.
9) Why the need for an 8 seat private hire to be a wheelchair vehicle. This would imply seating configuration in the rear to be conference style rather than forward facing.	<p>The Licensing Team need to make sure there is sufficient provision of wheelchair accessible vehicles in the district. As part of this policy review the team approached the Suffolk Disability Forum who undertook a Survey with disabled passengers, and it was identified that more disabled people prebooked their journeys with Private Hire vehicles as these were easier to access however, they identified that this provision is sometimes lacking when they approach operators.</p> <p>The vehicle would need to be configured so as to allow for wheelchair access.</p>
10) 6.1.13 – Is this all types of insurance write-off? Category N?	<p>Once a vehicle has been written off the safety of the vehicle is called into question as once damaged there would be an inherent weakness within the vehicle. The paramount concern here is public safety and a structurally unsound vehicle is not safe for use as a public service vehicle.</p> <p>The Licensing Team would consider relicensing a Category N only and will propose to reword the condition.</p>

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Comment from Consultee	Response by Officer
11) Fire extinguishers – a. Non-compulsory in many other districts (TfL does not have them in taxi or PHV) b. Please tell me where to stow a 2KG powder extinguisher where it is readily accessible to the driver but not in their way! c. It is cheaper to buy a new extinguisher every year than get it tested! d. Does the mandatory driver training cover fire extinguisher use?	<div style="background-color: #92D050; padding: 5px;"> <p>The requirement to carry a fire extinguisher is under the Local Government (Miscellaneous Provisions) Act 1976 and the type required is under this policy. It is a legal requirement to carry this there is no legal requirement to use it. The Licensing Team would advise if your vehicle is on fire to remove yourself to a safe distance and call the emergency services so therefore training on how to use this is not necessary.</p> <p>The fire extinguisher is normally stored within the boot of the vehicle. The Licensing Team have proposed that the nominated garage will check the fire extinguisher.</p> </div>
12) 6.9 First Aid Kits again not required for TfL, drivers testing etc.	<div style="background-color: #FF0000; padding: 5px;"> <p>The provision of a first aid kit is for your safety and wellbeing under the Health and Safety (First Aid) Regulations 1981 as a self-employed worker. You must not administer First aid to another individual unless you have been first aid trained. This is covered under the BTEC Course.</p> </div>
13) 6.15.1 Why the need for the roof sign to have company name/phone number?	The Licensing Team on review of this comment have proposed an amendment to the Policy.
14) 6.15.4 Does the limousine still need to display the identification sign? This would then defeat the object of not having any vehicle markings.	The Licensing Team have proposed to remove this from the policy.
15) 6.15.5 Please let us know how we would operate a “Taxi-Bus” without displaying the word “Taxi”	A taxi bus would have to be a Hackney Carriage Vehicle as a private Hire vehicle cannot be a taxi.
16) Our company name includes the word “cab” so how can we display our Logo, name or website?	Cabs can be used on all Hackney plate vehicles. Cars or similar wording should be used for Private Hire.
17) 6.16 Too small, a sheet of A4 is 623 sq. cms. So just 2/3 of a sheet either side of the vehicle and nothing at the back.	The Licensing Team take on board your comments and have amended the proposed sizing for Private Hire Advertising.
18) Receipts how can we show what tariff code is shown on the meter if there is not one installed in the vehicle?	If your vehicle is a Private Hire Vehicle (with no meter fitted) then the requirements are just to include date and time and total fare. The Licensing Team will add clarity regarding the other requirements.

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Comment from Consultee	Response by Officer
19) Does a hackney driver really need to use a sat-nav even after they have passed the knowledge test? Or to go from the rank to Waldingfield Road? Does the sat nav need to be set to shortest route? Do we start the meter before or after setting the sat-nav?	The Licensing Team feel it would be appropriate to make satnav an optional element of this policy as it is a quite costly form of technology that isn't as reliable as other forms of Satellite Navigation i.e., google maps use on smart phones. The meter should not be started before the journey is ready to commence. All address programming of the Satnav should be done prior to the meter being started.
20) 9.1.4 At what age should the vehicle have a MOT certificate? If brand new and straight from the manufacturers does it still require one? TfL rules state "All taxis and private hire vehicles more than 12 months from date of manufacture are required to pass two MoT tests as a condition of continued annual licensing."	The normal procedure for new Private Hire vehicles is a MOT becomes necessary after 3 years therefore this is the rule the team will apply. However new Hackney Carriage Vehicles are required to be tested yearly. The team are proposing to amend the policy to reflect this. If this point is referencing the taxi test that must be undertaken these will be on application and every subsequent renewal until the vehicle reaches 10 years of age where twice yearly checks will be required.
21) 9.2.4 Meter test certificate annually?	The Licensing Team have proposed to remove this from the policy.
22) 9.4.2 Steam clean the engine and chassis?	The Licensing Team have proposed to remove this from the policy.
23) 11.2 Policy for "virtual numbers" whereby the number called is diverted automatically to VOIP or mobile	The Licensing Team on review of this comment have proposed an amendment to the Policy.
24) 11.2 Should this include "Text Message" and mobile phone Message apps ?	The Licensing Team under 11.2.2 is referring to apps such as UBER which are not currently licensed within this District. The Licensing Team on review of this comment have proposed an amendment to the Policy regarding text messages.
25) 11.2 If the mobile the call is diverted to is predominately in district but occasionally goes outside of district is it not allowed to take a booking?	The Licensing Team on review of this comment have proposed an amendment to the Policy.

