

Consultation responses and recommendations

APPENDIX C

Date Received	Position of Consultee	Comments	Section of Policy	Page of Policy	Licensing Manager's Recommendation
07/01/2021	Taxi Driver	This all sounds great and fine with me, but our trade is being destroyed by this virus and Uber are worse than COVID.			Thank you - no change recommended.
07/01/2021	Kent Police	Support the changes that add rigour around DBS checks.			Thank you - no change recommended.
11/01/2021	Systems & Support Officer	2.23.4.1, 2.23.3, 4.6.3.1, 4.6.3.2	Para 2.23.4.1	18	<p>This is a valid point. It is proposed that Para 2.23.4 be amended to read:</p> <p>2.23.4 Given that vehicle licences are issued for a standard one-year period, all applicants, who are not already Medway-licensed drivers registered with the DBS Update Service, must provide a completed Basic DBS Check Certificate prior to the grant of each licence.</p> <p>...and that Para 2.23.4.1 and Para 2.23.6 be deleted.</p>
			Paras 4.6.3.1 & 4.6.3.2		<p>This is a valid point. It is proposed that Para 4.6.6 be deleted, and that Paras 4.6.3.1 &amp; 4.6.3.2 be replaced with the following:</p> <p>4.6.3.1 All new applicants, who are not already Medway-licensed drivers registered with the DBS Update Service, must provide a completed Basic DBS Check Certificate at the point of their initial application to the satisfaction of the council.</p> <p>4.6.3.2 All existing operators, who are not already</p>

					Medway-licensed drivers registered with the DBS Update Service, must provide a current (less than 3-month-old) Basic DBS Check Certificate annually, starting from the next anniversary of their licence start date or the start date of their next licence; whichever comes first. Any operator who fails to do so will be subject to suspension or other enforcement intervention as appropriate.
		Appendix A starts at number 15, where all the other Appendices start at 1.			This administrative matter will be corrected in the final Policy.
12/01/2021	Taxi Driver	It is stated that you consulted with the MLTDA This is not the case and the plan should be withdrawn until such time you have consulted with the trade and then be put forward again when this has been corrected. You should not be making proposals without consulting the trade or its representatives.	1.4.1		An explanation has been given to the individual. This is not relevant. This policy is a draft, the whole document. All wording within it including the references as to whom has been consulted is a draft and becomes fact only when the consultation period has ended, and the policy becomes a live document. We do not pre-consult with anyone on a consultation document.
		If the plan is approved and implemented on the 1st of May 2021 you cannot expect compliance to all items immediately there must be provision to allow time for drivers to comply.	1.4.2 & 1.4.3		Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence," but also that a pragmatic approach should be undertaken in terms of allowing reasonable time frames, etc. This is reflected in the appropriate sections where timescales for compliance

					for existing drivers is given for example Disability Awareness Training to be completed by 1 September 2021. No change recommended.
		<p>Medical if this is to be introduced this should have been from the next licence application. This has already been put into practice without prior notice my last licence application had to be accompanied with a medical at great expense.</p> <p>The medical form was also for lorry drivers if this is to now be mandatory a specific form should be produced for Taxi/ Private hire drivers not using a form for something else.</p>	3.10 5		<p>This is not a new requirement; the current taxi policy states - 3.4.7 A satisfactory medical certificate from a doctor in the form provided must be submitted on first application and then at 5 yearly intervals until the age of 55 then every 3 years until the age of 61, thence annually, and at reasonable time at the request of the Council. The applicant must meet all fees. The Council adopted the group 2 medical standards and the D4 medical form is applicable and updated by DVLA as and when changes to the medical standards are made. No change recommended.</p>
		<p>Although I agree that drivers should go on the update service from the next application for renewal. If this is introduced on May 1st and implemented immediately. time should be allocated for drivers to do this. I have already done this as I was asked to again at my last renewal.</p> <p>It seems like a pattern to introduce things before the plan comes into force and without consulting the trade.</p>	3.11.5.2		<p>Drivers not already registered are required to sign up to the update service by no later than 1 July 2021. In accordance with the National Standards, all drivers now must have a DBS check every 6 months. If the driver did not sign to the update service at a cost of £13 pa) they would have to pay £60 every 6 months. Signing to the update service now saves them £107. No change recommended.</p>

		Safeguarding - If this is introduced as on the plan is there a time frame and details of acceptable companies that can carry out this training. I see for new drivers it can be High Speed training, are there alternatives? can you provide further clarification. Also introducing this on the 1st May is ok but some time should be allowed for drivers to do this perhaps like disability awareness September is a good time frame.	3.9		This is a valid point. It is proposed therefore to include the following wording in para 3.9.2: The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021.
		I have done this disability awareness training do you keep records of drivers that have passed this training and can you confirm.	3.22		No. For consistency all training must be undertaken by an approved course provider. No change recommended.
		Currently there is provision for vehicles to continue to be licensed if they are over the Recommended age but still remain in great condition, I feel this should remain. However, if you move to strict over 10 years and it won't be re-licensed. If this proposal is approved and is introduced on the 1st May how will this be implemented a) on vehicles that have just been licensed b) vehicles that are due to be licensed within the following say 6 months. A period of time must be granted to allow the change of vehicle this cannot be introduced immediately. Example a vehicle is 10 years old in great condition and due to be licensed in June 2021 under current regulations	Vehicle Age	17	Clarification has been sought on this point and the recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle.

		<p>this will be fine with new regulations on 1st May this vehicle should be replaced immediately or by the renewal date I feel this should be 1 year from the renewal at least.</p> <p>This will cause undue hardship and could put a driver out of work.</p>			
12/01/2021	Taxi Driver	<p>Dual licence on implementation of this plan if it's all approved, please can you send me further information on changing my current HB to a dual HB PB or is the current badge issued recently is a dual badge or if I need to make any changes to be able to drive a PH vehicle. On application I did meet the new requirements and submitted medical forms DBS update etc. I also asked about my PH badge.</p>	3.1.2		<p>We will automatically issue a dual licence to those currently holding both. For all other hackney carriage drivers, we will issue them upon renewal. If they wish to 'upgrade' their licence sooner there will be an associated administration fee, which will cover the cost of processing, printing, and issuing new badges. This fee will be calculated to be cost neutral.</p>
13/01/2021	Taxi Driver	National guidance what can I say	1		Not relevant

		<p>2.1 no concerns</p> <p>2.5 fine should slow down the growth of hackney carriages that are not needed, because nobody has done a survey of need recently.</p> <p>2.6 All vehicles should be euro six, although with the 10-year age limit any vehicles that are under ten years old but euro 5 should be allowed to still be plated.</p> <p>2.8 fine by me</p>	2		<p>2.6 Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.</p>
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		<p>Where are we meant to store lost property and who will be responsible for it?</p>	10		<p>The Police no longer take lost property and Medway Council no longer has a facility or resources for storage. Drivers and Operators are in the best position to reunite property with its owner. We will continue to</p>

					maintain a lost property register.
		As long as it is proportionate.	13		Fees and charges are in line with legislation with a view to recovering costs of issue and administration. No change recommended.
		<p>15.2 &amp; 20 don't have a stretch limo.</p> <p>16 ???</p> <p>17 fine as long as the euro 5 cars can carry on working til they're 10 years old as a lot of drivers will be unemployed if the vehicles under euro 6 are written off. Also, what are the council going to do about the Arriva buses driving around 2001 2004 plate chucking out fumes daily.</p> <p>18.1.3 n/a</p> <p>18.1.10 – tinted windows are fine as long as factory, although plenty of TFL plated vehicles driving around with limo tints</p> <p>8.1.12 – no views</p> <p>21. euro 6 as above</p>	Appendix A		<p>17 - 3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change their vehicle. The licensing of buses is not within our remit and therefore the comment regarding buses is not relevant to this consultation. 8.1.10 - This is covered as specified in the new policy. Vehicles licensed by other authorities do not fall within our remit.</p>



		<p>Section 4 - First aid is the responsibility of the licensee I can't see why this has been added to the policy, extra cost and red tape when we have vehicles operating here that don't have to live up to half of the standards, we do.</p> <p>Section 7 I agree with this, this should be made national law.</p> <p>Section 9 would be nice if we the licenced MEDWAY driver didn't have to go to Gravesham website and input our personal data into another council's website.</p> <p>Section 10 Where do we get this signage from will there be a charge?</p> <p>Section 14 n/a</p> <p>Section 15 Fine by me.</p> <p>Section 18 No need for cctv as it only shows a moment in time and if you get stabbed you still got stabbed whether you have cctv or not.</p> <p>Section 28 – n/a</p>	<p>Appendix B</p>		<p>Appendix B, Section 4 - Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits, which has only come to light following this review, and fire extinguishers. No change recommended. Appendix B, Section 9 - We are now a shared licensing service, which is hosted by Gravesham Borough Council and therefore Medway Council Taxi Licensing webpages are redirected to Gravesham to enable applicants and existing drivers to apply for their licence on-line. Appendix B, Section 10 - This signage will be provided by the Council. The wording will be included on the rear of the internal vehicle licence so that it is visible by the passenger. Appendix B, Section 18 - This is included in the policy for those drivers wishing to install CCTV in their vehicles as a deterrent. No change recommended.</p>
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14/01/2021	Taxi Driver	<p>Hope you are well. I am writing to you about the new requirements as I do not agree with them. Our existing drivers have been working for about five to thirty years or more. This new law will affect our lives. The council has failed to stop uber drivers and out of area drivers, but they are trying to stop us as a long-time driver. However, we are helping and serving this community during this pandemic. Many drivers are old and unable to sit these exams or any training as they have a many issue. Therefore, we are unable to sit any English tests or disability awareness tests.</p> <p>Also, it is very hard for us to change our vehicle or any new requirements for the existing drivers even though we have not got enough jobs because of uber drivers, out of area drivers and this pandemic.</p>		<p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended. The comments relating to Uber are noted however the situation with Uber is governed by legislation and case law not policy and therefore are not relevant to this consultation.</p>
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		<p>If you make the applications hard for the new applicants, then we will lose drivers. Then uber driver and out of area drivers will work in here and Medway Council will not have any benefit.</p> <p>I am requesting the council to extend driver license and vehicle license to at least five years, it will also be less work for the council.</p> <p>We hope that the council will understand our situation and if you continue to liaise with MLTDA for any requirement it will be better.</p>			<p>As above. In relation to the extending the period of validity for driver licences, this is not possible. The maximum period of validity is governed by legislation, which is three years.</p>
14/01/2021	Vokes	<p>It is intended that there will be more wheelchair accessible vehicles on the road (which can only be a good thing), but insistence that new Hackney Carriage drivers must have a wheelchair accessible vehicle will surely have the opposite effect because in future I doubt any drivers will want a Hackney Carriage license. My guess is that very few new drivers will attempt to qualify for a Hackney Carriage license in future, and that the number of wheelchair accessible vehicles will continue to be in decline. My follow-on suggestion was going to be that new private hire drivers would need to drive wheelchair accessible vehicles too, but of course that would deter anyone wanting to</p>			<p>There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.</p>

		<p>enter the trade as a licensed Driver, and they'd look to become licensed elsewhere before working in the towns.</p>			
		<p>I know I sound like a broken record, but it will be farcical that many out-of-town vehicles that have acquired licenses elsewhere will be on the streets of Medway and able to act with impunity, while Medway licensed Drivers face tighter regulations concerning wheelchair accessible vehicles etc. In my eyes what we are seeing here is an honest attempt to raise the quality of service in Medway, but which will be totally undermined by UBER and other out of town drivers. It is already the case that most people looking to enter the trade with already choose to become licensed in Tonbridge and Malling, or join UBER. If this continues then in ten years there won't be any wheelchair accessible vehicles on the streets at all, and the Licensing Authority won't have any local vehicles to license. In service level terms we seem to be in a race to the bottom which will undermine any notion of the local taxi drivers being an essential part</p>			<p>The comments relating to Uber and vehicles licensed by other authorities are noted however these are governed by legislation and case law not policy and therefore are not relevant to this consultation.</p>

		<p>of the local authority's transport policy. Clause 2.22.1 effectively makes this point for me. I quote "No vehicle will be granted a license by Medway Council if it is licensed by another authority. This is because a vehicle is unlikely to comply with the requirements of two separate licensing authorities, could cause confusion to members of the public and impede the Council's ability to effectively regulate." This clause would make sense if the rule was that a vehicle licensed elsewhere couldn't be driven more or less exclusively in Medway, but it can, and they do...completely impeding the Council's jurisdiction.</p>			
		<p>I don't mean to harp on, but it feels that at times like these our local council should be supportive of local business. The fact that it doesn't seem inclined to take action to support your work by taking action against UBER and restricting other out of town drivers indicates to me that the importance of having a well licensed taxi service isn't appreciated or recognised. Accordingly, our trade seems doomed to gradual decline despite both our best efforts to raise standards. COVID-19 issues aside, I just wish someone in the Council would make a stand against this relentless march toward the destruction of our</p>			<p>As above.</p>

		industry.			
14/01/2021	Taxi Driver	<p>Our existing drivers have been working for about five to thirty years or more. This new law will affect our lives. The council has failed to stop uber drivers and out of area drivers, but they are trying to stop us as a long-time driver. However, we are helping and serving this community for a long time even during this pandemic as well. Many drivers are old and unable to sit these exams or any training as they have a many issue. Therefore, we are unable to sit any English tests or disability awareness tests.</p> <p>Also, it is very hard for us to change our vehicle or any new requirements for the existing drivers even though we have not got enough jobs because of uber drivers, out of area drivers and this pandemic.</p> <p>If you make the applications hard for the new applicants, then we will lose drivers. Then uber driver and out of area drivers will work in here and</p>			<p>Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended. In relation to the extending</p>

