

Rossendale taxi association

In relation to the licensing policy review for taxis, this document is vast and contains many items of significance, all of which **MUST** be fully understood before any decision can be made in relation to the policy as a whole.

At liaison meetings on this issue, the trade recommended that the policy be split into many parts and brought in those modules to committee in order to make the whole process much easier and digestible. This recommendation has however been ignored, which means we now must break it down at this meeting and discuss it in detail, therefore we would recommend that this meeting and review is taken as a question and answer meeting, members asking the questions of both the licensing manager and the trade representatives, this will allow the licensing unit **AND** the trade representatives equal opportunity to make the facts known in a fair and equal manner.

Having gone through the 32 pages of this document in detail, we have found 45 points of concern. Some are contradictions to regulations, some are contradictions to the English language, some are written without the committee approval of such changes to policy and some are things which have been changed, tried and failed due to a failure on the part of the licensing unit.

This whole review was supposed to be in order to bring Rossendale licensing policy in line with the governments best practice guide, but in fact much of it contradicts this very guide.

The main areas of concern are:

2.11 Reference: to penalty points scheme.....many references to this although the scheme was part of this (originally) 4 part document, this means that the policy review has been written on the assumption that all policy changes were going to be approved by committee and full council. In actual fact it clearly stated in the document that it had been approved by the

members next month, very presumptuous and we are sure that the members would prefer to at least see these items before they vote in favour of them.

1.4 CAN BE REVISED AT WILL.....changed at any time, without any approval or members input, very dangerous and highly recommended that this particular one is voted against before we continue.

2.4 CRB CHECKS... this should be discussed in more detail for the recommendation or request.

2.6 ANNUAL LICENSES....this contradicts the best practice guide, we have tried it but the licensing unit has failed to be able to provide enough appointments to be able to accommodate this, so we recommend that we revert back to the 3 year badges as was, also at the original price of £150 per badge, the photographs should only ever need to be endorsed once, on first application, after which we are on the licensing unit system and are known to the licensing unit staff, every year is pointless, unnecessary and a waste of our time, effort and money.

2.7 ANY OTHER REASONABLE CAUSE....is far too vague and allows for personal opinion to be used rather than clear legislation, this is a clear contradiction of the whole purpose of the policy review.

2.8 see 2.6

2.10 DSA DRIVING TESTS.....this should be taken on first application ONLY, the requirement to re-take this test, as a threat or as a punishment for not renewing a badge on time is completely unnecessary and a waste of time and money, and the idea of YOU MUST PASS IN 3 MONTHS is draconian, given the fact that it can take more than 3 months to book an appointment, also we have received numerous complaints from the trade, that they have been sent away for silly reasons, only to be told when they come back that they are too late and must now re-sit the DSA test, this is abuse by the licensing unit, therefore we recommend that the reference to this is removed immediately and it is written in that the test is for first time applicant ONLY.

- 2.13 VEHICLE INSPECTIONS.....again due to abusive and draconian actions of the licensing unit, we require that there is a trade representative present at vehicle inspections, this is due to the fact that the trade are painted in a very dim light in enforcement reviews, but the FACT is that many times the licenses are suspended for no reason, VOSA inspectors say it is a simple defect notice, but the licenses are suspended with NO justification, so we wish to be there to make sure that this does not happen in future, and to explain to the driver/operator why they have been suspended, knowing that the trade know they have representation in this matter.
- 2.14 RENEWAL OF LICENSE (see 2.10) a renewal is just that, not a first application, again, FAR TOO MANY TIMES, drivers are sent away to get a new log book for a 6 year old car for example, but when they come back with the log book, they are told the car is NOW too old and cannot be licensed, this is unacceptable.
- 2.15 ANNUAL BADGES... see 2.6 a contradiction of the best practice guide
- 2.17 35 RE-BOOKING FEE this was supposed to be for repeat offenders only and used at discretion, but has again been abused and used for many things including the licensing unit making a booking without request, therefore we request that this fee is abolished.
- 2.19 AGE LIMITS OF VEHICLES, this is yet another contradiction to the best practice guide and should therefore be scrapped with immediate effect.
- 2.21 ADVERTISING ON VEHICLES again the best practice guide clearly states that it is common practice and a good idea for hackney carriages to advertise in order to make themselves more easily identifiable and to subsidise their income.

- 4.3 MOTs have been discussed many times through liaison and not resolved or brought to committee therefore should not be written into this policy.
- 4.9 there are too many errors in this part to explain on paper, this will be explained at the meeting.
- 4.12 tolerance of timescale **MUST** be granted where there is personal injury involved.
- 4.19 **ALTERATIONS OF CONDITIONS** Again far too vague and puts far too much power in the hands of one individual,, committee must be involved in **ANY** alterations, therefore we recommend that this item be removed from the policy.
- 4.20 **ROSSENDALE TEST** is a completely different document which has not yet been approved, is again assuming that this item will be approved and should not yet be in this policy document, there is a cost aspect which **MUST** be resolved, and a frequency of testing issue (the Rossendale test is annually **NOT** every 6 months) which has not yet been resolved.
- 5.2 **PRIVATE HIRE OPERATORS LICENSE.....** firstly, far too many of the trade have been lied to by the licensing unit, as a result of which, it **MUST** be written in this part that an operators license **IS ONLY REQUIRED FOR OPERATORS OF PRIVATE HIRE VEHICLES**, and the business radio license **IS NOT REQUIRED** radio transmission is far too vague. This has been discussed and agreed at liaison.
- 5.3 **KEEPING OF RECORDS** This needs a complete overhaul and should have been discussed at liaison..
- 5.4.3 **PLEASE READ THIS ONE VERY CAREFULLY**and repeatedly, and if you can make any sense of this paragraph within the document please let me know, it defies the English language.
- 5.5 **AGREED PRICES....**are exactly that, if a price has been agreed then the meter is redundant and does not need to be used. It would be nice if the

licensing unit started working with the trade and not constantly finding ways to charge more but find ways to reduce their income. How would they like a pay cut at our discretion?

5.6 USING HACKNEY CARRIAGES....these two sections have been challenged at high court, at huge cost to the licensing boroughs, won at court, and have now been abolished. Maybe this should have been written into this policy, or at least removed from it.

5.8 AGAIN WITH THE THREATS.....A RENEWAL IS A RENEWAL

6.2 SEE 2.14

7.16 ALTERATIONS OF CONDITIONS.....see 4.19

7.17 ROSSENDALE TEST.....again should not be in this policy document as it has not been agreed.