













# Taxi Policy Consultation Survey

## 2. About you

1. Are you responding to this survey as...?				
Answer Choices			Response Percent	Response Total
1	Hackney carriage / private hire driver licensed by Havant Borough Council		38.71%	36
2	Hackney carriage / private hire driver licensed by another Council		2.15%	2
3	I am considering applying for a Hackney carriage / private hire driver license		1.08%	1
4	Hackney carriage / private hire vehicle proprietor licensed by Havant Borough Council		3.23%	3
5	Hackney carriage / private hire vehicle proprietor licensed by another Council		1.08%	1
6	I am considering applying for a Hackney carriage / private hire vehicle proprietor license		1.08%	1
7	Private hire operator licensed by Havant Borough Council		9.68%	9
8	Private hire operator licensed by another Council		3.23%	3
9	I am considering applying for a private hire operator license		1.08%	1
10	Representative of a Council licensing authority (e.g. licensing officer)		7.53%	7
11	Member of the public / user of taxis and private hire vehicles		26.88%	25
12	Other (please specify):		4.30%	4
			answered	93
			skipped	0
Other (please specify): (4)				
1	19/06/2023 15:20 PM ID: 220655576			

### 1. Are you responding to this survey as...?

2	02/07/2023 01:30 AM ID: 221461643	national private hire and taxi recognised stakeholder representing the taxi and private hire industry
3	02/07/2023 23:25 PM ID: 221489388	GMB Union National Rep for Southern Region ( Taxi & PH)
4	04/07/2023 15:23 PM ID: 221617159	Trade union

### 2. Which of the following age bands do you fall into?

Answer Choices		Response Percent	Response Total
1	16 - 24	0.00%	0
2	25 - 34	21.74%	20
3	35 - 44	27.17%	25
4	45 - 54	16.30%	15
5	55 - 64	23.91%	22
6	65 +	3.26%	3
7	Prefer not to say	7.61%	7
		answered	92
		skipped	1

### 3. What is your gender?

Answer Choices		Response Percent	Response Total
1	Female	19.57%	18
2	Male	71.74%	66
3	Prefer not to say	7.61%	7
4	Other (please specify):	1.09%	1
		answered	92
		skipped	1

Other (please specify): (1)







1	04/07/2023 15:23 PM ID: 221617159	
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### 3. Drivers

At present, the Council does not mandate safeguarding training for drivers.

The proposed policy changes would have a requirement for completion of safeguarding training by all drivers.






New applicants must complete this prior to a licence being issued, and current drivers will be given 2 years to complete the training.

4. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		40.23%	35
2	Tend to agree		25.29%	22
3	Neither agree nor disagree		14.94%	13
4	Tend to disagree		5.75%	5
5	Strongly disagree		11.49%	10
6	Don't know / Not sure		2.30%	2
			answered	87
			skipped	6

At present, the Council requires an enhanced DBS certificate every three years from drivers.

The proposed policy changes would have a requirement for all drivers to sign up to the DBS Update Service (costing £13 per year), to allow the Council to check their enhanced DBS status at least every six months.






New applicants will be required to sign up prior to a licence being issued, and current drivers will have until their next licence renewal date to comply.

5. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		63.22%	55
2	Tend to agree		17.24%	15
3	Neither agree nor disagree		10.34%	9
4	Tend to disagree		4.60%	4
5	Strongly disagree		4.60%	4
6	Don't know / Not sure		0.00%	0
			answered	87
			skipped	6

At present, new applicants are required to submit a criminal record check from another country only to complete a five-year address history.






The proposed policy changes would have a requirement for a new applicant or existing driver to submit a criminal record check from the relevant country where they have spent six or more continuous months overseas from the age of 18 years old.

Required for new applicants and for existing drivers during the period of their licence.

6. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		57.65%	49
2	Tend to agree		22.35%	19
3	Neither agree nor disagree		10.59%	9
4	Tend to disagree		1.18%	1
5	Strongly disagree		8.24%	7
6	Don't know / Not sure		0.00%	0
			answered	85
			skipped	8

The proposed policy changes would have a requirement for drivers to notify the Council within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, including the issue of a police fixed penalty notice.

At present, the Council does not formally require drivers to notify them of this information.

7. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		59.30%	51
2	Tend to agree		19.77%	17
3	Neither agree nor disagree		9.30%	8
4	Tend to disagree		4.65%	4
5	Strongly disagree		6.98%	6
6	Don't know / Not sure		0.00%	0
			answered	86
			skipped	7

The proposed policy change is where an applicant or existing driver has 7+ DVLA points, consideration will be given to refusing or revoking the licence. A minimum of 5 years must elapse before the Council will consider licensing the individual. At present, the Council will allow drivers with up to 12 DVLA points to be licensed, although decisions are made on a case-by-case basis.

8. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		23.53%	20
2	Tend to agree		27.06%	23
3	Neither agree nor disagree		8.24%	7
4	Tend to disagree		8.24%	7
5	Strongly disagree		32.94%	28
6	Don't know / Not sure		0.00%	0
			answered	85
			skipped	8

#### 4. Drivers

At present, the Council does not mandate safeguarding training for drivers. The proposed policy changes would have a requirement for completion of safeguarding training by all drivers. New applicants must complete this prior to a licence being issued, and current drivers will be given 2 years to complete the training.

9. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	19
1	18/06/2023 22:00 PM ID: 220602276	Online training should be sufficient. Face to Face training is not required for something that is basically common sense.		
2	19/06/2023 07:42 AM ID: 220610138	Not sure what safeguarding is		
3	19/06/2023 12:30 PM ID: 220622780	I am disagree because i am taxi driver for 6 years and i never had an incident with someone. It's so much work to do and drivers has no time for this. Try the thing to keep it simple .		
4	20/06/2023 16:20 PM ID: 220744827	Maybe minor safeguarding so if they ever had concerns they'd know what to do.		
5	20/06/2023 17:06 PM ID: 220749652	I have been licensed for over 8 years. I don't see what I would learn from a course. It would be an unnecessary expense for drivers with my experience. I would apply the course for new drivers and those with 1-3 years of experience		
6	20/06/2023 18:30 PM ID: 220756675	I do not disagree , I just feel that in a time when the borough is struggling to retain drivers it is just another obstacle for existing and new drivers to overcome.		

## 9. Why do you disagree and what do you think needs to be considered / addressed in the policy?

7	21/06/2023 14:45 PM ID: 220811561	Uber Britannia Ltd. as an licensed operator was doing couple of years ago such training courses with a certified provider which probably is eager now to expand his business. But Uber did not asked for any payment from the drivers, which will not be the case when the Council will ask drivers to hold a certificate as mandatory for driver's license. As a licensing authority you will only keep squeezing drivers of money without any benefit, not for them but for the public we all serve.
8	21/06/2023 22:24 PM ID: 220853684	I've been a Private Hire Taxi Driver for 30 Years , I know when something is not right with passengers in my car, I think Drivers with years of experience should be exempt from any training, but it is a good idea for new applicants.
9	23/06/2023 08:23 AM ID: 220937921	Because unless the training is free it's more expenses we are paying out to do a job we've been doing for years
10	30/06/2023 19:56 PM ID: 221036910	There are many drivers that are aware through age and experience what is right or wrong. Safeguarding covers many areas some of this comes with age and experience.
11	02/07/2023 01:30 AM ID: 221461643	since the license was issued under previous conditions, we would recommend that the requirement was for new applicants, but grandfather rights were adopted for existing drivers on the basis that the safeguarding training is a new course and a new requirement. we would recommend that the requirement for existing drivers to sit the course was reserved on a case by case basis, where evidence suggested that the existing driver may benefit from the course.
12	05/07/2023 08:54 AM ID: 220633310	Just feel its another expense and time lost to drivers that work really hard with all sorts of needs to there customers. Just going to be another obstacle for an already shrinking work force in our area.
13	05/07/2023 08:59 AM ID: 220851401	I have safeguarding for my coaching and volunteering . Can there not be one safeguarding certificate to cover all needs
14	05/07/2023 09:02 AM ID: 220683765	I see this as another bureaucratic step. I do not fully understand what this training is for. As drivers(especially the ones doing night weekend shifts) We have to endure a lot of abuse, mostly verbal, sometimes physical. Usually the most severe is our cars get kicked and damaged by drunk unhappy passengers. The police does not have the resources to deal with this situations and we are quite frustrated regarding this. What I am trying to say is I do not think most drivers are eager to do policework when they feel that their demands are not meet by the police.
15	07/07/2023 07:43 AM ID: 221832169	safeguarding is for police to action
16	08/07/2023 10:53 AM ID: 221855311	i've done safe guarding course but is not relevant . theory is very different from practice.
17	11/07/2023 17:27 PM ID: 222096656	What's the point and what's it meant to achieve?
18	12/07/2023 14:28 PM ID: 222157134	They are taxi drivers not social workers.
19	15/07/2023 18:57 PM ID: 222438636	This is not a bad thing but i do am not sure if it will work. Drivers, especially night drivers as myself have to put up with a lot of abuse. Rude, racist, drunk, violent, or drugged passengers. Unfortunately when we have problems, police is unable to help as they are stretched with personnel. Unfortunately I think it exist an "not happy with the police sentiment" among drivers. I do not think they will be helping much if they will take this training.

answered	19
skipped	74

## 5. Drivers

At present, the Council requires an enhanced DBS certificate every three years from drivers. The proposed policy changes would have a requirement for all drivers to sign up to the DBS Update Service (costing £13 per year), to allow the Council to check their enhanced DBS status at least every six months.

New applicants will be required to sign up prior to a licence being issued, and current drivers will have until their next licence renewal date to comply.

10. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	7
1	19/06/2023 05:38 AM ID: 220608010	Six months it is to small time interval.I think one year is enough.		
2	19/06/2023 07:42 AM ID: 220610138	It was too complicated to complete		
3	05/07/2023 08:59 AM ID: 220851401	More expense		
4	05/07/2023 09:02 AM ID: 220683765	This is welcomed as long as it is an easy process. In the past there were some confusing changes.		
5	06/07/2023 22:19 PM ID: 221824199	I disagree only for the money reasons, at the moment the taxi industry is very bad, we earn same money like 2/3 years ago and the cost of living has increased since.		
6	08/07/2023 10:53 AM ID: 221855311	think at 3 years is more then fair.		
7	11/07/2023 17:27 PM ID: 222096656	Seems very bureaucratic and over the top		
			answered	7
			skipped	86

## 6. Drivers

At present, new applicants are required to submit a criminal record check from another country only to complete a five-year address history.

The proposed policy changes would have a requirement for a new applicant or existing driver to submit a criminal record check from the relevant country where they have spent six or more continuous months overseas from the age of 18 years old.

Required for new applicants and for existing drivers during the period of their licence.

11. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	7
1	19/06/2023 11:57 AM ID: 220627670	Existing driver already had to provide criminal records check at their first application why would you ask for a document you should already have in your records		

### 11. Why do you disagree and what do you think needs to be considered / addressed in the policy?

2	19/06/2023 12:30 PM ID: 220622780	I agree.	
3	24/06/2023 09:14 AM ID: 220994170	If you are only checking the last 18months in this country they may have a clean record but you don't know what they have done previously in another country and that's why they are here so yes a check should should go further back .	
4	06/07/2023 22:19 PM ID: 221824199	I live in Uk for about 5 years now and I don't know how to get my DBS from my country	
5	08/07/2023 10:53 AM ID: 221855311	a	
6	11/07/2023 17:27 PM ID: 222096656	Overly bureaucratic and can it realistically be achieved to allow a licence to be granted. Enough delays as things currently stand	
7	13/07/2023 20:48 PM ID: 222252289	It would be difficult to obtain a such a certificate for me. I left my home country 12 years ago. I have no idea after so long time where to go and ask for it. At the Embassy will take ages to obtain one.	
		answered	7
		skipped	86

## 7. Drivers

The proposed policy changes would have a requirement for drivers to notify the Council within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, including the issue of a police fixed penalty notice.

At present, the Council does not formally require drivers to notify them of this information.

### 12. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices		Response Percent	Response Total
1	Open-Ended Question	100.00%	9
1	18/06/2023 22:00 PM ID: 220602276	Agree that serious offences should be disclosed, but not fixed penalty fines.	
2	19/06/2023 02:07 AM ID: 220606985	I only disagree with the part which says that we will have to inform the council about receiving fixed penalty notices and motoring offences because drivers will most likely forget to do this and this will only complicate more the problems and cause more issues in the long term.these matters are already governed by DVLA and Council rules	
3	19/06/2023 11:57 AM ID: 220627670	I think you should be notified by the police if there is something serious to report and not the driver that was involved in something dishonestly. What is to say it will be honest with you.	
4	19/06/2023 12:30 PM ID: 220622780	I am disagree with this policy because I don't think the Council should be involved in this issue.	
5	21/06/2023 14:45 PM ID: 220811561	No comment here. This is just another way round of the GDPR.	
6	21/06/2023 22:24 PM ID: 220853684	I agree that notifying the Council on any arrest charge or conviction of any sexual offence, dishonesty or violence charge within 48 hours is correct, but not so for minor motoring offences.	



## 12. Why do you disagree and what do you think needs to be considered / addressed in the policy?

7	27/06/2023 22:23 PM ID: 221214061	I disagree as the wording is all encompassing and not specific, i agree with serious charge of sexual offence, violence and dishonesty but fixed penalty notice can be very minor and could be unfair to drivers who on the road more then any normal driver and could be unfairly penalized for a minor lapse of concentration.	
8	05/07/2023 08:59 AM ID: 220851401	I feel I shouldn't have to disclose this unless found guilty of an offence	
9	08/07/2023 10:53 AM ID: 221855311	if a get 3 points fixid penalty from police , should not affect my job in any way ! mistakes happen. why should inform the council ?	
		answered	9
		skipped	84

## 8. Drivers

The proposed policy change is where an applicant or existing driver has 7+ DVLA points, consideration will be given to refusing or revoking the licence. A minimum of 5 years must elapse before the Council will consider licensing the individual. At present, the Council will allow drivers with up to 12 DVLA points to be licensed, although decisions are made on a case-by-case basis.

## 13. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	30
1	18/06/2023 22:00 PM ID: 220602276	Points should parallel DVLA points. Drivers are targeted as offences, and considering the amount of driving we do, we are more likely to incur points due to a slight lapse of judgement. 5 years ban is a long time.		
2	19/06/2023 02:07 AM ID: 220606985	I do believe that at only 7+ points to have the licensed renewed is too drastic.being a taxi driver involves driving every day for many many miles and as everybody in their job you can do mistakes and 7+ points can be done and someone's life can be changed in a very drastic way loosing the job so easy in today economy and living prices.the way it worked so far it was good enough and everybody was happy		
3	19/06/2023 05:38 AM ID: 220608010	12 points is ok.It is so easy to get points and so difficult to clean them.		
4	19/06/2023 07:42 AM ID: 220610138	Its not hard to gather more than 6 points over 5 years,it should be 10 points		
5	19/06/2023 11:52 AM ID: 220626673	The current policy should be kept as it is because for all drivers this is our main source of income. I believe that unless the driver has been banned by the court due to a serious offence or recklessness with their driving this statement should apply to them.		
6	19/06/2023 11:57 AM ID: 220627670	I see no proposal here that is actually helping drivers just trying to get more control over them . Don't go the route Portsmouth council is as it will push drivers to get licenced in other boroughs		
7	19/06/2023 12:30 PM ID: 220622780	I am disagree with new proposals and you should keep it with 12 DVLA points.		
8	19/06/2023 17:31 PM ID: 220619251	A lot of roads now are 20 MPH INCLUDING LONDON . You could get points for driving at 23 mph.		

### 13. Why do you disagree and what do you think needs to be considered / addressed in the policy?

9	20/06/2023 08:01 AM ID: 220695759	12 points is the legal requirement at moment should stay the same
10	20/06/2023 17:06 PM ID: 220749652	Revokin of the license for 7 +points is a tough decision for a driver who supports the family with the help of the license
11	20/06/2023 17:09 PM ID: 220750655	60,000 miles a year for 3 years there are drivers that will lose license that have good service snd made a few mistakes
12	21/06/2023 14:45 PM ID: 220811561	No comment.
13	21/06/2023 22:24 PM ID: 220853684	I think revoking an existing Drivers licence for 7+ DVLA points is unfair, but agree that consideration for refusal for new applicants should be considered.
14	24/06/2023 16:34 PM ID: 221010878	If dvla suspends the driver licence, the badge should be the same.
15	27/06/2023 22:23 PM ID: 221214061	As a driver on the road more then any other normal every day driver be penalized more and could lose his livelihood due to the possibility of having a couple of small speeding offences.
16	28/06/2023 16:39 PM ID: 220811829	My opinion a driver can have more than 7 points, depends what he did for the points.
17	30/06/2023 19:56 PM ID: 221036910	I should think not even a police officer wouldn't lose his job for having 7 points on his licence. If you have 6 points and a short time before or some of the points are removed you could pick up points and loose your job. As for not applying again for 5 years for your taxi licence seems excessive. I think it should be left as it is.
18	02/07/2023 01:30 AM ID: 221461643	<p>this is the IOL guidance and opinion only, it has no bearing or merit in law, and is considered by many within the industry to be far too draconian and biased, to quantify this, a taxi or ph driver is required to pass the same medical level as a HGV or coach driver, and yet those drivers remain entitled to accrue 12 points before any action is taken against their license, to introduce a more rigorous approach against taxi drivers is considered to fail the wednesbury reasonably necessary test.</p> <p>furthermore, the number chosen being 7, does not correlate to the penalty points issued, which is in multiples of 3 generally, as such it makes little to no sense at all.</p> <p>several other local authorities did adopt this guidance, but have since dropped it or amended it to read 9 points before being referred to licensing committee for assessment.</p>
19	05/07/2023 08:59 AM ID: 220851401	The law says 12 points is the limit before a possible ban . I feel it should be you explaining to us drivers why you should change this law to such a low figure and lengthy ban. Which you also don't say could be appealed
20	05/07/2023 09:02 AM ID: 220683765	<p>Drivers are very exposed to getting penalty points.</p> <p>Average PH driver drives 40.000 to 50.000 miles per year.</p> <p>In real life he has to use his phone or other handheld device to accept jobs to complete these jobs, to change destination when the passenger realises on the motorway that he put the wrong address where he wants to go....etc.</p> <p>I repeat! In real life it is impossible to do this job without touching some sort of handheld device, or navigation.</p> <p>You could argue that he can do this wile parked. But I repeat again. In real life this is IMPOSSIBLE. Doesnt matter if its Uber Andicars or other.</p> <p>There is no one that can make this job profitable without touching that phone at one point during the day. There are so many scenarios in which you have to do that I would have to write pages here.</p> <p>So it is very easy to get those is 6 points. Driving so many miles it is very easy to make some other mistake, get some points and loose the licence.</p> <p>Driver looses his job...goes on benefits. Not in the society interest. Or pays for an</p>