		<p>Medway Council will not have any benefit.</p> <p>I am requesting the council to extend driver license and vehicle license to at least five years, it will also be less work for the council.</p> <p>We hope that the council will understand our situation and if you continue to liaise with MLTDA for any requirement it will be better.</p>			<p>the period of validity for driver licences, this is not possible. The maximum period of validity is governed by legislation, which is three years.</p>
15/01/2021	Taxi Driver	<p>Is there an acceptable qualification that is required or a list of requirements that should be covered as many companies offer different courses, is there a list of recommended providers available that can provide the course and certificate required.</p>			<p>it will be mandatory for all drivers and applicants to attend an approved Safeguarding Awareness session; this is also applicable to Disability Awareness training. The Council will specify named course providers, which will be published on our website when the policy is approved.</p>
24/01/2021	Taxi Driver	<p>How long can I keep my licensed vehicle on the road after the implementation of the new taxi policy? In addition, after May will current licensed Hackney carriage drivers have a choice to purchase either a disabled access vehicle or a normal vehicle?</p>			<p>Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle.</p>

27/01/2021		<p>Hope you are well. I am writing to you about the new requirements as I do not agree with them. Our existing drivers have been working for about five to thirty years or more. This new law will affect our lives. The council has failed to stop uber drivers and out of area drivers, but they are trying to stop us as a long-time driver. However, we are helping and serving this community during this pandemic. Many drivers are old and unable to sit these exams or any training as they have a many issue. Therefore, we are unable to sit any English tests or disability awareness tests.</p> <p>Also, it is very hard for us to change our vehicle or any new requirements for the existing drivers even though we have not got enough jobs because of uber drivers, out of area drivers and this pandemic.</p> <p>If you make the applications hard for the new applicants, then we will lose drivers. Then uber driver and out of area drivers will work in here and Medway Council will not have any benefit.</p> <p>I am requesting the council to extend driver license and vehicle license to at least five years, it will also be less work</p>			<p>Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended. The comments relating to Uber are noted however the situation with Uber is governed by legislation and case law not policy and therefore are not relevant to this consultation.</p>
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		<p>for the council.</p> <p>We hope that the council will understand our situation and if you continue to liaise with MLTDA for any requirement it will be better.</p> <p>Thank you.</p>			
27/01/2021	Taxi Driver	<p>I am concerned regarding the policy changes to the taxi trade. My objection is If you suspend my licence on May 1st due to the new legislation it will cause financial hardship.</p> <p>The main problem is my car will be over 10 years old but is well looked after and serviced with a full Hackney licensed until Nov 2021.</p> <p>I would struggle to get finance at the moment with covid situ.</p> <p>Surely it would be better to fade this in over time not just have a cut off point? I'm sure there are many drivers in a</p>			<p>3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change</p>

		similar position to me.			their vehicle.
27/01/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old on the 1st of May 2021. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose. As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p>	Vehicles	11-12	<p>3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change their vehicle.</p>

		<p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>			<p>Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
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27/01/2021	Taxi Driver	<p>You are proposing that a driver with 6 points on his/her licence is classed as unfit to drive. If you were to receive 3 points in July 2020 and receive 3 points 2 1/2 years later, you class this as unfit to drive and therefore cannot work. This is very harsh and I totally object to this as I am not bound by the DVLA or police from driving Page 37 section 17 To make a licensed vehicle over 10 years on 1st May not except able it is complete madness due to the current world we live in This trade like others has been hit very hard in terms of income to tell a driver his car cannot be used due to age is a disgrace when this car has passed all council requirements i.e. annual and 6 monthly inspections I don't know what you think a taxi driver currently earns but none of us have been furloughed or work from home we are all self-employed As you know to get a loan you have to provide proof of income with the last 12 months our income has been reduced dramatically therefore the chance of getting car loans or bank loans have been reduced drastically I feel you as a council &amp; department have better and more important things to do Yet again the licensed driver is getting more rules and legislation thrown at us As normal UBER will carry on working this area under no</p>		<p>In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended. 17. Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. The comments relating to Uber are noted however these are governed by legislation and case law not policy and therefore are not relevant to this consultation.</p>
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		<p>rules or licence driving there out of date cars taking more business away from us          You as a council said you would back us to remove this problem yet again you have done nothing to date some of you won't even have a online meeting with our representatives to take this matter further Why should we accept your proposals when you won't even help us with our major problem in the area</p>			
27/01/2021	Taxi Driver	<p>Certain vehicles over 10 years old can be in exceptional condition if properly maintained. So, they should be allowed to be used until they fail to meet annual or interim test standards. And I do agree to the gradual removal of vehicles below Euro 6 standards. As long as it is within a reasonable timescale. The trade is suffering financially at the moment due to the pandemic. And some drivers will not be able to change vehicles.</p> <p>A driver not deemed as fit and proper after gaining 6 points on his DVLA licence is not acceptable. We are professional drivers, but we are also on the roads for a much longer period of time than a normal driver. Who would</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. In relation to the points and the suitability, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not</p>

		<p>be allowed 12 points before disqualification? So, although we are careful. Minor motor convictions sometimes occur.</p> <p>And I would expect a reasonable time limit to implement any changes. A minimum of 12 months after the start of the new policy. And kept under review due to the current Covid Pandemic.</p>			<p>take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
28/01/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old on the 1st of May 2021. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose.</p> <p>As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring</p>

		<p>of May) of vehicles that have high emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p> <p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>			<p>conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
28/01/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle is over 10 years old on the 1st of September 2020. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. I have purchased this vehicle last year and have another 4 years to pay off my finance, this will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose.</p> <p>As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that</p>

		<p>considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high emissions (below euro 6 for diesel and euro 5 for petrol) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p> <p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>			<p>is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
28/01/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old in near future.</p> <p>This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose. As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue</p>	Vehicles		<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor</p>



		<p>to be considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p>		<p>traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
		<p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>		<p>Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In relation to the points and the suitability, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional</p>

					responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.
29/01/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old on the 1st of May 2021. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose.</p> <p>As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle.</p>

		emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.			
30/01/2021	Taxi Driver	<p>I would like to make known my objections to the above proposal. It is very unfair to bring in this change at such short notice, especially at these times when so many of us are struggling to make a living. As things stand, we all keep our vehicle in a clean condition and good running order, then replace them when they fail to reach this standard.</p> <p>The proposed change concerning Appendix E puts us in a position that goes against government policy that any person is fit to drive with less than 12 penalty points. So would like to object to this being fair also.</p> <p>I hope my comments will be given proper consideration.</p>	Appendix A section 17		<p>It is a legal requirement for the current taxi policy to be reviewed at this time. The majority of the changes are in accordance with the Statutory Taxi &amp; Private Hire Vehicle Standards as outlined in the consultation summary. In relation to the proposed age criteria, our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers only when they next change their vehicle. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring</p>

					convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.
30/01/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old on the 1st of May 2021. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose.</p> <p>As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be considered fit for purpose. This</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring</p>

		<p>common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p> <p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>			<p>convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
31/01/2021	Taxi Driver	<p>I have several issues relative to the policy I am concerned about: - 1. vehicle age limit p37 section 17 if this section does not get changed all vehicles over 10-years old will no longer be able to work as these vehicles have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose I think this approach should be continued and a gradual replacement of vehicles be implemented similar to the situation when white taxis were proposed by the council, (rather than the 1st of May 2021)!something to be considered by</p>			<p>1. Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle.  2. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. 3. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that</p>

		<p>the council and the government is that we are going through particularly hard times and no authority should be responsible for putting drivers out of work or substantially increasing their hardship!</p> <p>2. Regarding, safeguarding awareness course, County lines exploitation training, and language proficiency test (oral and written) should all have a good lead in time as expressed by the department of Transport DFT section 314. Which I think should have a lead in time of a minimum of 12-months and kept under review relative to the current climate. It also begs the question of cost; I assume the council are going to pay for these courses for us as they are being imposed upon us.</p> <p>3. There are many other changes within this draft policy i.e., first aid kits, we are not first aiders, or are we to attend another course? point systems and considering a driver not fit for purpose after getting 6 DVLA points, I hope you will take my comments on board but obviously the main bone of contention here is the age of the vehicle section.</p>			<p>offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
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31/01/2021	Taxi Driver	<p>I would to Express my concerns and opposition to...</p> <p>1) vehicle age limit changing to 10 years max or euro 6, many drivers maintain their vehicles regardless of cost, so maybe exemptions on a case-by-case basis could be possible, or a mileage cap of 400 000 miles, or 10 years up to max 15 years if condition is very good. (Which I doubt if it's got 400 000 on the clock)</p> <p>2) all these courses, existing licensed drivers shouldn't need to do these, they have a wealth of experience dealing with the public, (new drivers maybe), if we have too, then a good lead in time!</p> <p>3) 6 DVLA points not fit for purpose, no way on this one, it's so easy to go from zero points to 6, a driver could be point free for over 10 years and get 6 points within a few weeks, you've only got to cop an unlucky one, (twice) there's cameras everywhere and we do a lot of driving!!</p>		<p>1. Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle.</p> <p>2. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021.</p> <p>3. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to the ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
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31/01/2021	Taxi Driver	<p>Page 11- 2.5.9 - 2.5.20. I cannot see many OR any new applicants being able or wanting to take that up (WAVs)</p> <p>Page 11 - 2.6.3 - 2.6.4 If you are looking at carbon footprints in Medway, how can you let WAVs and limousines not comply with Euro 6 as with all other drivers.</p> <p>Page 37 - 17.1 - 17.2 All new vehicles coming into the trade should have the same criteria regarding age Have we removed the "Exceptional Condition Guideline"?</p> <p>Page 40. 21. Looks like we are willing to drop our standards on emissions.</p> <p>Page 73 17.1. Can we have some guidelines on what offences we need to report to you - how trivial have they got to be?</p> <p>This Taxi Policy seems pretty reasonable - Good Luck with it.</p>		<p>Page 11- 2.5.9 - 2.5.20. There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.</p> <p>Page 11 - 2.6.3 - 2.6.4 As we need more WAVs but also need to improve Air Quality (AQ), the proposed way forward is to encourage more WAVS by disapplying some other policies, not least of which because WAVS can cost more in the first place, but in the knowledge that the numbers of WAVs are so small that the effects on AQ arising from lower emission standards would be negligible. The reason for not applying it to Limos is simply it is not practicable, and they are seen as specialist vehicles which meet a need but, again, are so few as to be insignificant in terms of AQ.</p> <p>Page 37 - 17.1 - 17.2 Permitting vehicles in exceptional condition to go beyond the maximum age limits are deemed risky as they are subjective and open to interpretation. Following a High Court ruling (R v Hyndburn Borough Council) it is recommended that the better approach is to not have an exemption clause, and this has therefore been removed from the Policy.</p> <p>Page 40 - 21. The emission is covered in Para 2.6.4</p>
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					<p>Page 72 17.1. The policy states Operators must notify us of any complaints they receive concerning their drivers/contracts for hire and of the action (if any) taken in respect thereof. This is in compliance with 4.30 of the Statutory Taxi &amp; Private Hire Vehicle Standards.</p>
31/01/2021	Taxi Driver	<p>I would like some clarification on the 10-year age that is being consulted upon, will There be a time frame to implement this? Is it necessary to implement this? Section 17 page 37 I strongly object to the age of the vehicle being the reason it can't carry on, as for changing to euro 6 should be a gradual process and not put drivers out of work.</p>			<p>Our recommendation is that the vehicle age requirement and the minimum Euro 6 requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. Whilst we have every sympathy with the taxi trade, it is a legal requirement to review the current policy at this time. In relation to the timescales proposed for the completion of disability awareness and safeguarding courses, which have been introduced in line with 6.11 -</p>

		<p>I don't feel it's a good time to implement changes which will affect drivers so much after a year that they have hardly worked, and don't know when things will return to normality. I agree with the minimum standards of courses but think we should be given 12 months to complete.</p>			<p>6.13 of the Statutory Taxi &amp; Private hire Vehicle Standards, it is proposed existing drivers complete these by 1 September 2021. No change recommended.</p>
01/02/2021	Taxi Driver	<p>If a vehicle meets the licence requirements a license should be issued. If a vehicle is already licensed elsewhere should not preclude it from obtaining a licence within Medway in fact if a vehicle is licensed in any area, it would be more likely to be suitable to be licensed having already undergone stringent tests.</p> <p>A vehicle licensed in Medway is clearly identified by colour door signs and licence plate.</p> <p>If the same vehicle is also licensed in another area the door signs and taxi plate would have to be changed making identifiable to a different area. Any confusion only comes about when a vehicle licensed in one area is working within another area, dual licensing would assist in alleviating this issue.</p> <p>It's also possible that a driver may be moving into the area who is already a</p>	2.11.1		<p>It is recommended that dual plating remains not permitted for the reasons already outlined in the policy, i.e., a vehicle is unlikely to comply with the requirements of two separate licensing authorities, could cause confusion to members of the public, impede the council's ability to take enforcement action, and force an unavoidable breach of policy. No change recommended.</p>

		licensed driver in a different area and require some overlap in the transition to the new area licence authority.			
01/02/2021	Taxi Driver	<p>I would like to object to one of the policy legislations you are proposing and raise my concern about it too.</p> <p>In your email, dated 07/01/21 you state that one of the requirements for applicants will be for drivers to be suitably proficient in the English language (oral, written and reading) however don't say how you will gauge this? However, you do say that we need to take tests for disability awareness after having an input.</p> <p>As you are aware many of us have been Hackney carriage licensed drivers for many years, with myself having been qualified for over 30 years.</p> <p>I do not believe that this should be a condition for current existing drivers, as we have already proved ourselves when</p>			<p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can</p>

