

**A summary of responses to Cheshire East Council's
Pre-Engagement Survey on 'Statutory Taxi & Private Hire
Vehicle Standards' and Conditions of Licence**



Lack of business during/since COVID has dramatically reduced turnover and proprietors have been hard hit financially. If Cheshire East pay for cost, then agree!



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Introduction

Purpose of the survey

Throughout July 2021 Cheshire East Council conducted a pre-engagement survey with existing taxi licence holders called 'Pre-Engagement Survey on 'Statutory Taxi & Private Hire Vehicle Standards' and Conditions of Licence.' The purpose of the survey was to seek licence holder views on a number of changes being considered in relation to the Drivers, Vehicles and Operators Licences to reflect the publication of the statutory Taxi & Private Hire Vehicle Standards which local authorities have to have regard to.

This pre-engagement will feed into a larger consultation planned with regards to the introduction of a taxi policy across the Borough.

Survey responses

A total of 107 responses were received to the pre-engagement:

- 54 responses to the online survey
- 52 paper survey completions
- 1 letter

This report presents the results of both the paper and online surveys combined. The report is split into three sections which are as follows:

1. National Standards
2. Operator Licences
3. Consultation on existing Licensing Conditions

Report produced 26 July 2021 by the Research and Consultation Team, Cheshire East Council. Email RandC@cheshireeast.gov.uk for further information. Please note due to rounding percentages in visuals will not always sum to 100% and that comments can generate multiple references meaning total number of references in open comment section may not sum to total comments received.

Section 1: National Standards

Respondents were asked how strongly they agreed or disagreed with several aspects around DBS checks.

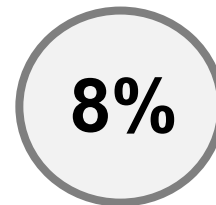
Enhanced Disclosure and Barring Service (DBS) check with searches on both barred lists every 6 months



Agree



Disagree



**Neither agree
nor disagree**

Total number of respondents 104

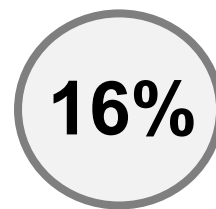
Required to sign up to the DBS update service and provide evidence of continuous registrations to enable the licensing authority to routinely check for new information



Agree



Disagree



**Neither agree
nor disagree**

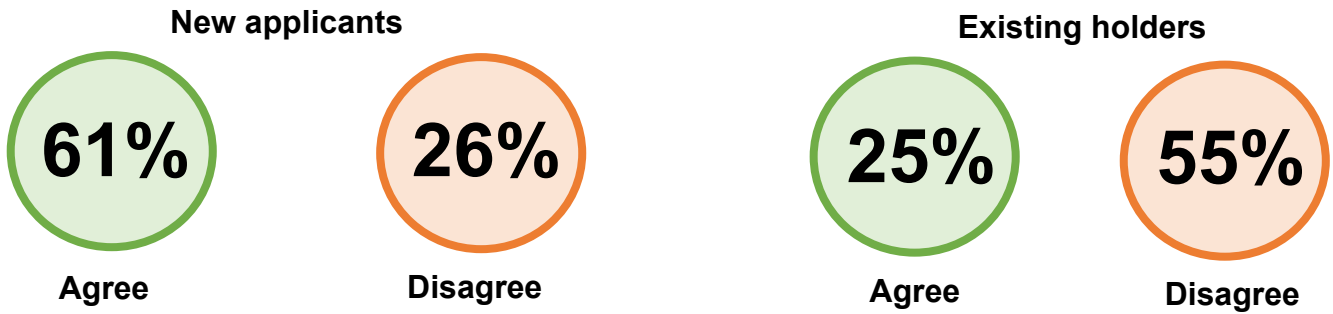
Total number of respondents 103

A total of 24 comments were left to this section, the main reason given for disagreement with the checks were:

- Unacceptable costs to drivers (14 references)
- More time/red tape/ bureaucracy (4 references)
- 6 months was too frequent/should be 12 months (4 references)

Respondents raised concerns about drivers outside the local authority not being subject to these checks (2 references) and felt that the current system worked fine (2 references). Three respondents identified that these checks may have safety benefits to the public, especially vulnerable groups.