### 13. Why do you disagree and what do you think needs to be considered / addressed in the policy?

		Wolverhampton badge where he doesn't have to take a real knowledge test and continues to do this job. Not in Havant borough residents interest.	
21	06/07/2023 19:25 PM ID: 221817368	Because they do many more miles driving on the roads than the general public it's possible they may pick up more points. DVLA and the courts manage licences	
22	06/07/2023 19:35 PM ID: 221817237	Because as a taxi driver your more likely to receive points than a normal driver with the amount of miles driven per year	
23	06/07/2023 19:48 PM ID: 221819002	It would depend on what points are for	
24	07/07/2023 08:02 AM ID: 221832357	Sometimes the points are given unfairly	
25	08/07/2023 10:53 AM ID: 221855311	to revoke license means to leave that driver without the job !! as a driver job is about 48-70 hours a week mistakes can happes . because of 7 points on licence can make a driver an employment person . council agree that ? 7 points are not an big road traffic offence! especially are keeping on licence for 3 years	
26	09/07/2023 12:55 PM ID: 221930848	It invokes a system of double or even treble jeopardy. 1. Higher insurance 2. Fine plus points 3. Council penalty or loss of work (potentially leading to a drain on the state with benefit claiming).	
27	10/07/2023 07:29 AM ID: 221828076	I consider that 5 years to elapse is to much..	
28	11/07/2023 17:27 PM ID: 222096656	This looks as though the council doesn't want anyone to be a taxi driver. Suggest this is restraint of trade	
29	12/07/2023 14:28 PM ID: 222157134	They are legally allowed to drive with 7 points. So are deemed safe	
30	15/07/2023 18:57 PM ID: 222438636	On average we drive about 40.000 to 50.000 miles per year. I agree with this requirement for a new application. But for renewal is really unfair considering how many miles we drive and how exposed we are to using a handheld device. All drivers have a phone or other similar device in the windscreen they use to get jobs. In real life it is impossible to do our job without touching that device. There are so many examples where we have to do it as there is no safe place to stop. If a customer on the motorway decides he wants to go somewhere else it is impossible to stop safely. We have update the trip or start the navigation. We cant tell that we have to find the next exit and a place to stop as they will be charged more and most people get very angry if we do that. So if a driver gets 6 points for this is very easy to get another 3 points considering how many miles we do. And what is going to happen with that driver if he looses his badge. Loses his job, go on benefits, or find another council to get a new licence where they will be accepted with 12 points. Both scenarios are not in Havant council interest.	
		answered	30
		skipped	63

## 9. Vehicles







The proposed policy changes would have a requirement for an annual basic DBS certificate from vehicle proprietors.

At present, the Council does not require a DBS certificate from vehicle proprietors.







14. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		47.50%	38
2	Tend to agree		23.75%	19
3	Neither agree not disagree		10.00%	8
4	Tend to disagree		6.25%	5
5	Strongly disagree		12.50%	10
6	Don't know / Not sure		0.00%	0
			answered	80
			skipped	13

The proposed policy change would be to increase the maximum age limit for hybrid and electric vehicles to 8 years from the date of first registration.







At present, new vehicles must be no more than 5 years from the date of first registration at the point that they are first licensed.

15. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		35.80%	29
2	Tend to agree		22.22%	18
3	Neither agree not disagree		13.58%	11
4	Tend to disagree		9.88%	8
5	Strongly disagree		13.58%	11
6	Don't know / Not sure		4.94%	4
			answered	81
			skipped	12

The proposed policy change would be to remove the pre-approved vehicle list from the policy, requiring all new vehicles to be visually inspected by a Licensing Officer prior to licensing. The Council currently pre-approves a number of vehicle makes/models, but this list is outdated and requires review.






16. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		27.50%	22
2	Tend to agree		30.00%	24
3	Neither agree not disagree		16.25%	13
4	Tend to disagree		7.50%	6
5	Strongly disagree		16.25%	13
6	Don't know / Not sure		2.50%	2
			answered	80
			skipped	13

The proposed policy change would be to remove the 3-month grace period after the expiry of a vehicle licence, requiring vehicle proprietors to renew their licences before expiry. Vehicle proprietors currently have a 3 month grace period in which to renew their licence after it expires.

17. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		33.33%	26
2	Tend to agree		15.38%	12
3	Neither agree not disagree		17.95%	14
4	Tend to disagree		8.97%	7
5	Strongly disagree		23.08%	18
6	Don't know / Not sure		1.28%	1
			answered	78
			skipped	15

The proposed policy would amend vehicle specification, including the proposal to permit rear or side-loading wheelchair accessible vehicles.

The Council currently only permits side-loading wheelchair accessible vehicles, which are typically more expensive to purchase and run than rear-loading models.

18. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		50.00%	39
2	Tend to agree		26.92%	21
3	Neither agree not disagree		15.38%	12
4	Tend to disagree		0.00%	0
5	Strongly disagree		1.28%	1
6	Don't know / Not sure		6.41%	5
			answered	78
			skipped	15

## 10. Vehicles

The proposed policy changes would have a requirement for an annual basic DBS certificate from vehicle proprietors.

At present, the Council does not require a DBS certificate from vehicle proprietors.

19. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	16
1	19/06/2023 02:07 AM ID: 220606985	For me it makes no sense why this should be done by vehicle proprietors. Its just more money more documents to handle more time wasted.		
2	19/06/2023 05:38 AM ID: 220608010	Not all the time owner of car is the taxi driver		
3	19/06/2023 07:42 AM ID: 220610138	Proprietors dont always drive the cars		
4	19/06/2023 11:52 AM ID: 220626673	I feel this would be unfair because the person who is leasing the vehicle is not driving the car unless they hold a taxi badge. However, you could always have some form of registration for people who wish to lease to Havant Borough taxi service. This way you will have information of who is leasing vehicles to our local authority.		
5	19/06/2023 11:57 AM ID: 220627670	I don't see the connection with the vehicle		
6	19/06/2023 12:30 PM ID: 220622780	I disagree because i not agree. Keep the things simple.		
7	19/06/2023 17:31 PM ID: 220619251	The customer is dealing with the driver not the vehicle proprietor		

### 19. Why do you disagree and what do you think needs to be considered / addressed in the policy?

8	21/06/2023 14:45 PM ID: 220811561	New useless documents added in your files, more jobs for licensing officers.	
9	21/06/2023 22:24 PM ID: 220853684	As an Owner Driver I already have an enhanced DBS. Would I need another for my vehicle?	
10	05/07/2023 08:59 AM ID: 220851401	I neither agree or disagree	
11	06/07/2023 19:35 PM ID: 221817237	Because you only allow operators who have a dbs in place anyway so why change it to an operator having to supply new one yearly that's just stupidity and more cost for an operator - we can't even get drivers through the council test they all go off and get licensed through other boroughs because of the shocking service they receive through Havant	
12	06/07/2023 22:19 PM ID: 221824199	I don't see the point, what relevance is between the car and the proprietor?	
13	07/07/2023 08:02 AM ID: 221832357	The owner is not necessarily the driver/user of the vehicle. Such proposition would infringe someone's right to carry a legitimate business	
14	08/07/2023 10:53 AM ID: 221855311	proprietor have nothing to do with drivers in some cases! my wife can be proprietor and me as a husband im the taxi driver . why you should oblige my wife for dbs ?	
15	11/07/2023 17:27 PM ID: 222096656	Overly bureaucratic and what purpose does it serve?	
16	15/07/2023 18:57 PM ID: 222438636	I own multiple vehicles and I am a driver also. If	
		answered	16
		skipped	77

## 11. Vehicles

The proposed policy change would be to increase the maximum age limit for hybrid and electric vehicles to 8 years from the date of first registration.

At present, new vehicles must be no more than 5 years from the date of first registration at the point that they are first licensed.

### 20. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	20
1	18/06/2023 22:00 PM ID: 220602276	It doesnt affect me.		
2	19/06/2023 07:42 AM ID: 220610138	Cars generally get untidy not just mechanically		
3	19/06/2023 11:57 AM ID: 220627670	It discriminates the drivers that can't afford hybrids or ev		
4	19/06/2023 17:31 PM ID: 220619251	At 8 years old the battery's on the car would be at the end of there working live		