		<p>having originally applied and through our many years of working for Medway council.</p> <p>I feel that this condition will discriminate against people like me, and it will be unfair to place people of my age into a test environment.</p> <p>I would therefore ask that this condition is either removed or consideration made for drivers of a certain experience or age, be exempt.</p>			<p>help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended.</p>
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01/02/2021	Taxi Driver	<p>I am writing about the proposed taxi policy consultation, published by Medway Council. As a hackney carriage driver, I would like to object to the following sections of the proposed policy:</p> <p>Page 11, 2.6.3 “vehicles should meet the Euro 6 standard (as a minimum) as a result of them having to be less than 7 years old at the time of first being licensed.”</p> <p>Page 37, Appendix A. 17.1 “Non-wheelchair accessible vehicles presented for first time licensing must be under 7 years old and will not be re-licensed if they are over 10 years old.”</p> <p>Page 23, 3.10.5 “Existing licensed drivers under 65 years old will therefore need to submit a new medical report with their three-yearly renewal application.”</p> <p>Page 23, 3.11.5.2 “All existing drivers who are not already registered with the DBS Update Service to provide a current ..... by no later than 1 July 2021. 1. Any driver who fails to do so will be subject to suspension or other enforcement intervention as appropriate.”</p> <p>Page 28, Disability Awareness 3.22.1 “.... The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021.”</p>		<p>Page 11, 2.6.3 Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council’s efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.</p> <p>Page 37, Appendix A. 17.1 Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle.</p> <p>Page 23, 3.10.5 The current policy states drivers age 61 or over must have an annual medical check. This frequency has been reviewed in line with the requirements under the DVLA Group 2 Medical Standards, which states annual checks for those aged 65 or over. No change recommended.</p> <p>Page 23, 3.11.5.2 The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit any future DBS applications and original identification documents. No change recommended.</p> <p>Page 28, Disability Awareness 3.22.1 The driver</p>
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		<p>Page 41, 4.1 “All licensed vehicles must carry a first aid kit suitable for treating minor injuries.”</p> <p>When deciding on these points, the current economic pressure on drivers has not been taken into consideration. As a result of the pandemic, a vast majority of drivers have not even attempted to start work, so it is not reasonable to expect them to buy a new vehicle in a few months’ time. Any limit on the age of a vehicle should have a rational approach, similar to existing policy, where if a vehicle passes the inspection, then it should be licenced, and removal of such vehicle should be gradual. A limit of 10 year seems to be excessive.</p> <p>The time frame of 5 years for a new medical assessment seems to be appropriate as drivers are required to report any new medical condition anyway.</p> <p>All hackney and PH drivers work in Medway have been negatively affected by the Medway Council’s failure to regulate Uber and drivers who are licenced by other local authorities. You may have noticed that some out-of-area drivers operate in Medway with a Medway Council style roof sign now, which would make it difficult for the public to distinguish them from a</p>		<p>conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended.</p> <p>Page 41, 4.1 Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended.</p> <p>The comments relating to Uber and vehicles licensed by other authorities are noted however these are governed by legislation and case law not policy and therefore are not relevant to this consultation.</p>
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		<p>Medway licenced vehicle. I do not think it can be justified to heavily monitor one group of operatives while putting a blind eye on the another.</p> <p>I suggest, any change to the policy should carefully take into account the extra financial burden on drivers especially at this difficult time. I cannot stress enough how much we are being affected by the pandemic as it is clearly visible on all sections of society. I understand that some of these changes are legal requirements set out by Department of Transport, but I hope Medway Council enforces these changes gradually with a more reasonable and better timescale.</p> <p>Thank you for taking the time to read this, and my details are included at the end of this email.</p>			
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02/02/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old on the 1st of May 2021. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose.</p> <p>As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p> <p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
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02/02/2021	Taxi Driver	<p>I have read Medway Council's proposed Hackney Carriage and Private Hire Licensing Policy and have the following objections:</p> <p>Section 3.10 – Annual medical checks by GP (relevant to you heart conditions, blood pressure, vision checks for anyone over 65)</p> <p>I object to this section of the draft policy for the following reasons:</p> <ul style="list-style-type: none"> <li>- First and foremost, the proposed policy requests that, for the annual medical check the DRIVER is required to pay for this service. At this current time being asked to pay for a service that checks that I am still able to work, is unreasonable due to the lack of earnings due to the Global Pandemic of Covid-19.</li> </ul> <p>Section 17.1</p> <p>I object to this section of the draft policy for the following reasons:</p> <ul style="list-style-type: none"> <li>- The costs associated with purchasing a vehicle that meets the proposed requirements by or before May 1st 2021 are unrealistic and unreasonable. The effects of the global pandemic have had a serious economic impact resulting in the temporary or permanent closure of many business, especially those frequented by the customers we service in the areas we operate in.</li> <li>- The council's proposal to obtain a</li> </ul>		<p>Section 3.10 - The current policy states drivers age 61 or over must have an annual medical check. This frequency has been reviewed in line with the requirements under the DVLA Group 2 Medical Standards, which states annual checks for those aged 65 or over. No change recommended. Section 17.1 - Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the</p>
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		<p>vehicle that meets these standards would require me to either use my savings or take out a loan. For those drivers with underlying health conditions (which have no impact on working capabilities) who have been required to shield during the Lockdowns (as advised to by OUR GOVERNMENT), this has had a serious impact on finances which is yet another reason I object to the proposed policy. With no foreseeable sign of government restrictions being eased and businesses being allowed to reopen on a continual basis, this would put drivers at risk of financial problems in an environment where their earnings are substantially diminished.</p> <p>I also object to the consultation period of 4-6 weeks as less than adequate.</p> <p>I strongly object to the drivers being penalised for having 6 points on their licence. This is victimisation as the national law is 12 points.</p>			<p>standards expected are set higher than that of a non-professional driver. No change recommended.</p>
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03/02/2021	Taxi Driver	<p>I am writing about the proposed taxi policy consultation, published by Medway Council. As a Private hire driver, I would like to object to the following sections of the proposed policy:</p> <p>Page 11, 2.6.3 “vehicles should meet the Euro 6 standard (as a minimum) as a result of them having to be less than 7 years old at the time of first being licensed.”</p> <p>Page 37, Appendix A. 17.1 “Non-wheelchair accessible vehicles presented for first time licensing must be under 7 years old and will not be re-licensed if they are over 10 years old.”</p> <p>Page 23, 3.10.5 “Existing licensed drivers under 65 years old will therefore need to submit a new medical report with their three-yearly renewal application.”</p> <p>Page 23, 3.11.5.2 “All existing drivers who are not already registered with the DBS Update Service to provide a current ..... by no later than 1 July 2021. 1. Any driver who fails to do so will be subject to suspension or other enforcement intervention as appropriate.”</p> <p>Page 28, Disability Awareness 3.22.1 “... The training must be completed by applicants at the time of applying and completed by existing drivers by 1</p>		<p>Page 11, 2.6.3 Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council’s efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.</p> <p>Page 37, Appendix A. 17.1 Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle.</p> <p>Page 23, 3.10.5 The current policy states drivers age 61 or over must have an annual medical check. This frequency has been reviewed in line with the requirements under the DVLA Group 2 Medical Standards, which states annual checks for those aged 65 or over. No change recommended.</p> <p>Page 23, 3.11.5.2 The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No change recommended.</p> <p>Page 28, Disability Awareness 3.22.1 The driver</p>
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03/02/2021	Taxi Driver	<p>I am writing about the proposed taxi policy consultation, published by Medway Council. As a hackney carriage driver, I would like to object to the following sections of the proposed policy:</p> <p>Page 11, 2.6.3 “vehicles should meet the Euro 6 standard (as a minimum) as a result of them having to be less than 7 years old at the time of first being licensed.”</p> <p>Page 37, Appendix A. 17.1 “Non-wheelchair accessible vehicles presented for first time licensing must be under 7 years old and will not be re-licensed if they are over 10 years old.”</p> <p>Page 23, 3.10.5 “Existing licensed drivers under 65 years old will therefore need to submit a new medical report with their three-yearly renewal application.”</p> <p>Page 23, 3.11.5.2 “All existing drivers who are not already registered with the DBS Update Service to provide a current ..... by no later than 1 July 2021. 1. Any driver who fails to do so will be subject to suspension or other enforcement intervention as appropriate.”</p> <p>Page 28, Disability Awareness 3.22.1 “.... The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021.”</p>		<p>Page 11, 2.6.3 Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council’s efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.</p> <p>Page 37, Appendix A. 17.1 Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle.</p> <p>Page 23, 3.10.5 The current policy states drivers age 61 or over must have an annual medical check. This frequency has been reviewed in line with the requirements under the DVLA Group 2 Medical Standards, which states annual checks for those aged 65 or over. No change recommended.</p> <p>Page 23, 3.11.5.2 The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No change recommended.</p> <p>Page 28, Disability Awareness 3.22.1 The driver</p>
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		<p>public to distinguish them from a Medway licenced vehicle. I do not think it can be justified to heavily monitor one group of operatives while putting a blind eye on the another.</p> <p>I suggest, any change to the policy should carefully take into account the extra financial burden on drivers especially at this difficult time. I cannot stress enough how much we are being affected by the pandemic as it is clearly visible on all sections of society. I understand that some of these changes are legal requirements set out by Department of Transport, but I hope Medway Council enforces these changes gradually with a more reasonable and better timescale.</p>			
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03/02/2021	Taxi Driver	<p>I am writing regarding the proposed taxi policy consultation, published by Medway Council. As a hackney carriage driver, I would like to object to the following sections of the proposed policy:</p> <p>Page 11, 2.6.3 “vehicles should meet the Euro 6 standard (as a minimum) as a result of them having to be less than 7 years old at the time of first being licensed.”</p> <p>Page 37, Appendix A. 17.1 “Non-wheelchair accessible vehicles presented for first time licensing must be under 7 years old and will not be re-licensed if they are over 10 years old.”</p> <p>Page 23, 3.10.5 “Existing licensed drivers under 65 years old will therefore need to submit a new medical report with their three-yearly renewal application.”</p> <p>Page 28, Disability Awareness 3.22.1 “... The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021.”</p> <p>1. When deciding on these points, the current economic pressure on drivers has to be taken into consideration. As a result of the pandemic, a vast majority of drivers have had very little work or no work at all during the last 12 months .so it is not reasonable to expect them</p>			<p>2.6.3 - Our recommendation is that compliance with a minimum Euro 6 standard should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. 3.10.5 - This requirement to have a medical at set intervals is not new; the current taxi policy states - 3.4.7 A satisfactory medical certificate from a doctor in the form provided must be submitted on first application and then at 5 yearly intervals until the age of 55 then every 3 years until the age of 61, thence annually, and at reasonable time at the request of the Council. The frequency for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal application. No change recommended. Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence,” but also that a pragmatic approach should be undertaken in terms of allowing reasonable time frames, etc. This is reflected in the appropriate sections where a timescale for compliance for existing drivers is given for example Disability Awareness Training to be completed by 1 September 2021. This is deemed to be proportionate. No change recommended.</p>
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		<p>to buy a new vehicle in a few months' time. Any limit on the age of a vehicle should have a rational approach, similar to existing policy, where if a vehicle passes the inspection, then it should be licenced, and removal of such vehicle should be gradual. A limit of 10 year seems to be excessive.</p> <p>2.The time frame of 5 years for a new medical assessment seems to be appropriate as drivers are required to report any new medical condition anyway.</p> <p>I suggest, any change to the policy should carefully take into account the extra financial burden on drivers especially at this difficult time. I cannot stress enough how much we are being affected by the pandemic as it is clearly visible on all sections of society. I understand that some of these changes are legal requirements set out by Department of Transport, but I hope Medway Council enforces these changes gradually with a more reasonable timescale.</p>			
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04/02/2021	Taxi Driver	<p>With regards to the proposed new Government regulations that are soon to come into force I am opposing to certain aspects of what you are proposing to add to this policy</p> <p>Vehicle age: I believe it's unreasonable to expect drivers to replace their vehicle with a new one that complies to Euro 6 standards by 1st May 2021 (regardless of the current climate) effectively only giving less than 3 months' notice to whoever falls into this category, why can this not be phased in over time or when the vehicle is replaced by the driver, surely the current system works well if the vehicle is in exceptional condition and well maintained.</p> <p>The Required Courses: more time should be given for drivers to attend the necessary courses.</p> <p>The points system: Page 53, 14.5.2 Surely 6 penalty points on your DVLA license (2 speeding offences) cannot warrant a driver to be classed as not fit &amp; proper.</p> <p>I must admit I don't have an immediate answer to this proposal but surely a discussion with existing trade members would hopefully come up with some</p>		<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. The policy will be amended to reflect this. Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence," but also that a pragmatic approach should be undertaken in terms of allowing reasonable time frames, etc. This is reflected in the appropriate sections where a timescale for compliance for existing drivers is given for example Disability Awareness Training to be completed by 1 September 2021. This is deemed to be proportionate. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that</p>
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		<p>suitable ideas, Page 11, 2.5.9. New Hackney drivers are expected to licence a WAV will surely only encourage new drivers to obtain a private hire driver licence rather than a Hackney driver licence due to the huge cost involved, this would also eventually cause problem for the rental market as many new drivers rent their first vehicle.</p>			<p>offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended. There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our existing licensed drivers. However, this will be kept under review. No change recommended.</p>
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04/02/2021	Taxi Driver	<p>The area I feel strongly about if the banning of vehicles older than 10 years old. As you know Medway taxi drivers have suffered for many years due to "out of town" drivers and due to the rapid expansion of Uber. Our incomes have been severely affected and "on the rank" the conversations have been very depressing for many years. Having this extra expense will be the death knell for many. Already vehicles of this age are having "interim" quarterly inspections, they obviously have been thoroughly inspected and meet government standards.</p> <p>This point regarding the 10-year vehicle would still be valid even if we did not have the current pandemic. I personally have not worked due to being at "risk" since last March and did not renew my vehicle license and insurance, due to affordability. If there is a push for "electric" vehicles than I know most drivers will not be able to afford them, without grants or funding. The drivers have not been earning enough for several years and many are working all day and night during Friday + Saturday nights. Having this extra financial burden will be dangerous for the driver and customer, as the only way drivers will afford this is by working long, long</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. The policy will be amended to reflect this.</p>
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		<p>hours. It cannot be feasible to ask any business owner to renew their premises in a few months, as this is what is happening to taxi drivers. This is from "Page 12 Section 2.6".</p> <p>Other issues such as the DBS service, training courses, although the expense is obviously something that I can do without. I fully endorse this and understand why this would be and is required.</p>			
04/02/2021	MLTDA	<p>The Medway Licensed Taxi Drivers Association (MLTDA) look forward to discussing these issues and being involved in any further dialogue on this proposed new policy as an interested party.</p>			<p>The responses received from the MLTDA are because of the consultation exercise and their comments have been duly considered. There is no further scope for discussion on the proposals as the policy must be approved (with any appropriate amendments) and presented to Council in April for approval and implemented by 1 May 2021.</p>

