

Responses received during the consultation.

Section A	Responses received to the online consultation
Section B	Comments received during the online consultation
Section C	Comments / feedback received from associations representing the local trade
Section D	Summary of feedback received from the Licensing Board
Section E	Written responses provided by members of the local taxi trade

## **Section A                      Responses received to the online consultation**

Interested parties were able to complete an online survey as part of the consultation. The consultation asked the following questions:

1. Please indicate whether you agree or disagree with our proposal that all applicants for the grant or renewal of a Private Hire Operator licence must undergo an interview with Licensing Officers as part of the application process.
2. Please indicate whether you agree or disagree with our proposal for additional conditions to be attached to Private Hire Operator Licences.
3. Please indicate whether you agree or disagree with our proposal that the Private Hire Operator must inform the customer at the time of acceptance of the booking, that the booking they have made will be sub-contracted to another Private Hire Operator.
4. Please indicate whether you agree or disagree with our proposal to remove the current limit on Hackney Carriages.
5. Please indicate where you agree or disagree with our proposal to change our Vehicle Age and Emissions Policy to allow older vehicles to be licensed if they meet the emissions, quality and safety standards.
6. Please indicate whether you agree or disagree with our proposal to require permanent fixing of signage if rules are not complied with.
7. Please indicate whether you agree or disagree with our proposal to introduce a requirement for the display of a vehicle licence plate on the front bumper / grille.
8. Please indicate whether you agree or disagree with our proposal to review our conviction policy to provide greater clarity and ensuring our requirements match or exceed those of all other neighbouring authorities.
9. Please indicate whether you agree or disagree with our proposal to require applicants for a vehicle license to undergo a DBS check.
10. Please indicate whether you agree or disagree with our proposal to clarify our decision making.
11. Please indicate whether you agree or disagree with our proposal to clarify our application processes.

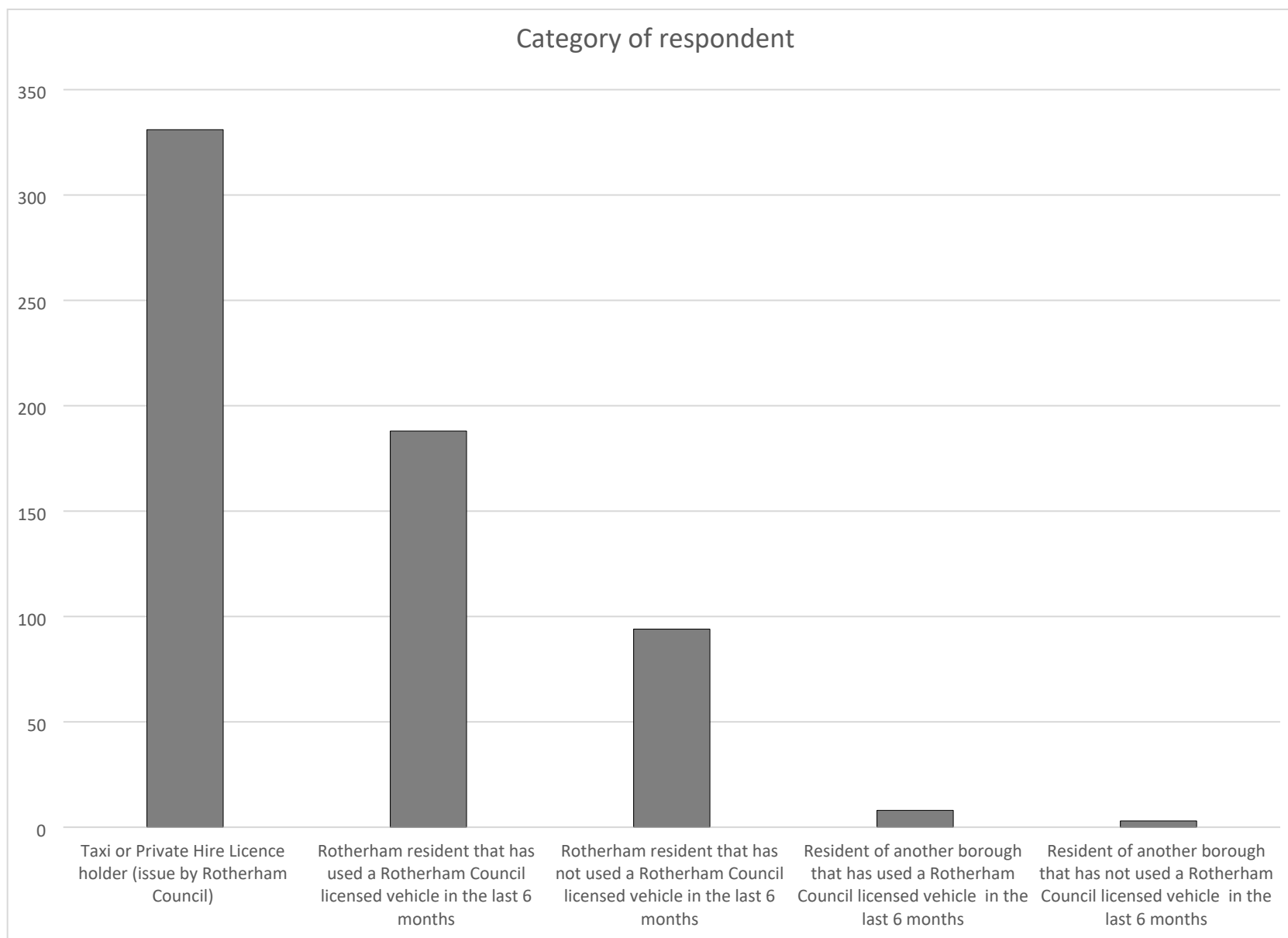
Prior to providing their response, the respondents were asked to state which of the following categories of respondent they felt most accurately described them:

1. Taxi or Private Hire Licence holder (issued by Rotherham Council)
2. Rotherham resident that has used a Rotherham Council licensed vehicle in the last 6 months
3. Rotherham resident that has not used a Rotherham Council licensed vehicle in the last 6 months
4. Resident of another borough that has used a Rotherham Council licensed vehicle in the last 6 months
5. Resident of another borough that has not used a Rotherham Council licensed vehicle in the last 6 months

A total of 624 responses were received, a breakdown is shown below:

	Number	
Taxi or Private Hire Licence holder (issued by Rotherham Council)	331	53%
Rotherham resident that has used a Rotherham Council licensed vehicle in the last 6 months	188	30%
Rotherham resident that has not used a Rotherham Council licensed vehicle in the last 6 months	94	15%
Resident of another borough that has used a Rotherham Council licensed vehicle in the last 6 months	8	1%
Resident of another borough that has not used a Rotherham Council licensed vehicle in the last 6 months	3	<1%

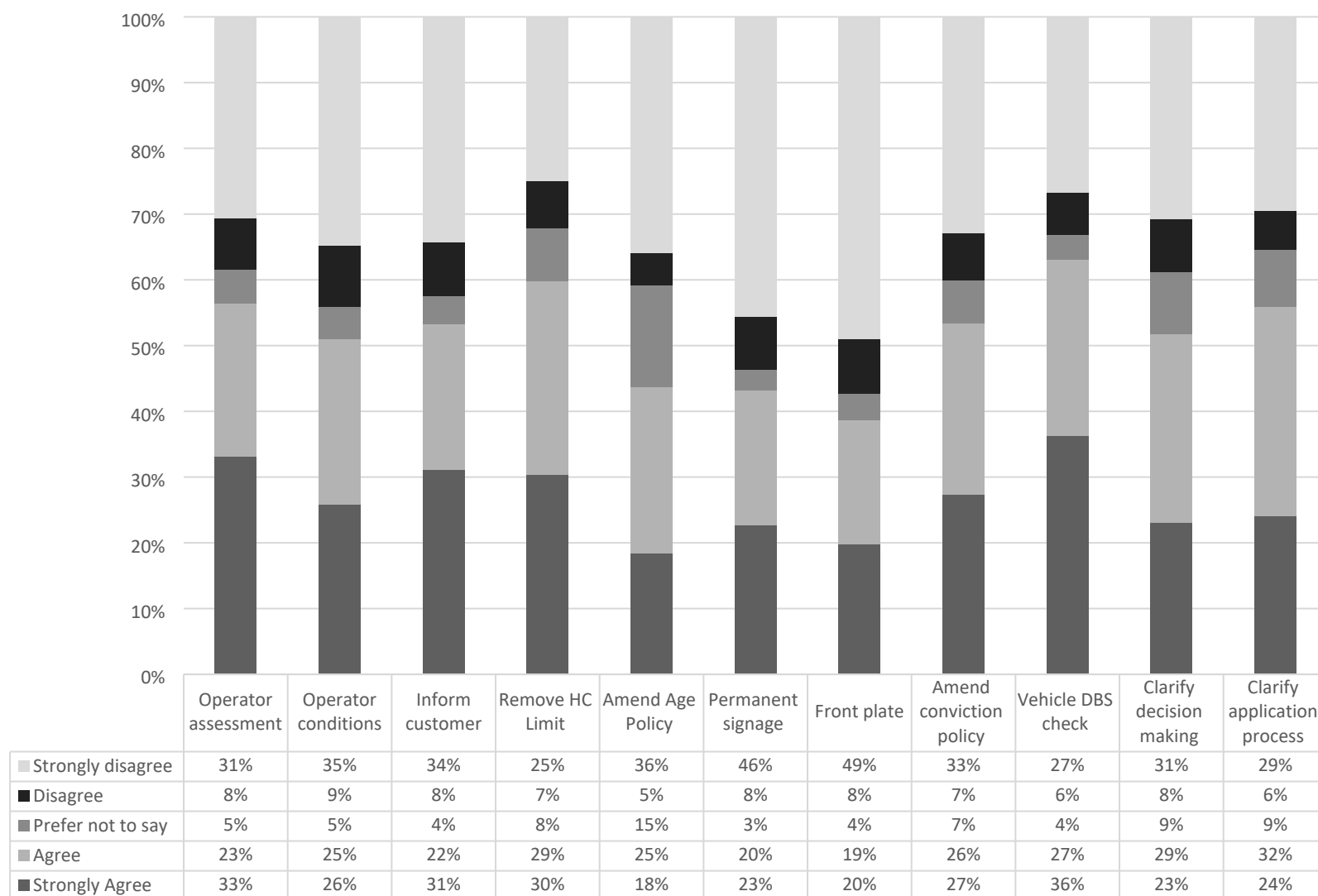
This is shown in graphical form in the chart on the following page.



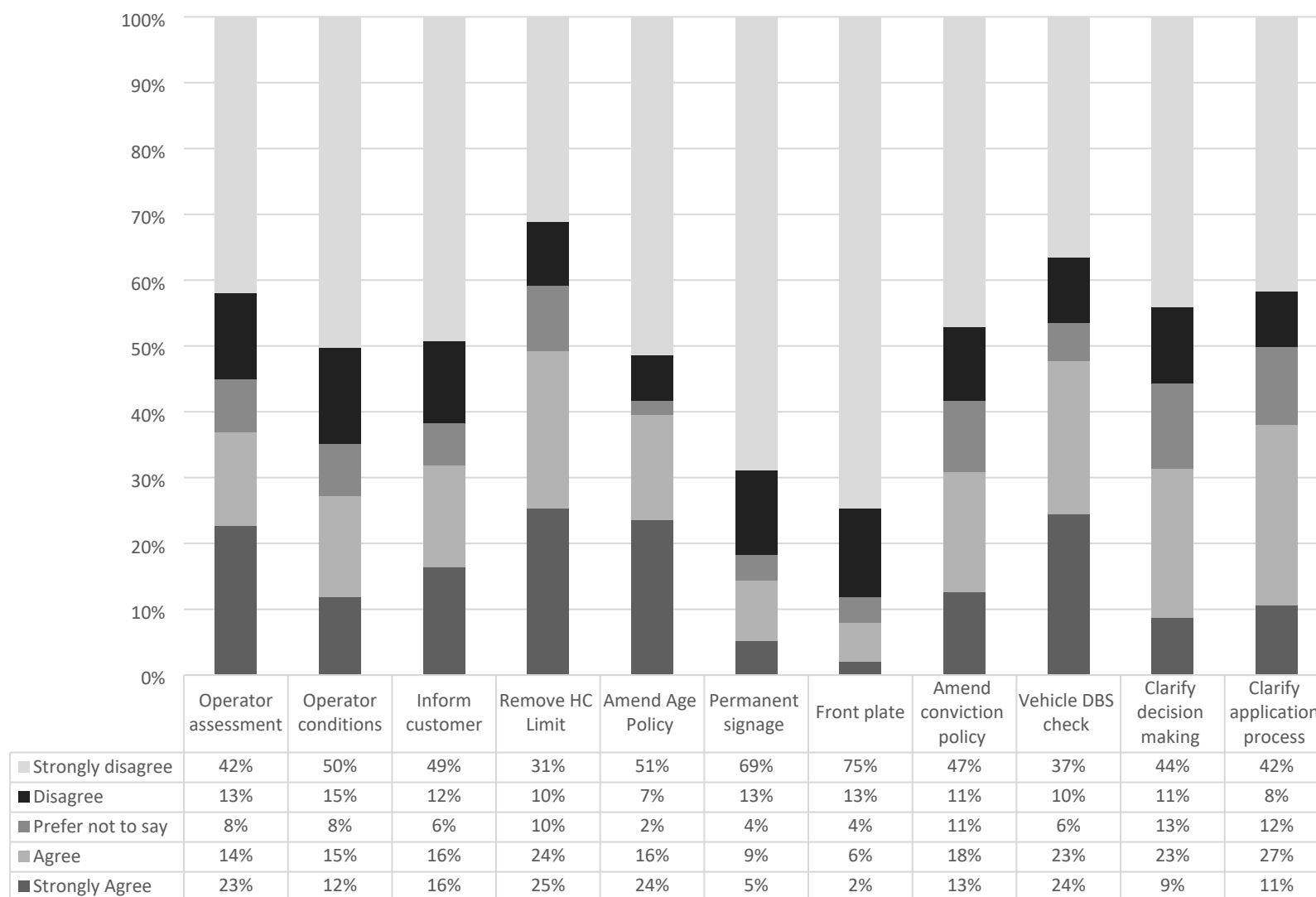
The charts on the following pages provide a graphical representation of the responses that were received to each of the questions asked.

