



02/03/2023

To all members of the Board and the Licensing department.

Please accept and consider the following for consideration, discussion and thought at the planned meeting 21st March 2023.

The simplest but safest application processes implemented by other councils to solve the major issues discussed with and at Mr. Craig Mackinlay at his surgery in November 2022 was brought about after lengthy attempts to ease the process of licensing new drivers with TDC Licensing whilst, at the same time including all the safety aspects but streamlining the whole entity to resolve **(a)** the total deficiency of private hire vehicles serving the community of Thanet since the Covid pandemic and lockdown periods which resulted in a drop of over 50% of both licensed vehicles and drivers. This has led to widespread complaints from the public both to the firms as well as negative reports across press and social media platforms. **(b)** All of the private hire operators, firms and the staff are and have been under pressure to cover work or to even take bookings, this has resulted in abuse to staff and in turn to drivers. This has included general public attempting to go about their daily lives, employees getting to their jobs, care workers and essential members of the NHS and the emergency services being unable to get to their places of work on time or home in a timely, safely manner. The school transport system, not just from the taxi services point of view but from parents and KCC tender's department being seriously affected too, leaving schools, children, and their parents/guardians very frustrated. **(c)** There has been an enormously negative push back from the hospitality sector including hoteliers, publicans, restaurateurs, entertainment venues and concerned parents, youngsters and vulnerable members of public wanting to get to and from home safely. This is especially at weekends and nights as this has historically been the busiest times. Since not only the pandemic and the problems that brought to us all but also since the changes that were implemented by the licensing department, the numbers of drivers either new to the trade or renewing, has fallen at unsustainable rate with the result being the continuing and frustratingly difficult communication from all the operators with the licensing department to find a solution with all parties rather than having to look at cross bordering solutions out of desperation.

At the meeting in November last year Mr. Mackinlay and Mr Sproates asked that the licensing department could consider, using common sense with regards to the present application process especially with respect to the knowledge test which seems outdated and unnecessary considering that all companies and drivers have modern despatch systems. These systems all have satellite navigation built into the drivers equipment that not only provide the drivers with route guidance when needed, but also automatically give the drivers directions to the pick-up point and customer information, the correct prices, the inclusion of GPS tracking for the safety of everyone that also sends the data to operators despatch system, the speed drivers have travelled at as well as accurate timing and routes taken.





Thanet Private Hire Association

It was agreed at the November meeting that the operators would wait an agreed 3 months before looking at finding solutions elsewhere. This period has now passed and with no constructive replies received when enquiries have been made to the licensing department we asked if we could be involved in the planned meeting or read a statement but this has been declined and after a delay in being informed of the date of the meeting, we have been given one week to provide this statement and the attached for consideration.

One of the solutions that we proposed was that it would, as in many other boroughs now make sense to have one practical test with a licensing officer (or as in other areas where they have many new drivers to process, tender these tests to external locally licensed testers) to check in a practical way the drivers driving aptitude, their English language knowledge, their basic mathematics skills, their knowledge of the highway code and also ensure that drivers without the use of sat nav can get from one area of Thanet to another without having to know every road, avenue and venue. If the applicant was also licensing a new vehicle, then the visual check could also be carried out at the same appointment.

Surely this would streamline the at present multi-step process solving many parts of the application in one appointment just leaving the safeguarding, medical, tax, and DBS checks to be carried out beforehand. In turn this has been proved to improve, modernise, and solve multiple issues whilst observing all laws and guidelines.

This type of process has been implemented in many other areas not necessarily within Kent but nationwide. This has led to the private hire and hackney services getting back to a healthy level for the needs of the community, the wellbeing of operators, firms, and the staff they employ but also has created a much-needed increase in revenue for the councils involved.

I submit this statement and the attached data and links on behalf of the Operators and Owners of Cab Call Centre, Thanet Taxis Ltd, United Cars and Central Cars all members of the TPHA (Thanet private Hire Association) established 1981.

Andy Doody





Information and links for 21st March TDC Licensing Board meeting.

<https://www.wolverhampton.gov.uk/licences/taxi-licences/taxi-knowledge-and-practical-test>

The driver assessment process consists of the following subject areas:

- Safeguarding children and vulnerable adults
- CSE awareness
- Modern Slavery
- County lines
- Face to face English assessment (followed by a recorded interview where there are any concerns)
- Licence conditions
- Vehicle conditions
- The licensing process
- Enforcement and compliance
- Plying for hire
- The Health Act 2006
- Environmental Protection Act 1990
- Customer safety
- Customer care
- Disability Awareness (Equality Act 2010)
- Road and passenger safety
- Personal safety

The course lasts approximately 6 hours and applicants must sit and pass a written multiple-choice test following the training, 75% correct is required to pass.