		<p>The authority expects all licence holders to comply with its terms immediately. I feel there should be a reasonable time ref 3.14 of Statutory T and PH Standards to allow all licence holders to be able to comply especially regarding DBS and National standards.</p>	1.4.3	8	<p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence," but also that a pragmatic approach should be undertaken in terms of allowing reasonable time frames, etc. This is reflected in the appropriate sections where timescales for compliance for existing drivers is given for example Disability Awareness Training to be completed by 1 September 2021. In relation to the age criteria of vehicles and compliance with the Euro 6 standard, our recommendation is these requirements should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle, thereby reducing the burden on existing licensees. The appropriate sections in the policy will be amended to reflect this.</p>
		<p>I agree Medway has a low proportion of WAV and am interested to see if this policy amendment does in fact resolve this problem. There are some concerns with the amendment as listed below. I would alongside this policy like to open the door to conversations between the MLTDA and the Medway disability groups to determine what provision is required from the trade to meet their travel needs and in doing so make future policy suggestions that are reflective of this important relationship</p>	2.5.7	10	<p>As part of the consultation process, an email was sent to the Disability Medway Network inviting them to comment on the council's revised policy. No response was received. There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.</p>

		and what I am hopeful will be ongoing dialogue directly with the trade on this matter.			
		An introduction of a policy along these lines could be quite restrictive towards new entrants to the Hackney Carriage trade. It creates a third layer of licensing and does put fresh restrictions and responsibilities on all new Hackney Carriage licence holders. This could deter new entrants from joining the trade and also in turn stop the Hackney Carriage trade meeting the needs of wheelchair users. Unfortunately, due to the height of purpose-built WAV, the only vehicle at present that will fit into the Rochester station taxi rank is the Mercedes Vito due to the height barrier (6'6"). This puts further restriction on WAV proprietors and where they can meet demand, make the provision and ply for hire.	2.5.9	11	There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.
		There simply is at present insufficient WAV available for rent and this could put new drivers at a disadvantage and potentially out of work during break down etc. Could clarity be written into the policy that a new Hackney Carriage driver (that will be dual licensed) could	2.5.12	11	The need for WAVs extends across both the taxi and PHV (Private Hire Vehicle) regimes equally for wheelchair users to be able to both prebook, hail and get access at a rank. Medway is not short on drivers/vehicles by any stretch of the imagination and existing drivers should look upon these favourably as they are not being told to change their vehicles and if



		drive a private hire vehicle that is not WAV if this driver needs to hire a vehicle for any reason?			fewer new drivers choose to come into the trade, then that will inadvertently leave more work available for existing drivers. The risk if they are permitted to hire a non-WAV is everyone will do so, and then we will not achieve an increase in WAVS.
		The cost of any potential unmet demand survey should not be funded by an increase in licence fees. I refer to section 53(2) and section 70(1) LMGPA 1976 where costs can only be recovered for the issue, administration, and enforcement of a licence. It could be arguable that an unmet demand survey will fall outside of these provisions. Section 53(2) and 70(1) on funding of licensing is confirmed by this draft policy's author, within section 11.1.2 of this draft policy.	2.4.5	10	The licence fees must be related to the costs of the licensing regime as specified in S70 ( c ), which makes provision for administrative and other costs in connection with the 'foregoing and with the control and supervision of hackney carriages and private hire vehicle'. Any costs associated with the licensing regime, including unmet demand surveys, are therefore recoverable.
		As Medway intend on issuing dual Hackney Carriage and Private Hire Driver licenses from the implementation of this policy. Can clarity be made within this section as to if this applies to all existing Hackney Carriage Driver licenses immediately from the date of implementation of this policy or if this only applies when a renewal of a Hackney Carriage driver's licence is made.	3.1.2	18	We will automatically issue a dual licence to those currently holding both. For all other hackney carriage drivers, we will issue them upon renewal. If they wish to 'upgrade' their licence sooner there will be an associated administrative fee, which will cover the cost of processing, printing, and issuing new badges. This fee will be calculated to be cost neutral. Recommended to update Policy to reflect this.

		<p>We look forward to finding out the details and costs and subsequent refresher training intervals of the proposed safeguarding awareness sessions and the date when all drivers must be compliant. In order to meet the Statutory T and PH Standards and request a reasonable minimum 12-month time period for compliance.</p>	3.9.2	22	<p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence," but also that a pragmatic approach should be undertaken in terms of allowing reasonable time frames, etc. This is reflected in the appropriate sections where timescales for compliance for existing drivers is given for example Disability Awareness Training to be completed by 1 September 2021, which is deemed proportionate balancing the council's need to comply with the Statutory Standards and the impact on existing drivers. The appropriate sections in the policy will be amended to reflect this.</p>
		<p>After looking through emails and correspondence to the MLTDA from licensing from the 1st of May 2018. There is no mention from Medway Licensing advising licence holders to subscribe to the DBS update service. The drivers were however informed about this in April 2020 to fill out the DBS application and pay £60, then within 19 days of the return of DBS certificate, pay £13 yearly for the update service. I find the £60 fee for a document to only last 19 days quite extortionate when over the years that fee lasted 3 years. An applicant cannot subscribe to the online update service after 19 days.</p>	3.11.3	23	<p>The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit any future DBS applications and original identification documents. No change recommended.</p>

		<p>In light of issue raised against 3.11.3 above and the requirement to subscribe to the DBS update service. Any driver whom has not subscribed will now be liable for costs of £60 and £13 subscription fees and as specified in this policy, no later than 1 July 2021. Where a driver falls into the above category and still has a valid DBS (within three years) in place. I feel that the deadline for compliance should fall at a minimum of 6 months after the date of the implementation of this policy or at the expiration (3 years) of their current DBS to allow drivers a realistic time scale to gather the funds for these costs. (pandemic is a major contributor to this request).</p>	3.11.5.2	23	<p>The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit any future DBS applications and original identification documents. No change recommended</p>
		<p>The disability awareness training to be completed by existing licence holders in my opinion should be completed within 12 months of the implementation of this policy rather than 1 September 2021 to allow all existing licence holders reasonable time for this to be undertaken and gained in accordance with: section 3.14 of the Statutory Taxi and Private Hire Standards: Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable</p>	3.22.1	28	<p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence," but also that a pragmatic approach should be undertaken in terms of allowing reasonable time frames, etc. This is reflected in the appropriate sections where timescales for compliance for existing drivers is given for example Disability Awareness Training to be completed by 1 September 2021, which is deemed proportionate balancing the council's need to comply with the Statutory Standards and the impact on existing drivers. The appropriate sections in the policy will be amended to reflect this.</p>

		<p>to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle. The same pragmatic approach should be taken to driver licence changes - if requirements are changed to include a training course or qualification, a reasonable time should be allowed for this to be undertaken or gained. The implementation schedule of any changes that affect current licence holders must be transparent and communicated promptly and clearly.</p>			
		<p>With the intention of making licensing services online for applications and renewals, I feel there should be some consideration made to anyone who intends to use these services that is unable to use such an online service (Equality Act 2010). I therefore recommend that phone line support is available to run alongside the online service to assist this minority of driver customers in line with all other service providers.</p>	5.1.1	32	<p>Applicants that do not have access to a computer are able to use ones situated in public libraries where staff will assist. In addition, applicants can contact the Licensing Team via phone where assistance will be given.</p>

		Where a private hire vehicle is fitted with a taxi meter the fare section does apply. This is in order to make the service provided to the travelling public transparent and unified so that whether travelling in a taxi or private hire vehicle the cost to the customer will be consistent within Medway. I feel the policy should be amended to reflect this important part of the service.	8.1.8	33	This is already set out in Appendix D under 'Fares and Journeys'. Sections 17.2 - 17.2.5 applies. No change recommended.
		Taxi ranks. Corporation Street car park Rochester Station rank is missing from this list.	9.1.1	33	The list of ranks has been updated following liaison with the MLTDA and the policy will be amended to reflect this.
		What facilities are in place in order to comply with this section if reporting of lost property is made over the weekend when licensing services are unmanned.	10.2	34	Notifications may be submitted by email at any time.
		It would be advisable and in the interest of safety of the travelling public to introduce and commit to joint authorisation of enforcement officers' section 9.2 of the Statutory Taxi and Private Hire Standards: Joint authorisation of enforcement officers 9.2: Licensing authorities should, where the need arises, jointly authorise officers from other authorities so that compliance and enforcement action can be taken against licensees from outside their area. An agreement between licensing authorities to jointly authorise officers enables the use of enforcement powers regardless of which authority	14	35	This cannot be included in the Policy. Agreement must be made with neighbouring authorities with the relevant powers being delegated.

		<p>within the agreement the officer is employed by and which issued the licence. This will mitigate the opportunities for drivers to evade regulation. Such an agreement will enable those authorities to take action against vehicles and drivers that are licensed by the other authority when they cross over boundaries. A model for agreeing joint authorisation is contained in the LGA (Local Government Association) Councillors' handbook. Licensing is there to protect the public and therefore feel that this part of the Statutory Taxi and Private Hire drivers Standards should be included in this policy to show the licensing departments commitment to ensuring all vehicles and drivers from out of town operating within Medway are complaint and do not pose a risk to the public in Medway.</p>			
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		<p>The introduction of a 10 year and 14-year age limit applied respectively to non-WAV and WAV vehicles goes completely against the common-sense principles in the current policy (2.3 and Appendix A) in place.</p> <p>There are several licensed vehicles in Medway that are currently licensed and considered fit for purpose, that are over 10 years old that meet Medway's requirements and are in exceptional condition as defined in Appendix A of the current policy. If a vehicle is not considered not fit for use solely on the basis of the vehicles age. It would put these vehicles and their proprietors in a situation of effectively having to remove these vehicles from service unnecessarily. These vehicles in most instances would have been maintained to an exceptional high standard to pass all previous inspections set by licensing in order to be fit for service.</p> <p>There is no mention in this draft policy regarding vehicles that are currently licensed for use of public and private hire. If a 10-year age limit is introduced across the current fleet of licensed vehicles it would have irreversible consequences to the service that can be provided and remove a considerable amount of the fleet of vehicles and</p>	17.1	37	<p>Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 17. Para 2.6.4 will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.</p>
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		<p>licensed drivers from service that is currently considered fit for purpose. This will have a huge knock-on effect and put severe financial burden upon the proprietors, at a time of crisis during the ongoing pandemic. I therefore would like to suggest removal of the age restriction in the draft policy in favour of a more common-sense approach to the fitness of licensed vehicles to be used.</p> <p>I am mindful of the Medway climate change emergency motion passed and agree strongly that all vehicles licensed for the first time from the implementation of this policy should be no less than euro 6 standards in emissions. This could be combined with a policy amendment to ensure all licensed vehicles are a minimum of euro 6 emission standard by the end of the new policy term of 2026. With a section added to the policy worded along the lines of: no vehicle will be re licensed after 1/5/2026 if it does not meet or exceed Euro 6 standard.</p> <p>This would allow a reasonable time for change and adjustment of the fleet of licensed vehicles to comply. This can also be kept under review to ensure we meet the Medway Climate Change Emergency Motion.</p>			
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		<p>White chequered stripes should also be allowed to be adhered to a private hire vehicle magnetically. (there is no mention of this in this policy). This is to ensure that they can be removed when the vehicle is not in use. By allowing easy removal of the chequered stripes, the vehicle will not stand out easily to potential thieves when parked for example overnight.</p>	19.5	39	<p>This is already permitted and the specification at 19.5 of Appendix A does not state they must be permanently adhered. The current standard colours for licensed vehicles were set following extensive consultation with the trade and interested parties in 2006 and the colours at that time were suggested by the trade as they were the most common standard provided by the manufacturer, which is no longer the case e.g., the VW id3, which is an electric car comes with a black roof as standard. Our view is that the existing signage (door signs, external and internal licence plates incorporating the Medway Logo) and the specified design top light (for hackney carriages) makes these vehicles identifiable as licensed by Medway Council. It is therefore recommended the standard colours for both hackney carriage and private hire vehicles and the requirement for chequered stripes for private hire vehicles be removed from the policy. If however, the standardisation is to remain, for clarity, it is recommended this section be amended to reflect magnetic striping may be affixed.</p>
		<p>All licensed vehicles, licensed for the first time after the implementation of this policy must meet or exceed Euro 6 emission standard. The words in bold are my policy amendment suggestion.</p>	21	40	<p>Para 2.6.4 will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.</p>
		<p>All vehicles must pass an MOT inspection annually and a 6-month interim test after the Mot date not the anniversary of their first registration as stated in this draft policy.</p>	2.2	41	<p>It is a legal requirement for licensed vehicles to have an MOT when it reaches 1 year old, this is calculated from the date of first registration. 2.2 of Appendix B reflects this "All vehicles must, at all times, be kept at or above the standard required to pass an MOT test annually and pass 6-month interim test every 6 months starting from</p>