How strongly do you agree or disagree that all new driver applicants and existing holders of drivers licences should be required to complete a Council approved course relating to Safeguarding?



Total number of respondents 106

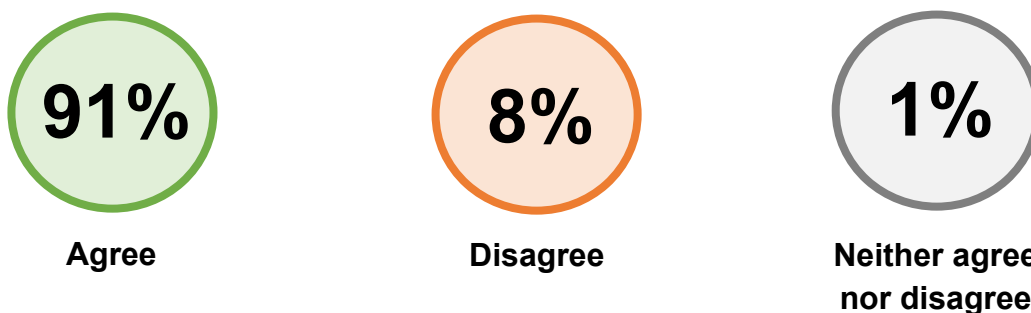
Respondents were more likely to agree that new applicants should complete the safeguarding course compared to existing licence holders (61% agree compared to 25% agree).

A total of 25 comments were left to this section, a summary is presented below:

- No need for extra training/ experience in the field should cover this/ more red tape (11 references)
- Already covered by existing training (NVQ/BTEC) (8 references)
- Additional costs (2 references)

Respondents raised concerns again about those acquiring a licence from a less strict authority (2 references) and that this could help protect vulnerable groups again (4 references).

How strongly do you agree or disagree that all new driver applicants should be required to obtain a recognised qualification or undertake an English language proficiency course as part of the application process?