Intentionally Blank

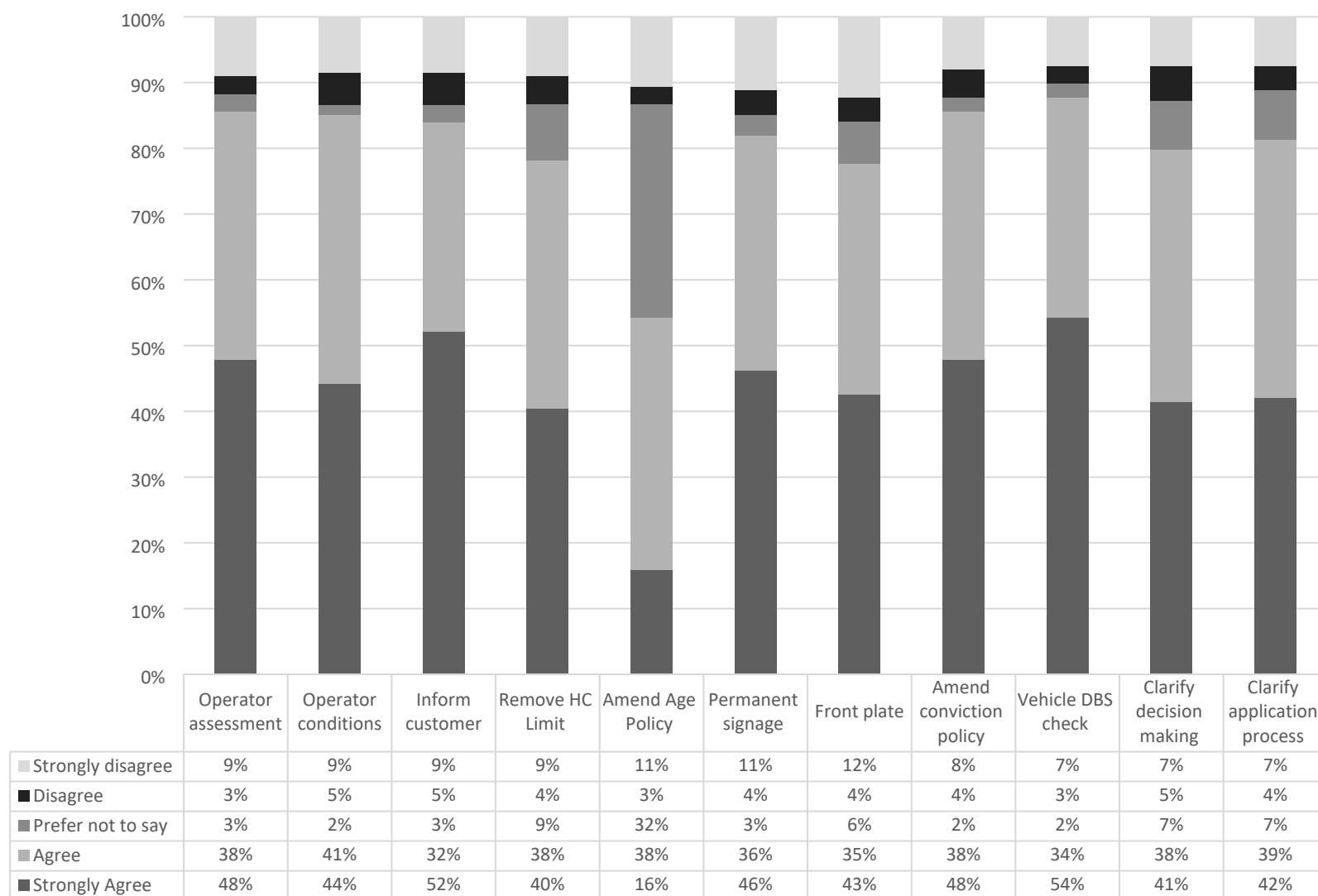
### All responses



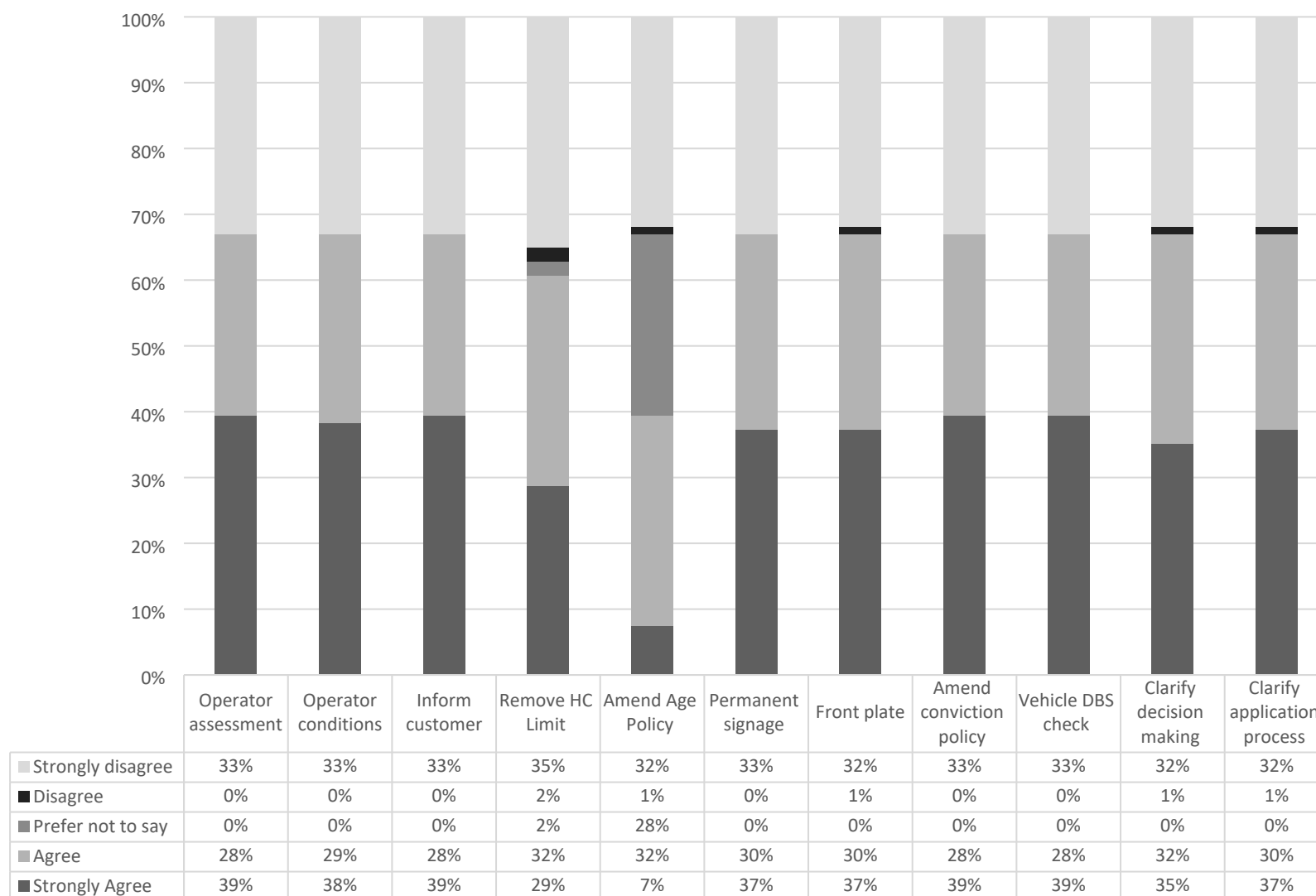
## Responses from the Rotherham Taxi and Private Hire Trade



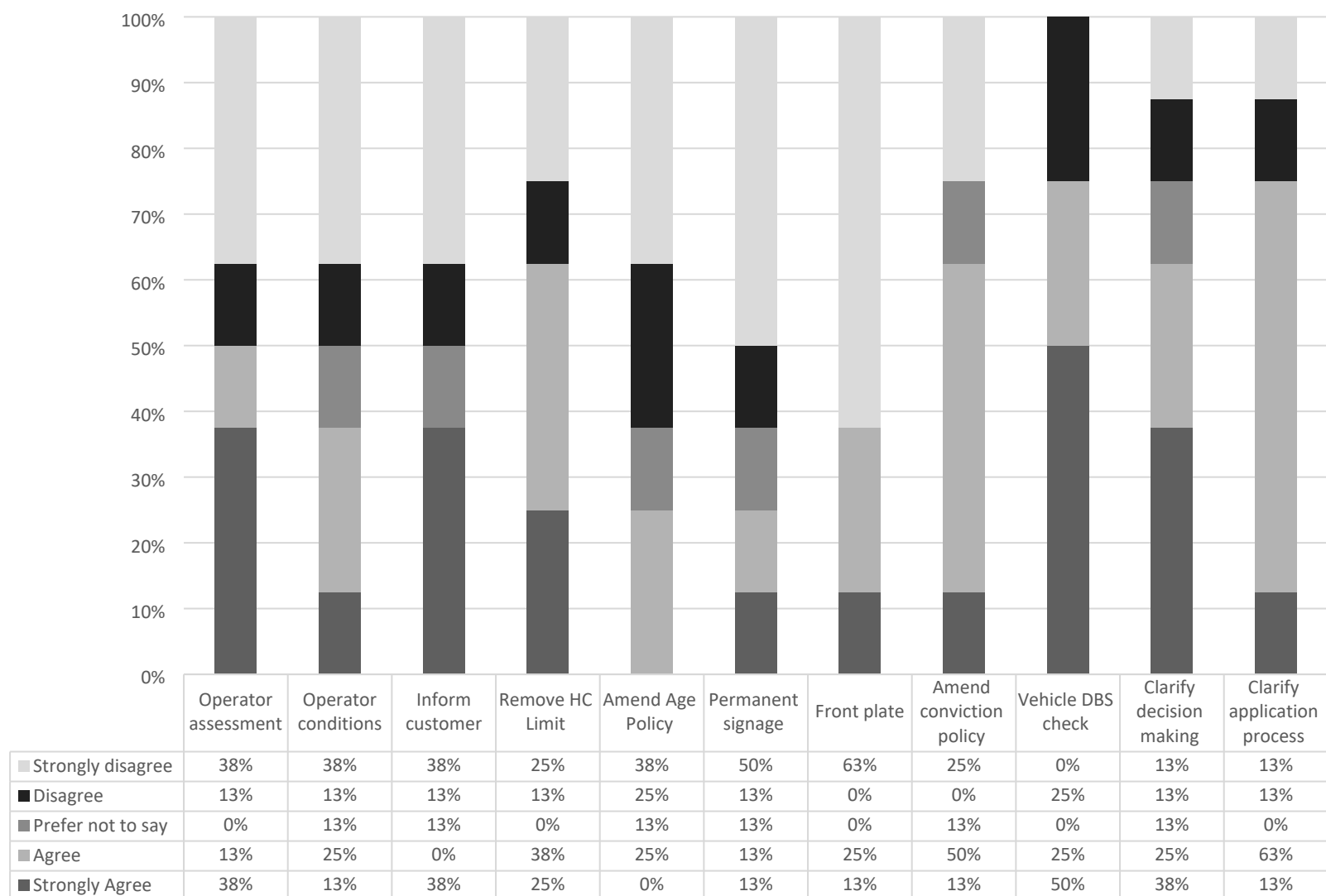
### Responses from Rotherham residents that are Taxi / PHV users



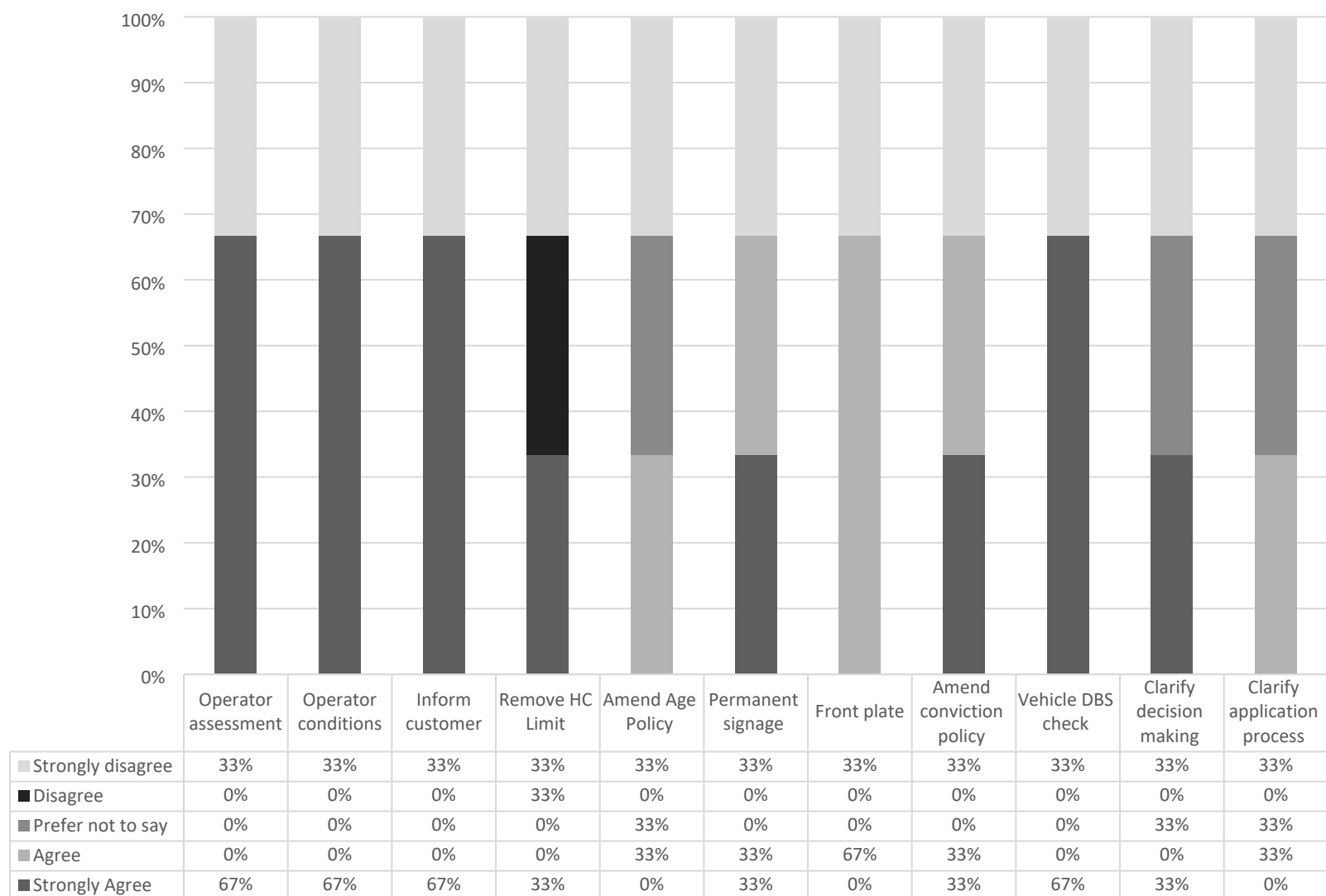
## Responses from Rotherham residents that are not Taxi / PHV users



### Responses from non-Rotherham residents that are Taxi / PHV users



## Responses from non-Rotherham residents that are not Taxi / PHV users



## Section B                      Comments received during online consultation

### Comments received through the online consultation from the taxi and private trade

*Note: where there are more than 3 instances of the exact same comment, the repeat comments have been removed from the list below but the number of repeated instances is acknowledged.*