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Comment from Consultee	Response by Officer
26) 11.2 Cloud based booking and dispatch systems?	The Licensing Team under 11.2.2 is referring to apps such as UBER which are not currently licensed within this District. This element will be explored in greater detail at a later date.
27) 11.10 See point 16)	Cabs can be used on all Hackney plates vehicles. Cars or similar wording should be used for Private Hire.
28) Outsourcing of booking and dispatch functions, does this need to be done within the district?	Outsourcing of booking and dispatch functions can be carried out by an operator based within the District to another operator whether based in or outside the District providing the booking and the outsourcing are recorded by all parties.
2.1 Disclosure and Barring Service Check 2.1.3 The current check lasts for a period of 3 years. Will this change to the update service or annual checks be bought in for all existing licenced drivers when renewing or just for new applicants? This is an added cost for an already low earning profession. If the check is valid for 3 years and Suffolk County Council are happy for Safeguarding purposes for drivers and passenger assistants to only have a 3 yearly check why does Babergh feel the need to have this done annually?	Under the July 2020 Safeguarding Standards proposed by the Department for Transport all applicants (new or renewal) will be required to either sign up for the DBS update service or undertake a yearly DBS Check.
2.2 – 2.14 Will these clauses apply to existing licence holders? If say an existing licence holder is found guilty of driving under the influence does this mean their taxi driver licence will be revoked and that they will not be able to reapply and be relicensed until after the minimum period mentioned?	Yes these apply equally to new and existing drivers.
2.18 Knowledge Test If you are only allowed 5 attempts to pass the knowledge test and will then have to wait 12 months before trying again do you perhaps the test is too difficult and not wholly fit for purpose? Is there an allowance for people that struggle to read and write? Colleagues that have taken the test have said some of the local area questions bore no relevance to our local area and reading further in to the document if you expect sat navs to be installed in all hackney carriages and used for every single journey what would be the point of continuing with a local area knowledge test?	The Licensing Team have set this limit at 5 but on average most of our applicants pass their test on either their 2 nd or 3 rd attempt. The test encompasses the entirety of the Babergh District not just the area in which the applicant will drive. The Sat Nav condition has been proposed for amendment.

Comment from Consultee	Response by Officer
<p>2.19 Training What are you hoping to achieve by forcing existing licenced drivers in to training? Have you not, by granting their licences already deemed them capable of carrying out that role? Many drivers, like myself, have been licenced with you for many years and you are asking them to take a course that is an 'Introduction to the Role of a Professional Taxi and Private Hire Driver'. I feel like you are saying 'we don't think you can do your job'. Like many others I have not been able to earn my full wage and the extra funds required to take the course is something I simply do not have. You would then damage my earning potential further by removing my licence which would in whole affect the general public as there would be fewer licenced drivers available. Other licencing districts are not enforcing this requirement and yet again this seems to be an extra cost burden. Whilst attending training courses I would not able to earn the money needed to fund the course and also not be available to serve the public. The cost of these courses seem to vary depending on providers and what relevant qualifications would the course tutors hold? Would they be licenced drivers themselves or just somebody reading from a book trying to tell me how to do my job? Perhaps an introductory course would be useful for new applicants or those drivers that have several substantiated complaints against them or have had their licences revoked. If this BTEC is bought in as a mandatory requirement I would seriously consider my position as a licenced driver and most likely take the decision to not renew my licence. I don't believe customers will be bothered whether you hold a BTEC qualification or not. They just want to be driven to their chosen destination.</p>	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p> <p>The Licensing Team are aware that 2 out of the three other Councils in Suffolk undertake the BTEC Level 2 Course. This is detailed under 6.9 of Ipswich Borough's Policy and 2.29 of West Suffolk District Council's. East Suffolk Council are currently looking to implement this course in their district.</p> <p>The course is over 2 days and comes at a cost of £150. The Licensing Team will inform you which colleges will be hosting the course.</p> <p>The Licensing Team understand the concerns that testing may discourage drivers but public safety is a paramount concern.</p>
<p>2.22 Tax Checks on Licence Applications and Renewals For what purpose is a tax check required and which type of tax check are you expecting to be done? I am an employed driver and my tax position is a matter between myself, my employer and HMRC. Whilst I submit a tax return I do not see this is any of your concern. My tax position bares no relevance to my ability to drive a taxi or private hire vehicle.</p>	<p>The Licensing Team are only required to check that the applicant (new or renewal) have undertaken the HMRC tax check. The Licensing Team are yet to be informed how this check will be undertaken. This is an external check via the HMRC and will be mandatory.</p>

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Comment from Consultee	Response by Officer
<p>3.1 General Conduct 3.1.2 It is not always possible to proceed to a particular destination by the shortest route especially when there are road closures and traffic delays. Also this implies that if a customer requests we take a different route to their destination that is not the shortest that we would not be allowed to do this.</p>	<p>The Licensing Team are proposing to reword this condition to include quickest alongside shortest so as to prevent drivers from prolonging journeys and incurring higher fares.</p>
<p>3.2 Driver Dress Code This is very ambiguous. What one person considers to be clean and respectable is not necessarily the same as another person. How far does this stretch? Will bushy beards and visible tattoos be deemed as not acceptable as some people do not like them?</p>	<p>The Licensing Team feel this section is self explanatory.</p>
<p>4.1 Assistance Dogs If a driver were to be allergic to or have a fear of dogs would they be allowed to refuse to carry an assistance dog?</p>	<p>The driver is able to apply for a medical exemption as per our current policy.</p>
<p>4.2 Wheelchair Passengers 4.2.1 e. How much mobility assistance is deemed as reasonable? Some passengers may just need an arm to steady them but surely I cannot be expected to physically transfer a passenger out of their wheelchair on to a vehicle seat if that is how they wish to travel? My own mother-in-law is wheelchair bound and much prefers to use an ordinary vehicle seat rather than stay in her chair. I know from experience that she can do very little to help move herself and her weight would cause the fittest of drivers a problem. Whilst I do not wish to be discriminatory I have to put my health and safety first.</p>	<p>Drivers of Wheelchair accessible vehicles will have to undertake the relevant training to ensure they are fully compliant.</p>
<p>Removing the requirement for plates 21+ to be wheelchair accessible is unfair on plates 1-20. Will you be compensating plate holders 1-20 for devaluing their businesses and will plates 21+ if no longer wheelchair accessible be made to pay the higher licence fee. If it was the other way around and wheelchair accessible vehicles were charged a higher licence fee this would be seen to be disability discrimination.</p>	<p>The Licensing Team charge for all Hackney Carriage vehicles £344.50. The team are unsure why this driver feels that the cost is higher for plates 1-20 unless they are alluding to the black-market sale of the plates within the trade.</p> <p>The Licensing Team have not been involved in this.</p>
<p>Will there be a cap on licenced vehicles as there is more vehicles than work available.</p>	<p>No</p>
<p>I am confused as to why rear doors in a minibus do not count in the number of required doors for that vehicle. These vehicles will have been approved by higher authorities than Babergh as safe and fit for purpose. Why are your requirements more than what has already been approved for use?</p>	<p>The Licensing Team are stating in this policy that the vehicle must have 3 doors in addition to the rear door for minibuses/transits (8 seats or less). Most minibuses have a sliding door for the back compartment and two doors for the front compartment.</p>