					the one-year anniversary of their (international) date of first registration. No change recommended.
		<p>The introduction of a first aid kit could be seen by many from the industry as surplus to requirement. It would force an extra licensing condition and cost responsibility upon licensed drivers. This is at a time when the new draft policy already lists a major overhaul of qualifications required by drivers in the Statutory T and PH Standards. The first aid kit is not mentioned in the Statutory T and PH Standards and we feel as a trade that we already have a major responsibility to ensure that we can protect the travelling public, without the need to carry first aid equipment as well. We have spoken to drivers that have been in the industry in Medway for several years and they have all reiterated that they have never been requested to supply first aid equipment to their customers. With a lot of these drivers pointing out that we are already burdened with carrying a certificated fire extinguisher that no driver is qualified on how to use.</p>	4	41	<p>Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. Medway were not previously aware of this and now that we are, it would be remiss of the council not to include it. No change recommended.</p>

		Please specify the positioning of this signage to avoid confusion. I agree that this should be placed in full view of any fare paying passengers. But I think the positioning of this should be stated within the policy to ensure a consistent and prominent place for it to be seen in each licensed vehicle. So that all customers know where to find this information if the need arises for them to make a complaint.	11	43	This signage will be included on the rear of the internal vehicle licence plate. The vehicle manufacturers have differing designs of bodywork and interior and what location may be suitable for one vehicle may not be for another. Therefore, it is deemed not appropriate to specify a location and therefore no change recommended.
		The wording in this section should be amended to: The sign must be fitted at all times, while the vehicle is in use for hire and reward, irrespective of whether the vehicle is carrying out a private hire booking, as the vehicle is still a Hackney Carriage at all times.	22.4	45	Clarification was sought from Legal on this point - They have confirmed that the judgements in the cases of Hawkins v Edwards and Yates v Gates makes it clear that the language of S 38 TPCA 1847 does not limit the period of time to which the carriage is in fact used for stand or plying for hire in a street and remain a hackney carriage all the while the licence is in force, therefore, all signage must remain in place even when the vehicle is used for social and domestic purposes. No change recommended.
		Although this statement is correct, and I agree that it is not unlawful for a private hire vehicle to not be required to be fitted with a taxi meter. I feel that a taxi meter should be fitted into non restricted Medway private hire vehicles as a condition of licence. This would ensure that whatever (Hackney Carriage or Private hire) vehicle is booked through an operator by the public has a transparent and regulated fare structure in place to ensure consistency	24.1	46	As this is not a legal requirement, we are unable to make this mandatory.

		of charges across the fleet of Medway licensed vehicles.			
		<p>In this section Guidelines Relating to Fitness and Propriety refers to applicants and existing drivers, that an accumulation of more than 6 points on their DVLA licence would put them forward to be not considered fit and proper to drive a licenced vehicle. This guidance is directly from the advice given to authorities by James Button from the Institute of Licensing. As a licensing authority and a trade require any licensed driver to have the highest standards. But the 6-point rule is very unfair when compared to for example a bus driver whom is licensed to carry a considerable greater number of passengers and would not be considered unfit until they had accumulated 12 DVLA penalty points. This particular 6-point rule has been challenged successfully by the GMB and Unite unions as unfair and potentially unlawful. For example, Leeds, Wakefield, Portsmouth, and Cannock Chase to name a few (information from the National Private Hire Taxi Association) have already removed this from their taxi policy. In light of what</p>	1.14 and 14.5.2	50 and 53	<p>In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to the ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>

		has been found to be an unfair piece of guidance from the Institute of Licensing I think that the sensible thing to do at present, is for it to be excluded from this policy and kept under review until all litigation surrounding the 6-point rule has been exhausted.			
		It seems now that all licensed drivers are required to wear a badge supplied by the council. This particular requirement has previously been removed from policy due to the fact that if a driver is wearing a badge around the or neck on a lanyard this could be used during any potential assault to strangle the driver. I therefore do not see the need for all licensed drivers to wear a badge as their photographic licence identification is clearly positioned in public view within the vehicle.	3.1	60	The issuing of a driver's badge is in accordance with S54 of the Local Government (Miscellaneous Provisions) Act 1976 which states the council shall issue a driver's badge and the driver must wear in in such a position and manner as to be plainly and distinctly visible. Safety lanyards or lapel clips will be issued. No change recommended.
		This policy requirement should be the responsibility of the operators to share this information with the licensing department within 7 days and not the licensed drivers in order for correct records to be kept simple and transparent way.	4.3	60	The operators are required to also retain this information, which is the crossed referenced against the notifications given by the drivers. No change recommended.

		<p>The penalty point system is a tool/guide used to introduce some form of fairness when dealing with non-compliance of drivers and operators. However, the level of points in this new policy has jumped significantly from 20 down to 12 from the existing policy in determining whether a person is fit and proper. This could in some instances bring drivers and operators before the licensing Committee unnecessarily due to the level of compliance being the a culmination of several minor offences that do not put them at a risk to the public. I however agree that all major offences do require an immediate review of that person’s licence. If the points system in this policy is to be implemented with a 12-point standard I would like to see an amendment of all minor offences to have a reduced amount of points issued against them.</p>	4.2	65	<p>Licensed drivers are professional passenger services and public safety is paramount and drivers should have regard to their responsibilities. The points reflect the severity, and this should promote compliance. However, we recognise that the changes to the points system may be of particular concern to licence holders already in receipt of points issued under the previous system and this will be taken into consideration in the event of future points being issued, and each case will be considered on its merits.</p>
		<p><a href="http://www.appealnow.com/taxi-driver-and-private-hire-drivers-High-Court-decision">www.appealnow.com taxi-driver-and-private-hire-drivers-High-Court-decision</a> MR JUSTICE BURNETT ruled on the 29th of November 2010 ‘The general rule of law is now confirmed that taxi drivers, minicab drivers and any other drivers are allowed to wait for a long as necessary on single or double yellow lines for the purpose of picking up a passenger and/or their luggage. In the case of black cabs which can be hailed</p>		69	<p>This should remain in the policy for those drivers who are found to be parked in a bus stop or on yellow lines in breach of the High Court ruling. Points will not be awarded to those picking up/dropping off a passenger and /or their luggage.</p>

		<p>by a passenger in the street it is easy to see what time is taken and in the normal course of events that pickup time is clearly necessary.' In the Traffic Signs Regulations and General Directions 2002 sch. 19 Part 1. Section 4 (d) states in relation to bus stops: (d)a taxi which is stationary only for so long as may be necessary for a passenger to board or alight and to load or unload any luggage of the passenger; Therefore, it would be incorrect for the licensing point system to have this section included in their point system. The only time points can be issued is when a Private Hire Vehicle stops in a bus stop as they are not allowed to do so.</p>			
		<p>It could also be strongly argued the current pandemic is a compelling local reason not to introduce the Statutory Taxi and Private Hire Vehicle Standards at this time into policy. This ability to operate in any way near normal. We therefore wish this to be considered when making any amendments to this policy that could further restrict the trade during these difficult times and further hinder any form of recovery when time allows.</p>			<p>When formulating a taxi and private hire vehicle policy, the primary and overriding objective must be to protect the public. The importance of ensuring that the licensing regime protects the vulnerable cannot be overestimated and it is a requirement for local authorities to include the Statutory Taxi and Private Hire Vehicle Standards within its taxi and private hire policy.</p>