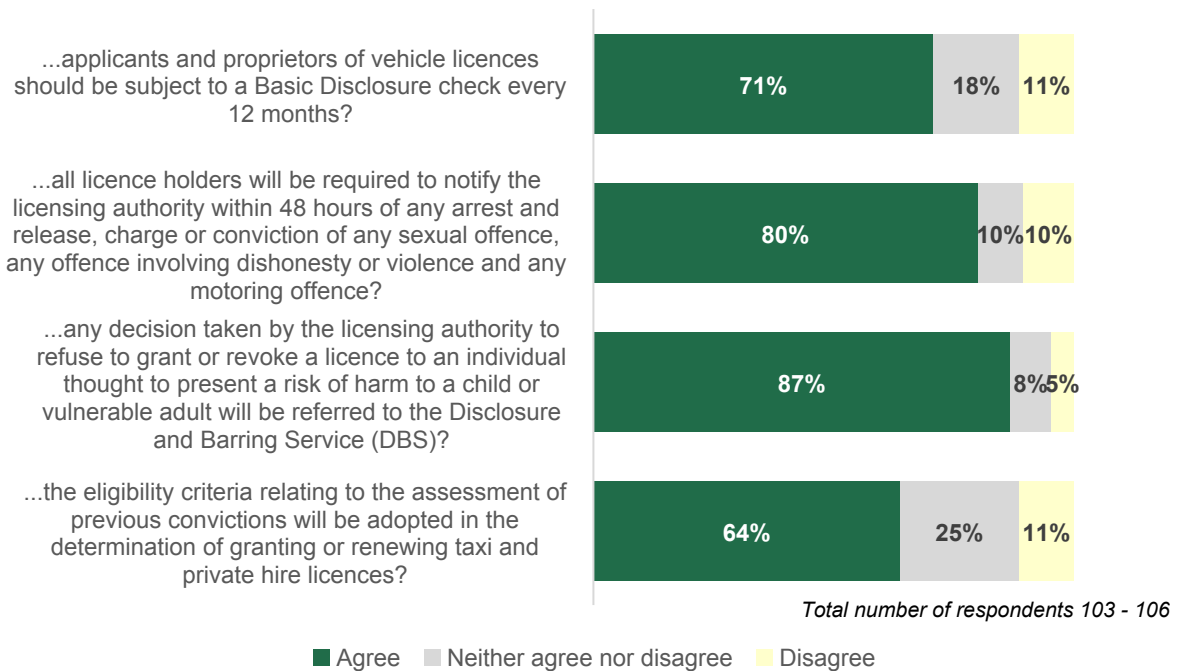
Total number of respondents 106

The majority of respondents agreed that all new driver applicants should be required to obtain a recognised qualification/English language proficiency course as part of the application process. A total of 24 comments were left to this section, the bulk of which focused on the positives and the need for drivers to be proficient in English for safety and to assist their customers (14 references). Respondents were surprised this wasn't already a requirement (3 references), that it should only apply to English second

language (2 references), concerns about cost (1 reference) and outside drivers (1 reference)

Figure one below presents a summary of responses to four questions around disclosure and convictions.

Figure 1: How strongly do you agree or disagree that...



Agreement with all four questions were high with the lowest level of agreement being 64% 'strongly agree' or 'agree' to previous convictions being adopted into the determination of granting or renewing a licence. Respondents left a total of 53 comments across all four questions, a summary of which is presented below:

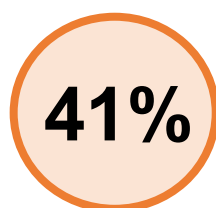
- These would improve safety for the public/ keep unfit drivers unlicensed (17 references)
- The type of offence needs to be considered/ severity of offence (motoring vs violence for example) (12 references)
- Consideration of innocent until proven guilty/ needs hard evidence and convictions rather than 'thought' (10 references)
- Current system should already cover this/ works well (4 references)
- Longer timeframe for reporting needed, 72 hours to a week (3 references)
- Cost of checks prohibitive (2 references)

Following on from these respondents were asked if they agreed or disagreed that Cheshire East should impose a condition for mandatory CCTV in vehicles.

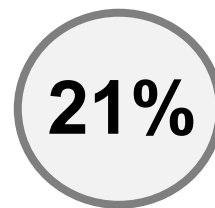
How strongly do you agree or disagree that Cheshire East Council should impose a condition on vehicles licences to make it mandatory for CCTV equipment to be fitted to all licensed vehicles?



Agree



Disagree



**Neither agree
nor disagree**

Total number of respondents 106

Respondents were generally split by mandatory CCTV in vehicles with 41% of all respondents either 'strongly disagreeing' or 'disagreeing' to this question.

A total of 24 comments were received to this section which clearly identified the reasons why respondents either agreed or disagreed with CCTV, a summary presented below:

Positives:

- Would help to protect drivers (5 references)
- Would help to protect the public (2 references)