## 20. Why do you disagree and what do you think needs to be considered / addressed in the policy?

5	20/06/2023 16:20 PM ID: 220744827	I don't really understand why there's a limit.	
6	20/06/2023 17:09 PM ID: 220750655	2 things need to be considered with vehicles, condition and emission age should not be a factor	
7	21/06/2023 14:45 PM ID: 220811561	A hybrid or electric car at 8 years of age will need for sure a new battery pack, so what is the point?	
8	21/06/2023 22:24 PM ID: 220853684	5 years is ok for a new licence, a vehicle that is already 8 years old has probably had its best years behind it and so not really a very good investment for a taxi.	
9	24/06/2023 09:14 AM ID: 220994170	Five years is fine at the moment	
10	27/06/2023 18:08 PM ID: 221195802	Electric cars will deteriorate as much as diesel so I don't think making it 3 years longer makes sense at all	
11	30/06/2023 19:56 PM ID: 221036910	An 8 year old car will be close to end of vehicle life.	
12	03/07/2023 14:29 PM ID: 221531057	Question is confusing, is the proposal to increase age limit when first licensed, if so then I agree with that element of the policy. not having an upper age limit does not really support Havant BCs climate strategies. Newer vehicles are cleaner.	
13	05/07/2023 09:00 AM ID: 220752922	Vehicle age limits are arbitrary and should be removed entirely. The better option is to have a high standard robust testing regime. Vehicles that can attain that high standard should be licensed, and continue to be licensed on merit. It is not always the case that there is a direct correlation between age and the condition of a vehicle. In my experience a well maintained older vehicle can be in a much better condition, both visually and mechanically, than a heavily used vehicle only a few years old.	
14	06/07/2023 19:25 PM ID: 221817368	I want the car to be up to the latest standards when it comes to safety and accident avoidance	
15	06/07/2023 19:35 PM ID: 221817237	It should be the same rule for all not just hybrid or electric	
16	07/07/2023 00:55 AM ID: 221828529	Think they should still be checked every 5 yrs	
17	07/07/2023 07:28 AM ID: 221831755	5 years is enough.	
18	07/07/2023 07:43 AM ID: 221832169	Age reflects the interior condition of a vehicle and the safety of interior features. The older it is the worse these become.	
19	07/07/2023 22:47 PM ID: 221889917	Age limits for vehicles are arbitrary, vehicles should be assessed and licensed on merit. A better system is to have a robust vehicle testing regime and if the vehicle can attain the required standard then it should be licensed/continue to be licensed, regardless of age.	
20	15/07/2023 18:57 PM ID: 222438636	Please look into this very carefully. An old hybrid car is more expensive to run than a modern diesel. I agree with full electric ones but I don't think it is the best idea for hybrids. Plus that it risks flooding the business with cheap and worn out Toyotas that had been imported from Japan. Most of these cars are clocked as there is not history before being imported. Drivers will risk buying these cars which are plagued with problems and get into all sort of financial problems.	
		answered	20
		skipped	73



## 12. Vehicles

The proposed policy change would be to remove the pre-approved vehicle list from the policy, requiring all new vehicles to be visually inspected by a Licensing Officer prior to licensing. The Council currently pre-approves a number of vehicle makes/models, but this list is outdated and requires review.

21. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	22
1	18/06/2023 22:00 PM ID: 220602276	It doesnt affect me.		
2	19/06/2023 02:07 AM ID: 220606985	I answered neither agree or disagree. A updated list i think it would be possible as it would simply make things easier and not end up drivers buying cars that would noy be accepted.		
3	19/06/2023 11:52 AM ID: 220626673	I believe if you remove the pre approved listing from the website it would be a mistake as it gives us some indication of what we are looking for in a vehicle and also most of the drivers would buy a vehicle from the listing. I also believe we should offer a wider range of vehicles which should be updated every two years. Most newer models don't include spare wheels and I think this policy should be reviewed. Other local authorities have a wide range of vehicles available.		
4	19/06/2023 11:57 AM ID: 220627670	The pre-approved cars are all tested and inspected visually already now so it's pointless waist of time and money		
5	19/06/2023 12:30 PM ID: 220622780	I am disagree this proposal because it's an waste of time for both parties. In my opinion you should given update to pre-approval list every year and should be all right. The drivers want to know which vehicle and model can be used.		
6	19/06/2023 17:31 PM ID: 220619251	Limits were you can get the car from if the council have to see it first Eg buying from up North were car are cheaper		
7	21/06/2023 14:45 PM ID: 220811561	Review the list and let the drivers decide what car is more practical and economical to drive. It is much easier to review the list every time a new model comes for the first time to license. But if the same model will have big variations, that is owner's risk and can be anytime inspected by your officer and the license revoked on clear reasons and not at officers discretion.		
8	21/06/2023 22:24 PM ID: 220853684	A pre approved list gives a driver a choice of vehicles to licence, why would any one buy a vehicle that might be refused? It would be a very expensive mistake.		
9	24/06/2023 09:14 AM ID: 220994170	The only problem is when you are thinking about buying a new car how do you get the council to view the car before purchasing it		
10	24/06/2023 16:34 PM ID: 221010878	Removing the pre-approved list, there are chances to buy a vehicle, pay £20000 for it, and you can say that it can t be licensed.		
11	27/06/2023 22:23 PM ID: 221214061	only due to the fact i fear getting a new car and then having a long waiting time to get it inspected also there should be an outline list of standard requirements of any vehicle to used as a taxi/PHV		
12	28/06/2023 16:39 PM ID: 220811829	My opinion is to have a list of pre-approves list of vehicle. If the council request to see the car the driver can go to the council with the car.		
13	30/06/2023 19:56 PM ID: 221036910	If you buy a car 50 miles away it would need to be inspected before purchase. The council officer is always busy and you could wait weeks. The written specification works well. If you need a a car outside of this then yes an inspection. If you had a hundred Skoda Octavia's on the firm you would only need look at one to see its suitable.		
14	06/07/2023 19:35 PM ID: 221817237	If you buy a vehicle you then have to take it to council for approval yet if council say no you have spent put on a vehicle for no reason this is an absurd rule and I		

## 21. Why do you disagree and what do you think needs to be considered / addressed in the policy?

		have personally already challenged this and asked for clarification because one rule is can't tilt or displace seats to get into the rear of a vehicle so the council think they know better than bsa British standard authority	
15	06/07/2023 19:48 PM ID: 221819002	I would like there to be a standards that are clearly defined With a more updated list And where rules are changed that older vehicles should have to comply within a set time frame	
16	06/07/2023 22:19 PM ID: 221824199	Nothing to say about this matter	
17	07/07/2023 08:02 AM ID: 221832357	What sort of qualifications (mechanical, engineering or similar) has the officer that should approve a vehicle?	
18	08/07/2023 10:48 AM ID: 221897728	Concerns on a mixture of items from vehicle design and build standards and their impact on people who do not meet 'the societal norm' including those disabled by society.	
19	09/07/2023 12:55 PM ID: 221930848	Any vehicle purchase is expensive, even more so for an EV. There is no need to deviate from an ever updated approved list. Once a vehicle is plated then there is absolutely no need to inspect an identical one. It is a complete waste of officer time. Furthermore, if buying privately it would not always be possible to arrange a test drive giving time to visit the Civic Offices and would require a lot of planning. Also it is quite possible that drivers would purchase their vehicles from outside the area, possibly online. A driver cannot reasonably be expected to purchase a vehicle from say, Newcastle, and to drive it to Havant and back just so it can be looked at. I have no problem with a new vehicle model and/or type being inspected on the first one to be plated. But see no point in inspecting multiple Skoda Octavias.	
20	11/07/2023 17:27 PM ID: 222096656	Think logically and practically. The way it's worded is overly complicated and strikes the tone of we don't really want taxi drivers	
21	12/07/2023 14:28 PM ID: 222157134	Vehicles are extensively type approved. The local council isn't going to do a better job than that.	
22	15/07/2023 18:57 PM ID: 222438636	I think doing this for each vehicle it will be very demanding for the council staff as there will be more work for them. Other than that I do not have a problem with that	
		answered	22
		skipped	71

## 13. Vehicles

The proposed policy change would be to remove the 3-month grace period after the expiry of a vehicle licence, requiring vehicle proprietors to renew their licences before expiry. Vehicle proprietors currently have a 3 month grace period in which to renew their licence after it expires.

## 22. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices		Response Percent	Response Total
1	Open-Ended Question	100.00%	28

## 22. Why do you disagree and what do you think needs to be considered / addressed in the policy?

1	18/06/2023 22:00 PM ID: 220602276	It doesnt affect me.
2	19/06/2023 02:07 AM ID: 220606985	This grace period is a common sense thing. Owners could have money problems or have to go abroad to family matters and miss the deadline for renewing licence in time. I think its a good thing and it should be kept as it is
3	19/06/2023 07:42 AM ID: 220610138	Its not easy to get a loan and select a car,the grace period is good
4	19/06/2023 11:52 AM ID: 220626673	Withholding from removing this grace period would mean that people who are on holidays or who have other reasons are allowed some leeway in renewing their vehicle before expiry. I believe that this policy should stay or could be reduced to one month and may be extended by writing to the council who may allow them an additional two weeks.
5	19/06/2023 11:57 AM ID: 220627670	There might be circumstances where illness or other problems occur that will be the first priority of the driver .I think the grace period should remain in place although personal I never renew late in my 10 years of driving
6	19/06/2023 12:30 PM ID: 220622780	I am disagree. Just think about one scenario. You have an medical problem and you should stay on the hospital for several weeks and in the meantime your license has expired and when you go out to the hospital you realise that you can't register your taxi license anymore and you lose the job. Leave the 3 months grace period !!!
7	20/06/2023 14:29 PM ID: 220734555	Sometimes it's hard to keep up / manage life and all it's demands so a 3 months period would allow for more flexibility
8	21/06/2023 22:24 PM ID: 220853684	I always licence my vehicle before it expires, but if for some reason, like a long trip to Australia for example, a period of grace would be very appreciated.
9	22/06/2023 18:51 PM ID: 220921523	In case something happened and you where unable to renew in time the license, maybe had a death in the family and you're time and mind was there and you omitted the renewal or maybe something else of personal matter happened and you were unable to renew it
10	23/06/2023 08:23 AM ID: 220937921	Because when having a vehicle serviced through experience have waited an extended time for parts for my vehicle
11	24/06/2023 09:14 AM ID: 220994170	I'm guessing there will be special circumstances in place say if you had an accident and your car is still being repaired
12	27/06/2023 22:23 PM ID: 221214061	As this does not allow for extenuating circumstance's ie long hospital visits or visiting family over seas and having to extend there stay.
13	28/06/2023 16:39 PM ID: 220811829	My opinion is to keep 3 month grace period, for example a driver can have a accident before the car lincens expire and it will take long time to repair the car(insurance company).
14	30/06/2023 19:56 PM ID: 221036910	You could cut it to 6 weeks for instance but the drivers circumstances e.g illness or council tests waiting times could push the vehicle over the grace period.
15	02/07/2023 01:30 AM ID: 221461643	there are occasions and situations which may result in such delays, family deaths leading to absence, awaiting parts for vehicles, time delays in booking appointments are among some of the reasons, as such we welcome the 3 month grace period, and would recommend it remains in place in order to allow greater flexibility.  having such a policy in place actually makes Havant council stand out form many other councils who do not allow for such human nature issues, as such, it should remain.
16	05/07/2023 08:59 AM ID: 220851401	I did not disagree