Both the course and the test are only available in English. No translation or interpretation of the training or test is available.

<https://www.chichester.gov.uk/privatehiredriverslicence>





Chichester council provides not only guidance notes but also has a sensible and modern application process with guidance and study notes.

https://www.reigate-banstead.gov.uk/info/20373/taxi_and_private_hire_information_resource/816/knowledge_test

1. Private Hire Knowledge Test

You will be sent a link to an online platform which will allow you to complete the test in a place of your choice.

General Information

To be able to take the test you must have already applied to be a private hire driver with Reigate & Banstead Borough Council.

There are four sections, listed below, with five questions in each section:

1. Ability to navigate the local area, locate destinations and plan a route. (You may use either a map book or online tool such as google maps/app to assist you during the test)
2. Basic maths - dealing with money and fares;
3. The Council's '**Private Hire Policy and Conditions Document**' (PDF); and **Convictions Policy (PDF)**
4. The Official Highway Code (2022 edition) - Department for Transport, Driver & Vehicle Standards Agency. We do not provide this. **You can order a copy of The Highway Code book** online or buy a copy from most high street bookshops.

The time allowed is 45 minutes to answer 20 multiple choice questions, which have been spread equally amongst the topics listed above.

<https://www.eastsuffolk.gov.uk/business/licensing/taxi-and-private-hire-licensing/>

A simple but safe application process including a 2 day college course but as recently revised no Knowledge test for private hire drivers.

If you would like to become a licensed driver there are several checks and a college course which you will have to pass, with separate fees payable for each of the checks:

A basic reading, writing and arithmetic test





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An enhanced level Disclosure and Barring (DBS) check

A DVLA check

A medical check (unless you hold a PCV or HGV licence)

A driving skills test and theory test

A local geographical knowledge test (**for hackney carriage drivers only**)

A two-day college course 'The Role of a Professional Taxi and Private Hire Driver'

http://www.moray.gov.uk/moray_standard/page_69814.html

A very straightforward and simple application process that covers all the safety guidelines.

Thurrock.

<https://www.thurrock.gov.uk/hackney-carriage-or-private-hire-driver-licence/apply-for-new-licence>

To apply for a hackney carriage or private hire driver's licence, you need to submit:

a completed online application form, below

a valid DVLA driving licence, or equivalent

a recent colour passport photograph

a valid passport or birth certificate

evidence of your National Insurance number

a utility bill that is less than 3 months-old

payment of the application fee – for details, go to taxi licensing fees

either criminal record information or a 'Certificate of Good Character' from overseas if, from the age of 10 years-old, you have spent 6 months or more continuously living outside the UK

provide a valid medical report





provide a Passenger Assistant Training Scheme (PATS) certificate

complete a Disclosure and Barring Service (DBS) application online

give consent to a DVLA check online

provide proof of your language proficiency

provide additional documentation, if required, showing your right to work

These are just a few examples from various other boroughs displaying how the whole system of applying for a private hire drivers' badge can be modernised and simplified whilst ensuring that all safety and standard requirements are met.

The main reasons with all of these and others that have similar processes that they have succeeded in resolving all of the issues we have come across in the recent few years in Thanet is that they all provide either practical courses with an appropriately licensed inspector/examiner and also give access to training programmes to encourage new drivers to join our trade.

Extracts from a recent letter to Mr Andy Doody from the PHTM – Private Hire & Taxi Monthly National magazine.

'Hi Andy

I admire your fighting spirit and glad to see you are still battling on behalf of the trade in Thanet, unfortunately your story is not unique, we are hearing the inadequacy of licensing departments across the country with long delays in processing of licensing applications.

Many operators are having no option but to now register in Wolverhampton so their drivers can license there instead...we have covered this topic many times in PHTM over the last few months.

I am of course happy to run an article on this topic for you in PHTM if you wish to supply something for the April issue.'

We in Thanet Private Hire Association do NOT want to take this as a way forward but desperation and frustration points have been reached. We look forward to attending the meeting even as purely visitors in the public gallery to hear the proposals including in the meeting's agenda.



**Thanet Private Hire Association
c/o 76 Northdown Road
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**Bullet points of issues for meeting including Mr Mackinlay, Mr Sproates and Councillors
Friday 25th November.**

Operators attending:

Mr Irfan Arif – Owner/Operator. United Cars.