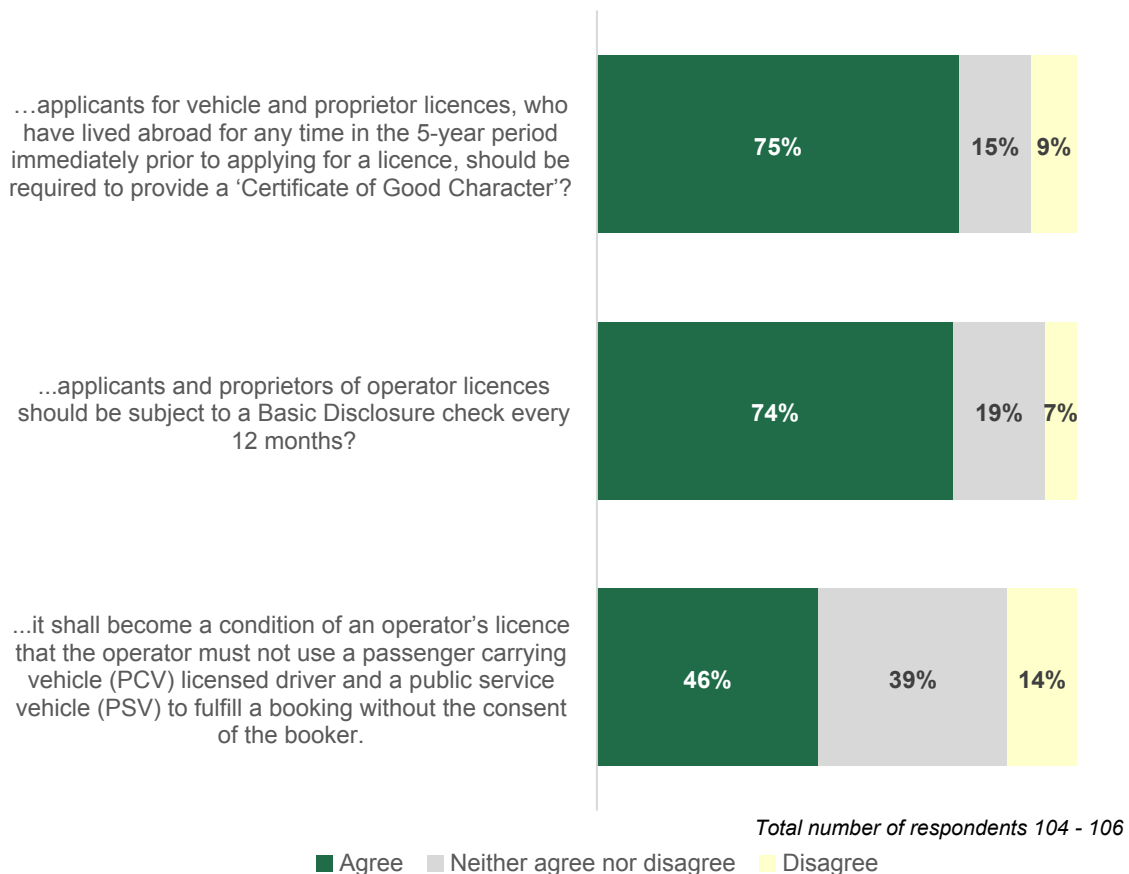
Negatives:

- The cost would be prohibitive/ could not afford/ would need assistance (9 references)
- Should be an owner's choice and not mandatory (6 references)
- Concerns about school transport due to recording minors (3 references)
- Not for private hire (1 reference)

Section 2: Operator Licences

Respondents were asked several questions regarding operator licences. Figure two below presents a summary of results to three of these questions.

Figure 2: How strongly do you agree or disagree that...



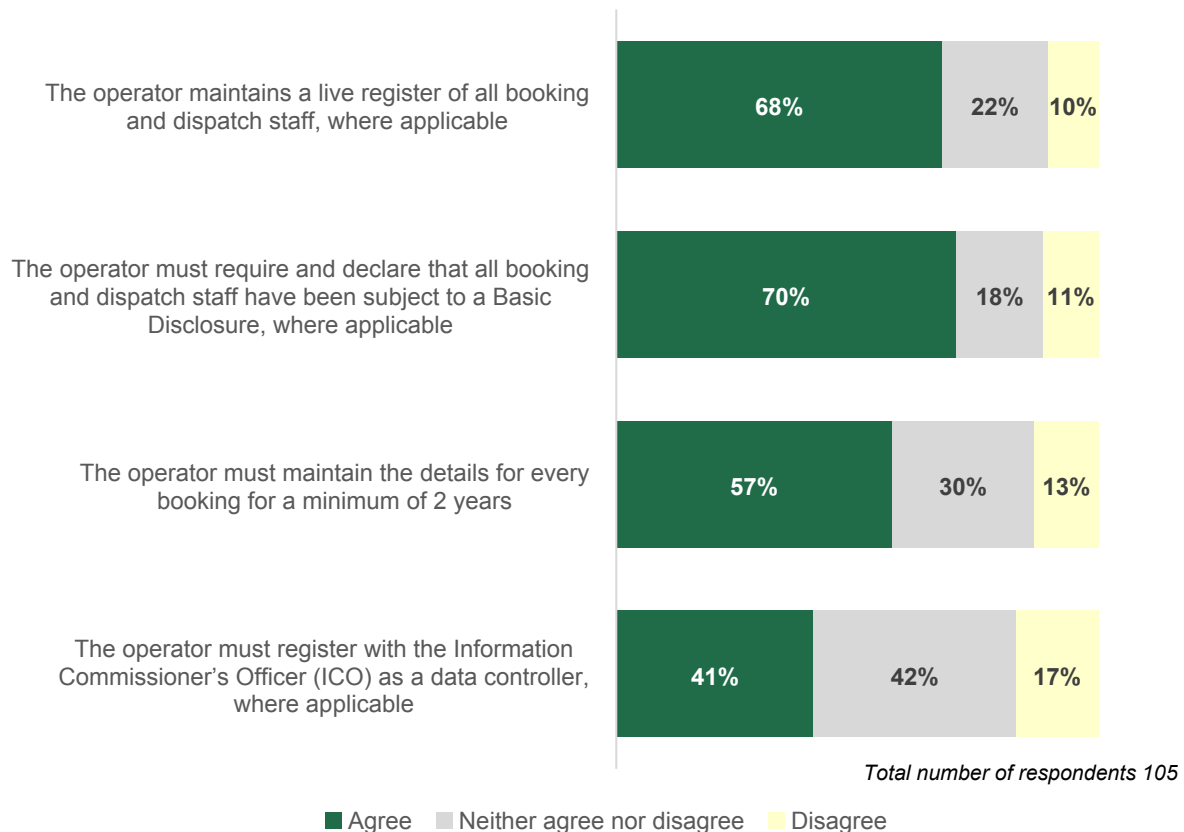
Agreement with a 'certificate of good character' and applicants being subject to a basic disclosure check every 12 months was high at 75% and 74% 'strongly agree' or 'agree' respectively. Agreement with PCV/PSV without the consent of the booker was slightly lower at 46% 'strongly agree' or 'agree.'