04/02/2021	Taxi Driver	<p>Page 12 Section 2.6,</p> <p>Talk about why we should have older then 10 years old, include facts such as the vehicles having a valid MOT, good working order, if we could have it before why not now? They conform to the current legislations, having a Euro 6 vehicles is a choice not a necessity, we drivers can't afford these new vehicles with the council giving us funding, encouraging us to go electric, during a pandemic is not something that we as drivers can afford, we are not earning enough money to be going down this route,</p> <p>Page 17 Section 2.23</p> <p>Talk about why we shouldn't have the enhanced DBS update service. For someone who has done an enhanced DBS over 6 months ago they will have to pay for the service again out of the driver's pocket, we are not earning enough to be paying £13 a year, we never had this rule before why now? Unfair on drivers unless the council would like to pay for this,</p> <p>Page 19 Section 3.2,</p> <p>Talk about why the council should pay for disability awareness training, English test, safeguarding and child sexual</p>		<p>Page 12 Section 2.6 - Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. 3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change their vehicle.</p> <p>Page 17 Section 2.23 - The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification</p>
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		<p>exploitation and any tests we have to take. We never had this before, I was required a DSA taxi test, a knowledge test and a medical for me to get my licensed taxi badge, I've done this as per the council requirements, so therefore it's not our job as drivers to be paying this,</p> <p>Page 23 Section 3.10,</p> <p>Talk about why over 65-year-old drivers do not need a medical every year, it's a burden on the over 65 generation, again we never had this before, why is the council not paying for this?</p> <p>Alternative may be having a medical every two years or any suggestions you feel may be correct,</p>		<p>documents. No change recommended.</p> <p>Page 19 Section 3.2 - Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended.</p> <p>Page 23 Section 3.10 - This requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal</p>
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					application. No change recommended.
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04/02/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old on the 1st of May 2021. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose.</p> <p>As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p> <p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>		<p>Clarification has been sought on this point and the recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle. This will also be reflected in Para 2.6.4 (our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle) which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not</p>
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					<p>exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
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04/02/2021	Operator	<p>Firstly, I propose that prior to approval an open invite online forum should be held, perhaps over zoom.</p> <p>page 9/10 - section 2.4 - Limiting numbers of Hackney Carriages may help bolster earnings of existing drivers who have had their livelihoods decimated in recent years, even pre-COVID due to non-local drivers encroaching on the local market. As a result of this it could also help bolster standards of vehicles and quality of service as drivers earn a more stable income again and treat hackney carriage driving as a full-time profession again as opposed to the direction it has been heading towards i.e a part time / gig role. The relative scarcity of hackney carriage licenses may also help drivers take more care with protecting their livelihood.</p> <p>page 10/11 - section 2.5 - In light of my above suggestion, I understand that this would effectively slow down the rate of new drivers gaining a hackney carriage license. However, in order to combat this and provide a suitable amount of WAV to serve the public it may be preferable to reduce licensing fees a token amount to encourage drivers to start using WAVs or even following London's example and making all hackney carriages WAVs. This way if older drivers refuse to get WAVs as</p>		<p>The purpose of this consultation is to seek the views of all interested parties on the proposed policy and due consideration has been given to all responses received.</p> <p>Page 9/10 - section 2.4 - Before a local authority can impose a limit on the number of Hackney Carriages it must be satisfied that there is no significant demand for the services of hackney carriages (within the area to which the licence would apply) which is unmet. The DfT (Department of Transport) Guidance advises that the matter should be approached in terms of the interest of those who use the services of such vehicles and that, where a Council takes the view that a local quantity restriction can be justified in principal, it should establish the level of unmet demand and the quantity limit by means of a survey. The draft policy reflects this and states that Medway Council, do not currently impose any quantity restrictions on hackney carriage vehicles, which is in keeping with the DfT guidance and in the event of this changing and the Council commissioning an unmet demand survey, the cost would likely need to be funded by an increase in licence fees.</p> <p>Page 10/11 - section 2.5 - There is a need to increase the level of wheelchair accessible vehicles within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our existing licensed drivers. However, this will be kept under review. No change recommended.</p> <p>page 11/12 - section 2.6 - These vehicles are likely to be especially polluting and there is no identified demand</p>
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		<p>their next vehicles and invest in the trade, they can leave the trade and allow newer younger drivers to enter. This secondly would stop operators and new drivers by exploiting loopholes, i.e. driving a WAV for a year before converting it to an 8-seater or simply renting a WAV.</p> <p>page 11/12 - section 2.6 - I propose that 7 passenger seat vehicles/LCVs and above are added to exemption due to the lack in current circulation on taxi circuits as well as the lack of availability on the used market as well as hybrid options. This can be revisited after a certain point.</p> <p>page 14 - 2.10.4.1 - More criteria should be given for qualifying for an executive plate for the avoidance of doubt. Age limit when entering trade (unless in cases where an older vehicle is more desirable ie. classics), RRP when new would also be a good metric, perhaps around £50,000 plus.</p> <p>page 16 - 2.16.4 - should further clarify that this would be for permanent seating changes. As seats can be removed from some vehicles to allow for luggage or wheelchairs</p> <p>page 18 - 2.23.4.2 - the criteria should be extended to 6 months as some drivers are semi-retired or have consistent business interests outside</p>			<p>or need in the same way there are for WAVs, however, this will be kept under review. Limos are different because they are often older/unique vehicles and are not readily available but serve a niche purpose. The Euro 6 standard will apply when vehicles are next changed, rather than when they are next licenced (i.e., at their point of renewal. No change recommended.</p> <p>page 14 - 2.10.4.1 - It is a legal requirement to display a private hire vehicle licence plate at all times unless an exemption is given. 2.10.4.1 clarifies this exemption will only be given for vehicles that are used for Executive Car hire (e.g., chauffeur driven, luxury vehicles). No change recommended.</p> <p>page 16 - 2.16.4 - This is a valid point, and it is therefore proposed to amend para 2.16.4 to read: 2.16.4 Seating may only be removed temporarily for the purpose of making space for carrying luggage or wheelchairs, where they have been adapted with the installation of appropriate anchorage. Seating must not be altered permanently without notifying the Council - proprietors wishing to alter the number of passenger seats may apply to do so through the DVLA and subsequently by applying to change their vehicle licence details via the Council's online form for updating a taxi or private hire licence.</p> <p>page 18 - 2.23.4.2 - A DBS check may not provide a complete picture of an individual's criminal record where the applicant has spent an extended period of three or more continuous months outside the UK. Therefore, it is essential a 'Certificate of Good Character is obtained.</p>
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		<p>page 40 - 21 - exemption should apply to 7 seats and above also.</p> <p>page 41 - 4 - First Aid Kits although positive should not be mandatory as can be hazardous if used wrongly.</p>			<p>to not accept enhanced DBS checks obtained in relation to any other purpose or profession or by any other means nor will it accept any that have been carried out by any other external Agency.”</p> <p>page 32 - 7.2 - This is already in place with copies sent in the post.</p> <p>page 37 - 17.2 - Normal vehicles must be under 7 when first licenced and will not be licenced after they are 10 but allowing WAVs to be up to 10 when first licence and stay licenced until they are 14. This provision would make them much more affordable, and therefore appealing, but we need some limits to ensure standards. No change recommended.</p> <p>page 40 - 21 - These vehicles are likely to be especially polluting and there is no identified demand or need in the same way there are for WAVs, however, this will be kept under review. Limos are different because they are often older/unique vehicles and are not readily available but serve a niche purpose. The Euro 6 standard will apply when vehicles are next changed, rather than when they are next licenced (i.e., at their point of renewal. No change recommended.</p> <p>page 41 - 4 - Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits.</p>
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04/02/2021	Taxi Driver	<p>I strongly object to this, it would mean that my vehicle will be over 10 years old on the 1st of May 2021. This could put me off the road or be forced to purchase a new vehicle which during this difficult financial time is not good prospect. This will also prematurely put vehicles off the road unnecessarily as they have previously met all licensing conditions and inspections and because of this considered in exceptional condition and fit for purpose.</p> <p>As long as a vehicle is in exceptional condition and passes the Councils inspections it should continue to be considered fit for purpose. This common-sense approach should perhaps run alongside the proposal of the gradual removal (rather than the 1st of May) of vehicles that have high emissions (below euro 6) in order to give drivers time to replace their vehicles and also for the trade to meet the Climate Change Emergency motion passed at full council.</p> <p>There are many other changes within this draft policy (first aid kit, points systems, considering a driver not fit and proper after gaining 6 points on their DVLA licence to name a few) that i feel shouldn't be included in the new policy.</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits and fire extinguishers. No change recommended. In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
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04/02/2021	Taxi Driver	<p>I object the section 17 of page37. Which states all non-wheelchair accessible vehicles will not be re-licensed if they are over 10 years old.</p> <p>As our vehicles go under regular inspections and Mots why they can't be re-licensed? We maintain our vehicles in top condition for good business.</p> <p>As we are going through the pandemic it's been very hard for the business. As there is no sing of economic recovery if we can't get our vehicles licensed, we will be out of work. As it may be impossible to buy a new vehicle in this pandemic.</p> <p>I hope you considerate on this issue and delay it. Please think again.</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle, and the policy will be amended to reflect this.</p>
04/02/2021	Taxi Driver	<p>I strongly object about the change in the policy about the age of the vehicle, in this situation no one is able to get new vehicle, our vehicles always pass council inspection and fit for business.</p>			<p>Our recommendation is that the vehicle age requirement should apply to all vehicles being licensed with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle, and the policy will be amended to reflect this.</p>

04/02/2021	Taxi Driver	<p>Hope you are well. I am writing to you about the new requirements as I do not agree with them. Our existing drivers have been working for about five to thirty years or more. This new law will affect our lives. The council has failed to stop uber drivers and out of area drivers, but they are trying to stop us as a long-time driver. However, we are helping and serving this community for a long time even during this pandemic as well. Many drivers are old and unable to sit these exams or any training as they have a many issue. Therefore, we are unable to sit any English tests or disability awareness tests.</p> <p>Also, it is very hard for us to change our vehicle or any new requirements for the existing drivers even though we have not got enough jobs because of uber drivers, out of area drivers and this pandemic.</p> <p>If you make the applications hard for the new applicants, then we will lose drivers. Then uber driver and out of area drivers will work in here and Medway Council will not have any benefit.</p> <p>I am requesting the council to extend driver license and vehicle license to at</p>			<p>Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended. The comments relating to Uber are noted however the situation with Uber is governed by legislation and case law not policy and therefore are not relevant to this consultation.</p>
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		<p>least five years, it will also be less work for the council.</p> <p>We hope that the council will understand our situation and if you continue to liaise with MLTDA for any requirement it will be better.</p>			
04/02/2021	Taxi Driver	<p>Thank you for your below email. I wish to comment as follows, in respect of the following point:</p> <p>New requirements for applicants and existing drivers to attend disability awareness training and pass a test and be suitably proficient in the English Language (oral, written and reading); to promote equality and enhance the calibre of licensed drivers for the benefit of the travelling public.</p> <p>I have been a taxi driver for 36 years and I have dealt with numerous passengers with disabilities and special</p>			<p>Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The</p>