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Comment from Consultee	Response by Officer
<p>A 2kg/litre fire extinguisher is the same size as that which is required in a bus. Where in a car would you safely position one that does not impede on the passenger or driver space but is readily available for use?</p>	<p>The requirement to carry a fire extinguisher is under the Local Government (Miscellaneous Provisions) Act 1976 and the type required is under this policy. It is a legal requirement to carry this there is no legal requirement to use it. The Licensing Team would advise if your vehicle is on fire to remove yourself to a safe distance and call the emergency services so therefore training on how to use this is not necessary.</p> <p>The fire extinguisher is normally stored within the boot of the vehicle.</p>
<p>Whilst a first aid kit should be carried, as a driver I surely should not be expected to administer first aid to a passenger. I have no medical training to be able to do this safely. Surely there should be a policy on this?</p>	<p>The provision of a first aid kit is for your safety and wellbeing under the Health and Safety (First Aid) Regulations 1981 as a self-employed worker. You must not administer First aid to another individual unless you have been first aid trained. This is covered under the BTEC Course.</p>
<p>Why does it matter about the position of stickers on the vehicles? Surely if they do not contain false information or give a false impression of the vehicle type and are not impeding the visibility of the driver and the passenger and are not covering licence plates it should not matter on their positioning.</p>	<p>The Licensing Team have proposed to remove this from the policy.</p>
<p>Who would be responsible for training me if I were to be a driver of a wheelchair accessible vehicle and who would bear the burden of the cost of training?</p>	<p>The Operator or licensed driver would be responsible for ensuring training is undertaken at their cost.</p>
<p>Sat Navs can be as much of a distraction as they are an assistance. Why should we be forced in to using one if we already know the route to the passengers' destination? Purchase, installation and updates are again another cost being forced upon operators and drivers.</p>	<p>The Sat Nav condition has been proposed for amendment.</p>

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Comment from Consultee	Response by Officer
<p>My role within my employment is dual. I am mainly based in the office assisting with bookings and dispatching as well as all aspects of administration associated with the business. Your requirements for record keeping are excessive. Why does it matter who took the booking and who dispatched it and why is important to record the time at which a driver was allocated to the booking. This is unnecessary data recording for the sake of it and will not work in practice. Other member of our office team who are not drivers have no contact with passengers other than a conversation on the phone when they book their journey. Why would these members need to hold a DBS certificate?</p>	<p>The July 2020 Safeguarding Standards as set by the Department for Transport have introduced this as a requirement as the booking staff are in a position of trust.</p>
<p>If licenced drivers leave the profession because of these increased costs and hoop jumping exercises the council members of the public will be left with a diminished service and the council will ultimately suffer a drop in revenue too. Is this really what you are after?</p>	<p>The Licensing Team have to balance the needs of the trade and public protection which is the paramount concern. We are not trying to put companies out of business</p>
<p>During the pandemic what assistance did you offer to drivers and operators? Did you consider an extension to their licence period to help with their financial difficulties they must have suffered or any emotional support for those finding it difficult to cope with the uncertain situation we all found ourselves in?</p>	<p>The Council via our economic development team did offer financial grants to licensed operator and drivers over the pandemic.</p>
<p>You happily take our money from us in licence fees and now you are looking at proposals that will relieve us of more of our earnings. Will you be transparent and let us know where are licence fees go and what we actually get for our money?</p>	<p>The Licensing Team are looking to undertake a fee review in 2022 to assess if the fee levels are appropriate at their current level.</p>
<p>I find it unfair that yet again the press were informed of this important matter before you had contacted the operators and drivers like myself. Are we not the very people and organisations you expect to go along with your plans? If you want our support and co-operation please do not treat us like an after-thought.</p>	<p>The Licensing Team attended the meeting on the 16 August 2021 where the general public via YouTube and the Press were in attendance. The consultation letters were sent before the consultation began and 28 days have been given for responses to be made. The press were not informed by the Licensing Team.</p>
<p>2.1.3 With regards to the DBS system, we are currently checked every 3 years at a cost to ourselves. You now want the update system or every year at a cost to us. So, this involves increasing costs to us 3-fold. Why is this now needed especially seeing as our earnings have been considerably less over the last nearly 2 years.</p>	<p>Under the July 2020 Safeguarding Standards proposed by the Department for Transport all applicants (new or renewal) will be required to either sign up for the DBS update service or undertake a yearly DBS Check.</p>