## 22. Why do you disagree and what do you think needs to be considered / addressed in the policy?

17	06/07/2023 19:35 PM ID: 221817237	If you can't get test booked as numerous occasions have happened to me and end up waiting for the test then I can't replace my vehicle if the council want to do this they need more testing sites not just Norse	
18	06/07/2023 19:48 PM ID: 221819002	If a vehicle has an issue just before renewal and it can't be repaired in time	
19	06/07/2023 22:19 PM ID: 221824199	3 months grace is a decent time and we need a grace period.	
20	06/07/2023 22:20 PM ID: 221824619	If the car is in the garage being repaired when the plate expires it gives no chance for the plate to be renewed.	
21	07/07/2023 00:55 AM ID: 221828529	Think	
22	07/07/2023 03:34 AM ID: 221829568	Because this should be up to vehicle owner	
23	07/07/2023 07:28 AM ID: 221831755	Why wait responsible proprietor would know when to relicense	
24	07/07/2023 08:02 AM ID: 221832357	Maybe they need more time to fix the issues	
25	08/07/2023 10:53 AM ID: 221855311	can happen to be in my origin country for some problems i have there and posible to be 2-3 weeks before my renewal. why to revoke my licence if i cant fizical to be for renew ? think the 3 months grace is better to avoid unpredictable things!	
26	09/07/2023 12:55 PM ID: 221930848	It could be that a vehicle may fail a plate test prior to renewal or have a known mechanical problem even prior to taking the test. Currently many spare parts are taking a long time to arrive and could well be longer than 3 months. I had a problem with my car recently and could not book it with a main dealer for 8 weeks (had to go elsewhere but was still 2 weeks). One garage told me he had been waiting for an EGR valve for a Mercedes for nearly 12 months. It is not reasonable that a driver/proprietor could lose access to that vehicle for work purposes when it could be totally out of their control.	
27	11/07/2023 17:27 PM ID: 222096656	The policy is being loaded with massive bureaucracy and this is another example. Think of the business owner often a small business with many things to do. The current 3 months grace period is reasonable and recognises that	
28	15/07/2023 18:57 PM ID: 222438636	I think removing it altogether is not the best idea. Maybe making it 1 month if it is necessary.	
		answered	28
		skipped	65

## 14. Vehicles

The proposed policy would amend vehicle specification, including the proposal to permit rear or side-loading wheelchair accessible vehicles.

The Council currently only permits side-loading wheelchair accessible vehicles, which are typically more expensive to purchase and run than rear-loading models.




23. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	7
1	18/06/2023 22:00 PM ID: 220602276	It doesnt affect me.		
2	19/06/2023 05:38 AM ID: 220608010	Not so many cars with wheel chair on the Roads.Encourage more owner to buy them.		
3	20/06/2023 14:29 PM ID: 220734555	I cant comment on this one		
4	27/06/2023 18:08 PM ID: 221195802	Netural		
5	07/07/2023 03:34 AM ID: 221829568	Don't know		
6	09/07/2023 12:55 PM ID: 221930848	There have long been issues with not being permitted to have rear loading access for wheelchair vehicles. I have no problem with rear access WAVs but I do feel there should be a national ruling (primary legislation) to define the type of access permissable on WAVs.		
7	10/07/2023 07:29 AM ID: 221828076	more expensive to purchase and run		
			answered	7
			skipped	86

## 15. Operators



The proposed policy would require an annual basic DBS certificate from all private hire operators.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council currently requires a basic DBS certificate every three years from private hire operators.

24. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		48.53%	33
2	Tend to agree		25.00%	17
3	Neither agree nor disagree		17.65%	12

**24. To what extent do you agree or disagree with the above proposed changes to the policy?**







4	Tend to disagree		4.41%	3
5	Strongly disagree		4.41%	3
6	Don't know / Not sure		0.00%	0
			answered	68
			skipped	25

The proposed policy would require completion of safeguarding training by all private hire operators.

New applicants must complete this prior to a licence being issued, and current operators will be given 2 years to complete the training.





The Council does not currently mandate safeguarding training for operators.

**25. To what extent do you agree or disagree with the above proposed changes to the policy?**



Answer Choices			Response Percent	Response Total
1	Strongly agree		41.18%	28
2	Tend to agree		25.00%	17
3	Neither agree nor disagree		14.71%	10
4	Tend to disagree		7.35%	5
5	Strongly disagree		10.29%	7
6	Don't know / Not sure		1.47%	1
			answered	68
			skipped	25

The proposed policy would require operators to have an address in the Borough, where records of bookings can be inspected by appointment. The Council's existing policy does not currently require operators to have an address in the Borough.

**26. To what extent do you agree or disagree with the above proposed changes to the policy?**

Answer Choices			Response Percent	Response Total
1	Strongly agree		44.78%	30
2	Tend to agree		19.40%	13
3	Neither agree nor disagree		10.45%	7
4	Tend to disagree		4.48%	3







**26. To what extent do you agree or disagree with the above proposed changes to the policy?**

5	Strongly disagree		14.93%	10
6	Don't know / Not sure		5.97%	4
			answered	67
			skipped	26

The proposed policy would require private hire operators to maintain a register of all staff members that take bookings and/or dispatch vehicles. New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to record and maintain this information.

**27. To what extent do you agree or disagree with the above proposed changes to the policy?**





Answer Choices			Response Percent	Response Total
1	Strongly agree		51.47%	35
2	Tend to agree		22.06%	15
3	Neither agree nor disagree		8.82%	6
4	Tend to disagree		4.41%	3
5	Strongly disagree		8.82%	6
6	Don't know / Not sure		4.41%	3
			answered	68
			skipped	25

The proposed policy would require private hire operators to obtain a basic DBS certificate from all staff members that take bookings and/or dispatch vehicles.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to obtain DBS certificates for staff members.

**28. To what extent do you agree or disagree with the above proposed changes to the policy?**







Answer Choices			Response Percent	Response Total
1	Strongly agree		48.53%	33
2	Tend to agree		26.47%	18
3	Neither agree nor disagree		10.29%	7
4	Tend to disagree		2.94%	2

28. To what extent do you agree or disagree with the above proposed changes to the policy?				
5	Strongly disagree		7.35%	5
6	Don't know / Not sure		4.41%	3
			answered	68
			skipped	25

The proposed policy would require private hire operators to produce a policy on employing ex-offenders.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to produce an ex-offenders policy.

29. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		48.53%	33
2	Tend to agree		29.41%	20
3	Neither agree nor disagree		13.24%	9
4	Tend to disagree		1.47%	1
5	Strongly disagree		5.88%	4
6	Don't know / Not sure		1.47%	1
			answered	68
			skipped	25

## 16. Operators

The proposed policy would require an annual basic DBS certificate from all private hire operators.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council currently requires a basic DBS certificate every three years from private hire operators.

30. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	8
1	19/06/2023 02:07 AM ID: 220606985	I don't see the point		



### 30. Why do you disagree and what do you think needs to be considered / addressed in the policy?

2	19/06/2023 11:42 AM ID: 220629895	Annually is too often regarding costs etc. 3 yearly is adequate	
3	21/06/2023 22:24 PM ID: 220853684	What is the point? passengers are in the Drivers vehicles not at the office.	
4	06/07/2023 19:35 PM ID: 221817237	Because to be an operator in Havant you had to be a driver already which means you had dbs anyway	
5	06/07/2023 19:48 PM ID: 221819002	I think every three years is enough	
6	06/07/2023 22:19 PM ID: 221824199	Private hire operators have a private hire licence issued by Havant Borough Council and I think is not necessary for them to provide another DBS	
7	10/07/2023 07:29 AM ID: 221828076	More paperwork to Chase, more money to spend	
8	11/07/2023 17:27 PM ID: 222096656	3 years is reasonable so why propose change? Overly bureaucratic	
		answered	8
		skipped	85

## 17. Operators

The proposed policy would require completion of safeguarding training by all private hire operators.

New applicants must complete this prior to a licence being issued, and current operators will be given 2 years to complete the training.

The Council does not currently mandate safeguarding training for operators.

### 31. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	13
1	19/06/2023 02:07 AM ID: 220606985	Neither agree or disagree		
2	19/06/2023 12:30 PM ID: 220622780	I am totally disagree .		
3	20/06/2023 16:20 PM ID: 220744827	Basic safeguarding is good to know		
4	21/06/2023 22:24 PM ID: 220853684	What is the point? passengers are in the Drivers vehicle.		
5	23/06/2023 08:23 AM ID: 220937921	Have had a safeguard certificate and it didn't even get checked		
6	30/06/2023 19:56 PM ID: 221036910	The operators being the owners or staff. If the staff suspect something is wrong I would hope the they would take the appropriate action. This forcing people to take this course may not in some cases yield anything.		
7	02/07/2023 01:30 AM ID: 221461643	as with existing drivers, it is counter productive and serves no actual purpose to adopt this for a telephone operator who has been in the role for a number of years without incident or issue.		