A total of 23 comments were received across these three questions, a summary is presented below:

- These requirements would improve safety/ stop unfit people getting licences (7 references)
- This system would be complicated/ reduce applications/ unfair to UK nationals (6 references)
- Current system works as is (3 references)
- How will false documents be prevented (2 references)
- More costs to operators (1 reference)

Figure three below presents a summary of results to how strongly respondents agree or disagree with several statements becoming a condition of an operator's licence.

Figure 3: How strongly do you agree or disagree that the following become a condition of an operator's licence?



Respondents expressed a high level of agreement to operators maintaining a live register of all booking and dispatch staff (68% 'strongly agree' or 'agree') and that these staff are subject to a basic disclosure (70% 'strongly agree' or 'agree').

Respondents were less likely to agree that booking records be maintained for a minimum of 2 years, and that they should register with the ICO as a data controller (57% and 41% 'strongly agree' or 'agree').

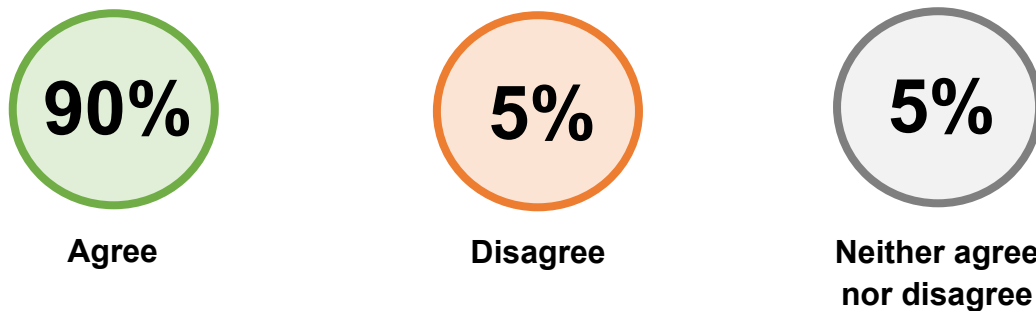
Respondents left 6 comments to this question:

- Bookings would become too complicated (1 reference)
- Too much bureaucracy/ no big firms left in Cheshire East (2 references)
- Due to limited data, registering to the ICO would not be proportionate (1 reference)
- Increased running costs (1 reference)
- Operators should test the legal alcohol limit of drivers each morning, especially school drivers (1 reference)

Section 3: Consultation on existing Licencing Conditions

Respondents were asked questions around the existing licencing conditions as part of the pre-engagement.