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Comment from Consultee	Response by Officer
<p>2.18 With regards to the Knowledge test, if you are stating that someone may have 5 attempts to pass in the first instance does this not indicate that this test is maybe not suitable for purpose. Speaking to people in the past who have had to do this test say there was little in it that bared resemblance to the job they would be required to do and some questions were nothing to do with our specific area and were never likely to get right. Many people who have approached the company I work for with an interest to becoming a driver have changed their minds when they hear about the knowledge test.</p>	<p>The Licensing Team have set this limit at 5 but on average most of our applicants pass their test on either their 2nd or 3rd attempt. The test encompasses the entirety of the Babergh District not just the area in which the applicant will drive.</p> <p>The Sat Nav condition has been proposed for amendment.</p>
<p>2.19 With regards to BTEC courses, I would strongly disagree to having to do this after I have already had a licence for several years (why should an existing driver have to have an introduction to the role when they already know what their role is and carry it out to the standards expected). I have no desire to go back to a college etc especially at another cost to myself (which with recent earnings is not something I have spare). As already stated, the earnings for a driver have been dramatically reduced during the last couple of years and having to attend the course would not only be a cost to us but we would also lose another couple of days earnings at the same time.</p> <p>I can agree that maybe in the future for new applicants only that this may be something that could prove useful or for those who have maybe had complaints against them, their license suspended or revoked for some reason. Seeing as other councils across the country are not insisting on this course, it clearly is not a nationwide regulation. If this was a future requirement, I would consider not renewing my license at that time, which talking to many other drivers in the area have all indicated the same feelings and ending up with no experienced drivers instead of all new ones is not helpful to the industry or any industry in most cases.</p>	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p> <p>The Licensing Team are aware that 2 out of the three other Councils in Suffolk undertake the BTEC Level 2 Course. This is detailed under 6.9 of Ipswich Borough's Policy and 2.29 of West Suffolk District Council's. East Suffolk Council are currently looking to implement this course in their district.</p> <p>The course is over 2 days and comes at a cost of £150. The Licensing Team will inform you which colleges will be hosting the course.</p> <p>The Licensing Team understand the concerns that testing may discourage drivers but public safety is a paramount concern.</p>

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Comment from Consultee	Response by Officer
<p>2.22.1 With regards to tax checks, what does this actually mean? I am an employed person and all my taxes are calculated and paid through my wages. I cannot see what the council needs to know about this. For self-employed people who do their own taxes again why does the council need to know what the details are.</p>	<p>The Licensing Team are only required to check that the applicant (new or renewal) have undertaken the HMRC tax check. The Licensing Team are yet to be informed how this check will be undertaken. This is an external check via the HMRC and will be mandatory.</p>
<p>3.2.1 With regards to the dress code, this has always been stated to be of a smart appearance but quite a few of the drivers in our area wear very casual items such as football shirts, slogan T. Shirts etc and I have seen some drivers in quite dirty jeans etc. The company I work for have shirt, ties, logo jumpers and coats for uniforms and those of us who are combined office and driver staff still go out in smart clothes.</p>	<p>The Licensing Team feel this section is self explanatory.</p>
<p>6.1.1 With regards to electric vehicles, unfortunately this would be a difficult move for this kind of industry. If you need to fill up with fuel it can be a 5-minute job, if you need to park up at a charging point this could be a matter of missing several fares because of the time difference is having to charge a vehicle. Unfortunately, with the costs of new batteries being in and around £10,000 (that I know of) to replace aswell as difficulties in towing and pushing electric vehicles (when things 'may' go wrong) hopefully the government will see these issues before it gets too late.</p>	<p>The Licensing Team recognises the need to move towards a greener fleet for the benefit of the environment. The motor trade is also moving in this direction under the central government direction to cease the sale of all new petrol and diesel cars by 2030. Given the current infrastructure and cost constraints it is impractical to require the trade to change wholesale to greener vehicles in the short term however the Council will look to research and develop an incentive scheme to encourage a move towards carbon reduction in line with the Council's Climate Change Strategy.</p>
<p>6.1.5 6.1.6 6.1.15 With regards the vehicles we have in the company I work for they are all Mercedes and are very well maintained. The industry is not really making enough money to justify the purchase of newer cars all the time. In regards to having to have twice yearly MOTs this seems excessive seeing as they is not required by law for any other vehicle and having a friend in the motor trade who recently had a Sudbury taxi only a few years old in his garage recently which was in poor condition and the driver was warned that his tyres were showing the cords through the rubber. The driver said he would not address the situation as he felt there was nothing wrong with them. If your vehicle is maintained well then this should not be an issue. Our company also has a PCV fleet and if they are over a certain age, they do not require 2 tests a year and these vehicles carry many passengers so do not see the need for cars to have this.</p>	<p>Once the vehicle reaches 10 years of age more frequent Council testing is required.</p> <p>MOTs are only required annually.</p>

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Comment from Consultee	Response by Officer
<p>6.8 With regards to a 2kg fire extinguisher being required where is this supposed to go. The company I work for has buses have that have 2kg ones the cars have only had 1kg / 1lt ones which have always been sufficient to pass the yearly taxi MOT test. The testers have never marked a fire extinguisher to say they have been checked either.</p>	<p>The requirement to carry a fire extinguisher is under the Local Government (Miscellaneous Provisions) Act 1976 and the type required is under this policy. It is a legal requirement to carry this there is no legal requirement to use it. The Licensing Team would advise if your vehicle is on fire to remove yourself to a safe distance and call the emergency services so therefore training on how to use this is not necessary.</p> <p>The fire extinguisher is normally stored within the boot of the vehicle.</p>
<p>6.14.1 With regards to the plate being visible at the rear of the car. Why can't the plates not be attached to the inside of the rear window if they are still visible. As you have previously requested plates to be fixed to the outside of vehicles this involves drilling holes into our vehicles bodywork which in turn will de-value the car because of bodywork damage. The plates used to be supplied with suction cups for rear window instillation so I cannot see what the problem is if they are visible that way.</p>	<p>The Licensing Team have for purchase plate holders which affix to the number plate without the requirement of drilling holes.</p>
<p>6.15.1 With regards to signage, why does a hackney carriage need to have an illuminated roof sign. In London (or big cities and towns) where people are wanting to hail down a taxi from the side of the road at night maybe so. We are a rural area that doesn't have that kind of business. If people book a taxi at night the car is going specifically for them and if not maybe on the rank so it is obvious, they are for hire.</p>	<p>Hackney Carriages have to have an illuminated sign with the word Taxi on it when available for hire. This must be lit whilst stationed on the rank waiting for a fare. Private Hire Vehicles do not require this.</p>
<p>6.15.4 I have never seen a private hire vehicle with this information on so when has this ever been needed before? Obviously, a private hire vehicle should not be parked anywhere near a taxi rank so it has never arisen in the company I work for.</p>	<p>The Licensing Team have proposed to remove this from the policy.</p>
<p>6.16 With regards to signage on vehicles you state that private hire vehicles can only have the logo etc on the rear doors of the car. We routinely swap our signage from front to back to prevent fading on the paintwork so as prevent devaluation of our vehicles. Is it also really necessary to be that stern with the size of lettering and numbers being able to be used on signage?</p>	<p>The Licensing Team have proposed an amendment to the Policy for this matter.</p>