### 31. Why do you disagree and what do you think needs to be considered / addressed in the policy?

		we would recommend this condition only applies to new staff members being taken on board.  furthermore, telephone staff do not have direct contact with members of the public at all, let alone those members of the public that would fall into the safeguarding category.	
8	07/07/2023 07:43 AM ID: 221832169	Safeguarding is for police to enforce - a course just pays lip service - actions speak louder than words, or a course	
9	07/07/2023 08:02 AM ID: 221832357	The operator does NOT interfere directly with the customer in the car	
10	08/07/2023 10:53 AM ID: 221855311	no effect after the course was done .	
11	09/07/2023 12:55 PM ID: 221930848	Not sure that there is any real benefit to this. Many operators now accept work other than by phone or walk in. It is very difficult for an online booking to be assessed for safe guarding issues. I feel this may have been relevant 20 years ago but not now.	
12	11/07/2023 17:27 PM ID: 222096656	What's the objective of this change? Overly bureaucratic	
13	12/07/2023 14:28 PM ID: 222157134	It is not the job of driver	
		answered	13
		skipped	80

## 18. Operators

The proposed policy would require operators to have an address in the Borough, where records of bookings can be inspected by appointment. The Council's existing policy does not currently require operators to have an address in the Borough.

### 32. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices		Response Percent	Response Total
1	Open-Ended Question	100.00%	12
1	19/06/2023 02:07 AM ID: 220606985	Some small operators could mean they could not comply with this and make it unconcurential as big operators can afford to.operators could have an office few miles away from council boundary limita and this would still mean they would need a change	
2	19/06/2023 11:42 AM ID: 220629895	Why be restricted to such an extent. Uber operates the whole of the south coast	
3	19/06/2023 11:57 AM ID: 220627670	I don't see haw this would help small operators	
4	20/06/2023 16:20 PM ID: 220744827	Why do they need an address in the Borough?	
5	20/06/2023 17:09 PM ID: 220750655	Electronic systems can be integrated remotely, the important thing is that you have access, a school only operator will operate county wide.	

### 32. Why do you disagree and what do you think needs to be considered / addressed in the policy?

6	23/06/2023 08:23 AM ID: 220937921	As an Uber driver can be expected to pick up jobs outside county lines	
7	30/06/2023 19:56 PM ID: 221036910	I understand that H.B.C. already require this and I have to put this on application forms.	
8	06/07/2023 19:25 PM ID: 221817368	Can you not just ask for them to be made available.	
9	06/07/2023 22:19 PM ID: 221824199	I have thinking to apply for a private hire operator and I always lived in Portsmouth, so I think once you issue private hire license for the people outside the Borough is normal for them to can apply for the operator licence	
10	07/07/2023 08:02 AM ID: 221832357	Tesco is based in Welwyn Gardens, that means you don't buy from them? Utter stupidity	
11	09/07/2023 12:55 PM ID: 221930848	I was under the impression that operators have to have an operating address in the Borough where records could be inspected etc. However you seem to be suggesting that the home address of an operator should be within the Borough. I am not aware that the home address of an operator is where records should be kept? Surely the whole idea is that the Operating address should be within the Borough because it is a business address. This will affect others more than me but most definitely would apply to Aqua/AndiCars and Uber. Such a restriction could cost the Council dearly in terms of lost revenue. Additionally many home addresses have a historical covenant barring commercial activity from the residential property.	
12	11/07/2023 17:27 PM ID: 222096656	They have an address don't they? Inspection can be made. What's the problem you're trying to solve!	
		answered	12
		skipped	81

## 19. Operators

The proposed policy would require private hire operators to maintain a register of all staff members that take bookings and/or dispatch vehicles. New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to record and maintain this information.

### 33. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices		Response Percent	Response Total
1	Open-Ended Question	100.00%	8
1	19/06/2023 02:07 AM ID: 220606985	Good idea in a way	
2	30/06/2023 19:56 PM ID: 221036910	I cant see why a record needs to be kept. It is my understanding that when a booking is taken the name of the taker is recorded and mostly the booking goes out automatically.	
3	06/07/2023 19:35 PM ID: 221817237	Why do the council need a list of all people who work within the business I don't understand	
4	06/07/2023 22:19 PM ID: 221824199	I agree	

### 33. Why do you disagree and what do you think needs to be considered / addressed in the policy?

5	07/07/2023 08:02 AM ID: 221832357	Stupid! What if the operator uses IVS or AI?	
6	11/07/2023 17:27 PM ID: 222096656	Overly bureaucratic and without substance or reason	
7	13/07/2023 20:48 PM ID: 222252289	I do not see how this can be any help	
8	15/07/2023 18:57 PM ID: 222438636	This policy seems to put more bureaucracy in place for an already struggling industry.	
		answered	8
		skipped	85

## 20. Operators

The proposed policy would require private hire operators to obtain a basic DBS certificate from all staff members that take bookings and/or dispatch vehicles.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to obtain DBS certificates for staff members.

### 34. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	8
1	21/06/2023 22:24 PM ID: 220853684	What is the point? passengers are in the drivers vehicles.		
2	06/07/2023 19:35 PM ID: 221817237	Because it's a cost who is going to pay for that the council if that's the case then yes but as a small business who struggle because of council rules and laws then I would not want to pay for this		
3	06/07/2023 22:19 PM ID: 221824199	You already ask for DBS for 10 times, and I think is not necessary for another one		
4	07/07/2023 08:02 AM ID: 221832357	Same as above, utterly stupid		
5	09/07/2023 12:55 PM ID: 221930848	I think this is overkill.		
6	11/07/2023 17:27 PM ID: 222096656	Overly bureaucratic. What problem are you trying to solve? Sounds more like you want to put people off from working for a taxi business		
7	13/07/2023 20:48 PM ID: 222252289	It is a business for operators. I think this is up to them how they recruit their staff, with or without DBS. In case that something happens, i assume is the employer responsibility, with or without DBS.		
8	15/07/2023 18:57 PM ID: 222438636	This policy seems to put more bureaucracy in place for an already struggling industry		
		answered	8	
		skipped	85	

## 21. Operators

The proposed policy would require private hire operators to produce a policy on employing ex-offenders.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.



The Council does not currently require operators to produce an ex-offenders policy.

35. Why do you disagree and what do you think needs to be considered / addressed in the policy?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	6
1	30/06/2023 19:56 PM ID: 221036910	Ex-offenders such as ? Sometimes the conviction is a while ago or is spent. Is there any evidence of ex-offenders in this role doing something wrong. I would not like to see an sex offender in this role and I would think would company would feel the same.		
2	06/07/2023 19:35 PM ID: 221817237	I agree anyone with a criminal conviction should not be employed		
3	07/07/2023 08:02 AM ID: 221832357	If the driver is DBS checked, what all of this has to do with a telephonist?		
4	08/07/2023 10:53 AM ID: 221855311	a		
5	09/07/2023 12:55 PM ID: 221930848	1. The majority of private hire/taxi businesses do not 'employ' drivers. 2. Small operators like myself are one driver outfits. I do not have any point in having such a policy. 3. Does the council have a policy like this for allowing ex offenders to become drivers, once the DBS check has found issues?		
6	11/07/2023 17:27 PM ID: 222096656	If this is for taxi businesses what about other businesses you licence - food for example? Overly bureaucratic and discriminatory		
			answered	6
			skipped	87

## 22. General

The proposed policy would revise the penalty points system, with a higher number of points applied per incident and a maximum of 12 points awarded prior to Sub-Committee referral for review.

The Council's current penalty points system does not align with guidance from the Department for Transport.

36. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		36.62%	26
2	Tend to agree		23.94%	17

36. To what extent do you agree or disagree with the above proposed changes to the policy?				
3	Neither agree nor disagree		12.68%	9
4	Tend to disagree		5.63%	4
5	Strongly disagree		12.68%	9
6	Don't know / Not sure		8.45%	6
			answered	71
			skipped	22

The proposed policy would have a clear definition of how the Council determines whether an applicant is 'fit and proper' to hold a licence.

37. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		55.71%	39
2	Tend to agree		22.86%	16
3	Neither agree nor disagree		14.29%	10
4	Tend to disagree		2.86%	2
5	Strongly disagree		2.86%	2
6	Don't know / Not sure		1.43%	1
			answered	70
			skipped	23

The proposed policy would have a clear policy on how the Council considers applicants and licensees with criminal convictions.

38. To what extent do you agree or disagree with the above proposed changes to the policy?				
Answer Choices			Response Percent	Response Total
1	Strongly agree		62.86%	44
2	Tend to agree		27.14%	19
3	Neither agree nor disagree		5.71%	4
4	Tend to disagree		0.00%	0
5	Strongly disagree		1.43%	1
6	Don't know / Not sure		2.86%	2

### 38. To what extent do you agree or disagree with the above proposed changes to the policy?

answered	70
skipped	23

## 23. General

The proposed policy would revise the penalty points system, with a higher number of points applied per incident and a maximum of 12 points awarded prior to Sub-Committee referral for review.

The Council's current penalty points system does not align with guidance from the Department for Transport.