#	Comment
1	<p>1. Rotherham License HC or PH vehicles are not permitted to operate beyond Rotherham. Rotherham Council should ban Licensed vehicle of other councils to operate within its boundaries.</p> <p>2. Regarding CCTV cameras, the requirement to install cctv camera should be removed and drivers should be allowed to install their own Dash Cams instead, to provide driver with more security and flexibility</p> <p>OR</p> <p>Drivers should be given the right to get the footage where they need. Currently, drivers has no power to control the functions of cameras.</p>
2	15 years for electric cars is good
3	<p>1st register as taxi age limit from 5 years to be increased 10 years as long as its in good conditions and categories eg like N, S etc should be removed.</p> <p>1 test upto 7 years and 2 test every year as long it's registered as taxi.</p> <p>Dont need permanent door signage or extra plates in front of car just to inform customers by registration number to avoid being attacked by stones egges etc.</p> <p>Application processing should be faster.</p>
4	<p>Additional information as follows:</p> <p>1-7 years = 1 test per year</p> <p>7 - 12 years = 2 tests per year</p> <p>Increase age of euro 6 diseal/petrol cars to minimum 14 years. This is due to cars are very expensive and drivers are unable to afford Â£20k plus for a hybrid vehicle otherwise drivers will be out of trade.</p> <p>We do not want grills for safety hazard people throwing stones.</p> <p>Rather i would suggest no plates at all and introduce rear and front windscreen affixed stickers with same details as on plate like TFL (London private Hire cars).</p> <p>London going forward with these stickers no issues at all.</p>

	<p>We also need RBC to produce credit card neck badge as the currant badges are dangerouse due to the sharpe edges and too big.</p> <p>RBC need to look into TFL sticker type.</p> <p>Fire extinguishers and first aid kits out we are not trained for such instances</p> <p>These are main concerns.</p>
5	<p>Age limit of vehicle should be increased from 10 years to 12 years and thereupon use the EQS standards</p> <p>Testing should take away the 3 tests per year</p> <p>Should be 1-7 years is 1 test per year</p> <p>7+-12 years 2 tests per year</p> <p>Vehicles are costing more money, they are euro 6 so more compliant to the environment. Labour and parts are more expensive why test every 4 months when 6 months is sufficient. Added burden of us drivers coughing out Â£46 is not fair in such difficult times.</p> <p>Permanent signage should not be implemented this is safety hazard as my car has been pelted with stones and damage done to it twice. People see a taxi from far away and having the grill at front will be added cost to us and our cars will be more chance of being pelted. Customers book via app or phone, so can trzck and ring driver. Stickers to side of doors and back plate and docket at windscreen more than enough.</p> <p>Work with us drivers and listen to us</p> <p>Or else people will move to getting out of town taxi and working in rotherham and rmhc will lose out.</p> <p>Goverment have not been able to stop this and trust me rmhc will not</p> <p>I will move away myself and get wolverhampton plate if condicitons and policies are made more stringent</p> <p>Rotherham js the stricted in uk</p>
6	<p>age of cars extended to 15 years . 1 m.o.t a year . no extra signs on cars are needed. reduce price of m.o.t and have more m.o.t centres .</p>
7	<p>Agree with age limit and test increase disagree with most others</p> <p>Main comments</p> <p>Increase age limit of euro 6 cars to 13 years and then per year after</p> <p>Testing</p> <p>1-7 years = 1 test per year</p>

	<p>7 + = 2 tests per year</p> <p>Scrap 3 tests per year</p> <p>Signage</p> <p>Do not need front grill plate as extra cost for us and customers get vehicle details and can communicate with driver via message, track taxi and so on</p> <p>Front plate is safety concern people breaking into cars and throwing stones and vandalising</p> <p>Risk for us and extra stress</p> <p>Get rid of fire extinguishers and first aid kits not needed and never used extra cost for us drivers</p> <p>With influx of out of town taxis such as wolverhampton and ashfield</p> <p>People getting badges elsewhere and working in rotherham covering our work</p> <p>Work with trade not against</p>
8	<p>All vehicles that are euro 6 or above should be allowed to be used as private hire vehicles. As for signage no more extra signs/plates needed. As all information is given to customers, ie vehicle Reg and colour.</p> <p>Mots/compliance tests max 2 per year.</p>
9	<p>Any vehicle coming on for licensing should be able to be 7 years old and come off 14 years old never used a fire extinguishers or first aid kit taxi drivers currently paying above odds for cars petrol etc front plate not required as customers have vehicles registration the way rmhc are going is quite pathetic all i can say is i will be looking to go to Wolverhampton</p>
10	<p>Any vehicle thatâ€™s operating in Rotherham borough council ( including sub-contracted vehicle) should comply with the rules of Rotherham Metropolitan Borough Councilâ€™s licensing authority regulation, which includes fixing of camera for vehicle.</p>
11	<p>As a licensed driver I feel that some of the requirements and proposals are designed to purposefully make current drivers and future drivers go to other licensing authorities such as Wolverhampton where the rules are not as Draconian.</p> <p>I am in favour of:</p> <p>â€¢Refresher training at renewal</p> <p>â€¢Current requirements to become a driver are fine with safeguarding, knowledge test etc.</p> <p>My opinion on what should be introduced:</p>

	<p>â€¢Magnetic signage should stay and rear licensed plates should be allowed to be displayed with magnets these are quite strong and can't just easily be removed without some force. Sheffield council allow this so why can't Rotherham. Signage should always be displayed whilst working and should be allowed to remove when not working in order to deter theft, criminal damage etc.</p> <p>â€¢Age limits should be how they were prior to 2015 any age vehicle like Chesterfield allow providing it passes the test as regarding clean air zones and emissions the private hire and hackney trade aren't the only contributors and drivers that don't meet emissions will just pay the clean air zone charges anyway.</p> <p>â€¢Testing should be similar to Wolverhampton vehicles aged under 10 years should have 1 test a year and anything over 10 years should be tested twice a year. Chesterfield council test a vehicle twice a year regardless of age so 3 tests aren't needed and with cost of living is affecting drivers with 3 tests a year.</p>
12	As a private hire driver I strongly disagree about the permanent signage of the private hire vehicle because we are using our vehicle as our private vehicle too.
13	<p>Being a taxi driver for many years</p> <p>The trade has gone backwards due to covid</p> <p>Expensive labour parts and car values going up.</p> <p>It is seen majority of drivers have got euro 6 cars so invested for rmhc policy.</p> <p>Reward should be given and incentives to keep drivers as a lot have dual badges rotherham and wolverhampton/doncaster/barnsley</p> <p>If rotherham want to sustain the local drivers they have to meet with drivers needs and support them</p> <p>Increase age limit of cars to 15 years and not have EQS. ALL rotherham standards are the highest threshold, most expensive and stringent terms. They need to pipe down this is due to rewarding us drivers</p> <p>3 tests should be dismissed, why give extra stress extra payment for 3rd mot test when 2 a year are more than enough</p> <p>1-7 years = 1 test per year</p> <p>7 -15 = 2 tests per year.</p> <p>We have plenty signage and customers get details of car and driver coming to pick them up. Extra grill plate will cost us per year extra and is a safety hazard and vandalism</p>

	Fire extinguishers and first aid kits not need and not safe enough to use as not trained
14	Car age 1 - 7 years should be 1 m.o.t. After 7 years, every six months. We dont need front door signage because kids throw stones when they see taxi. Door signage should be competely finished because with new technology you can see number plates on the phone, and when cars are 8 years they should be allowed to be taxi, and 15 years to not.
15	<p>Car only should be required 1 mot test from new to 7 years old, and after that 2 test in a year.</p> <p>Mot test fees should be significantly reduced.</p> <p>New car should be allowed from 7 year old and changed at when its 12 years old.</p> <p>No permanent signage as car will be used as personal use aswel and this can cause thefts, which then adds further cost.</p>
16	<p>Cars should be allowed 7yrs for 1 yr test after that 2 times a year there after</p> <p>Sign pertinent not good people will be getting robbed all time</p> <p>Plates on front not good so kids throwing stones will see coming it will get worse peoples cars getting damaged and police dont do nothing to sort it out all they say is claim of insurance and insurances have gone up in last 2 yrs 25% not good</p>
17	<p>Cost of living crisis</p> <p>Costs us more for signgage and tests</p>
18	Council should allow vehicles 1 test per year for cars upto 10 years and from 10 years old to 15 years old vehicles 2 tests.
19	Don't agree with vehicle age limits. Fire extinguishers and first aid kits no need.1 Mot first 7 years and then 2 mots after 7 year age vehicle totally agree with Wolverhampton Council on there policy i will be obtaining a licence with them
20	<p>Drivers will always take the easiest most cost effective route. If the council can not make rules that are fair to drives then they will go with other councils and operators will follow where the drivers go.</p> <p>Why have you got so many tests and then stull have age limits. If a vechile is bieng is essencse having an mot test 3 times every year there is not much likelihood it wont be road worth. Vechile age needs to be scrapped and council should just stick to the 3 tests per year. This makes it easier for drivers and will also ensure customer safety. Until tou work with drivers they will always find a way of working with councils that are more understanding and no matter what conditions you put in place you cant stop this its the bendit of a freeham market, thats how a capitalists free market system works unless rotherham council think they can override this which is highly unlikely.</p>
21	<p>Enforcement officers need to look for non-plated cars doing taxi-ing</p> <p>Drivers are too often falsely accused.</p>

	Driver safety needs to be a higher priority.
22	<p>Euro 6 cars are expensive they are emissions clarified</p> <p>Increase the age of cars to 15 years</p> <p>Reward is drivers</p> <p>1 -7 = 1 test per year</p> <p>7-15 years = 2 tests per year</p> <p>3 tests are not needed extra stress for us and costly for driver no reasoning</p> <p>Grill should be scrapped safety hazard people throw stones or vandalise vehicles</p> <p>New technology is here they have name of car, vehicle reg, can ring or text driver stickers on each side front docket on windscreen and back plate</p> <p>Why make us pay for another plate which is not needed</p> <p>Work with us not against us</p> <p>Fire extinguisher and first aid kit scrap not needed and never used extra payment per 3 years for us drivers</p> <p>We suffer or else I will get badge with Doncaster and Wolverhampton</p> <p>Work with trade or else you will lose out on drivers who can work in Rotherham with other city plate</p>
23	<p>Euro 6 cars have come' new cars cost us more money to invest. Reward us drivers</p> <p>Increase car age to 15 years</p> <p>Scrap 3 tests per year</p> <p>1-7 = 1 test per year</p> <p>7 -15 years = 2 tests per year</p> <p>Cars are maintained really well and work with us</p> <p>Grill signage is not needed' customer gets details of car' driver reg' can ring or tx customer. What else is needed why make us pay more per year when not needed</p> <p>Hackney limit scrap wheelchair cars needed more</p> <p>Take away fire extinguisher and first aid kits never used cost for us drivers for</p>

	<p>bo reason</p> <p>Work with us rmhc or else people will get badges elsewhere and you will lose out</p>
24	Everything very expensive
25	<p>Financial cost is very high at the moment</p> <p>Cost of cars are very high and unable to afford hybrid cars</p> <p>Age of the car should be 15 years</p> <p>Permanent signage should not be on the vehicle</p>
26	<p>Fuel prices have increased</p> <p>Permanent signage removed from car</p> <p>Financial cost gone now is very high</p> <p>Cost of cars are very high and unable to afford hybrid cars</p> <p>Age limit should be 15 years</p>
27	<p>Having held the licence for over 4 years- i have always driven a hybrid car- which was brand new purchase- i currently feel the test limit which for me now is every 6 months is absurd where as other council are doing test every 6 months on much older vehicles. I would like the below points to be considered</p> <ul style="list-style-type: none"> <li>- 1-7 years = 1 test per year</li> <li>- 7 - 12 years = 2 tests per year</li> <li>- Increase age of euro 6 diesel/petrol cars to minimum 12 years</li> </ul> <p>- I do not want licence on my grill- safety hazard people throwing stones not only that with the door signage, plate and now the blue stickers is enough for individuals to note that i am a taxi</p> <p>- Fire extinguishers and first aid kits- we do not need them</p> <p>Thank you for your consideration</p>
28	<p>Hi as a rotherham taxi driver</p> <p>Age limit needs to increase. As all new cars are euro 6 compliant and are hybrid. Better quality and better standards. 10 years it is now needs to increase to 13 years minimum.</p> <p>Testing is over powered with stress for no reason. 3 tests is a full on joke. What is difference between having car tested every 4 months and every 6 months. This is money making process which us drivers suffer. If a personal</p>

	<p>vehicle someone is doing 20,000-30,000 motorway work mileage. They will get tested once a year regardless. Why push for things with no reasoning.</p> <p>1-7 years = 1 test per year</p> <p>7-13 = test every 6 months</p> <p>Front Grill has to be scrapped. What is need when we have stickers at front, plate ag back and docket at front windscreen. Wheb most customers ring it gives car details, make, colour, vehicle reg, name of driver and so on. Extra cost on the drivers</p> <p>It is always drivers who suffer and have to give the costs not anybody else. We are a easy scapegoat. Listen and work with the trade</p> <p>Wolverhampton taxis are flocking all around UK. If you want to lose rotherham taxis to out of town taxis and lose out on revenue then be it. But trust me many drivers have got rotherham badges and out of town badges, but working on out of town taxis not rotherham plated.</p> <p>Be reasonable and supportive</p> <p>Do not force us out of being a rotherham plated taxi</p>
29	<p>I am not agree with 3 tests after 7 years old car I think 2 tests in a years are more than enough.</p> <p>Thank you</p>
30	<p>I believe out checks and balances are in place and we should stick to them and accommodate ROTHERHAM residents to earn their living.</p> <p>Also the issuing of badges and plates process should be made simpler similarly to Sheffield council.</p> <p>Many thanks</p>
31	<p>I donâ€™t think that their should be a vehicle license plate on the front bumper and grille.</p>
32	<p>I dont get how a council can propose changes, when we have wolverhampton drivers. These drivers have convictions and dont have the same safety measures to what we follow. As for the law from 2015 can be changed if our council actually put effort in to changing the rules on this instead trying to penalise their own drivers with more restrictions. Even make the law county to county where they can work from the county next to them. Not 80 miles away in wolverhampton and take anyone with numerous convictions who has one brain cell between them</p> <p>Permanent stickers- dont agree with these at all as i use my car for personal use. I dont want to be pestered in my own time by customers waiting for a taxi or even worse broke in to(which has happened when i keep my stickers on over night)</p> <p>Criminal law checks- Great we are doing this but again wolverhampton take</p>

	the drivers you reject so it defeats the object of you trying to implement this. I already know wolverhampton drivers rejected by numerous councils with records being accepted.
33	<p>I have been a taxi driver for over 10 years, trade is going harder work is getting difficultly as more out of town drivers are coming</p> <p>Rotherham is too strict with policy and need to keep us rotherham deivers mindful of policy changes. Work with us and help us out please</p> <p>Increase age limit of euro 6 cars to 13 years and then per year after</p> <p>Testing</p> <p>1-7 years = 1 test per year</p> <p>7 + = 2 tests per year</p> <p>Scrap 3 tests per year</p> <p>Signage</p> <p>Do not need front grill plate as extra cost for us and customers get vehicle details and can communicate with driver via message, track taxi and so on</p> <p>Front plate is safety concern people breaking into cars and throwing stones and vandalising</p> <p>Risk for us and extra stress</p> <p>Get rid of fire extinguishers and first aid kits not needed and never used extra cost for us drivers</p> <p>With influx of out of town taxis such as wolverhampton and ashfield</p> <p>People getting badges elsewhere and working in rotherham covering our work</p> <p>Work with trade not against Asim jhanwaz</p>
34	<p>I have been a taxi driver for over 16 years and have seen the costs rise by alot since then and is becoming more difficult to earn a living. The cost of new vehicles is really high.</p> <p>The 3 tests a year should be reduced to 1 test a year for vehicles upto 7 years old and 2 tests a year for vehicles 7+ years old.</p> <p>The front grille plate is dangerous for drivers and customers when kids throw stones eggs etc as they target taxis on a night and will see the taxi from far away with the front grille plate.</p> <p>In the 16+ years iâ€™ve had my first aid kit and fire extinguisher i have never</p>