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Comment from Consultee	Response by Officer
<p>6.22.4 With regards to training of carrying wheelchair passengers, who is authorised to give training. I remember a customer telling me a few years ago that with another company her wheelchair bound husband had booked a taxi with a ramp on the side to take him to a hospital appointment. When the driver pushed him into the vehicle his head hit the roof and was cut quite badly. I personally do not drive vehicles that can carry a wheelchair as I only drive a saloon or hatchback car but that instance is a worry. The vehicles the company I work for that can carry wheelchair users are fitted with lifts so you do not have to push passengers up a gradient ramp.</p>	<p>Drivers of Wheelchair accessible vehicles will have to undertake the relevant training to ensure they are fully compliant.</p>
<p>6.26 With regards to inspections, recently there was an inspection from a council employee at the rank in Sudbury. The person was wearing a badge that stated their role as in the food sector. Is this person trained and knowledgeable in our industry to do such checks?</p>	<p>The individual referenced in this response was the Assistant Manager of Food Safety & Licensing who is trained and knowledgeable in this area.</p>
<p>6.29 With regards to satellite navigation, since when should all vehicles be fitted with this and used on every journey. The drivers I work with all have good knowledge of their local areas and do not need such items and none of our vehicles have these fitted. Some drivers may have their own sat navs but very rarely use them and if they do this would be for the most minimal jobs. Our drivers have access to maps if they need to check something or have access to office staff who could advise them. This requirement is not something I agree with at all and again would incur another substantial cost with no real advantages.</p>	<p>The Licensing Team have proposed an amendment to the Policy for this matter.</p>
<p>8.1 I have never been asked to drive a fire engine so not sure why this is relevant to a hackney or private hire driver.</p>	<p>A Fire Engine has previously been licensed in our sister Council Mid Suffolk District Council as a special events vehicle and the team felt it would be appropriate to retain this element in case an individual wishes to licence one again.</p>
<p>9.2.2 With regards to applications not being limited, this has caused problems in our Sudbury area with so many vehicles now being licensed. To the point where it just seems you keep licensing people and vehicles to have more income.</p>	<p>It is a free market and there is no intention to cap the number of drivers, vehicles or operators.</p>

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Comment from Consultee	Response by Officer
<p>9.5 With regards to the taxi ranks, in Sudbury there is a total of 8 spaces and yes, I am fully aware that is more than others get but at the same time the number of available spaces is nowhere enough for the number of vehicles you have licensed. Where are people supposed to park to ply for business, and because you very often drive round to the rank on Sudbury's one way system there is no space you have to drive by again and again waiting for a space. This is considered bad for the environment not to mention wasting fuel and yet again incurring more costs while not earning. I would suggest maybe halting any more licenses being granted as there is just too many now with a combination of hackney and private hire together.</p>	<p>Suffolk County Council Highways as of 2019 began the process of consulting relevant parties on a review of the parking and general road infrastructure of Sudbury. The Licensing Team were alerted that a new rank was being determined for King Street. As of February 2020, all drivers were consulted by the team on the creation of the new rank in King Street and the Licensing & Regulatory Committee approved the new rank as of June 2020.</p> <p>However, since the Committee approved this Suffolk County Council Highways have begun the process to review again the infrastructure and the Traffic Regulation Order. The new proposed taxi rank has fallen by the wayside.</p> <p>The Licensing Team are waiting instruction from Suffolk County Council Highways as to the next steps.</p>
<p>10.2.21 With regards to applicants not being limited, as mentioned before please stop licensing more and more, we have struggled to get drivers because they do not want to the knowledge test and it's just becoming harder to make enough money to make it a viable living.</p>	<p>It is a free market and there is no intention to cap the number of drivers, vehicles or operators.</p>
<p>11.1 With regards to the details of bookings made, we do not have an electronic booking system therefore we handwrite all bookings that are pre-booked in advance and on the date. Any jobs taken from the rank are noted by the driver in their logs. Why do you need to know dates and times of when the booking was requested? Why do you need to know at what time the driver was given the job? Why do you need to know who took the booking? Why do you need to know the name of the person who gave the job to the driver? This all seems like waste of time overkill. We work in a very busy office if we had to keep making all these notes, we would miss more phone calls the drivers would have to write more down which means they have to be stationery instead of driving to the next location. All our handwritten bookings are kept for several years in accordance with regulations so cannot see why we need to record anything else.</p>	<p>Under the July 2020 Safeguarding Standards proposed by the Department for Transport this requirement for additional information with regards to bookings is to ensure public safety and protect the business if a complaint is received.</p>