### 39. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices		Response Percent	Response Total
1	Open-Ended Question	100.00%	12
1	19/06/2023 02:07 AM ID: 220606985	The Council has done a good job so far,no changes are needed from Transport Department	
2	21/06/2023 22:24 PM ID: 220853684	Never had any points, but reviewing drivers for getting 12 points seems a bit harsh, especially if points per incident is increased.	
3	30/06/2023 19:56 PM ID: 221036910	I think the system is fine as it is. How will the council be able to enforce many of these rules without out and about daily enforcement.	
4	02/07/2023 01:30 AM ID: 221461643	as a national representative body, we have seen various examples of penalty points schemes being abused and far too open to opinion and abuse.  whilst Cardiff verses singh did not rule penalty points to be unlawful, the case did rule that such a scheme must be reasonable and proportionate.  with no appeal process against council issued points, they can be far too draconian and not fit for purpose.  there is a convictions policy in place, and measures in place for dealing with breaches of conditions, this should be sufficient.	
5	03/07/2023 14:29 PM ID: 221531057	Penalty points systems tend to be too rigid, each incident and each case needs to be considered on its own merits, including the history of any complaints etc..	
6	05/07/2023 14:29 PM ID: 221711630	i feel this is very harsh	
7	06/07/2023 19:35 PM ID: 221817237	How are the points awarded for what reason and how do we appeal the points system needs to be done on a fair basis not on the council biased opinion when they clearly don't care about the trade on the whole	
8	07/07/2023 08:02 AM ID: 221832357	Is the severity of the incidents clearly outlined?	
9	08/07/2023 10:53 AM ID: 221855311	agree	
10	11/07/2023 17:27 PM ID: 222096656	The points are per the DVLA you can't make them up yourselves	
11	12/07/2023 14:28 PM ID: 222157134	Make it in line with the law	

### 39. Why do you disagree and what do you think needs to be considered / addressed in the policy?

12	15/07/2023 18:57 PM ID: 222438636	I find this uncles		
			answered	12
			skipped	81

## 24. General

The proposed policy would have a clear definition of how the Council determines whether an applicant is 'fit and proper' to hold a licence.

### 40. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	6
1	20/06/2023 08:01 AM ID: 220695759	Depends on what has happened in past history		
2	30/06/2023 19:56 PM ID: 221036910	The proposed rules in places seems extreme e.g. rule 29-40 rule 15 quite often customers purchase alcohol is proposed we cant carry this.		
3	05/07/2023 14:29 PM ID: 221711630	i do think a driver should be fit and healthy to drive		
4	06/07/2023 19:35 PM ID: 221817237	I didn't disagree here but think the council needs to look at the whole policy before commuting to say who is classed as fit and proper		
5	08/07/2023 10:53 AM ID: 221855311	a		
6	11/07/2023 17:27 PM ID: 222096656	Don't you have one now? Needs to be more specific for everyone to understand		
			answered	6
			skipped	87

## 25. General

The proposed policy would have a clear policy on how the Council considers applicants and licensees with criminal convictions.

### 41. Why do you disagree and what do you think needs to be considered / addressed in the policy?

Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	2
1	08/07/2023 10:53 AM ID: 221855311	a		







#### 41. Why do you disagree and what do you think needs to be considered / addressed in the policy?

2 | 11/07/2023 17:27 PM  
ID: 222096656 | Not got one now? You need to be more specific and allow us to form a judgement on what you want to achieve and why






answered	2
skipped	91

#### 26. Public safety

#### 42. How often do you use / hire a taxi or private hire vehicle?

Answer Choices			Response Percent	Response Total
1	At least once a week		5.88%	1
2	At least once a fortnight		17.65%	3
3	At least once a month		47.06%	8
4	At least once a year		29.41%	5
5	Less often than once a year		0.00%	0
			answered	17
			skipped	76







#### 43. How safe or unsafe do you feel when you are in / using a taxi or private hire vehicle?

Answer Choices			Response Percent	Response Total
1	Very safe		5.88%	1
2	Fairly safe		52.94%	9
3	Neither safe nor unsafe		29.41%	5
4	Fairly unsafe		5.88%	1
5	Very unsafe		5.88%	1
6	Don't know		0.00%	0
			answered	17
			skipped	76








## 27. Public safety

44. Why do you feel unsafe when you are in / using a taxi or private hire vehicle?				
Answer Choices			Response Percent	Response Total
1	Open-Ended Question		100.00%	7
1	20/06/2023 10:59 AM ID: 220711537	When using a taxi I don't feel safe nor unsafe however this is based on having heard of horror stories in which being a woman travelling could be considered as potentially dangerous in general. However checks as previously mentioned would definitely allow for good piece of mind		
2	20/06/2023 16:20 PM ID: 220744827	I don't know the driver		
3	20/06/2023 18:58 PM ID: 220760112	Because I do not know if they have been fully checked to safely transport me		
4	27/06/2023 18:08 PM ID: 221195802	Had 2 bad experiences. Complained both times to company and not even had a return call. One the driver refused to stop and let out so was very scary		
5	07/07/2023 00:55 AM ID: 221828529	Taxis sometimes licenced from outside hampshire and feel you don't know who they are and after question about it you don't regulate these taxis		
6	07/07/2023 07:28 AM ID: 221831755	Never too sure about car / driver history.		
7	08/07/2023 10:48 AM ID: 221897728	Driving standards are way below that I consider a good and competent driver should be. This includes using phones while driving, speeding, aggressive tailgating, and. A general. Lack of consideration for other road users, including the most vulnerable (pedestrians and people cycling)		
			answered	7
			skipped	86

## 28. Public safety

45. What, if anything, would make you feel safer in using taxis or private hire vehicles?				
Answer Choices			Response Percent	Response Total
1	Nothing, I feel safe		5.88%	1
2	CCTV (video only)		11.76%	2
3	CCTV (video and audio)		58.82%	10
4	Driver wearing an identification badge		58.82%	10
5	Vehicle displaying a licence plate		58.82%	10
6	Vehicle licence number displayed in the vehicle		47.06%	8

**45. What, if anything, would make you feel safer in using taxis or private hire vehicles?**

7	Details of how to contact the Council displayed in the vehicle		58.82%	10
8	Driver subject to 6-monthly enhanced DBS (criminal record) check		70.59%	12
9	Driver required to complete safeguarding training		70.59%	12
10	Driver required to complete regular medical fitness checks		76.47%	13
11	Pre-booking the vehicle via telephone		17.65%	3
12	Pre-booking the vehicle online / via an app		41.18%	7
13	Other (please specify):		5.88%	1
			answered	17
			skipped	76
Other (please specify): (1)				
1	08/07/2023 10:48 AM ID: 221897728	More police on our roads, and Havant borough council having staff to investigate complaints within suitable timeliness demands. removal or licences for those holding more than 6 points, no hardship please.		

# Havant Taxi Policy Survey



**Written response from  
GMB UNION  
Southern Region  
Professional Drivers**

# Response to Havant Council Consultation

## Introduction

GMB are a national general trade union, with over 600,000 members who are either users or workers within the transport sector across the UK.

This response comes from GMB Southern Region where we have around 90,000 members who are comprised of many different industries including those who drive buses, taxis, private hire vehicles and ambulances or who work in road freight and distribution.

Overall, GMB recognises the important role a safety policy provides but is clear in its belief that a policy must be inclusive of the protections afforded to Taxi and Private Hire drivers. Havant has chosen to ignore the relevance of including a policy in respect of such protections. Further commentary in this iniquity will be included within our conclusion in this document.

## Proposals:

### Proposal 1.

**At present, the Council does not mandate safeguarding training for drivers.**

**The proposed policy changes would have a requirement for completion of safeguarding training by all drivers.**

**New applicants must complete this prior to a licence being issued, and current drivers will be given 2 years to complete the training.**

**We also advocate for conflict resolution training for drivers is a necessity and a value.**

GMB Say that the timescale for current drivers may be problematic, and we suggest upon renewal safeguarding training takes place to not create a burdensome workload for licensing staff.

Additionally, GMB are keen to learn what the costs of such training would equate to for drivers undertaking courses.

Also, some drivers may have carried out previous training in other jurisdictions where they may have proof in place it would be logical to consider a baseline for accepting these qualifications or proofs to avoid extra cost and duplication.

### Proposal 2

**At present, the Council requires an enhanced DBS certificate every three years from drivers.**

**The proposed policy changes would have a requirement for all drivers to sign up to the DBS Update Service (costing £13 per year), to allow the Council to check their enhanced DBS status at least every six months.**

**New applicants will be required to sign up prior to a licence being issued, and current drivers will have until their next licence renewal date to comply.**

GMB Wholeheartedly agree with this proposal as in the longer term this allows drivers the surety that their license can be re-issued in short order. Likewise, they are able to apply for other roles such a community volunteering role without delay.

### **Proposal 3:**

**At present, new applicants are required to submit a criminal record check from another country only to complete a five-year address history.**

**The proposed policy changes would have a requirement for a new applicant or existing driver to submit a criminal record check from the relevant country where they have spent six or more continuous months overseas from the age of 18 years old.**

**Required for new applicants and for existing drivers during the period of their licence.**

Whilst GMB are completely at one in relation of the need for passenger and other road users safety it is clear that many individuals would not have been able to obtain a CoGC (Certificate of good conduct) based upon the need to depart their country of origin due to discrimination or perhaps political or religious beliefs where receiving such a document would be an impossibility creating a decision to remove drivers licences (Or the possibility of being licensed.) due to lack of availability of such a document.

It is also possible that there may be an abuse of provision where nefarious individuals create counterfeit documents to circumvent conditions. The increased cost of translation and fees is a further unreasonable expense. No details of how a driver's absence from the United Kingdom would be monitored. Who would cover the cost of such a licensing condition.

### **Proposal 4**

**The proposed policy changes would have a requirement for drivers to notify the Council within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence, including the issue of a police fixed penalty notice.**

**At present, the Council does not formally require drivers to notify them of this information.**

GMB believe that the proposed timescale is inappropriate given the probability that during holiday periods and occasions where the driver concerned may be still in custody or incapacitated through injury that a period of 7 days would be more logical to allow notification to take place.