	used it or ever heard of a driver use it i think thatâ€™s a waste of money to have them but never use them.
35	<p>I have been a taxi driver since 2007 (15+years) expenses have increased by alot only vehicles alone are Â£10,000+ for a euro 6 diesel and the hybrid vehicles are alot more to buy. Having new vehicles i think they should be allowed to run until 12-15 years old. The 3 tests a year should be reduced to 1 test a year for vehicles upto 7 years old and 2 tests for vehicles 7+ years old as most company vehicles do similar mileage a year and only have 1 mot a year. The front grille plate is dangerous for drivers and customers especially the elderly who will get frightened when kids throw stones eggs etc as they will see the taxi from a mile away with the front grille plate. Since 2007 iâ€™ve had my first aid kit and fire extinguisher and not once used it or ever heard of a driver use it i think thatâ€™s a waste of drivers money.</p>
36	<p>I have been doing taxis for over 10 years. The price of cars has increased. With most drivers getting euro 6 cars including hybrids. I think the policy needs to increase the age of them from 10 years and make it 12 years. The 3 tests per year should be scrapped, this is a money making process where we as drivers are paying for no reasoning. Getting tested every 4 months or 6 months either way the driver is losing out as in 2 months what difference will it make. Be helpful for the drivers. This is why people are getting out of town badges such as wolverhampton, ashfield, doncaster badges and going away from rotherham. This is with having rotherham badges also at the same time. Work with the trade not against it. 1-7 years should be one test per year, 7+ to 12 should be 2 tests per year. Signage at the grill is a safety hazard as many drivers get pelted with stones and this will make it an easy target. Plus we have door signage at the side of the car, for customers to see taxi, back is the plate and at front it is the docket on the windscreen. When approaching pick up customers see the taxi from the side and if stickers are there then they know it is a taxi. Customers who book taxis get messages on the phone or the app of driver name, car reg, colour of taxi, car make and so on. People who book from automated phones such as supermarkets or hotels the driver gets the information. When getting to the pick up the driver confirms name and destination. This is another money making exercise i do not agree with.</p> <p>Fire extinguishers and first aid kits to be scrapped, excessive money spent for no reason. We are not trained and i have never used any before. Plus the emergency services do not advise us to use fire extinguisher during a fire.</p> <p>Listen to the trade we are going through a very hard time</p>
37	<p>I know a lot of drivers who have dual badges, eventhough having rmhc badge they work for out of town licensed council</p> <p>You are taking drivers away from our own town</p> <p>Increase the age limit of cars to 15 years as euro 6 cars equivalent and new car costs alot and they have been well looked after</p> <p>Reward the drivers and give incentives to keep them on and stop EQS standards</p> <p>Get rid of fire extinguishers and first aid kits as never been used and fire</p>

	<p>extinguishers are a safety hazard</p> <p>Every 3 years got to get new ones which is additional cost for no reason for US drivers</p> <p>Take away 3rd mot test per year and adhere to</p> <p>Vehicle up to 7 years = 1 test</p> <p>7 -15 years = 2 tests</p> <p>3 tests are extra cost for no reason to us drivers, normal cars do plenty miles but still have one test per year. 2 tests are sufficient what difference is 6 months test and 4 months. No brainer stringent rules for no reasoning</p> <p>Front grill do not bring in, as safety hazard, people throwing stones, and vandalising. So it is an easy target. Also extra cost to get front plate, not needed for driver side</p> <p>People are plating cars in wolverhampton and working in rotherham. Rotherham has stringent standards why should i work for rotherham plated car when wolverhampton less tests per year, less fees, less training and work is equal field for both.</p> <p>Work with us to keep up or else soon all drivers will go elsewhere and local drivers and council will lose out</p> <p>Give postive initiaitives for us to stay here and work with rmbc plated taxis</p> <p>7 or 8 years it has been very hard since last policy review</p> <p>Instead of enticing new drivers or keeping old ones you are making more to stop driving rmbc plated cars</p>
38	<p>I think good thing is allow 7 year old cars and instead drive go and get badges and plates from other borough council we should keep money in rotherham not own people to force them out all policies should be people friendly</p>
39	<p>I think once a vehicle is licensed it should be allowed to stay on license for 12 years without any enhanced criteria. As long as it Passes the necessary Test at the time. Especially if the advisories are minor.</p> <p>A vehicle between 1-7 years should be tested once a year and vehicles over 7 years should be tested 2 times a year.</p> <p>This is enough to determine a car road worthy enough and will bring Rotherham Council upto date with all the surrounding councils around them.</p>
40	<p>I think that if the private hire vehicle has passed a mot inspection etc it should be ok to be licensed as a taxi irrespective of age.</p> <p>Also fees to the council should be made cheaper then you wouldnâ€™t have vehicles been licensed with other councils (eg Wolverhampton etc)</p>

41	<p>I would like the RB council to Increase the age limit of cars to 15 years. Euro 6 and new car do costs alot money and are well looked after.</p> <p>Hybrid cars are not affordable around Â£30k</p> <p>Bring the car taxi plate like TFL in the front and rear windscreen stickers.</p> <p>Removal of yellow taxi plates as this is an easy target to bring inn.</p> <p>Remove the fire extinguishers and first aid kits</p> <p>Take away 3rd mot test per year and adhere to:</p> <p>Vehicle up to 7 years = 1 test</p> <p>7 -15 years = 2 tests</p> <p>Front grill should not be bought in as safety hazard, people throwing stones, and vandalising the vehicles it will be an easy target. Also extra cost not needed for driver side.</p>
42	<p>I would like to bring council attention towards private hire vehicles under Wolverhampton License. We as Rotherham council licence holder has to go under each and every rule set by council. Why you allow outsiders licence holders to work in Rotherham and dont have to follow council rules and regulations like we do? No licence standards, no vehicle compliance test?</p>
43	<p>I would like to mention the fact that due to the cost of living crisis it is becoming extremely difficult for us taxi drivers to be forced into buying new cars in order to feed our families. I personally will have 2 options once my 14 plate taxi runs out. 1 either go to a different council that will allow my vehicle to work or 2. Become unemployed. We keep our vehicles in good condition as is evident from the numerous mot's we go through every year. I believe the council should lower the age of vehicles otherwise many drivers like myself will have no option but to either move to a different council or become unemployed.</p>
44	<p>I would like to say 3 test not necessary if its really need it when vehicle is more then 10 years old also no need fixed bumper plate need to introduce london style tfl private hire vehicle also need to reduce the retest fees if really need 3 test 1 test dont need to be charged thank you</p>
45	<p>I would need to say to increase vehicle age limit 10 years to 12 and up to 15 years also only maximum test first 7 years only 1 also allow london tfl sytle sticker introduce not fixed taxi plate system need to scrap also allow part worn good condition tyre thank you</p>
46	<p>I would really appreciate it once the car is 5 years off age the mot test goes twice a year till the expiration off the vehicle thanks for everything</p>
47	<p>If driver has been released by law. He should not become a scapegoat by council. Court of law is superior over council.</p> <p>With new cars which are euro 6 compliant extra age needs to be added to age limit. From 10 years to minimum 13 years as they cost a lot to maintain and look after</p>

	<p>Testing needs to be abolished especially 3 tests</p> <p>I would say 1-7 years should be 1 test a year</p> <p>7-13 should be 2 tests a year</p> <p>No 3 vehicle tests at all this is burden on driver and costly which is not needed</p> <p>Signage should be scrapped by council on grill. This is safety hazard people target with stones regularly and also people break in when car is parked at home.</p> <p>Fire extinguishers and first aid kits scrapped we are not trained and the emergency services have said not to use at all.</p> <p>Hackney limit increase as not enough wheelchair accessible need is there</p> <p>Listen to trade or people will go Wolverhampton and not have cameras or strict laws and still work in Rotherham</p> <p>Work with the trade not AGAINST</p>
48	<p>In relation to the vehicle age limit this would make it more affordable to stay with RMBC and keep the spending of funds local.</p> <p>The same goes for licensing cost and fees these should be around the same as the out of town licensing authority s to keep drivers from going else where to obtain a licence to work in Rotherham and it's surrounding areas.</p>
49	<p>Increase age limit of euro 6 cars to 13 years and then per year after</p> <p>Testing</p> <p>1-7 years = 1 test per year</p> <p>7 + = 2 tests per year</p> <p>Scrap 3 tests per year</p> <p>Signage</p> <p>Do not need front grill plate as extra cost for us and customers get vehicle details and can communicate with driver via message, track taxi and so on</p> <p>Front plate is safety concern people breaking into cars and throwing stones and vandalising</p> <p>Risk for us and extra stress</p>

	Get rid of fire extinguishers and first aid kits not needed and never used extra cost for us drivers
50	<p>Increase age limit of euro 6 cars to minimum 13 years</p> <p>Scrap front grill plate for safety concerns</p> <p>Scrap 3 tests per year to maximum 2 tests</p>
51	<p>Increase age of cars to 15 years as costs us more to buy new cars</p> <p>All are euro 6 so no emissions problems</p> <p>Scrap 3 tests per year</p> <p>1-7 year = 1test</p> <p>7 -15 = 2 tests</p> <p>3rd test is costly for us drivers in such tough times why make it increase</p> <p>Grill take away from changes as safety hazard and vandalism and extra cost for us</p> <p>Fire extinguisher and first aid kits take them away as never used added cost for no reason</p>
52	<p><b><u>THIS IS A REPEAT COMMENT THAT HAS BEEN ENTERED INTO THE SURVEY 82 TIMES</u></b></p> <p>Increase the age limit of cars to 15 years as most cars are euro 6 equivalent, having new cars costs a lot and they have been well looked after and made to a better spec</p> <p>Reward the drivers in extending the age limits other councils have increased age limits in such hard times</p> <p>I do not agree with fire extinguishers and first aid kits as never used them and fire extinguishers are safety hazard</p> <p>Costs us extra Â£75 every 3 years for no reason and we are told you can not use them</p> <p>Every 3 years got to get new ones which is additional cost for no reason</p> <p>Take away 3rd mot test per year and adhere to</p> <p>Vehicle up to 7 years = 1 test</p> <p>7 -15 years = 2 tests</p> <p>3 tests are extra cost for no reason, normal cars do plenty miles but still have one test per year. 2 tests are sufficient what difference is 6 months test and 4 months. These stringent testing is pushing drivers away to get badges and plated elsewhere</p> <p>Why give stress and inconvenience and be fair</p> <p>Front grill do not bring in, as safety hazard, people throwing stones, and vandalising when been driven. Plus front headlights will not bring in ease for customers to see if it is a taxi. Customers can ring and message driver when</p>

	<p>booking taxi with new technology, stickers on sides, back plate and front docket on windscreen is enough. Also extra cost not needed for driver side in these tough times as having plate will be cost on us.</p> <p>People are plating cars in wolverhampton and working in rotherham. Rotherham has stringent standards why should i work for rotherham plated car when wolverhampton less tests per year, less fees, less training and work is equal field for both.</p> <p>Work with us to keep us drivers or else soon all drivers will go elsewhere and local drivers and council will lose out Give postive initiaitives for us to stay here and work with rmhc plated taxis</p> <p>Improve better badges as they are dangerous and too big Work with the trade in tough times We have spent a lot on new vehicles and work is less due to out of town drivers</p>
53	Just wanted to say that deregulation act 2015 cross border hiring is having a big impact loss on rotherham private hire drivers something need to be done about this
54	licesed taxi cars should have the age extended. less m.o.t for vehicles one a year . no extra signage on cars . more m.o.t centres.
55	<p>Limit should not be removed for hackney as space for parking on rank, not enough ranks. Will get gridlocked</p> <p>Increase age of cars to 15 years as they are euro 6</p> <p>1 test Upto 7 years of age</p> <p>2 tests per year 7 till 15</p> <p>Reason is new cars more reliable and general statistics show they are maintaining them</p> <p>Plate on grill should as technology customer gets notification of driver and vehicle. This is safety hazard as people throw stones and break and vandalise vehicles.</p> <p>Take away fire extinguishers and first aid kits as they have never been used as we are not trained.</p>
56	<p>More test centre</p> <p>1-7 years old 1 test per year</p> <p>7-12 2 test a year</p> <p>Completely disagree with front plate idea.</p> <p>Signage should be smaller</p> <p>Badge size need to be smaller</p>

	Operator should kept record or sub contractor but not necessary to pass on to customers
57	<p>Mot should be 1 a year and i strongly disagree with 3 a year.</p> <p>I say that the taxi plate should go and have sticker like TFL in the rear nd front windscreen.</p> <p>Car age should be 15 years and not 12 years due to hybrid cars being unfordable.</p> <p>All cars should be Euro 6 cars.</p> <p>Do not want permanent signage</p>
58	MOT Test should be 2 tests per year for Vehicles over 7 years and The limit for hybrid cars should be 15 years.
59	My opinion is that fire extinguisher and first aid kit has never been used in 10 years , and we are not trained or insured to use them
60	no extra signage on cars. age of vehicle extended to 15 years . m.o.t price reduced more m.o.t test centres free retest .
61	no extra signage one m.o.t a year reduce m.o.t fees age limit extended to 15.
62	<p>No front plate it will be extra cost and also more likely to be victims of vandalism</p> <p>Vehicle 1-7 one test per year</p> <p>Vehicle over 7 year old 2 test per year</p> <p>Increase age limit for new vehicles to 15years</p> <p>No need for fire extinguisher or first aid kit as never used and additional cost for no purpose</p> <p>If the above are not met unfortunately i will be applying for wolverhampton license who are very fair with their policy</p>
63	<p>Once a vehicle has been licensed it should be able to carry that license for 15 years currently it would hold the license for a 10 years period.</p> <p>At the moment all or most the vehicles are under 5 years old so this would be better if they could use the vehicle for 15 years.</p>
64	<p>One MOT is enough for 7 years old car.</p> <p>No further signage required.</p> <p>Already had my window smashed.</p> <p>No need of fire extinguisher and first aid kit as I am aware of nobody has ever used them.</p> <p>Your every new rule cost us so please don't make our life more harder.</p>