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Comment from Consultee	Response by Officer
<p>11.8 With regards to charging on a private hire vehicle some of our private have meters and customers accept that the meter price will be what they pay.</p>	<p>The Licensing Team agree that if a meter is used the fare cannot exceed the fare stated on the meter.</p>
<p>11.15 With regards to dispatch and office staff needing a DBS, why? These staff do not come in to contact with passengers other than phone calls so why should that be a need for a DBS, it's just more cost to the company or to an individual again.</p>	<p>The July 2020 Safeguarding Standards as set by the Department for Transport have introduced this as a requirement as the booking staff are in a position of trust.</p>
<p>We note from page 1 of the document that the requirement for plates 21+ to be wheelchair accessible vehicles will be removed. This will devalue plates 1 –20. If plates 21 + chose not to renew as wheelchair accessible vehicles will these licences then be charged at the same rate as plates 1 –20? How will the council be recompensing plate holders 1 –20 for the devaluation of their business?</p>	<p>The Licensing Team charge for all Hackney Carriage vehicles £344.50. The team are unsure why this driver feels that the cost is higher for plates 1-20 unless they are alluding to the black-market sale of the plates within the trade.</p> <p>The Licensing Team have not been involved in this.</p>
<p>2.1 Disclosure and Barring Service Check 2.1.3 The current check lasts for a period of 3 years. Will this change to the update service or annual checks be bought in for all existing licenced drivers when renewing or just for new applicants? This is an added cost for an already low earning profession.</p>	<p>Under the July 2020 Safeguarding Standards proposed by the Department for Transport all applicants (new or renewal) will be required to either sign up for the DBS update service or undertake a yearly DBS Check.</p>
<p>2.2 –2.14 Will these clauses apply to existing licence holders? If say an existing licence holder is found guilty of driving under the influence does this mean their taxi driver licence will be revoked and that they will not be able to reapply and be relicensed until after the minimum period mentioned?</p>	<p>Yes these apply equally to new and existing drivers.</p>
<p>2.18 Knowledge Test What allowance will be made for applicants who struggle to read and write? They may be more than capable of being a taxi driver but would be held back by their struggle to understand the written questions posed to them.</p>	<p>The Licensing Team offer an independent one to one test with the applicant to ensure those who have difficulty with reading or writing are not disadvantaged.</p> <p>Any difficulties should be disclosed to the team on application to ensure we can facilitate the independent test.</p>

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Comment from Consultee	Response by Officer
<p>2.19 Training What is to be gained by forcing existing licenced drivers in to training? Surely by granting their licences you have already deemed them capable of carrying out that role. Many drivers within the district have been licenced with you for many years and you are asking them to take a course that is an 'Introduction to the Role of a Professional Taxi and Private Hire Driver'. For the majority of them this will equate to you saying 'we don't think you can do your job'. We foresee many of them deciding to not renew their licences because of this and this will lead to a shortage of experienced drivers throughout the district. Many of our licenced drivers also hold a PCV licence and already have to undertake additional CPC training. They will gain nothing by taking yet another course that probably covers a similar basis to their CPC training. Other licencing districts are not enforcing this requirement and yet again this seems to be an extra cost burden. Whilst drivers are attending training courses they are not able to earn the money needed to fund the course and they are also then not available to serve the public. The cost of these courses seem to vary depending on providers and what relevant qualifications would the course tutors hold? Would they be licenced drivers themselves or just somebody reading from a book trying to tell an experienced licenced driver how to do their job? Perhaps an introductory course would be useful for new applicants or those drivers that have several substantiated complaints against them or have had their licences revoked.</p>	<p>The course will ensure all drivers have disability awareness and safeguarding training and other vital information to ensure they are fully compliant with their obligations in relation to protecting the public and compliant with the July 2020 Safeguarding Standards as set by the Department for Transport.</p> <p>The Licensing Team are aware that 2 out of the three other Councils in Suffolk undertake the BTEC Level 2 Course. This is detailed under 6.9 of Ipswich Borough's Policy and 2.29 of West Suffolk District Council's. East Suffolk Council are currently looking to implement this course in their district.</p> <p>The course is over 2 days and comes at a cost of £150. The Licensing Team will inform you which colleges will be hosting the course.</p> <p>The Licensing Team understand the concerns that testing may discourage drivers, but public safety is a paramount concern.</p>
<p>2.22 Tax Checks on Licence Applications and Renewals For what purpose is a tax check required and which type of tax check are you expecting to be done? The tax position of operators and drivers is a matter between the individual/company and HMRC. The tax and financial standing of a driver should be of no concern of the council. You are not employing any of us and you are not responsible for paying our tax, national insurance, class 2 & 4 contributions etc. As an operator we will not be sharing these details with you.</p>	<p>The Licensing Team are only required to check that the applicant (new or renewal) have undertaken the HMRC tax check. The Licensing Team are yet to be informed how this check will be undertaken. This is an external check via the HMRC and will be mandatory.</p>
<p>3.1 General Conduct 3.1.2 It is not always possible to proceed to a particular destination by the shortest route especially when there are road closures and traffic delays. This also implies that if a customer requests we take a different route to their destination that is not the shortest that we would not be allowed to do this.</p>	<p>The Licensing Team are proposing to reword this condition to include quickest alongside shortest so as to prevent drivers from prolonging journeys and incurring higher fares.</p>

