

From: Toni Conlon
Sent: 30 December 2016 13:59
To: Sharon Degiorgio
Subject: Re: TWBC - Draft Hackney Carriage and Private Hire Licensing Policy 2016/17

Good Afternoon

Please see below my comments regarding the current Consultation.

Knowledge Test – In great favour. The more knowledge a driver has, the more confidence the travelling public will have in the service provided by both HC and PH. It has become evident that a number of the newer drivers are sadly lacking in some of the most basic knowledge of the area. I have sat the test, and found it to be a good all round test of local knowledge together with safeguarding and general Policy questions.

I would be most supportive of the Council adopting the new online test.

Officer response:
Comment noted

All other proposed changes make sense, particularly having Operators located in within the Borough, long overdue, but agree with the Grandfather rights of existing Operators.

Officer response:
Comment noted

Would like to see a change to the Policy which states that a vehicle which is to be replaced, must be younger than the vehicle being taken off.

There is already provision within the Policy which states that a car being brought on, must be less than 6 years old. Should a driver be involved in an accident, or suffer catastrophic mechanical failure, they may not be in a position to purchase a vehicle which is younger than the one they are replacing, particularly if the vehicle is relatively new, but out of Warranty.

The Officers assure me that the case can be put before a Sub-Committee, but these seems like taking sledge hammer to crack a nut and not cost effective, apart from the fact that by the time the Committee convenes, any vehicle that has been located for purchase, may well have already been sold. Failing the Committee route, it has been suggested that an Officer can make the decision, but again, really, under what circumstances would they say no? Surely the 6 year rule is sufficient.

Officer response:

There is a reasonable policy consideration around preventing a slide to an older fleet. That said, you can understand the concerns raised, but I think this can be dealt with effectively by making the discretion an Officer decision.

Whilst on the subject of the Policy, I would like to see an end to the 10 day Rule when issuing Points when disciplining drivers. This proved to be a real stumbling block, when, recently, drivers were given points as a result of evidence gathered during the Unmet Demand Survey, but had to be withdrawn again as they were issued outside of the 10 day

period. This made the Council look inefficient, and the point system look ridiculous. There should not be a time limit placed on the issuing of points, they should simply be issued once an infraction of the rules has been notified, which of course could be some time after the offence.

Officer response:

Agree, it is therefore proposed to amend Appendix 10, paragraph 3, by removing the reference to *“within 10 working days”*. Amend to *“Points issued to a licence holder will be confirmed in writing from the notification/discovery of the contravention or the conclusion of an investigation into a complaint”*.

Yours faithfully
Toni Conlon