	<p>These are the reasons why drivers approaching other councils to obtain the license.</p> <p>Many thanks</p>
65	Please remove taxis from Rotherham that do not have a Rotherham license. Thank you.
66	Rmbc genuinely need to wake up especially alan as drivers now have too much choice in terms of where to get a license any car you put on should be 7 years old and take off at 13 years 1 mpt for 1 to 7 years and after that 1 every 6 months fire extinguishers and first aid kits to be abolished as no one uses them and we are also not trained in them new tyres are also an added expense which proves nothing i have personally seen over 18 drivers go to Doncaster Council for there new badges and the amount i have seen go to Wolverhampton is shocking a normal mot should be sufficient all i can say is i will very soon be leaving rmbc and go to another Council who don't have as much red tape as rmbc
67	Since I'm a Private Hire Driver I'm not happy with the permanent Sinage policy to be introduced. I'm using the same car for my personal use and I feel uncomfortable to use the car with permanent signs when I use it to travel with my family. (Vacations, family & friends meet ups). Thanks.
68	Something needs to be done regarding drivers from Wolverhampton council been allowed to work for rotherham taxi firms its not fair for the local drivers.
69	Stop Rotherham licensed drivers working in Sheffield force permanent signage and also send regular enforcement as they are all goosing at night.
70	Stop Wolverhampton drivers working in Rotherham please
71	Thank you for providing us with the opportunity to participate in this process. I believe it would be unfair to request individuals to give an interview when renewing their licence as some drivers whilst being competent and law abiding still have a language barrier as you know and depending on how their responses are interpreted by whoever is carrying out the interview they could lose their licence and livelihood. I'm sure you will put an appeal process in place however I am also sure this would also be lengthy meanwhile drivers would of course not be able to work.
72	The taxi mot should b only two times year, every six months, most of cars are literally been looked after very well plus not too old to get mot checked 3 times year.
73	The use of out of town taxis in my opinion makes a mockery of these and other regulations . The council should prevent all private hire operators from employing a driver who is not registered in Rotherham I have been told of out of town drivers who don't even know which side of the road they should be on .the policy needs to change to maintain the safety of the public and the reputation of Rotherham drivers
74	the vehicle age should be extended and the m.o.t should be one or 2 test an year. no extra signs are are needed to clarify its a taxi . price of m.o.t should be reduced to help drivers with cost
75	<p>There should be an increase in the length of time a vehicle can be licensed for. In my opinion it should be increased from 10 years to 15 years as most cars that are Rotherham licensed are Euro 6 and above and are maintained highly and regular.</p> <p>Get rid of fire extinguishers and first aid kits as we can't legally use them.</p>

	<p>Take away 3rd mot test per year and adhere to</p> <p>Vehicle up to 7 years = 1 test</p> <p>7 -15 years = 2 tests</p> <p>We don't need a front grill license plate as it adds to the vehicle being targeted by vandals and and thief's. We already have plenty of those type of crimes against us please have a look at police reports where people have thrown stones etc and broken windows.</p> <p>Customers now have a text with the our license numbers and registration plate and plate vehicle make and model.</p>
76	<p>There should not be age limit for car and should keep getting plate untill it pass annual test . There should not be more than 2 mot tests in a year for any car no matter how old car is .</p> <p>There should not be any plate infront or back of car as it make obvious for kids to identity it is taxi and they can throw eggs and stones on us . Leeds style stickers on back of car will do job.</p> <p>There should be no operator signage on car at all to avoid stones and eggs as customers already get vehicle registration number and that is more than enough .</p> <p>No need to carry fire extinguisher and first aid kit as we are not trained to use them .</p>
77	<p>These extra additions that the council is consulting on must include more funding made available to the licensing team to deliver on these changes. Its all good making all these proposals but must be backed by funding. We are seeing a lot of Councils struggling financially and going bankrupt therefore cutting corners to deliver minimum service.</p>
78	<p>Under 7 years taxi test should be 1 in a year</p> <p>Need fews more testing stations</p> <p>Should provide new/renewal plate same place where they do test</p> <p>No more signs stickers</p>
79	<p>Unfortunately it looks as though Rotherham council licensing is making it tough for the drivers who want to be licensed with their local council as the amount of tests a car requires, the vehicle age limit and the process involved to obtain a licence is expensive and time consuming hence drivers are going elsewhere where it is more cost effective to become a taxi driver. The other issue I have heard is Rotherham Council seems to think they are above the law as driver's who have previously been involved in an investigation and cleared by the police are been treating like criminals and it is made difficult for them to reapply as they have been told to reapply as a new driver and then a decision will be made if they can be licensed by Rotherham again. This seems unfair as the law has cleared the drivers but then still treated this way</p>

	by the licensing department. I hope the issues are resolved so people are not victimised and treated this way. As for OOT drivers personally I don't think the customer cares what car transports them home as long as they can get from A to B.
80	<p>Vehicle 1to 7 year old one test per year</p> <p>Over 7 years 2 test per year</p> <p>No front plates as we become target for vandalism</p> <p>Re-test should be free if vehicle is booked in 48hrs after mot failure</p> <p>Donâ€™t need fire extinguishers or first aid kits</p>
81	Vehicles 7yrs plus should also have 2 tests per year, too.
82	Very expensive everything
83	<p>Very precisely ill point out the factors that has made the life of a taxi driver hard and vulnerable.</p> <ul style="list-style-type: none"> <li>â€¢ Current economic situation</li> <li>â€¢ Increase in number of drivers due to unemployment.</li> <li>â€¢ Taxi licence obtained from various councils reduced the income.</li> <li>â€¢ Taxi trade Rules and regulations getting harder and harder.</li> <li>â€¢ Hard rules increase the probability of licence being revoked.</li> <li>â€¢ Financial distress</li> <li>â€¢ Mental stress and anxiety</li> <li>â€¢ Poor future planning due to uncertainty</li> <li>â€¢ Weaker bounding in relations</li> <li>â€¢ Loosing confidence</li> <li>â€¢ Week financial commitments</li> </ul> <p>I hope I donâ€™t need to explain the above mentioned points any further. We are already at the verge of giving up, so please not any more the harder rules because it cost us.</p> <p>I believe one MOT is enough for 7 years old car and donâ€™t need any further signage because I canâ€™t remove them all times for a peaceful sleep every night. When a window gets smashed it not only cost us but also waste the time. We donâ€™t get any holiday or sick pay or any bonus and reward.</p> <p>With kind regards.</p>

84	<p>We have got new cars spent a lot of money. We should be rewarded not made things difficult. Increase age of cars to 15 years as will sustain drivers otherwise they will go other towns rmbc will lose out. Stats show cars are been looked after</p> <p>Scrap 3 tests</p> <p>1-7 years = 1 test</p> <p>7 - 15 years = 2 tests</p> <p>Extra test costs us and not needed</p> <p>Front grill is safety hazard as people throw stones, costs us so much per year. Customers have technology so can track ring or see details of car and drivers. Extra signage not needed</p> <p>Rmbc stop killing us drivers they are losing drivers and going wolverhampton and dpncaster</p> <p>Take away fire extinguishers and first aid kits never used and costs us every 3 years for no reason</p>
85	<p>We do not need to fire extinguisher or first aid kits because we are not qualified and in past 10 years i never ever used them waste of space and money from our pocket.</p> <p>1 test car aged upto 5 years then 5 years old to 12 years old 2 tests and we should have a choice to put any cameras on other than council proofed because they are expensive as long we meet cctv requirements it should be allowed. Plus side stickers that council have introduced waste of money looks tacky on. Cars that have been about 20k plus we don't need to show its a taxi when you out with family etc</p>
86	<p>we have new cars</p> <p>need to increase age of vehicles to 15 years</p> <p>need to scrap 3 tests per year</p> <p>1-7 years = 1 test per year</p> <p>7 + - 15 years = 2 tests per year</p> <p>extra test costs us more for no reason</p> <p>scrap the plate at front safety hazard and extra cost for us</p> <p>fire extinguisher and first aid kit need taking away we have never used them and authorities say we are not capable to carry these out</p> <p>take away hackney limit as wheelchair needs increasing lack of it</p>

	<p>council need to listen otherwise people will go doncaster, wolverhampton or other councils.</p> <p>RMBC listen to us</p>
87	<p>With regards to signage there is enough signage already on the private hire vehicle. As we use our cars for social, domestic and pleasure purpose its unreasonable with alot more signage on our OWN cars.</p> <p>With rules regarding MOT ,council need to rethink as cost we pay for tests and condition of the roads. Council should be leineint. As a private hire driver I feel under alot more stress and worries me what my future will be.</p>
88	<p>Work with the trade in tough times</p> <p>We have spent a lot on vehicles and work is less due to out of town drivers</p> <p>no fire extinguisher's o first aid kits</p>
89	<p>Work with the trade in tough times</p> <p>We have spent a lot on vehicles and work is less due to out of town drivers</p> <p>remove fire extinguisher's and first aid kits</p>
90	<p><b><u>THIS IS A REPEAT COMMENT THAT HAS BEEN ENTERED INTO THE SURVEY 4 TIMES</u></b></p> <p>Work with the trade in tough times</p> <p>We have spent alot on vehicles and work is less due to out of town drivers</p>
91	<p>Work with the trade in tough times</p> <p>We have spent alot on vehicles and work is less due to out of town drivers</p> <p>get rid of fire extigushers and first aid kits</p>
92	<p><b><u>THIS IS A REPEAT COMMENT THAT HAS BEEN ENTERED INTO THE SURVEY 16 TIMES</u></b></p> <p>Work with the trade in tough times</p> <p>We have spent alot on vehicles and work is less due to out of town drivers</p> <p>Increase the age limit of cars to 15 years as most cars are euro 6 equivalent, having new cars costs alot and they have been well looked after and made to a better spec</p> <p>Reward the drivers in extending the age limits other councils have increased age limits in such hard times</p> <p>I do not agree with fire extinguishers and first aid kits as never used them and fire extinguishers are safety hazard</p> <p>Costs us extra Â£75 every 3 years for no reason and we are told you can not use them</p> <p>Every 3 years got to get new ones which is additional cost for no reason</p> <p>Take away 3rd mot test per year and adhere to</p> <p>Vehicle up to 7 years = 1 test</p>

	<p>7 -15 years = 2 tests  3 tests are extra cost for no reason, normal cars do plenty miles but still have one test per year. 2 tests are sufficient what difference is 6 months test and 4 months. These stringent testing is pushing drivers away to get badges and plated elsewhere  Why give stress and inconvenience and be fair</p> <p>Front grill do not bring in, as safety hazard, people throwing stones, and vandalising when been driven. Plus front headlights will not bring in ease for customers to see if it is a taxi. Customers can ring and message driver when booking taxi with new technology, stickers on sides, back plate and front docket on windscreen is enough. Also extra cost not needed for driver side in these tough times as having plate will be cost on us.</p> <p>People are plating cars in wolverhampton and working in rotherham. Rotherham has stringent standards why should i work for rotherham plated car when wolverhampton less tests per year, less fees, less training and work is equal field for both.</p> <p>Work with us to keep us drivers or else soon all drivers will go elsewhere and local drivers and council will lose out  Give positive initiatives for us to stay here and work with rmhc plated taxis</p> <p>Improve better badges as they are dangerous and too big</p>
93	<p>Work with the trade in tough times</p> <p>We have spent a lot on vehicles and work is less due to out of town drivers</p> <p>no fire extinguishers or first aid kits</p>
94	<p>Work with the trade in tough times</p> <p>We have spent a lot on vehicles and work is less due to out of town drivers</p> <p>no fire extinguishers or first aid kits</p>
95	<p>Work with the trade in tough times</p> <p>We have spent a lot on vehicles and work is less due to out of town drivers</p> <p>no fire extinguishers or first aid kits reduce m.o.t costs</p>
96	<p>Work with the trade in tough times</p> <p>We have spent a lot on vehicles and work is less due to out of town drivers</p> <p>no fire extinguishers or first aid kits reduce m.o.t costs</p>
97	<p><b><u>THIS IS A REPEAT COMMENT THAT HAS BEEN ENTERED INTO THE SURVEY 7 TIMES</u></b></p> <p>Work with the trade in tough times  We have spent a lot on vehicles and work is less due to out of town drivers  no first aid kits or fire extinguishers</p>

98	<p>Work with the trade in tough times</p> <p>We have spent alot on vehicles and work is less</p> <p>Increase the age limit of cars to 15 years as euro 6 cars equivalent and new car costs alot and they have been well looked after</p> <p>Get rid of fire extinguishers and first aid kits as never used them and fire extinguishers are safety hazard</p> <p>Every 3 years got to get new ones which is additional cost for no reason</p> <p>Take away 3rd mot test per year and adhere to</p> <p>Vehicle up to 7 years = 1 test</p> <p>7 -15 years = 2 tests</p> <p>3 tests are extra cost for no reason, normal cars do plenty miles but still have one test per year. 2 tests are sufficient what difference is 6 months test and 4 months. No brainer</p> <p>Front grill do not bring in, as safety hazard, people throwing stones, and vandalising. So it is an easy target. Also extra cost not needed for driver side</p> <p>People are plating cars in wolverhampton and working in rotherham. Rotherham has stringent standards why should i work for rotherham plated car when wolverhampton less tests per year, less fees, less training and work is equal field for both.</p> <p>Work with us to keep up or else soon all drivers will go elsewhere and local drivers and council will lose out</p> <p>Give postive initiaitives for us to stay here and work with rmbc plated taxis</p> <p>7 or 8 years it has been very hard</p>
99	<p>Your policy is that you do 5 year old car and three tests instead it should be 7 year old car and one test.</p>

Comments received through the online consultation from Rotherham residents that use taxis and PHVs

#	Comment
1	All drivers are friendly and well mannered i personally am not bothered if an out of town vehicle picks me up as long as i get home in one piece is all that matters
2	cost of living has gone so high
3	<p>Do not let people with other council plate's operate in Rotherham who live in Rotherham.</p> <p>If you live in Rotherham and you want a taxi licence to operate in Rotherham,you must have a Rotherham licence.</p>
4	Ensure vehicles have internal cctv installed & that footage cannot be erased for several months
5	Having recently traveled in a Taxi registered in Rotherham and one registered in Sheffield. The standard of driving was much better in the Rotherham taxi.
6	<p>Hi</p> <p>I use taxis regularly, with covid hitting the country and we have not recovered i have seen taxi drivers struggle to earn a living.</p> <p>The council is making it harder they need to be driver friendly also. I am the wife of a taxi driver and I know how stressed my husband is with work and earnings.</p> <p>All the cars that are coming are new cars, updated cars. Incentives need to be given</p> <p>Increase age limit to maybe 15 years as emissions are low and they are good road friendly</p> <p>Cut down on testing as i have heard many drivers say 3 tests a year. That is outrageous and unkind giving costs to driver for no reason.</p> <p>1-7 = years 1 test</p> <p>7+ =2 tests a year</p> <p>This is not fair for driver to maintain every 4 months, what difference will it make if tested every 6 months</p> <p>No justification in this all the time the taxi is kept in top notch condition internally and externally. Why burden extra cost no reasoning</p> <p>Extra signage is not needed with technology all information is given via app. Even if someone books from shopping complex or private the driver asks for the name and destination and by two side door stickers and back plate that is enough</p> <p>Technology gives name of driver, vehicle reg, colour of car. You can track message or call the driver so se where they are</p>