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Comment from Consultee	Response by Officer
<p>3.2 Driver Dress Code All of our drivers are always clean, tidy and respectable with the majority wearing a collar and tie. Unfortunately your wording to this term is ambiguous as everyone has a different idea of what is clean, respectable and befitting. Setting details of expected dress code e.g collared shirt, trousers etc would be better. We are aware that some drivers find it acceptable to wear football shirts or sloganed t-shirts with dirty jeans or beach shorts or jogging bottoms.</p>	<p>The Licensing Team feel this section is self explanatory.</p>
<p>3.6 Lost Property Please define what is a reasonable period. Some operators might consider a reasonable period to be a day or so and others might consider a reasonable period to be 3 months. Also is there a uniform procedure for dealing with lost property after the reasonable period?</p>	<p>What a reasonable period is, is to be determined by the business based on the circumstances.</p>
<p>4.2 Wheelchair Passengers Should a wheelchair passenger wish to transfer from their wheelchair to a vehicle seat it is unfair to expect the driver to help them perform that transfer. Personal manual handling should not be undertaken unless there has been proper training and who would be liable should an injury occur to either the passenger or driver? The current government guidance whilst the world is still suffering from Covid-19 is to keep your distance. Please explain how a driver is supposed to give mobility assistance whilst keeping their distance.</p>	<p>Drivers of Wheelchair accessible vehicles will have to undertake the relevant training to ensure they are fully compliant. The liability would lie with the driver or their employer.</p>
<p>4.3 Medical Exemptions Exemption from lifting wheelchair passengers. Presumably this does not mean that the driver is expected to physically lift up the passenger.</p>	<p>If you are exempt you do not have to lift a wheelchair or the passenger.</p>
<p>5.3 CCTV 5.3.2 CCTV should not be mandatory. Whilst it may be useful in some circumstances installing CCTV in all vehicles is another cost burden on the operator and would surely raise some privacy issues for customers.</p>	<p>The Licensing Team are yet to do a full consultation on this matter however the earlier talks with the trade in 2020 did highlight that they were not keen on the provision being made mandatory as it is an additional cost for them.</p>

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Comment from Consultee	Response by Officer
<p>6 Vehicle Specifications and Conditions of Licence</p> <p>6.1 General</p> <p>To assist the move to electric/hybrid type vehicles will there be charging points fitted on the rank or strategic points around the district to enable the drivers to charge their vehicles without impacting on the service that they can provide? At the moment a driver can pop to a filling station and purchase fuel in a reasonably short space of time. Having to charge vehicles will take considerably longer and could lead to a shortage of available vehicles while they are being charged and may hamper drivers being able to accommodate longer journeys.</p>	<p>The Council recognises the need to move towards a greener fleet for the benefit of the environment. The motor trade is also moving in this direction under the central government direction to cease the sale of all new petrol and diesel cars by 2030. Given the current infrastructure and cost constraints it is impractical to require the trade to change wholesale to greener vehicles in the short term however the Council will look to research and develop an incentive scheme to encourage a move towards carbon reduction in line with the Council's Climate Change Strategy.</p>
<p>6.1.12 As mentioned previously removing the requirement for plates 21+ to be wheelchair accessible will devalue plates 1-20. As a holder of plates between 1-20 we have always found it unfair that plates 21+ were charged at a vastly lesser rate and there was no cap on the amount of these plates issued.</p> <p>Going forward there is not enough work in the district for so many licenced hackney carriages nor the appropriate space for them to ply for hire. Will there be a cap on the number of new hackney plates issued especially with the wheelchair element being removed.</p>	<p>The Licensing Team charge for all Hackney Carriage vehicles £344.50. The team are unsure why this driver feels that the cost is higher for plates 1-20 unless they are alluding to the black-market sale of the plates within the trade.</p> <p>The Licensing Team have not been involved in this.</p> <p>It is a free market and there is no intention to cap the number of drivers, vehicles or Operators.</p>
<p>6.3 Doors</p> <p>6.3.1 Why are rear doors not included in the minimum number of doors. If a minibus would pass PCV regulations with the same amount of doors, why is Babergh's requirements so much more demanding. The vehicles have already been deemed safe and fit for purpose when manufactured. Why does Babergh think this is not the case?</p>	<p>The Licensing Team are stating in this policy that the vehicle must have 3 doors in addition to the rear door for minibuses/transits (8 seats or less). Most minibuses have a sliding door for the back compartment and two doors for the front compartment.</p>
<p>6.8 Fire Extinguishers</p> <p>6.8.1 A 2kg/2litre fire extinguisher is fairly large and is generally the size required for a PCV. Where would you suggest the extinguisher be fixed in a position readily accessible to the driver so that it is ready to use without impeding the minimum space that you deem is required for the passengers? Surely the position of the extinguisher should be away from passengers as they could fiddle with the equipment during their journey causing injury to themselves and or the driver?</p> <p>6.8.2 Can a fire extinguisher check not be part of the annual taxi test? Annual checking by yet another party is again another cost burden on the operator. We are not suggesting safety should be compromised or ignored but extra costs in one area may mean cutting corners in others for some operators.</p>	<p>The requirement to carry a fire extinguisher is under the Local Government (Miscellaneous Provisions) Act 1976 and the type required is under this policy. It is a legal requirement to carry this there is no legal requirement to use it. The Licensing Team would advise if your vehicle is on fire to remove yourself to a safe distance and call the emergency services so therefore training on how to use this is not necessary.</p> <p>The fire extinguisher is normally stored within the boot of the vehicle.</p>

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Comment from Consultee	Response by Officer
<p>6.11 Luggage 8 seater minibus type vehicles do not generally come with boot/luggage spaces. Where would you recommend that luggage be stowed?</p>	<p>The Licensing Team feel this should be an Operator/driver decision based upon the number of passengers seated in the vehicle and how much luggage is to be carried.</p>
<p>6.14 Licence Plates and Stickers 6.14.2 As long as the licence plate is displayed on the rear of the vehicle why should it matter whether it is inside or out. As long as it does not impede the rear view of the driver and is clearly visible to the public outside surely being positioned inside the vehicle is safer. The plate will remain clean and readable, will not fall off the vehicle whilst in motion and is less likely to be stolen. Affixing it to the inside of the rear window also means no damage to the exterior of the vehicle, which is a requirement at 6.12.</p>	<p>The Licensing Team have for purchase plate holders which affix to the number plate without the requirement of drilling holes.</p>
<p>6.15 Signage 6.15.1 The need for the roof sign to be illuminated is another unnecessary extra cost and possible burden on the electrical system of the vehicle.</p>	<p>Hackney Carriages have to have an illuminated sign with the word Taxi on it when available for hire. This must be lit whilst stationed on the rank waiting for a fare. Private Hire Vehicles do not require this.</p>
<p>6.15.4 Are magnetic door signs considered to be self-adhesive and will the council be supplying the exact wording that is to be displayed on these signs?</p>	<p>The Licensing Team have proposed to remove this from the policy.</p>
<p>6.16 Advertising 6.16.5 Why must the lettering be confined to the rear of the vehicle if it is a minibus/transit or people carrier? A minibus is a different type of vehicle to a people carrier. As these types of vehicles are commonly used on school runs being able to display your name on the front of the vehicle helps staff and students at schools easily identify the vehicle they require.</p>	<p>The Licensing Team have proposed an amendment to the Policy for this matter.</p>
<p>6.22 Disability Access 6.22.4 Who should supply the initial training and refresher training to load and convey wheelchair bound passengers? Does the council have a list of approved trainers and who would bear the burden of cost for training?</p>	<p>All training concerning passengers who require wheelchair assistance will be required to be undertaken by a driver. The sourcing of this training will be a duty for the Operator/driver.</p> <p>The Licensing Team do not currently have an approved list of providers.</p>
<p>6.29 Satellite Navigation 6.29.1 Why must a 'Sat Nav' be fixed within a hackney carriage and be used on every single journey. Drivers will have regular customers and will know the route to take for those regular journeys. It will often take longer to set the route for a very local short journey than it will to actually drive and complete the journey.</p>	<p>The Licensing Team have proposed an amendment to the Policy for this matter.</p>