How strongly do you agree or disagree that Cheshire East Council should sign up to the National Register of Refused and Revoked licences (NR3)? *Total number of respondents 105*

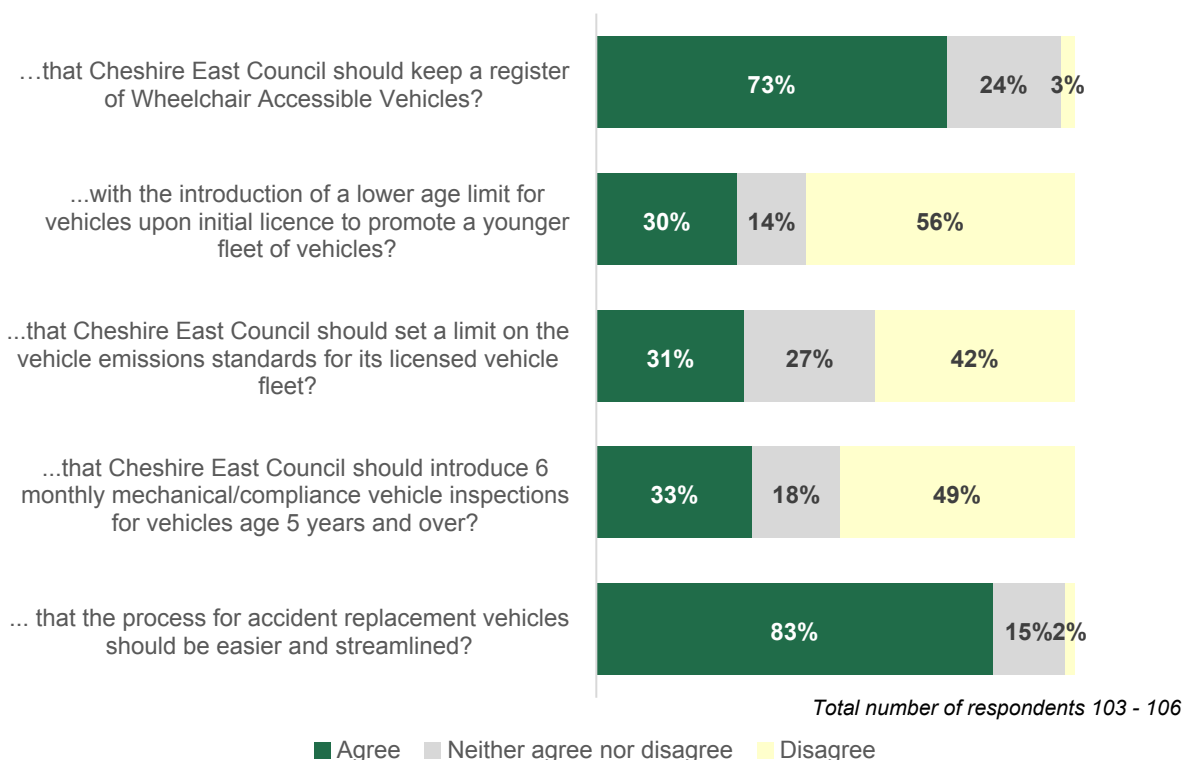


The majority of respondents agreed that Cheshire East Council should sign up to the National Register of Refused and Revoked licences (90% 'strongly agree' or 'agree'). A total of 12 comments were left to this section, a summary presented below:

- Agreement that this a good idea/needed/should have been in place already (11 references)
- Needed to monitor out of area drivers (3 references)
- Cheshire East should do its own checks rather than relying on this (1 reference)

Figure 4 below presents a summary of results to five conditions of licence around vehicles.

Figure 4: How strongly do you agree or disagree...