	<p>Why are you trying to create a mockery of the drivers making cars into christmas trees</p> <p>Work with them or else they will work elsewhere through other councils</p> <p>As more and more out of town taxis are picking me up and they are local regular previous rotherham plated drivers</p> <p>Do not kill local drivers trade off</p> <p>Work with them in partnership</p>
7	I am seeing a lot of Wolverhampton drivers picking me up if this can be cracked down on
8	I believe it should be a requirement for all licensed taxi operators to provide a cashless payment option, as well as a routine cash payment option, for all passengers who book a taxi and May wish to pay using a cashless card payment. It should not be an option for only cash to be used for payment. The card payment option should be a requirement of receiving a taxi licence from RMBC.
9	<p>I catch taxis every so often maybe twice or 3 times a month</p> <p>They all got new cars,good tidy cars</p> <p>Should increase age limit from 10 years to 15 years as cost of taxi is very high</p> <p>Testing should be decreased</p> <p>The 3 tests are not fair on them</p> <p>1-7years should have one test per year</p> <p>7+ should be two tests per year</p> <p>3rd test is extra money and stress for driver what is logic of 3 tests per year</p> <p>I do 25,000 miles a year I just have one mot test a year</p> <p>Why burden them for this work with the drivers or else more out of town drivers are working in rotherham you will lose out as a lot are dual badge holders</p> <p>You may think you have plenty they are working the system and working through wolverhampton, doncaster as things are not as strict or stringent there</p> <p>When booking taxi i get all info of driver car colour and vehicle reg. Why put extra plate at front i can see it is taxi through stickers</p> <p>I can track and ring the driver</p> <p>Why make them pay extra per year for the front grill and loads taxis have had broken into and vandalising</p>

	<p>Extra signage will make it worse for there expensive vehicles</p> <p>Work with drivers they do a great job</p> <p>Do not abuse your powers for no reason</p>
10	I do not agree that external taxi companies should have generic licences to work in Rotherham and other parts of the country when there isn't enough work for the existing taxi drivers. This is unfair and will flood the area with taxi drivers and push smaller companies out of business.
11	<p>I get a taxi regularly. A lot are new taxis the drivers work hard and it costs a lot to buy. I know they have test every 4 months after the 5 years. This 3 tests should be stopped and max should be twice a year.</p> <p>As cars are expensive increase the age of vehicles end of life to support the drivers in such difficult times. Increase to max age of 12 instead of 10 years.</p> <p>The grill is not needed we can see via the app the name of driver, colour of car, registration. It has plenty of signage with big stickers on side which is more than enough. They have taxis targeted and stones thrown at them which is safirty risk for them and costs them to repair and miss out on work.</p> <p>I can see more out of town taxis working and i would not be suprised if people left getting licence at rotherham and got wolverhampton badge and vehicle.</p> <p>This will have impact on you. I know drivers with rotherham and wolverhampton badges but are working for wolverhampton not rotherham</p> <p>I am in support with them</p>
12	I have noticed on numerous occasions that the taxi comes which is registered in Wolverhampton and various other towns in uk. And the taxi drivers are not displaying photo id
13	I think the council needs to be fair people trying to earn a living i think as taxi driver have strict policy so should council employees working with Rotherham council and will you be telling Uber to tell there customer itâ€™s out if town or only local people being challaged and scrutinise as they donâ€™t have much say if you want to sort problem take it with government and tell them to stop Uber and bolt veezu big companies then see how far you get
14	I would like to request, in the fairness of diversity, that there will be an equal amount of drivers from all backgrounds, races, religions etc. In today's society, we must endeavour there is equality for all and that we dont discriminate, therefore equal numbers of drivers from all backgrounds for inclusivity.
15	I would like to see DRIVERS HOURS introduced as with coach/bus drivers as they all do the same job, they all drive fare paying passenger vehicles. I would like to see this introduced NATIONALLY,
16	If taxi drivers can obtain a licence elsewhere they can avoid the processes you are putting in place
17	In the last review taxi drivers were supposed to wear ID badges, but I use taxis a lot and I have only seen 3 taxi drivers with ID's, so you do not know how the driver is. It is one thing interviewing applicants for a taxi licence and the person how is driving the taxi.

	<p>Also it would be useful if taxi's were easier for older people to get in and out off.</p> <p>It would helpful if a tenant was involved in the interviews, as they may have a perspective that may be relevant.</p>
18	Please continue to do everything you can to keep people safe
19	Should all have trackers on the taxis for the safety of others especially women
20	Some thought must go in to how any changes impact the cost of becoming a licensed taxi driver. This has a huge impact on the price for customers. As a person with limited mobility, I am becoming increasingly isolated due to rising taxi costs.
21	<p>Taxi drivers are doing a great job and need the acknowledgment for all the hard work they do. Every taxi I get in to that has a rotherham sticker on talks very badly and negatively of all the council and taxi licensing board. They all hate someone called Sue Ellis who is some manager.</p> <p>Hopefully you can work with drivers and make a better rotherham rather than workers of the council like Sue Ellis who are making drivers lives hell.</p>
22	<p>Taxi drivers are getting plated from out of rotherham and working in rotherham. This is because the council are too stringent with their policies and implementations. Work with the trade and local drivers you are pushing them away. Drivers have multiple badges but working with out of town councils due to rmhc being too strict.</p> <p>No extra signage needed or front plate as technology gives all information as can track and call driver. All car details come via app and text message. Why do you want to make the expensive car into a xmas tree.</p> <p>Increase the age limit of taxi to 15 years to reward local drivers as new cars more advance and expensive to buy. Emissions protected with euro 6 most are new</p> <p>Decrease testing as 3 tests per year is a bit too much on the driver as 2 tests a year is more than adequate and fair</p>
23	Taxis from other boroughs , that operate in our borough , should be required to comply with Rotherham rules i.e cameras and no smoking etc , as people say some taxis from Wolverhampton operating in Rotherham do not .
24	Taxis not registered and checked by RMBC should not be working in Rotherham. There are many working daily consistently in the borough whom will have not been vetted.
25	That the meter should be in a prominent position and that the starting price should be of a reasonable amount I have a taxi for same pick up and drop off on a weekly basis and have been asked for different amounts on quite a few occasions
26	<p>Using taxis in rotherham and speaking to the taxi drivers once again as per im shown how so easy it is for some to pull the wool over council eyes and all lies as per believed by the council and police, as per. But no point putting in complaints or reporting as nothing shall change. Just the usual data protection and confidentiality broken by rmhc staff.</p> <p>Criminality is promoted by the council like ASB, racism and disability hate crime</p>
27	Vehicle's 7year old one test year and vehicles aged 15year no front plate extra cost no fire extinguisher
28	Work with the drivers

	<p>Expensive new cars but no lee way to help sustain them to work in rotherham</p> <p>People are going other towns to get badge</p> <p>Increase age of cars to 15 years</p> <p>Plenty of info given when booking taxi via tezt and can track driver</p> <p>Not needed extra expense for driver to pay every year</p> <p>Take away 3 tests and treat them more equally</p> <p>They work hard and then pressure from council</p> <p>Stick to maximum 2 tests per year</p> <p>Work with the drivers not against them pushing them to get badges from other towns to work in rotherham</p> <p>You are going to be the losers</p>
29	<p>You need to block outside Borough plated cars from working local or put a ban on firms for expecting out of town vehicle. the operator business owner should be responsible for any safety of public with recruiting out of town private licensed vehicle.</p>

Comments received through the online consultation from Rotherham residents that have not used a taxi or PHV in the last 6 months

#	Comment
1	After the scandal in Rotherham the safest measures must be continued or implemented
2	All taxi drivers should have annual enhanced DBS check annually whether employed now or in the future. All taxis must have photo of driver in the taxi in a sealed poster to identify matching driver/vehicle.
3	Any taxi should have to be licensed by RMBC if they pick up in the area . Some are licensed elsewhere to avoid extra regulations . This needs to be stopped
4	Coast of living to high.
5	cost of living also cant afford it.
6	Fuel prices have increased and is difficult to buy a new car  Permanent signage should be removed from vehicle  Financial cost is very high at the moment  Cost of cars are very high and unable to afford hybrid cars  Age limit should be 15 years
7	Greater control over excessive speeds around the Borough. Pre test, awareness etc. To undergo courteous driving, ie not bully their way around, park dangerously, basics road use and follow the road rules not what they want to do.
8	Have experienced incidents of drivers travelling too fast at night (eg above the speed limit) because they are late. Hard for the customer to deal with this because they have your destination and home address details!
9	I am against more taxi licences being issued as there are already far too many private hire cars and taxi speeding around Rotherham and constantly using roads/lanes designated for buses only.  It's about time the police caught some which would lead to prosecutions and hopefully put a stop to all the speeding and other infringements.
10	no much work left since wolverhampton plated cars here,
11	Really positive to see you are taking steps to increase the amount of vehicles that can carry a person in a wheelchair.
12	Rotherham council need to increase the pressure on the powers that be to stop out of town vehicles operating in Rotherham
13	The licensed taxi numbers are above 1000.  Are checks made to see if they are claiming benefits due to lack of income
14	You have to buy new cars you can not afford

Comments received through the online consultation from the residents of other Boroughs that have used a taxi or PHV in the last 6 months

#	Comment
1	Help the taxi drivers save money with 1 m.o.t a year and less signage and free retest
2	Internal CCTV with audio in all taxis to be kept for 3 months. Forward and rear cameras in all taxis. No privacy glass in taxis. Drivers to speak a basic level of English (assessed by Licensing Team at time of application).
3	No extra signage on taxi's. one m.o.t a year. Lower costs affecting drivers.
4	Taxi age should be up to 15 years old. no extra signage reduce price of m.o.t and help drivers with cost reduction
5	The requirements for vehicle age/emissions, particularly Euro 6 are well intentioned but this will harm the trade and limit the choice for customers like myself as drivers may be priced out of the industry. The Sheffield clean air zone has already pushed many Sheffield and Rotherham drivers out to neighbouring boroughs, giving residents and borough visitors (like myself) far less choice. I think Rotherham Council should make every effort to try and retain their suitable drivers and avoid them leaving people stranded in Rotherham, especially in a pinch.

## Section C                      Comments / feedback received from associations representing the local trade

### **Enhanced requirements for Private Hire Operators**

- All applicants for the grant or renewal of a Private Hire Operator licence must undergo an interview with Licensing Officers as part of the application process. The interview will include an assessment of the applicant's licensing knowledge, compliance history and an evaluation of their business practices / method of operation. Applicants that do not satisfy Council Officers that they are competent and will operate their business in an acceptable manner will have their application for a licence refused.

***Rotherham Private Hire Association:***

*No problem with this - it will cut down on the number of people in the industry that don't know what they are doing. Some people use it as an opportunity to ply for hire and this will stop that.*

***GMB S75 Branch:***

*See separate document*

***App Drivers and Couriers Union (ACDU)***

*If this is introduced then there will not be any operators in the area as they will think that the Council is putting too many restrictions in their way. The operators are not able to communicate due to not speaking English and the answers will not be understood so the licence will be revoked or refused.*

*If this is happening on every renewal then it will be very onerous for the existing licence holders – if they go through this process every time their licence is renewed. It would be more reasonable for the operator to go through it once but not every renewal (like it is with drivers).*

*Carrying out the interviews will add to the costs of the Council and therefore the costs of the licensing process will increase.*

*Operator licences should be issued for at least two years (ideally the full 5 years).*

***Rotherham Hackney Carriage Association:***

*Agree with this proposal – as long as the assessment is reasonable.*

The following additional conditions will be attached to Private Hire Operator Licences:

- The Private Hire Operator must inform the customer at the time of acceptance of the booking that the booking they have made will be sub-contracted to another Private Hire Operator. If this is not known at the time of booking then the customer must be informed as soon as practicable (and in any event, the customer must be informed before the vehicle is dispatched to undertake the booking).

**Rotherham Private Hire Association:**

*Will a voice message be enough (similar to what was used in Covid) – for example, as you join a queue you will be told that out of town may be used – will this be sufficient? If so, then this will not achieve what it intends to achieve as people won't pay attention to the message. People need to be given a real choice and opportunity to respond to the question properly rather than just listening to it on a recorded message (which may not even be played depending on how long people are in the queue). Could a touch tone system be used – are you happy to receive an out of town car then press 1, if not then press 2 etc.*

**GMB S75 Branch:**

*See separate document*

**App Drivers and Couriers Union (ACDU)**

*The initiative is welcome but there are practical issues that will prevent this from happening – dispatch systems cannot do this, iCabbi does not allow this – Uber's system does but no other operator will allow this as they use third party software. Also – it will be difficult to enforce by licensing so it is enforced consistently.*

**Rotherham Hackney Carriage Association:**

*This may not work as systems may not allow it – the principle is fine, but not sure that it will be able to be put into practice.*

- Private Hire Operators must maintain records of each sub-contracted booking. These records must include (as a minimum):
  - The time and date that the booking was sub-contracted to the third party operator.
  - The time and date that the customer was informed that their booking had been sub-contracted.
  - The name and Private Hire Operator number of the operator that the booking was sub-contracted to.
  - The details of the vehicle and driver that undertook the sub-contracted booking.

**Rotherham Private Hire Association:**

*It would be relatively easy to comply with this requirement if the same system is used by the operator who is subcontracting the job to another operator in their ownership. It could be problematic if the sub-contracting was between operators not in the same ownership – this would need to be recorded manually. It would be difficult to know which vehicle and driver were carrying out the booking after the job had been sub-contracted – would need to rely on the other operator to provide the information and they may not provide it – so we would be breaching the condition but there would be nothing we could do about it. Also – concerns about sensitive information being shared with other operators.*

**GMB S75 Branch:**

*See separate document*

**App Drivers and Couriers Union (ACDU)**

*The dispatch systems will not allow this to be done automatically as they allocate the bookings to any driver in the system – this means it would not be possible to maintain these records.*

**Rotherham Hackney Carriage Association:**

*There may be some technical issues with some of the information as it may not be recorded on the system – but general record keeping is fine.*

**Rotherham Private Hire Association:**

*This is a good idea – have the facility to run reports off the system so it will be easy to show that complying with the requirements.*

**GMB S75 Branch:**

*See separate document*

**App Drivers and Couriers Union (ACDU)**

*Agree with this proposal.*

**Rotherham Hackney Carriage Association:**

*Operators should abide by the law and anybody that isn't complying with the law should be dealt with accordingly – but reasonably. There may be some technical issues with looking into some of the systems.*

**Rotherham Private Hire Association:**

*Agree it should apply to all operators – including those that are already licensed.*

**GMB S75 Branch:**

*See separate document*

**App Drivers and Couriers Union (ACDU)**

*Generally in agreement – but shouldn't have to go through it on every renewal.*

**Rotherham Hackney Carriage Association:**

*Should not apply to existing operators unless there are some issues or need to clear things up.*

**Review of conviction policy**

It is proposed that the Council's Policy on the Relevance of Previous Convictions (currently Appendix C to the Hackney Carriage and Private Hire Licensing Policy) is amended as follows:

- Greater clarity will be provided through the introduction of additional categories of convictions. New categories will include immigration offences, certain motoring offences, offences connected to the operation of businesses, cultivation of illegal drugs, offences involving discrimination, offences related to public safety and breaches of environmental protection legislation.

***Rotherham Private Hire Association:****Agree – needs to be clear.****GMB S75 Branch:****See separate document****App Drivers and Couriers Union (ACDU)****This is agreed.****Rotherham Hackney Carriage Association:****Each case should be looked at individually and on its merits – clarity on categories of offences would be useful.*

- The minimum time periods that must elapse before a person is considered to be suitable for licensing will be reviewed and compared with other standards throughout the country (including the national statutory guidance) – with periods increasing where required. The time periods detailed in the current policy will not decrease and will match or exceed those of all other neighbouring authorities.