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Comment from Consultee	Response by Officer
<p>Continued What is the point of having a knowledge test for potential drivers that requires them to know their local area if you are then insisting that they use a sat nav for every single journey? Will the local area knowledge requirement be removed from the initial test? These devices can be a distraction to the driver and again this seems to be another unnecessary cost burden.</p>	<p>The Licensing Team have proposed an amendment to the Policy for this matter.</p>
<p>9 VEHICLE LICENCES: APPLICATION PROCEDURES –(HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLES) 9.4 VEHICLE TESTING 9.4.5 Whilst this may be a courtesy service how would we be able to submit a declaration/renewal application if we have not been sent the relevant forms?</p>	<p>The Licensing Team ensure all renewals are sent out a month prior to your vehicle, driver or Operator is required to be renewed. If you do not receive these this is your duty to contact the team and request the paperwork.</p>
<p>9.5 Taxi Ranks The document shows that there are only 10 rank spaces available in Babergh and all of them are in Sudbury. As there are so few spaces why have the council issued in excess of 20 hackney carriage plates? Where are all of these vehicles supposed to go to ply for trade?</p>	<p>Suffolk County Council Highways as of 2019 began the process of consulting relevant parties on a review of the parking and general road infrastructure of Sudbury. The Licensing Team were alerted that a new rank was being determined for King Street. As of February 2020, all drivers were consulted by the team on the creation of the new rank in King Street and the Licensing & Regulatory Committee approved the new rank as of June 2020.</p> <p>However, since the Committee approved this Suffolk County Council Highways have begun the process to review again the infrastructure and the Traffic Regulation Order. The new proposed taxi rank has fallen by the wayside.</p> <p>The Licensing Team are waiting instruction from Suffolk County Council Highways as to the next steps.</p>

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Comment from Consultee	Response by Officer
<p>PART 3: PRIVATE HIRE OPERATOR POLICY</p> <p>10. GENERAL INFORMATION</p> <p>10.1 General Information.</p> <p>10.1.3 as per 9.4.5 How would we able to submit the relevant forms in a timely manner if we have not been sent them?</p>	<p>The Licensing Team ensure all renewals are sent out a month prior to your vehicle, driver or Operator is required to be renewed. If you do not receive these this is your duty to contact the team and request the paperwork.</p>
<p>10.1.6 as per 2.22 For what purpose is a tax check required and which type of tax check are you expecting to be done? The tax position of operators and drivers is a matter between the individual/company and HMRC. The tax and financial standing of a driver should be of no concern of the council. You are not employing any of us and you are not responsible for paying our tax, national insurance, class 2 & 4 contributions etc. As an operator we will not be sharing these details with you.</p>	<p>The Licensing Team are only required to check that the applicant (new or renewal) have undertaken the HMRC tax check. The Licensing Team are yet to be informed how this check will be undertaken. This is an external check via the HMRC and will be mandatory.</p>
<p>10.2.7 If the council refuses a licence application for what purpose would you keep the fee paid by the applicant? You would not accept going into a shop and handing over money to buy goods and then the shop refuses to pass over the goods to you and also will not refund you the money you have paid to them.</p>	<p>The Licensing Team have already had to begin the process and other external bodies require portions of the fee i.e., DBS Checking Service, Garages etc.</p>
<p>10.2.10 as per 10.2.7 not refunding part of the fee appears unjust.</p>	<p>The Licensing Team have already had to begin the process and other external bodies require portions of the fee i.e., DBS Checking Service, Garages etc.</p>
<p>11 CONDITIONS OF PRIVATE HIRE OPERATOR LICENCE</p> <p>11.1 Record Keeping</p> <p>11.1.1</p> <p>(iii) why is it necessary to keep a record of how the booking was made?</p> <p>(vi) why is it necessary to keep a record of the time the driver was allocated to the booking?</p> <p>(xi) why is it necessary to keep a record of the name of the individual that responded to the request and what is actually meant by this?</p> <p>(xii) why is it necessary to keep a record of the name of the individual that dispatched the vehicle.</p>	<p>Under the July 2020 Safeguarding Standards proposed by the Department for Transport this requirement for additional information with regards to bookings is to ensure public safety and protect the business if a complaint is received.</p>
<p>11.15 Booking and Dispatch Staff</p> <p>Why must booking and dispatch staff have a basic DBS check? They are office based staff and generally have no personal contact with passengers to be conveyed. This seems to be overkill and yet another unnecessary cost burden.</p>	<p>The July 2020 Safeguarding Standards as set by the Department for Transport have introduced this as a requirement as the booking staff are in a position of trust.</p>