## Proposal 5

**The proposed policy change is where an applicant or existing driver has 7+ DVLA points, consideration will be given to refusing or revoking the licence. A minimum of 5 years must elapse before the Council will consider licensing the individual.**

**At present, the Council will allow drivers with up to 12 DVLA points to be licensed, although decisions are made on a case-by-case basis.**

GMB believe such a process is highly detrimental and GMB have advised IOL and NALEO that this is a retrograde policy that penalises drivers who would be able to work in any other role without penalty. As an example, an LGV driver or Plumber who receives 9 points would still be able to drive just as a council employee perhaps using a refuse truck would be able to do so. Are Havant proposing removal of council staff's facility to drive vehicles who have reached the same threshold?

There is a reason that DVLA set the guidelines and not licensing authorities.

James Button and IOL are now re-assessing the current guidance we would recommend that Havant park this until further guidance is available.

## Proposal 6

**The proposed policy changes would have a requirement for an annual basic DBS certificate from vehicle proprietors. At present, the Council does not require a DBS certificate from vehicle proprietors.**

GMB agree with this proposal given our concerns over behaviours of proprietors in some instances.

However, we would go further in requiring the council to have sight of rental or sales agreements such as rent to buy from proprietors to be sure that the agreements do not breach FCA or best practice. At present GMB is dealing with issues with a company who have failed to disclose APRs of over 45% and other excessive costs on such agreements.

## Proposal 7

**The proposed policy change would be to increase the maximum age limit for hybrid and electric vehicles to 8 years from the date of first registration.**

**At present, new vehicles must be no more than 5 years from the date of first registration at the point that they are first licensed.**

GMB believe these proposals are a value. However, GMB believe a discount on licensing is granted to drivers adopting a full ZEC Battery Electric Vehicle (BEV) and that work must be carried out with county council to improve local and regional charging infrastructure.

## Proposal 8

**The proposed policy change would be to remove the pre-approved vehicle list from the policy, requiring all new vehicles to be visually inspected by a Licensing Officer prior to licensing.**

**The Council currently pre-approves a number of vehicle makes/models, but this list is outdated and requires review.**

GMB agrees with this proposal. Some vehicle variants may take the same name but be different in terms of capacity or layout EV Yaris and Golf Versions.

## Proposal 9

The proposed policy change would be to remove the 3-month grace period after the expiry of a vehicle licence, requiring vehicle proprietors to renew their licences before expiry.

Vehicle proprietors currently have a 3 month grace period in which to renew their licence after it expires.

GMB say this is unfair and unrealistic given the possibility that some driver / owners of vehicles take extended journeys abroad and return is not always practical in such instances. This may be seen as unreasonable in many instances given the viability of the vehicles previously. We accept this may be subject to age limits.

## Proposal 10

**The proposed policy would amend vehicle specification, including the proposal to permit rear or side-loading wheelchair accessible vehicles.**

**The Council currently only permits side-loading wheelchair accessible vehicles, which are typically more expensive to purchase and run than rear-loading models.**

GMB agree with this proposal but would also ask licensing to look at allowing electric winches and or pullies to allow drivers to load wheelchairs due to the high level of injuries sustained when loading and off-loading passengers using mobility devices.



### Op1

The proposed policy would require an annual basic DBS certificate from all private hire operators.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council currently requires a basic DBS certificate every three years from private hire operators.

GMB Agree but also believe that all staff should be subject to this certification and that operators have a full DBS in place that is a live item as previously suggested for drivers. A three year certificate is a safeguarding issue waiting to happen.

### Op2

**The proposed policy would require completion of safeguarding training by all private hire operators.**

**New applicants must complete this prior to a licence being issued, and current operators will be given 2 years to complete the training.**

**The Council does not currently mandate safeguarding training for operators.**

GMB agrees this proposal but feel that new employees should undertake this training within 2 months of assuming their role. We also believe that disability training is a practical training value too. Training for existing employers should be within 1 year.

Conflict resolution training is also a value.

### Op 3

**The proposed policy would require operators to have an address in the Borough, where records of bookings can be inspected by appointment. The Council's existing policy does not currently require operators to have an address in the Borough.**

GMB believe this is appropriate and proportionate where an application is in place a set of electronic keys should be available to licensing officers (and Police) to examine when deemed appropriate or necessary.

#### Op 4

The proposed policy would require private hire operators to maintain a register of all staff members that take bookings and/or dispatch vehicles. New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to record and maintain this information.

GMB Agree with this proposal.

#### Op 5

The proposed policy would require private hire operators to obtain a basic DBS certificate from all staff members that take bookings and/or dispatch vehicles.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to obtain DBS certificates for staff members.

As previously stated, all staff should hold a live DBS certificate and this should be immediate.

#### Op 6

The proposed policy would require private hire operators to produce a policy on employing ex-offenders.

New applicants will be required to evidence this prior to a licence being issued, and current operators will have until their next renewal date to comply.

The Council does not currently require operators to produce an ex-offenders policy.

GMB Agree with this planned policy.

#### Gen 1

The proposed policy would revise the penalty points system, with a higher number of points applied per incident and a maximum of 12 points awarded prior to Sub-Committee referral for review.

The Council's current penalty points system does not align with guidance from the Department for Transport.

GMB emphatically disagree with this proposal and feel that bias could be visited upon drivers and that there may not be the same proportionality in each instance leading to targeting of individual drivers.

The fact that externally licensed drivers working locally would not be subject to the same system may drive drivers away.

Ultimately using a system that is intended to punish is not viable as a policy especially when it is subjective.

## Gen 2

**The proposed policy would have a clear definition of how the Council determines whether an applicant is 'fit and proper' to hold a licence.**

GMB believe the terminology must appropriate and would wish to engage on a working group to reach an agreed phraseology and policy.

## Gen 3 Public liability insurance

The proposed policy would have a clear policy on how the Council considers applicants and licensees with criminal convictions.

GMB believe the terminology must appropriate and would wish to engage on a working group to reach an agreed phraseology and policy.

### Conclusion:

GMB Union recognise the requirement for passenger safety and safeguarding but are disappointed to find the questions do not recognise driver protections and safety or speak to driver health or mental health issues that drivers face.

GMB urgently seeks a minimum standard of behaviour for operators to adhere to towards drivers as well as improved campaigns that recognise the inherent risks that drivers face daily from verbal & physical abuse to theft and false allegations.

GMB now formally request that Havant Council out a survey to learn and adapt the outcome in to create a set of standards and protections for drivers.

This response has been produced on behalf of GMB Southern Region

Ali Haydor Regional representative  
[ali.haydor@gmbactivist.org.uk](mailto:ali.haydor@gmbactivist.org.uk)

National Lead  
[steve.garelick@gmb.org.uk](mailto:steve.garelick@gmb.org.uk)

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Uber Ltd  
Aldgate Tower  
2 Lemn Street  
London, E1 8FA  
United Kingdom

11 July 2023

Submitted via email to [licensing@havant.gov.uk](mailto:licensing@havant.gov.uk)

**Response to Havant Borough Council Consultation: Hackney Carriage and Private Hire Licensing Policy**

Dear Licensing Team

We welcome the opportunity to contribute to the consultation on Havant Borough council's Hackney Carriage and Private Hire Licensing Policy and also welcome the Council's intent to raise the bar in safety standards in the industry.

Our feedback on the proposed conditions is outlined below, with conditions shared for reference followed by the respective feedback thereafter.

**DBS Checks (5.39 - 5.46)**

We support steps to raise safety standards across the industry and, in that spirit, welcome the standards that increase the frequency of DBS checks across drivers, operators and vehicle proprietors.

We are keen to discuss with LAs and others how the process of undertaking Directors' DBS checks can be streamlined through use of the DBS Update Service (not currently set up for the Basic DBS Checks that Directors are required to undertake).

**Staff Members (5.16 - 5.21)**

We support the intention behind each of these standards - to prevent any bad actors within an operator facilitating harmful activities on TPH trips. It is, however, worth noting that modern, app-based operators such as Uber also use technology to process bookings and dispatch vehicles, and often do not rely solely on human agents. In many cases, it does not make sense to keep a register of staff that take bookings or dispatch vehicles as there may be none involved in this specific process. As you implement this standard in your record keeping policies, we would encourage you to reflect these different business models so it is clear where requirements do or do not apply.

### **Records (Appendix D - 22-32)**

- **Condition 23h):** The name of any staff member who accepted the booking;
- **Condition 23i):** The name of any staff member who dispatched the vehicle;
- **Condition 23(l):** This condition requests that our booking records include 'The exact location of where the acceptance of the booking was taken (e.g., the operator premises, via mobile phone within the Borough etc).'

Uber's business model is such that we use technology to process bookings and dispatch vehicles, and often do not rely solely on human agents. We do not keep records of staff members who accept or dispatch bookings as a result.

### **Operating premises (Appendix D - 18-21)**

We are keen to review this condition as we would seek to have a postal address in an office location within the local authority area rather than a physical office.

Our current location does not have any public reception or waiting area as we do not allow members of the public to enter. No person is physically needed in the office to accept bookings due to the app based nature of our booking methods.

One of the main reasons for having a physical office is to allow booking records to be inspected by a licensing officer or by the police. We have a number of well established digital processes for providing this information upon request without the need of visiting a physical office.

We have with other local authorities conducted audits and compliance checks virtually over Zoom and Microsoft Teams. All of our records are digital and therefore the requirement to have a physical office presents an unnecessary regulatory burden given Uber's business model.

I welcome the opportunity to discuss this feedback in more detail. Should you have any questions please do not hesitate to contact me via email or phone call.

Yours sincerely



**Pritesh Gokani**

Head of Cities | South of England

**Uber**