***Rotherham Private Hire Association:****Need to have clarity so applicants know what to do, and how long after conviction etc they should apply for a licence.****GMB S75 Branch:****See separate document****App Drivers and Couriers Union (ACDU)****Agree with the proposal.****Rotherham Hackney Carriage Association:****Agree with this proposal. As present policy is fine.*

### **Removal of limit on Hackney Carriages and action to increase the number of wheelchair accessible vehicles**

The number of Hackney Carriage licences that can be in effect at any one time is currently limited to 52.

Government guidance clearly states that Councils should not impose a limit and should instead allow market / commercial forces to dictate the number of Hackney Carriages that are able to operate within its area. It is therefore proposed that the current limit of 52 Hackney Carriages in Rotherham is removed, but with a requirement for any new Hackney Carriages to be capable of carrying a passenger seated in a wheelchair.

#### ***Rotherham Private Hire Association:***

*It seems wrong that will need an unmet demand survey to protect the 52 current licence holders. That said, we don't want a free for all and there needs to be enough demand for the hackneys – but they can do other work (e.g. for private hire operators). Understand the need to increase wheelchair accessible vehicles – but not sure that this proposal will increase their number – largely because of the cost of the vehicles in the first place and the annual check on the lifting gear. The vehicles will need to be able to carry a wheelchair or 4 people so can also do regular taxi work – this means that the vehicles are going to be expensive.*

#### ***GMB S75 Branch:***

*See separate document*

#### ***App Drivers and Couriers Union (ACDU)***

*The number should be increased as the system is being abused – people are making money through the hackney licences, and some people hold five or six hackney carriage licenses. People should only be allowed to hold one hackney carriage licence.*

*If the trade want a limitation then it must be evidence based and a survey would be required – this is costly so it would be preferable to remove the limit.*

#### ***Rotherham Hackney Carriage Association:***

*We do not agree with this proposal at all – for several reasons:*

- 1. Big health and safety concern as not enough space on ranks.*
- 2. No business in Rotherham or trade in the town to support existing trade.*
- 3. Night time ranks are not accessible – especially on High St – due to private cars parking on them (delivery drivers, takeaway / bar staff, members of the public on a night out).*

*When everything is back up and running in town it may be worth having a look at this then, but at the moment it isn't appropriate.*

*Drivers cannot afford to fund a survey, drivers have to buy new cars due to recent changes in policy in 2016. The work is not there so the income is not coming in – so cannot afford to pay for a survey.*

*The requirement for wheelchair accessible vehicles will not solve the issue with low numbers of private hire vehicles that can carry a wheelchair. The number of wheelchair accessible vehicles on the hackney fleet currently is sufficient for the demand that is there – around 25% of the fleet is wheelchair friendly. The hackney trade is already meeting the demand for wheelchair accessible vehicles – nothing will be achieved in relation to the hackney trade. All that will happen is that the new hackneys will go and work for a private hire operator when there is no demand but when there is a demand they will work as a hackney – this will mean that the work available for hackneys will be shared out over a greater number of vehicles which will mean less money for the hackney drivers that are already struggling with a low income.*

*If the council does decide that they need to issue more plates – then we would suggest that only the bigger cabs are allowed (such as Ford Procab or Mercedes Vito Cab) – and the vehicle must be brand new when first licensed. The licence cannot be transfer it to another person for 7 years unless there are serious medical issues or the person leaves the trade (they must surrender their badge as well).*

### **Clarification regarding application requirements**

It is proposed that the revised policy will include the following:

- An outline of the processes that will apply to the handling of applications for driver, vehicle and operator licences. This will provide clarity in relation to the required documentation, timescales and any specific requirements regarding individual elements.

**Rotherham Private Hire Association:**

*It is better to tell people what they need so that they can sort it out before making their application and what to expect.*

**GMB S75 Branch:**

*See separate document*

**App Drivers and Couriers Union (ACDU)**

*This proposal is acceptable.*

**Rotherham Hackney Carriage Association:**

*The more information to new comers into the trade the better so can prepare beforehand.*

- Details in relation to the application process for former licence holders that had their licence revoked due to their involvement in a prior criminal investigation (which they have subsequently been released from).

**Rotherham Private Hire Association:**

*People need to know where they stand with things so it would be good to set out what the requirements are.*

**GMB S75 Branch:**

*See separate document*

**App Drivers and Couriers Union (ACDU)**

*We disagree with this proposal, the Council should suspend the licence whilst they are under investigation not revoke – if released from investigation then they should be required to do a knowledge test (only if the policy or the knowledge test has changed). DBS check should be carried out. Would only ask for driving test if driving related offences. Licence should then be given back to the driver. No other requirements as they are totally released from investigation. Deal with on a case by case basis.*

**Rotherham Hackney Carriage Association:**

*Things need to be looked at carefully as we are protecting the public, but sometimes things are said that aren't true. Some drivers have been working for years and never had a single complaint – if law has allowed them back into society then it is fair to let them back into the trade as it is all they have ever done and the only job they know.*

*Needs to be a fair balance and council should listen to drivers as well – drivers are part of the council and vetted so need to be trusted by council as well and give us a fair trial.*

*If DBSs are clean then allow them back to work but monitor them. Has not harmed anybody or done anything wrong.*

### **Confirmation of decision making processes**

It will be made clear that most licensing decisions will be made by licensing officers with referrals to the Council's Licensing Board generally being limited to:

- those cases where there is a clear breach of the Council's policy, and
- licensing officers are of the opinion that it may be appropriate for an application be refused, or for an existing licence to be revoked (with the exception of cases where it is in the interests of public safety for a revocation to take effect immediately).

<p><b><i>Rotherham Private Hire Association:</i></b></p>
--

<p><i>Agree – they need to know clarity on what is going to happen.</i></p>
---

<p><b><i>GMB S75 Branch:</i></b></p>
--------------------------------------

<p><i>See separate document</i></p>
-------------------------------------

<p><b><i>App Drivers and Couriers Union (ACDU)</i></b></p>
--

<p><i>This proposal is agreed.</i></p>
--

<p><i>In addition, all of the heads of the unions should be part of the decision making process – they should consider the cases with the licensing board.</i></p>
--

<p><b><i>Rotherham Hackney Carriage Association:</i></b></p>
--

<p><i>Clarity is useful. Appropriate information needs to be provided not unuseful, adequate and accurate within certain time frame in accordance with the policy not outdated.</i></p>
---

### **Additional requirements and improved guidance around vehicle signage**

The policy will provide clear guidance on the placement of vehicle signage (including door signs). It will also introduce a requirement that all required signage must be permanently fixed to the vehicle by default. However, the Council will allow deviations from this requirement in cases where if the method of fixing allows the signage to be placed in accordance with the policy requirements and there is no history of formal action being taken against the licence holder as a result of non-compliance with signage requirements (during the period of the licence).

In addition to the above, a new requirement will be introduced for the display of a vehicle licence plate on the front bumper / grille.

#### ***Rotherham Private Hire Association:***

*With regard to the permanent signs if don't follow the rules – agree that this is appropriate. If you follow the rules then you shouldn't be penalised. It is necessary to remove the plates / signs as a security measure (avoid getting the car broken into).*

*In relation to the front plate – have noticed that all EV vehicles have nowhere to attach the plate to – so there need to be some way of attaching the plate if there is no grille.*

*No real objection to the front plate as long as it isn't too big (it can make a noise in the car – like a humming noise). Car needs to be identifiable as a taxi from the front – doesn't necessarily need to be a plate on the front – could be a window sticker. There are likely to be difficulties in attaching a front plate to most vehicles not just EVs. Needs to be removable so doesn't get broken into when off duty.*

#### ***GMB S75 Branch:***

*See separate document*

#### ***App Drivers and Couriers Union (ACDU)***

*Disagree with this proposal. The signage is on the car and it shouldn't matter where it is placed. It is not practical to put magnetic signs on the front doors of some cars. There is no need for door signage generally – it is not used or referred to by anybody, they only look at the plate – there should just be something in the front window and at the back of the vehicle – like in TfL.*

#### ***Rotherham Hackney Carriage Association:***

*Should be able to remove plates and signage when not working as a taxi as this reduces the chance of being a victim of a crime. Previously cars were targeted because of signage etc – we have only just solved this issue, we don't want it to happen again. Parts etc are expensive and drivers are struggling anyway so don't want have to pay for repairs due to damage caused as a crime. If drivers don't follow the rules then they should be permanent but not everybody else.*

*Magnetic signs cannot be fitted to some front doors – they should be allowed to put signs elsewhere.*

*No need for plate on front of vehicle, and in night time won't even be able to see it because of head lights. Most customers are sent text details of the taxi. In addition, there may be practical difficulties because some cars don't have grilles (for example EV or hybrid)*

### **Amendment to vehicle age and emissions policy**

It is being proposed that the Council's Vehicle Age and Emissions policy is amended as follows:

- A vehicle which is not licensed at the point of application must have been registered (or in the case of imported vehicles, manufactured) on or after the 1<sup>st</sup> September 2015.
- Licences will not be renewed in respect of any licensed vehicle that was first registered (or, in the case of imported vehicles, manufactured) more than 10 years prior to the date that the renewed licence will take effect. This is however subject to the exemptions below:
  - i. Vehicles that meet the Council's Enhanced Quality Standards (detailed below) must be aged under 12 years old on the date that the renewed licence would take effect.
  - ii. Vehicles that meet the Council's Enhanced Quality Standards and are capable of carrying a passenger seated in a wheelchair must be aged under 15 years old on the date that the renewed licence would take effect.
  - iii. Ultra-Low Emission Vehicles (as defined at the time that the vehicle was first licensed) that also meet the Council's enhanced quality standards must be aged under 15 years old on the date that the renewed licence would take effect.

The Enhanced Quality Standards are:

- The vehicle must pass the Council's compliance test and be must free from minor issues at the time that the test is passed. A minor issue is one that on its own would not result in a test failure at that time, but in the opinion of the tester will require remedy before the next test in order to avoid becoming a failure item (advisory notes provided at the time of an MOT inspection are an example of a minor issue).
- The vehicle's emissions must comply with, or exceed, the Euro 6 emissions standard.
- The vehicles bodywork must be in a condition that does not adversely affect the overall appearance of the vehicle.
- The interior trim, panels, seating, carpets and upholstery are clean and free from any condition that would adversely affect the appearance of the vehicle interior.

Compliance with emissions requirements will be assessed with reference to the information detailed on the vehicle's V5 (logbook) and through

emissions testing carried out at the Council's testing depot (including as part of the required compliance test).

The assessment of a vehicle against the Enhanced Quality Standards will primarily be carried out by the Council's authorised vehicle testers at the Council's testing depot, but may occasionally be carried out by other persons authorised to make the assessment on behalf of the Council (for example, Licensing Officers).

The exemptions detailed in paragraphs i), ii) and iii) above will only apply whilst the vehicle meets or exceeds the enhanced quality standards. If a vehicle aged over 10 years is found (at any time) not to meet the Enhanced Quality Standards, then the licence on that vehicle will be immediately suspended until such time as the standards are met.

In conjunction with the above, the frequency that vehicles are required to undergo a compliance test at the Council's testing station will be amended.

The current requirements are:

- Vehicle aged under 3 years old – one test per year
- Vehicle aged between 3 and 5 years old – two tests per year
- Vehicle aged over 5 years old – three tests per year

In order to incentivise the purchase of newer vehicles, whilst ensuring that older vehicles remain suitable for use as licensed vehicles, it is being proposed that the test frequencies are amended as follows:

- Vehicles aged under 5 years old – one test per year
- Vehicles aged between 5 and 7 years old – two tests per year
- Vehicles aged over 7 years old – three tests per year

***Rotherham Private Hire Association:***

*Agree with change to vehicle age policy so that cars registered after 1<sup>st</sup> September 2015 are acceptable.*

*Age limit of 12 years for cars that are well maintained is fine – also agree with proposals for wheelchair accessible vehicles and ULEVs (15 years).*

*Proposals in relation to tests are agreed.*

***GMB S75 Branch:***

*See separate document*

***App Drivers and Couriers Union (ACDU)***

*Any Euro 6 vehicle should be plated as a taxi – not just those registered after 1<sup>st</sup> September 2015. Vehicles should be kept on until they are 15 years – including vehicles that are already licensed and are not Euro 6. Wheelchair accessible vehicles and ULEVs should be allowed on for 20 years, because they are expensive. Zero emission vehicles should have no age limits. Zero emission*

*vehicles will be newer vehicles and build quality is better and so should be allowed on for longer.*

*Only one test per year unless vehicle fails in which case there should be more tests per year – too many MOTs increases the costs on the driver (lost time, cost of test, cost of preparation). Licensing carry out checks on vehicles during the year.*

*Testers should carry out repairs for minor things – they shouldn't fail the car for small things such as a light bulb – they should repair it and charge for the cost of the bulb.*

*There should be more test centres so the drivers can choose which test centre they can go to and get an appointment sooner. There is no competition currently.*

***Rotherham Hackney Carriage Association:***

*Euro 6 requirement is fine, but cars should be allowed on for 12 years anyway (i.e. no requirement for enhanced standards to be met). 15 years for wheelchair accessible vehicles should be standard, but should be extended to 17 years if met enhanced criteria – same should also apply to ULEVs. If an electric wheelchair cab (i.e. wheelchair accessible AND ULEV then should be allowed on for 20 years – no requirement to meet any of the enhanced requirements).*

*Tests – 1 to 5 years old, one test per year is fine. 5 to 7 years, would prefer this to be 8 year – so two tests for cars aged 5 – 8 years old. Cars older than 10 years will have 3 tests per year.*

*We would prefer if the third test would be scrapped and only have tests every 6 months*

**Criminal record checks to be carried out on vehicle proprietors**

It is proposed that the revised policy includes a requirement for all vehicle proprietors to undergo a basic level DBS check as part of the application process (unless the applicant is an existing Rotherham MBC licensed driver).

***Rotherham Private Hire Association:***

*No objections to this proposal.*

***GMB S75 Branch:***

*See separate document*

***App Drivers and Couriers Union (ACDU)***

*This proposal is agreed.*

***Rotherham Hackney Carriage Association:***

*Agree with this proposal.*

**General amendments to wording and format of policy to improve readability**

The general wording of the policy and associated appendices will be reviewed and if appropriate amended in order to improve clarity and readability.