		<p>needs. I have not encountered any issues during that time, and I do not believe that these new requirements are necessary, or that they will be of any benefit. This may be of relevance to new drivers, but not for those who have been taxi driving for extended periods.</p>			<p>training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended.</p>
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05/02/2021	Taxi Driver	<p>First of all, I would like to speak about Medway becoming a carbon neutral borough by 2030. The date for all new fossil fuelled cars to be sold in the UK were to be banned in 2040, that date was then brought back to 2035 and now 2030. We are currently in 2021 and we have 9 years to try and save up enough so that we can be compliant with new vehicles that are to be sold here in the UK. Unfortunately, Medway Council is expecting to enforce rules by mid-2021, giving us less than 6 months which I feel is unfair. Furthermore, the restriction of not plating vehicles over ten years old means that again our fully functioning, MOT'd and carefully maintained vehicles are to be taken off the roads as taxis. This is very unfair on us as drivers because these vehicles are fully compliant to be on the road and to operate. With the current legislations suggest vehicles over 5 years of age must have a full-service history and be in 'good working order', this is something that we are happy to continue to comply with, if we weren't in a pandemic, we would have more likely had the capabilities to agree to the new rules but with our current incomes this is an impossible condition to follow. The vehicles are running properly and are compliant to be taxis</p>		<p>Page 12 Section 2.6 - Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. In relation to the age criteria: 3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change their vehicle.</p> <p>Page 17 Section 2.23 - The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit</p>
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		<p>and transport customers safely and securely. They have the appropriate fittings and are always maintained well, so I can't see what the problem is. Yes when 2030 comes round we will have to comply but not 9 years prior. Page 12 Section 2.6</p> <p>Furthermore, we have the enhanced DBS, the council has outlined that we must have the updated £13 a year service, but for someone like me who's license renewed back in 2019 means that I must spend £13 a year from today for the updated service, when my license renewed, I didn't have to have this service which I opted not to get because I couldn't justify spending £13 a year on something that I'm going to need in three years times. Now what it means is I must keep on paying for this service, out of my own pocket? How comes, we never had this rule before and why are we having this now? What is the need for it may I ask? Page 17 Section 2.23</p> <p>Also, I'd like to add the disability awareness training, English test, safeguarding and child sexual exploitation are good for one to know and have, but this is something the council must pay for and not the drivers. I paid for a knowledge test, Hackney Carriage driver's license and</p>		<p>further DBS applications and original identification documents. No change recommended.</p> <p>Page 19 Section 3.2 - Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. No change recommended.</p> <p>Page 23 Section 3.10 - This requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new</p>
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		<p>also Hackney Carriage vehicle license. I have done everything on my side to become a qualified Medway Hackney Carriage driver and these new tests and rules are NOT something that drivers should be paying for, as this is not something that was required at the time of becoming a Medway Hackney Carriage taxi driver. Page 19 Section 3.2</p> <p>I also feel that the introduction of having a medical every year for a driver over the age of 65 years old is also too much, I feel that a year goes by too fast and as per the pandemic driver are already struggling with trying to make ends meet and this is a burden cost on them, alongside a waste of the time which can be spent working – especially considering drivers over 65 never had to do this previously. I feel that maybe 2 years may be fairer on the drivers because again they are having to pay for this out of their own pockets. Page 23 Section 3.10</p>			<p>medical report with their three-yearly renewal application. No change recommended.</p>
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05/02/2021	Taxi Driver	<p>Please can you ask Medway council if we purchase electric cars such as tesla models why is there an age limit going to be applied to these vehicles as they don't emit any emissions and have drive motors capable of one million miles.</p> <p>Funding electric cars cost about £80k new and if they have to be replaced within 10 years then surely people in the trade will think twice. I understand that the car will still need to be tested etc but there shouldn't be an age restriction on electric cars as such.</p>			<p>We recognise that it may not be appropriate for the usual age limits to be applied to newly licenced fully electric or other zero emissions vehicles and propose to consider this in more detail at, if not before, the next date of review. The age limit would not affect any such driver in the meantime.</p>
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05/02/2021	Taxi Driver	<p>First of all, I would like to start off with incorporation of the new statutory taxi and private hire vehicle standards, and also the wheelchair accessibility taxi vehicles. I currently have a licensed Medway Hackney Carriage Vehicle; this vehicle is not disable access and therefore would not conform to your regulations. With the current pandemic and lockdown, I have seen a huge loss in income over the past 10 months. This means we as drivers just don't have the funds for vehicles of this type, unless a grant of some sort is approved by the council it is not possible for us drivers to purchase these vehicles. Secondly, I would like to add, where has the demand for disable access vehicles risen in recent times for the council to be setting these new rules out? Has there been a survey, complains...? We would need answers for this.</p> <p>Additionally, I would like to speak about the carbon neutral borough by 2030, this is something I am aware of, the date for all new fossil fuelled cars to be sold in the UK were to be banned in 2040, that date was then brought back to 2035 and now 2030. We are currently in 2021 and we have 9 years to try and save up enough so that we can be compliant with new vehicles that are to be sold here in the UK.</p>		<p>The requirement for drivers to have Wheelchair Accessible Vehicles is applicable to newly licensed Hackney Carriage Drivers only. There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.</p> <p>The recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle. This will also be reflected in Para 2.6.4 (our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle) which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update</p>
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		<p>Unfortunately, Medway Council is expecting to enforce rules by mid-2021, giving us less than 6 months which I feel is unfair. Furthermore, the restriction of not plating vehicles over ten years old means that again our fully functioning, MOT'd and carefully maintained vehicles are to be taken off. This is unfair on us as drivers because them vehicles are fully compliant to be on the road and operate. With the current legislations of having vehicles older than 5 years old but must having full service history and be in 'good working order' is something that we are happy with, maybe if we wasn't in a pandemic, we would agree but with the current income we can't do it. The vehicles are running properly and are compliant to be a taxi and transport customers safely and securely. They have the appropriate fittings and maintained well, so I can't see what the problem is. Yes when 2030 comes round we will have to comply but not 9 years prior.</p> <p>Furthermore, we have the enhanced DBS, the council has outlined that we must have the updated £13 a year service, but for someone like me who's license renewed back in 2019 means that I must spend £13 a year from today for the updated service, when my license renewed, I didn't have to have</p>		<p>service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No change recommended.</p> <p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The fees and charges are set by the local authority which covers only the cost of administering the licensing regime. If the Council paid for the training the</p>
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		<p>this service which I opted not to get because I couldn't justify spending £13 a year on something that I'm going to need in three years times. Now what it means is I must keep on paying for this service, out of my own pocket? How comes, we never had this rule before and why are we having this now? What is the need for it may I ask?</p> <p>Also, I'd like to add the disability awareness training, English test, safeguarding and child sexual exploitation are good for one to know and have, but this is something the council must pay for and not the drivers. I paid for a knowledge test, Hackney Carriage driver's license and also Hackney Carriage vehicle license. I have done everything my side to be a qualified Medway Hackney Carriage driver and these new tests and rules are NOT something the drivers should be paying for, as this is not something that was required at the time of becoming a Medway Hackney Carriage taxi driver.</p> <p>I also feel that the introduction of having a medical every year for a driver over the age of 65 years old is also too much, I feel that a year goes by too fast and as per the pandemic driver are already struggling with trying to make ends meet and this is a burden cost on them which they can do without. I feel</p>			<p>costs would have to be recouped by increasing the licence fees. No change recommended.</p> <p>The requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal application. No change recommended.</p>
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		that maybe 2 years may be fairer on the drivers because again they are having to pay for this out of their own pockets.			
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05/02/2021	Taxi Driver	<p>I don't know how the council can expect us to change our vehicles just like that, it's hard and scary to earn the money in this Covid situation. Plus, nothing is happening about uber. But Maidstone is down the road, and they don't operate there.</p> <p>We live in Kent they should have been out by now.</p> <p>My vehicle is coming up to 10 years very soon however she is still very clean and tidy inside and out she is in tip top condition, always passed the mot without a fault.</p> <p>It's hard to even pay the bills let alone going out there buying a new vehicle and going into debt Please put "Page 12 Section 2.6" at the end of your argument.</p> <p>We are not earning enough to be paying £13, or any amount we never had this rule before why now, why are we always paying and paying and paying? Unfair on drivers unless the council would like to pay for this I don't see the staff members paying anything out of their pocket so why do you expect us to pay when it is very hard to earn the money.) Page 17 Section 2.23" at the end of your argument.</p>		<p>The recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle. This will also be reflected in Para 2.6.4 (our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle) which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. The comments relating to Uber and vehicles licensed by other authorities are noted however these are governed by legislation and case law not policy and therefore are not relevant to this consultation. The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No change recommended. Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already</p>
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05/02/2021	Taxi Driver	<p>I would like to ask for more clarity on those potentially required courses, such as disability and language writing and oral test, can you please provide why these tests are required to my current knowledge they not part of national taxi law apart from disability awareness course, and can you also provide me how it will apply to those who have higher educational backgrounds such as a levels degrees etc, as I believe those test should not apply to the ones, who have educational backgrounds. As their certifications degrees and a levels diplomas proving that, so it would be not fair making them undergo those tests if they already have required knowledge. Secondly can you please make a clarity how the over 10 years vehicles requirements will apply, for an instance if the vehicle it's already licensed with Medway council and it's over 10 years older, will this mean due to the new policy the vehicle will have to be taken of the road, if yes how can the driver afford a new vehicle when the current vehicle still it's in working order, this will put us in big disadvantage.</p>		<p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle. This will also be reflected in</p>
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05/02/2021	Taxi Driver	<p>First of all, I would like to start off with incorporation of the new statutory taxi and private hire vehicle standards, and also the wheelchair accessibility taxi vehicles. I currently have a licensed Medway Hackney Carriage Vehicle; this vehicle is not disable access and therefore would not conform to your regulations. With the current pandemic and lockdown, I have seen a huge loss in income over the past 10 months. This means we as drivers just don't have the funds for vehicles of this type, unless a grant of some sort is approved by the council it is not possible for us drivers to purchase these vehicles. Secondly, I would like to add, where has the demand for disable access vehicles risen in recent times for the council to be setting these new rules out? Has there been a survey, complains...? We would need answers for this. Additionally, I would like to speak about the carbon neutral borough by 2030, this is something I am aware of, the date for all new fossil fuelled cars to be sold in the UK were to be banned in 2040, that date was then brought back to 2035 and now 2030. We are currently in 2021 and we have 9 years to try and save up enough so that we can be compliant with new vehicles that are to be sold here in the UK. Unfortunately, Medway</p>		<p>The requirement for drivers to have Wheelchair Accessible Vehicles is applicable to newly licensed Hackney Carriage Drivers only. There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.</p> <p>The recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle. This will also be reflected in Para 2.6.4 (our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle) which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update</p>
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		<p>Council is expecting to enforce rules by mid-2021, giving us less than 6 months which I feel is unfair. Furthermore, the restriction of not plating vehicles over ten years old means that again our fully functioning, MOT'd and carefully maintained vehicles are to be taken off. This is unfair on us as drivers because them vehicles are fully compliant to be on the road and operate. With the current legislations of having vehicles older than 5 years old but must having full service history and be in 'good working order' is something that we are happy with, maybe if we wasn't in a pandemic, we would agree but with the current income we can't do it. The vehicles are running properly and are compliant to be a taxi and transport customers safely and securely. They have the appropriate fittings and maintained well, so I can't see what the problem is. Yes when 2030 comes round we will have to comply but not 9 years prior.</p> <p>Furthermore, we have the enhanced DBS, the council has outlined that we must have the updated £13 a year service, but for someone like me who's license renewed back in 2019 means that I must spend £13 a year from today for the updated service, when my license renewed, I didn't have to have</p>		<p>service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No change recommended.</p> <p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The fees and charges are set by the local authority which covers only the cost of administering the licensing regime. If the Council paid for the training the</p>
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		<p>this service which I opted not to get because I couldn't justify spending £13 a year on something that I'm going to need in three years times. Now what it means is I must keep on paying for this service, out of my own pocket? How comes, we never had this rule before and why are we having this now? What is the need for it may I ask? Also, I'd like to add the disability awareness training, English test, safeguarding and child sexual exploitation are good for one to know and have, but this is something the council must pay for and not the drivers. I paid for a knowledge test, Hackney Carriage driver's license and also Hackney Carriage vehicle license. I have done everything my side to be a qualified Medway Hackney Carriage driver and these new tests and rules are NOT something the drivers should be paying for, as this is not something that was required at the time of becoming a Medway Hackney Carriage taxi driver. I also feel that the introduction of having a medical every year for a driver over the age of 65 years old is also too much, I feel that a year goes by too fast and as per the pandemic driver are already struggling with trying to make ends meet and this is a burden cost on them which they can do without. I feel that maybe 2 years may be fairer on the</p>		<p>costs would have to be recouped by increasing the licence fees. No change recommended.</p> <p>The requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal application. No change recommended.</p>
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		drivers because again they are having to pay for this out of their own pockets.			
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05/02/2021	Taxi Driver	<p>To increase WAV's i think council can ask every operator shall Have to keep at least 2 Vehicles in Their Fleet. To encourage buying WAV council can remove the colour restriction for the WAV hackney carriage vehicle for new drivers and operators, it can be any colour rather than Only white colour. This policy is applying in Tunbridge wells Borough council and Tonbridge and Malling Borough Council last more than 15/20 years ago. These councils all hackney carriage vehicles shall have to white colour except WAV, because Buying Hackney carriage vehicle is very expensive then to do respray will costs additional no minimum £3000 which will be very difficult for new drivers and operators. Most of the roads in Medway are very narrow and steep hill so too many WAVs in Medway is not good because of its size.</p>	2.5.12	11	<p>This was something we had considered. However, because drivers move to different circuits this would be very difficult for Operators to comply with. The requirement for drivers to have Wheelchair Accessible Vehicles is applicable to newly licensed Hackney Carriage Drivers only. There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.</p>
		<p>More than 4 passengers Should be Tarrif 2, Because running and mantainence of 7-seater vehicles are always costs more.</p>	8.1.6	33	<p>The tariffs are set following request from the MLTDA/licensing drivers, duly advertised in accordance with legislation and approved once the consultation period is over. Historically, the request for variation to the tariffs is submitted by the MLTDA and are based on the current competitive market.</p>
		<p>Taxi is always targeted by thief, if the driver keeps the lost property in the car, it might be stolen then driver will get in trouble. So i strongly recommends hackney carriage driver should not keep</p>	10.2	34	<p>The Police no longer take lost property and Medway Council no longer has a facility or resources for storage. Drivers and Operators are in the best position to reunite property with its owner. We will continue to maintain a lost property register.</p>

		the lost property for 14 days, it should be returned to the Council Lost property department with in 72 hours.			
		Buying Hybrid Vehicle is very Expensive but it gives very low emission so it should continue until reach the age of 12 Years old.	17.1	37	We recognise that it may not be appropriate for the usual age limits to be applied to newly licenced fully electric or other zero emissions vehicles and propose to consider this in more detail at, if not before, the next date of review. The age limit would not affect any such driver in the meantime.
		Very difficult to find a white colour vehicle, if find a white colour vehicle then it costs £1000 more, So hackney carriage vehicle should be Any colour.	19.1	38	This is a valid point. The current standard colours for licensed vehicles were set following extensive consultation with the trade and interested parties in 2006 and the colours at that time were suggested by the trade as they were the most common standard provided by the manufacturer, which is no longer the case e.g., the VW id3, which is an electric car comes with a black roof as standard. Our view is that the existing signage (door signs, external and internal licence plates incorporating the Medway Logo) and the specified design top light (for hackney carriages) makes these vehicles identifiable as licensed by Medway Council. It is therefore recommended the standard colours for both hackney carriage and private hire vehicles and the requirement for chequered stripes for private hire vehicles be removed from the policy.



05/02/2021	Taxi Driver	<p>In light of the above, the Council is of the view that there is a need to gradually increase the proportion of wheelchair accessible taxis. The Council would however encourage all drivers to consider disability when changing their vehicles. Some disabled vehicles are not appropriate for passengers. I live on a tight road and have issues with parking my vehicle outside my house, and on public roads. Therefore, will have parking problems, also not suitable to access through narrow roads and dead-end roads. Plus, the high expense of these cars will not be suitable for me and my personal use. I have family and owning a disability vehicle will not be appropriate.</p>	2.5.8		<p>The requirement for drivers to have Wheelchair Accessible Vehicles is applicable to newly licensed Hackney Carriage Drivers only. There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.</p>
		<p>Eligibility Criteria and Application Requirements – new requirements for applicants to:</p> <ul style="list-style-type: none"> <li>• Attend disability awareness training and, if required, pass an associated test.</li> <li>• Be suitably proficient in the English language, in terms of oral, reading, and written skills.</li> </ul> <p>Expansion of safeguarding and CSE awareness training to include County Lines Exploitation awareness and allow further components to be added as may be required. This is all extra expense which I won't and can't afford. But am willing to attend at no extra cost, meaning that the council will</p>	3.2		<p>Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further</p>

		fund these training sessions.			enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi & Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The fees and charges are set by the local authority which covers only the cost of administering the licensing regime. If the Council paid for the training the costs would have to be recouped by increasing the licence fees. No change recommended.
		Medical Examination – updated to reflect requirement for annual medical checks for all drivers aged 65 of over (instead of 61) and All others at every driver licence renewal. Again, this is all extra cost which will be inconvenient as we are struggling as it is. Lack of runs due to lockdowns and restrictions, so how are we expected to cover all these expenses? It won't be worth me being a taxi driver.	3.10		The requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal application. Given the primary purpose of the taxi and PH licensing regime is public safety, the introduction of three yearly medicals for all other drivers is deemed proportionate. No change recommended.
		Criminal Record Checks – updated, notably to require enhanced disclosure checks every 6 months instead of every 3 years. Again, more expense and inconvenience.	3.11		The Statutory Taxi & Private Hire Standards require all existing licensed drivers to have a DBS every 6 months at a cost of £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No change

					recommended.
		Disability Awareness – new requirement for drivers are required by condition to attend an approved Disability Awareness session and pass an associated test to demonstrate a satisfactory understanding If free of charge am willing to attend.	3.22		Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021.

		<p>Public Safety and Child Sexual Exploitation. This did not apply before so why now. If free of charge I am willing to attend.</p>	16	<p>Section 3.14 of the Statutory Standards clarifies that, “Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers’ ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The fees and charges are set by the local authority which covers only the cost of administering the licensing regime. If the Council paid for the training the costs would have to be recouped by increasing the licence fees. No change recommended.</p>
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		<p>All applicants and existing drivers will also be required, at their expense, to attend an approved Safeguarding Awareness session, subsequent refresher training at intervals determined by the Council and, if required, pass an associated test to demonstrate a satisfactory understanding of the matters covered. This was not a requirement when I first applied for a taxi licence so why now. Again, it will be an inconvenience as I will not be able to afford to take time off to attend.</p>	3.9.2		As above
		<p>The Council has adopted this best practice and therefore requires all applicants to have a medical examination carried out by their own GP. Again, more expense. I have a family to support and mortgage to pay.</p>	3.10.2		<p>The requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal application. Given the primary purpose of the taxi and PH licensing regime is public safety, the introduction of three yearly medicals for all other drivers is deemed proportionate. No change recommended.</p>
		<p>It is an offence for any person to cause or permit any vehicle other than a hackney carriage to wait on any stand for hackney carriages. Drivers of hackney carriages may only wait on a stand whilst plying for hire or waiting for a fare; drivers who park on a stand and leave their vehicle unattended are committing an offence. This is an</p>	9.2.1		<p>This is set in legislation - Section 64 Local Government (Miscellaneous Provisions) Act 1976.</p>

		inconvenience as we may need the toilet or assist passengers for some reasons.			
		Non-wheelchair accessible vehicles presented for first time licensing must be under 7 years old and will not be re-licensed if they are over 10 years old.	17.1		The recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. If agreed, the policy will be amended to reflect this.
		Purpose built and converted wheelchair accessible vehicles presented for first time licensing must be under 10 years old and will not be re-licensed if they are over 14 years old. I can't afford to keep upgrading my vehicle. as the vehicle comes along with lots of A-Z costs. It's easier to upgrade phones but not vehicles. This is too much of a stressful, unnecessary expense. If we have a valid MOT and a good working vehicle, why do we have to change our vehicle? During this pandemic, this is not something we can afford with all the other expenses in the new policy.	17.2		The recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. If agreed, the policy will be amended to reflect this.