Respondents were very split on this set of questions with two conditions attracting a high level of agreement: the process of accident replacement vehicles being streamlined (83% 'strongly agree' or 'agree') and that Cheshire East should keep a register of wheelchair accessible vehicles (73% 'strongly agree' or 'agree'). A total of 16 comments were left to these two questions, a summary of which is presented below:

- A record of wheelchair accessible vehicles is needed and should be promoted (5 references)
- A record of wheelchair accessible vehicles is not needed/should already exist (3 references)
- Treatment of wheelchair users needs monitoring (attempt to book these vehicles) (2 references)
- A simpler/faster/easier process is needed for replacement vehicles to prevent loss of earnings (5 references)

Three conditions attracted a high level of disagreement ('strongly disagree' or 'disagree') all related to vehicles being used: 6 monthly inspection for vehicles older than 5 years (49%), a limit of vehicle emissions (42%) and a lower age limit for vehicles on initial licence (56%). A total of 52 comments were left to these three questions, a summary of which is presented below:

- Age of the vehicle is not the important factor; maintenance should hold more weight (19 references)
- Cost of a younger fleet/electric cars would be too high, would not function, cost of testing prohibitive (18 references)
- Over inspection of vehicles, not necessary (8 references)
- Inspections should be milage based, not age of vehicle based (4 references)
- Grants should be introduced to lower fleet age/electric cars (2 references)
- Current testing system struggles, this would add more pressure (1 reference)
- Safety benefit of increased testing (1 reference)
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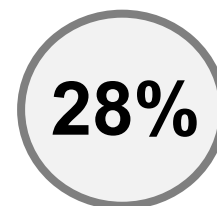
How strongly do you agree or disagree that all Private Hire Operators should keep a record of complaints received from customers for a minimum of 2 years?



Agree



Disagree



**Neither agree
nor disagree**

Total number of respondents 106

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A total of 14 comments were left to this section across a broad range of considerations. Respondents were split between whether complaints should be kept for a longer duration (2 references) or a shorter duration or whether this was even needed (4 references). Respondents queried how this would be enforced (3 references), who would keep the log (1 reference) or whether the positive reviews would have a mechanism for capture also (1 reference).

Respondents also felt that the severity of the complaint needed to be considered within the system raising concerns around serial complainers or those under the influence of alcohol (3 references)

Respondents were asked where the most convenient locations for electric vehicle would be charging points in Cheshire East. A total of 75 comments were left to this section. Specifically named roads were as followed:

- Market Street
- Commercial Road Macclesfield
- Styal Road
- Oak Street
- Pedley Street
- Nantwich Swimming Baths
- Ruskin Road
- Beam Street
- Churchill Way
- Delamere Street

In terms of more generic locations respondents also suggested the following:

- Council owned/ free car parks (22 references)
- Taxi ranks (19 references)
- Supermarkets (11 references)
- Train stations (11 references)
- Petrol stations/garages (10 references)
- Town centre locations (8 references)
- Private households (7 references)
- Operator bases (6 references)
- Leisure centres/Libraries (2 references)

Some respondents questioned the viability of electric vehicles for trade due to cost (2 references) and felt that more taxi ranks were needed in general (2 references).

Conclusions

The pre-engagement survey obtained an acceptable level of feedback with a response rate of 19% to the paper survey and a 10% response to the online survey. However, there was a high rate of bounce backs on the email invite suggest that some emails on the database may need updating in the future (28% failure rate).

In terms of safety measures respondents were generally positive around these, especially regarding new licence applications. There was some resistance in terms of renewal of licences and how these changes may affect them in the future, but respondents did identify several measures and conditions that they felt would increase safety for both drivers and public.

In terms of mandatory conditions on vehicles (such as age, maintenance checks and CCTV) respondents were less supportive. The main issue repeatedly raised throughout the survey was around the cost that some of these conditions would impose on an already delicate balancing act. Support for these measures could be improved through suggested grant funding or phased integration to give time for costs to be absorbed. Secondly respondents felt that too much weight was being given to the age of the vehicle and felt that focus should be more on the maintenance and mileage of vehicles for additional checks.

Throughout the survey there were concerns raised around many points about the amount of time or 'red tape' and cost that adoption of these conditions would add to renewal and operating costs of a driver. This has been particularly sharpened by the impact of COVID-19 on the industry. Out of area drivers were brought up under several sections and respondents felt that the stricter Cheshire East became as a licencing authority, this was something that would increase in the future and would need to be dealt with.

Overall, the pre-engagement has provided a good base point for discussions into the future and for further consultation to be undertaken and the development of a taxi licencing strategy.