Mr Rupert Lambert – Director/Operator. Central Cars

Mr Karl Evans -Owner/Operator. Thanet Cars

Miss Tiffany Stafford – Director/Operator. Central Cars

Mr Andy Doody – Operator. Thanet Taxis Ltd/ Secretary TPHA

- Our trade is and has never been one that is a chosen career path and has mainly been a trade taken up by people that have been made redundant, retired, or found it difficult due to their academic level. Our trade also used to have a large contingent of part time drivers that would use the job as a way of topping up their salaries or to be able to save and improve their standards of living by working as drivers' weekends and or evenings. It has now become economically unviable for part time drivers anymore due to the costs involved, the knock-on effect being even less drivers available for us as companies trying to provide a service.
- All 3 of our companies are now running with roughly 50% the number of drivers we had 3 years ago. How we are supposed to provide a service to the community, NHS, schools, the elderly and disabled, the vulnerable young people who need safe transport, rural areas of Thanet as well as the tourism and public entertainment sectors? Social media is full of complaints and general dissing of the private hire/taxi service in Thanet. Decades of hard work building our reputations has been decimated.
- This decline is not the same across the UK as many councils have been working with operators from their own districts as well as others to recruit new drivers to the trade. Applications and knowledge tests have to be thorough we all acknowledge but why when there is so many people that are either unemployed or unskilled that want to work finding it so difficult to become licensed as private hire drivers in Thanet?

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- **Initial interest:** when contacting the council licensing department either in person or by email there is again no real encouragement with the stock answer being go on the website and in several cases new people enquiring at the Gateway being told when they ask what the relevant site is being told “you’ll have to look it up”, great attitude eh? If a simple request for information when emailing is then asked, the response is minimal and not very forthcoming. Please see the example and can there not be again communication between the operators and licensing officers that could make the job more attractive.

- The time taken to actually get a knowledge test booked as well as the frequency. At times it has taken up to 6 weeks to get onto a course and if they fail it can again have to wait over a month to retake and then pay again. This also prevents them applying for their DBS which in turn slows down the application process.

- Understandably there must be a charge for attending and taking a knowledge test but if a potential new driver and as someone that would be soon working and contributing to the community and to the council instead of taking from the system could there not be a reduction on the first test and following tests? Maybe even a refund/discount from their drivers badge fee once they have passed as an incentive. Every driver that gets licensed is only going to increase revenue not only in annual licensing fees but in that another vehicle with the licensing costs of that vehicle resulting in increased income for the council.

- All private hire companies use software despatch systems that include not just sat nav but give the driver the option to use the systems to take them to the pickup address and the destination. Why does a local knowledge test of addresses then have to be taken? None of us want or would take on drivers that are not going to be an asset to our companies. There are other councils that no longer include an old-fashioned street/place knowledge.

- Safeguarding has to be paid for and passed with blue lamp and a certificate is issued so why then does this have to be retested with our licensing? There has also been feedback that the translations of parts of this into other languages are incorrect. **(Rupert to expand on the difficulties)**
 - We as operators have asked before, that when a new applicant fails the licensing departments knowledge test that they could be given advice, training and or support on what areas they have got incorrect. Then to encourage that applicant that has passed all sections bar one, could they not then be tested on just that particular section rather than having to complete the whole test again? We have never suggested that they be given the exact points but surely if they were at least told it is

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on safeguarding or licence conditions etc then they could then revise and study that particular area again with the knowledge that the other sections were answered correctly? Would this surely not be an improvement on the present stock answer of “everything you need to know is on the website” that has been told to applicants before? These men and women need to be encouraged not discouraged with the whole process surely. **(Training prior to test as is carried out by other districts and resulted in safer, more knowledgeable drivers)**

- Testing on the highway code as part of Thanet licensing test? Why then when a driver has passed their driving test including those from other countries that have been given a full UK licence and have been driving with no convictions for 1 year do they have to be tested again to pass the licensing knowledge test?

- We understand that in the New year the application process will be including an English language test and we were told by Ms Button at a previous meeting, that they will be introducing a practical driving test. If this is the case as it is in many other districts including Canterbury, then we all believe that this would be very beneficial and encourage this notion. Surely then it will eliminate the need for testing separately the sections currently in place on (a) the English language test, (b) the highway code section and (c) the need for the local knowledge/route section? After the driving assessment then the driver would only need his blue Lamp safeguarding certificate and Ambassador course certificate, plus the written tests of maths, driver and vehicle licence conditions. This would result in them being able to submit and complete their applications and get working **(Irfan to expand on these points)**

Further points to be discussed if time allows.

If not, please could a further meeting with all the relevant people be arranged? Would it not be a good idea to have quarterly meetings between licensing and the operators?

- **Safety one badge one company etc? Many instances of drivers carrying out school accounts, distance work for other operators without notifying either licensing or the operator named on their badge. This also adds to the problems of having sufficient cars on their correct company leading to customer complaints and further social media slating.**

- **Where are the supposed new drivers going? How many brand-new drivers have actually gained badges in the past 3 years compared to the same period previously?**

The problems of driver's whereabouts, council regular contact as in the past,

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even weekly, what drivers are where/ insurances etc.