05/02/2021	Taxi Driver	<p>In the past, we were allowed vehicles which are older than 10 years old with no issues, why is it that has to change? There is no reason to not allow such vehicles as they still in good working order, which is proved by the valid MOT. Also, they still confirm with current legislations. Further, having a Euro 6 vehicle is a choice, these new vehicles are far too expensive for us drivers and on top forcing electric vehicles. These are times where drivers are really struggling to make ends meets so without council funding, we cannot follow these new unnecessary requirements.</p>	2.6	12	<p>Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. 3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change their vehicle.</p>
		<p>Secondly, enhanced DBS update service shouldn't be needed, in the case of someone who has done their check only 6 months ago, they will have to pay again for this service. Again, this is out the drivers' pockets. £13 a year is far too much for a service which is</p>	2.23	17	<p>The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months. currently costing £60 each time. Registering for the update service is at an annual cost of £13, which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No</p>

		unnecessary as before we did not have this. This is unfair unless the council is willing to fund it.			change recommended.
		the council should pay for disability awareness training, English test, safeguarding and child sexual exploitation and any tests we have to take. We never had this before, I was required a DSA taxi test, a knowledge test and a medical for me to get my licensed taxi badge, I've done this as per the council requirements, so therefore it's not our job as drivers to be paying this.	3.2	19	Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi & Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The fees and charges are set by the local authority which covers only the cost of administering the licensing regime. If the Council paid for the training the costs would have to be recouped by increasing the



					licence fees. No change recommended.
		over 65-year-old drivers do not need a medical every year, it's a burden on the over 65 generation, again we never had this before, why is the council not paying for this? With all these changes the council is making is furthering putting a cost burden and this yearly medical is just another on a mountain.	3.10	23	This is not a new requirement; the current taxi policy states - 3.4.7 A satisfactory medical certificate from a doctor in the form provided must be submitted on first application and then at 5 yearly intervals until the age of 55 then every 3 years until the age of 61, thence annually, and at reasonable time at the request of the Council. The applicant must meet all fees. The current policy states drivers age 61 or over must have an annual medical check. This frequency has been reviewed in line with the requirements under the DVLA Group 2 Medical Standards, which states annual checks for those aged 65 or over. No change recommended.
05/02/2021	Taxi Driver	1: Re Disabled Vehicles. I have had a Mercedes Vito taxi, wheelchair access vehicle for 7 years. In that time, I have had less than 1 job a year, booked through Computer cabs. Most disabled passengers have their own transport. The other problem is taxis are only big enough to take non-electric chairs. The			There is a need to increase the level of wheelchair accessible vehicles. within Medway, out of a fleet of over 660 vehicles, only 6 are wheelchair accessible. This approach is designed to gradually increase the proportion of wheelchair accessible taxis within Medway and is deemed appropriate by not affecting our current licensed drivers. However, this will be kept under review. No change recommended.

		<p>electric ones are too large to fit back to front in the cab. Also are too heavy making my ramps bend. The only way to get them in is side to side. This is dangerous, as you would not be able to anchor the chair correctly.</p>			
		<p>2. The age of vehicles. This is not an issue, as the new emission rules (nox) will take most of the older vehicles off the road. Which are not euro 6 compliant. They can have a Nox filter fitted and add blue tank. You could bring this rule in by 2026.</p>			<p>3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. Our recommendation is that the requirement in relation to the age of vehicle should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change their vehicle.</p>

		3. Fire extinguishers. Medway should consult Kent Fire and Rescue. As when I asked the question if we need one. The answer was no, as you should get yourself and passengers out of the car to a safe distance and dial 999. in the event of a fire. Do not tackle the fire yourself.			Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry a fire extinguisher. No change recommended.
		4. First aid kit. If the council will pay for my first aid course and underwriter the drivers against being sued for wrong full use.			Taxis and PHVs (private hire vehicles or minicabs) are required by law to carry first aid kits. Medway were not previously aware of this and now that we are, it would be remiss of the council not to include it. Unless a person is a qualified first aider, they are not required to administer first aid to others. There is no requirement for drivers to undergo first aid training. No change recommended.
		5. Various courses and NVQ. It is unfair for the driver to pay out for these courses. Then have to attend classes in their work time. Medway have Adult education colleges which could offer free courses.			Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The

					<p>training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The fees and charges are set by the local authority which covers only the cost of administering the licensing regime. If the Council paid for the training the costs would have to be recouped by increasing the licence fees. No change recommended.</p>
		<p>6. DBS online reg. The DBS are having problems setting this up. I have had 2 refunds from them as the certificate they issued was the wrong type for service. Please contact DBS for advice.</p>			<p>The Statutory Taxi &amp; Private Hire Standards require all existing licensed drivers to have a DBS every 6 months, currently costing £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. The update service operated by the DBS has been in operating successfully for some considerable years. This issue to which this individual refers is where a 'Manual Certificate' is issued. These are only carried out when technical issues occur during the retrieval of data from the Police National Computer (PNC) and putting it into perspective out of 4,335,385 standard and enhanced checks processed in 2016/17 1,161 were produced manually. No change recommended.</p>

		<p>7. Points system. This needs to be realistically looked at. So, a taxi driver getting 6 points on his licence, would be put in from the panel. But a bus driver gets 12 points, no action taken by bus company. So can still carry 50+ passengers. This could be challenged in the courts. A waste of time for all involved.</p>			<p>In assessing the suitability of an applicant with points on his DVLA driving licence, this is in line with the Statutory Taxi &amp; Private Hire Vehicle Standards, which states "Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally. Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence." The Council's responsibility is to ensure the safety of the public and therefore the standards expected are set higher than that of a non-professional driver. No change recommended.</p>
05/02/2021	Taxi Driver	<p>1. The whole country is upside down just because of covid-19. why do you need to change policy now? I am totally against to change any policy now.  2. Financially most of us struggling now. If we have to spend more money to accommodate new policies, it is going to be immoral.  3. Let's discuss more ethical way when</p>			<p>Unfortunately, this has coincided with the current difficulties faced due to the Covid-19 pandemic, however, it is a mandatory requirement to review the policy every 5 years and to incorporate the Statutory Taxi &amp; Private Hire Vehicle Standards.</p>

		everything goes back to normal.			
05/02/2021	Taxi Driver	<p>I am emailing regarding the new developments about taxi vehicle eligibility, whereby cars over 10 years old are no longer allowed for use. The new legislation will put additional stress on taxi drivers during the national crisis of COVID-19. This pandemic has already been detrimental to all taxi drivers due to the lack of work and income due to governmental restrictions. In this email I would like to discuss the negative effects of this legislation and why I believe it is not necessary to put in place. Firstly, if cars over 10 years old are able to adhere to strict MOT regulations, it highlights the extent to which the cars are fit and safe for passengers. The regulatory checks conducted by governmental guidelines test all vehicles on safe operation, therefore there is evidence that cars over 10 years old are as safe if not safer than newer cars. Page 12 Section 2.6</p> <p>Moreover, this additional financial stress is causing more adverse effects on the mental and physical wellbeing of taxi drivers. This is due to the impact of</p>			<p>Page 12 Section 2.6 - Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards. 3.14 of the Statutory Taxi &amp; Private Hire Vehicle Standards state "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle." Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time and all current drivers when they next change their vehicle.</p> <p>Unfortunately, this has coincided with the current</p>

		<p>COVID-19, which has been significant for the sole source of income for many households of these taxi drivers. Consequently, this is the wrong time to pressure taxi drivers to purchase a new vehicle. Many taxi drivers are already suffering with extreme pressures and therefore should receive more help and support from the government. The new legislation would hinder the wellbeing of taxi drivers in a time where more support should be given.</p> <p>Lastly I would like to highlight the unnecessary additional cost that over 65's are required to pay for medical checks. These checks are arguable unnecessary to conduct every year, however if this is required by the government, they should subsidise the costs associated with this. Over 65's tend to work reduced hours, therefore it is unfair to make them pay for something that is required by the government. Page 23 Section 3.2</p> <p>I hope that this email highlights the challenges associated with these new developments, felt by many taxi drivers, not just myself. Please do respond with consideration and support during these difficult times.</p>			<p>difficulties faced due to the Covid-19 pandemic, however, it is a mandatory requirement to review the policy every 5 years and to incorporate the Statutory Taxi &amp; Private Hire Vehicle Standards.</p> <p>Page 23 Section 3.10 - The requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal application. No change recommended.</p>
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05/02/2021	Taxi Driver	(1) I'm very concerned at your new proposals to force me and all other taxi drivers to buy new vehicles once their Hackney vehicles become 10 years old. Because vehicles like mine have 4 monthly MOT's - THREE TIMES EVERY YEAR. These are in fully working order mechanically and electrically sound for the safety of our passengers and all other road users. They conform to all current legislations. If we could have it BEFORE, WHY not NOW?			Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle.
		We drivers can't afford these new vehicles without the council giving us funding, encouraging us to go electric, during a Worldwide Pandemic it is not something that we as drivers can afford, we are not earning enough money to be going down this route.	2.6	12	Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.
		(2) If as a Hackney Driver, I already have a valid enhanced DBS over 6 months ago, why do I have to pay for the service again out of my pocket, during these hard times? I'm not earning enough to be paying. Is the council going to help to pay for £13 every 6 months?	2.23	17	The Statutory Taxi & Private Hire Standards require all existing licensed drivers to have a DBS every 6 months, currently costing £60 each time. Registering for the update service is at an annual cost of £13 which results in a cost saving to the driver and negates the requirement to complete and submit further DBS applications and original identification documents. No change recommended.



		<p>(3) To become a Taxi Driver, I was required to pass a DVSA practical taxi test, a knowledge test and a medical for me to get my licensed taxi badge. All this cost me £700 including paying for a Hackney Vehicle Licence and Hackney Driver Licence. I have done this as per the Council Requirements. So now you want me to pay for Disability Awareness Training, English Test, Safeguarding and Child Sexual Exploitation training. It's not our job as drivers to be paying this. It is the Council, who should pay for this as we are working and providing a service to the public on your behalf.</p>	3.2	19	<p>Section 3.14 of the Statutory Standards clarifies that, "Any changes in licensing requirements should be followed by a review of the licences already issued. If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. In addition, the requirement for drivers to be suitably proficient in the English language is already set out in the current Policy. The driver conditions require that drivers shall assist, where necessary, passengers' ingress to and egress from vehicles, as well as take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle. Therefore, the new Policy requires drivers to undertake disability awareness training which it is hoped will further enhance the knowledge and calibre of drivers. The training must be completed by applicants at the time of applying and completed by existing drivers by 1 September 2021. Safeguarding Training is in line with 6.11 - 6.13 of the Statutory Taxi &amp; Private Hire Vehicle Standards, which states Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation and the need to be aware of what to do if they believe a child or vulnerable person is at risk of harm and who to contact. The fees and charges are set by the local authority which covers only the cost of administering the licensing regime. If the Council paid for the training the costs would have to be recouped by increasing the licence fees. No change recommended.</p>
		<p>(4) For Drivers over 65-year-old it is a burden to pay for a medical every 12 months. We never had this before, why</p>	3.10	23	<p>The requirement to have a medical at set intervals is not new; the frequency currently set for those aged 61 or over has been reduced to those age 65 or over to</p>

		is the council not paying for this? Every two years for a medical would be more practical and affordable solution.			reflect the DVLA standards and for all other drivers to submit a new medical report with their three-yearly renewal application. No change recommended.
05/02/2021	Taxi Driver	under the current gloomy situation, it is not a good policy to force drivers to buy new car while I looked after my existing vehicle very well. I strongly object/disagree this policy.	17	37	The recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. It is therefore recommended Para 17.4 be included to say: For existing drivers, the age criteria will apply when they next change their vehicle.

05/02/2021	Taxi Driver	<p>I am strongly opposed to the condition that non-wheelchair accessible vehicles presented for first-time licensing must be under 7 years old and will not be re-licensed if they are over 10 years old.</p> <p>This is a significant shift from the current policy which allows vehicles of any age that comply with the current vehicle standards, as set out by Medway Licensing, to be licensed and to continue to be licensed if the annual MOT inspection criteria is met.</p> <p>There are taxis that are currently licensed in Medway that are more than 10 years old and are running superbly well and providing a great service to the public. They are licensed and continue to be licensed as they have been deemed to be roadworthy by Medway Council-approved MOT centres. It is not for Medway Council to overrule the MOT centres. They should be left to do their work and report back to you their professional opinion without interference.</p> <p>Medway Council outsourced the inspection of Hackney Carriages and PH vehicles to MOT centres of their choosing. The MOT centres would have been selected on trust. So why now, if</p>	17.1	37	<p>Our recommendation is that the requirement should apply to all vehicles being licenced with the council for the first time, so that it applies to all people coming into the trade for the first time, and all current drivers when they next change their vehicle. This will be reflected in Para 2.6.4 which will be updated to say: In support of the council's efforts to reduce air pollution in Medway however, all vehicles presented for first time licensing from the start date of this policy, other than stretched limousines and Wheelchair Accessible Vehicles will have to meet or exceed the Euro 6 emission standards.</p>
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