***Rotherham Private Hire Association:***

*Agreed – need it in plain English.*

***GMB S75 Branch:***

*See separate document*

***App Drivers and Couriers Union (ACDU)***

*Agree with this proposal – use plain English.*

***Rotherham Hackney Carriage Association:***

*Agree with this proposal.*

**General Comments:**

<b>Rotherham Private Hire Association:</b> None
<b>GMB S75 Branch:</b> See separate document
<b>App Drivers and Couriers Union (ACDU)</b> None
<b>Rotherham Hackney Carriage Association:</b> <p><i>No fire extinguisher or first aid kit as not trained and advised by professionals that are not allowed to use them as are not trained / qualified so are an extra cost every three years of around £70. In 30 years of taxiing the fire extinguisher and first aid kit have not been used, so why do we need to have them. Also the 2mm tyre limit needs to come down to 1.6mm as police and law states.</i></p> <p><i>Drivers id badges needs to be smaller as previously discussed with the licensing mnager and other members of the council as agreed previously.</i></p> <p><i>Multiple drivers are holding badges from various councils including Rotherham. But not working/using the Rotherham license or vehicle. We're not achieving anything by this policy instead were driving away people to obtain a license from elsewhere and we feel in these difficult times, with cost of living so high we don't think the council needs to do anything as the existing policy has been effective as we traders/stake holders have worked along with the council to make things better and improve things ad in these difficult times we would like to ask the council to leave the existing policy as is and we continue to work and get over the cost if living crisis as the drivers are just managing to come out or recovering from covid-2019.</i></p>



Our Ref: BMc

21 October 2023

Alan Pogorzelec  
Licensing Manager  
Community Safety and Street Scene  
Regeneration and Environment Services  
Rotherham Metropolitan Borough Council  
Riverside House  
Main Street  
Rotherham  
S60 1AE

Dear Alan

Please see GMB response in Green, to the Rotherham Taxi Consultation.

### **Enhanced requirements for Private Hire Operators**

All applicants for the grant or renewal of a Private Hire Operator license must undergo an interview with Licensing Officers as part of the application process.

Agree, must be fair and Transparent.

### **The following additional conditions will be attached to Private Hire Operator License's:**

The Private Hire Operator must inform the customer at the time of acceptance of the booking that the booking they have made will be sub-contracted to another Private Hire Operator. If this is not known at the time of booking then the customer must be informed as soon as practicable (and in any event, the customer must be informed before the vehicle is dispatched to undertake the booking).

### **Contradiction with the Council's policy:**

We believe that operators should not have the ability to subcontract, as it contradicts the current policy.

Out-of-town cars not following local policies: the policy in Rotherham, which includes the use of cameras, is good but out-of-town cars are not required to follow it. This discrepancy can create challenges for local drivers who have to comply

with the policy. It's important for the local transportation authority to ensure that all operators, regardless of their location, adhere to the same regulations and policies.

Impact on local drivers: The use of out-of-town drivers by operators can result in reduced opportunities for local drivers. With more drivers available, the amount of work may be shared among a larger pool of drivers, which can impact individual drivers' income. This situation may prompt local drivers to seek employment in other nearby areas where there may be more opportunities.

Licensing discrepancies between Rotherham and Wolverhampton: the licensing requirements in Rotherham are more stringent compared to Wolverhampton. Rotherham drivers are required to undergo professional training, safeguard training, knowledge tests, and driving tests. Additionally, they must comply with strict vehicle age limits and emission standards. In contrast, Wolverhampton drivers can obtain their license in a day without any driving or knowledge tests and can use older and cheaper vehicles.

It's important for licensing requirements to ensure the safety and professionalism of drivers, as well as the quality of service provided to passengers. We believe that the licensing requirements in Wolverhampton are inadequate, we are raising this issue with the transportation authorities to promote consistency and fairness across different areas.

We have identified several discrepancies and challenges regarding the subcontracting policy, enforcement of local regulations, and licensing requirements.

REF:- 16<sup>th</sup> October 2023 Taxi Point Magazine

( Cross Border Concerns)

Transport for London (TfL) have expressed concerns over potential 'serious safety risks' posed to passengers and other road users as a result of limited enforcement and inspection of drivers and vehicles operating outside their licensed areas.

In a recent statement given to Taxi Point, the capital's regulator emphasised the need for new legislation to put an end to cross-border hiring within the taxi and private hire industry.

TfL have been focused on enhancing regulations within London to prioritise passenger safety. However, the exploitation of a loophole in the current legislation undermines these efforts, distorts the market, and potentially compromises passenger safety, according to the statement.

While acknowledging that cross-border hiring may be lawful under specific circumstances, TfL firmly believes that the potential risks associated with this practice necessitate intervention from the Government.

TfL said in a statement to Taxi Point: "While lawful in specific circumstances, we believe cross-border hiring potentially presents serious safety risks to passengers and other road users due to the limited enforcement and inspection these drivers and vehicles are subject to when operating outside of the area they are licensed in. Furthermore, we have spent considerable time reviewing and enhancing the regulations in London to ensure passenger safety and to ensure that taxi and private hire services are fit for the diverse city we serve. These regulations are potentially being undermined, the market distorted, and therefore passenger safety compromised by the loophole in the current legislation being exploited.

"As such we have, for a number of years, maintained our position that we would like the Government to bring forward legislation that ensures a journey starts or finishes in the area where a licence was granted, ending cross-border hiring. We wrote a detailed policy paper on this topic in 2018 setting out proposals for change. In 2019, the Government committed to giving this topic consideration and we remain open to working with Government to stop this unsafe practice."

**Without any prejudice, and based on the information before you, would you allow your Mother or Daughter or a person for whom you care, to travel alone in a vehicle by a driver at any time day or night, that are not LICENSED OR VETTED BY RMBC?**

### **Review of conviction policy**

It is proposed that the Council's Policy on the Relevance of Previous Convictions (currently Appendix C to the Hackney Carriage and Private Hire Licensing Policy) is amended as follows:

Greater clarity will be provided through the introduction of additional categories of convictions. New categories will include immigration offences, certain motoring offences, offences connected to the operation of businesses, cultivation of illegal drugs, offences involving discrimination, offences related to public safety and breaches of environmental protection legislation.

More detail would be useful in relation to the convictions that are going to be included – not too sure at the moment, think the policy covers quite a bit but some more detail would be useful.

The minimum time periods that must elapse before a person is considered to be suitable for licensing will be reviewed and compared with other standards

throughout the country (including the national statutory guidance) – with periods increasing where required. The time periods detailed in the current policy will not decrease and will match or exceed those of all other neighbouring authorities.

The time period in the current policy is matched across the other Councils, there aren't any that are any higher than Rotherham. The current requirements are FIT FOR PURPOSE.

### **Removal of limit on Hackney Carriages and action to increase the number of wheelchair accessible vehicles**

The number of Hackney Carriage licenses that can be in effect at any one time is currently limited to 52.

Government guidance clearly states that Councils should not impose a limit and should instead allow market / commercial forces to dictate the number of Hackney Carriages that are able to operate within its area. It is therefore proposed that the current limit of 52 Hackney Carriages in Rotherham is removed, but with a requirement for any new Hackney Carriages to be capable of carrying a passenger seated in a wheelchair.

There is limited space for Hackneys to park on the ranks, causing over parking safety issues.

Due to the influx of out-of-town taxi, it has saturated the work.

At this moment in time, we do not feel is the right time given the present economic situation to lift the restriction.

Has a needs assessment/consultation been undertaken to establish if there is a requirement for additional Hackney Carriages?

### **Clarification regarding application requirements**

It is proposed that the revised policy will include the following: An outline of the processes that will apply to the handling of applications for driver, vehicle, and operator licenses. This will provide clarity in relation to the required documentation, timescales, and any specific requirements regarding individual elements.

Agree, this will help in understanding the process and requirements better.

Details in relation to the application process for former license holders that had their license revoked due to their involvement in a prior criminal investigation (which they have subsequently been released from).

Agree, must be fair and transparent.

### **Confirmation of decision-making processes**

It will be made clear that most licensing decisions will be made by licensing officers with referrals to the Council's Licensing Board generally being limited to:

those cases where there is a clear breach of the Council's policy, and licensing officers are of the opinion that it may be appropriate for an application be refused, or for an existing licence to be revoked (with the exception of cases where it is in the interests of public safety for a revocation to take effect immediately).

Agree, must be fair and transparent.

### **Additional requirements and improved guidance around vehicle signage**

It is proposed that the revised policy includes clear guidance on the placement of vehicle signage (including door signs). It will also introduce a requirement that all required signage must be permanently fixed to the vehicle by default. However, the Council will allow deviations from this requirement in cases where if the method of fixing allows the signage to be placed in accordance with the policy requirements and there is no history of formal action being taken against the licence holder as a result of non-compliance with signage requirements (during the period of the licence).

We do not want the operator names on the door signs – we do not want company logos as firms do not give us work if they see us working for other operators. Operators are not happy if people work for other firms. We suggest just having RMBC logo, private hire licence, which is more than suffice to meet the SAFETY AND WELL BEING criteria.

number and Rotherham text (**Attached to Appendix A**). They do this in Oldham, Manchester, Wakefield, and Southampton.

It should be an option for the driver – if they want to advertise their company for example – so they can put their signs on with their logo, but it should not be a MANDATORY requirement for everybody. It creates an unfair restriction on work.

The driver would be able to confirm to the passenger which company they work for and who the taxi is for. This would only be an issue for people that do not use an app or mobile – if an app or mobile is used then get the information sent to the phone (**Attached to Appendix B**).

Both modern smart phones and traditional phones.

Customers and Drivers can message each other using the app on their mobile devices.

There is no need for a front plate as the vehicle has rear plate and door stickers and a front window sticker that identifies it as a taxi.

Main concerns of having a front plate are safety and wellbeing of drivers and customers targeted by youths throwing stones, eggs, etc.

### **Amendment to vehicle age and emissions policy**

It is being proposed that the Council's Vehicle Age and Emissions policy is amended as follows:

A vehicle which is not licensed at the point of application must have been registered (or in the case of imported vehicles, manufactured) on or after the 1st September 2015.

Licences will not be renewed in respect of any licensed vehicle that was first registered (or, in the case of imported vehicles, manufactured) more than 10 years prior to the date that the renewed licence will take effect. This is however subject to the exemptions below:

Vehicles that meet the Council's Enhanced Quality Standards (detailed below) must be aged under 12 years old on the date that the renewed licence would take effect.

Vehicles that meet the Council's Enhanced Quality Standards and are capable of carrying a passenger seated in a wheelchair must be aged under 15 years old on the date that the renewed licence would take effect.

Ultra-Low Emission Vehicles (as defined at the time that the vehicle was first licensed) that also meet the Council's enhanced quality standards must be aged under 15 years old on the date that the renewed licence would take effect.

The Enhanced Quality Standards are:

The vehicle must pass the Council's compliance test and be must free from minor issues at the time that the test is passed. A minor issue is one that on its own would not result in a test failure at that time, but in the opinion of the tester will

require remedy before the next test in order to avoid becoming a failure item (advisory notes provided at the time of an MOT inspection are an example of a minor issue).

The vehicle's emissions must comply with, or exceed, the Euro 6 emissions stand.

The vehicle's bodywork must be in a condition that does not adversely affect the overall appearance of the vehicle.

The interior trim, panels, seating, carpets and upholstery are clean and free from any condition that would adversely affect the appearance of the vehicle interior.

Compliance with emissions requirements will be assessed with reference to the information detailed on the vehicle's V5 (logbook) and through emissions testing carried out at the Council's testing depot (including as part of the required compliance test).

The assessment of a vehicle against the Enhanced Quality Standards will primarily be carried out by the Council's authorised vehicle testers at the Council's testing depot but may occasionally be carried out by other persons authorised to make the assessment on behalf of the Council (for example, Licensing Officers).

The exemptions detailed in paragraphs i), ii) and iii) above will only apply whilst the vehicle meets or exceeds the enhanced quality standards. If a vehicle aged over 10 years is found (at any time) not to meet the Enhanced Quality Standards, then the licence on that vehicle will be immediately suspended until such time as the standards are met.

In conjunction with the above, the frequency that vehicles are required to undergo a compliance test at the Council's testing station will be amended.

The current requirements are:

Vehicle aged under 3 years old – one test per year.

Vehicle aged between 3 and 5 years old – two tests per year.

Vehicle aged over 5 years old – three tests per year.

In order to incentivise the purchase of newer vehicles, whilst ensuring that older vehicles remain suitable for use as licensed vehicles, it is being proposed that the test frequencies are amended as follows:

Vehicles aged under 5 years old – one test per year.

Vehicles aged between 5 and 7 years old – two tests per year.

Vehicles aged over 7 years old – three tests per year.

The age criteria – requirement for Euro 6 is fine. Any car that is Euro 6 should be licensed until it is 15 years old – shouldn't have to meet the enhanced standards.

For wheelchair accessible vehicles and ultra-low emission vehicles it should be 18 years – shouldn't have to meet the enhanced standards.

Tests – should be 1-7 years old will have one test, 7 years plus is two tests. There should be no third test for any car. Having a test every four months or six months is costing a driver £46 extra – they should only have a maximum of two tests saving them £46 per year.

Other councils have relaxed age limits to help drivers with the current costs of inflation.

Over time quality in car production has improved for better durability and safety enhancements.

### **We would also like to remove the following from the current policy**

#### **1. fire extinguisher**

Reason - Fire extinguisher powder inhalation is one of the biggest dangers with fire extinguishers. It is very irritating to mucous membranes and may cause difficulties with breathing if inhaled. The dust may coat your lungs on the inside, which can prevent oxygen from reaching the rest of the body.

#### **2. PH/Hackney Badges**

We have numerous complaints about the size of the current PH/Hackney badges, the edges of the badges are sharp and dangerous which can cause serious harm to the drivers. We would like the Sheffield style Taxi badges, Sheffield had the similar problem and was rectified with the trades, the outcome was to have credit card style badges that were introduced.

Please note all the staff that are employed by RMBC use the same style CREDIT CARD ID DESIGN.

## **APPENDIX A**

### **ROTHERHAM PRIVATE HIRE VEHICLE**



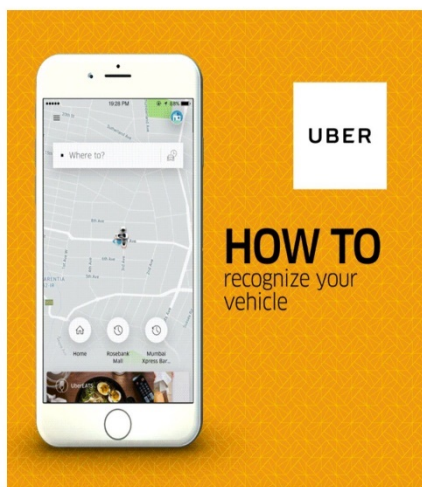
**6787**

**INSURED FOR ADVANCED – BOOKING ONLY**

## APPENDIX B

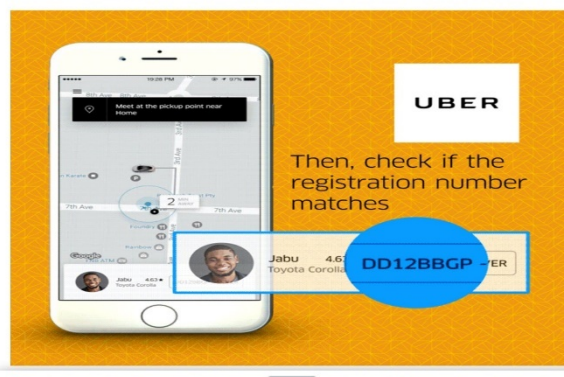
vehicle recognition checklist before you hop in:

- ✓ Check that the car colour matches.
- ✓ Identify the registration plate.
- ✓ Confirm your driver's name and photo.



vehicle recognition checklist before you hop in:

- ✓ Check that the car colour matches.
- ✓ Identify the registration plate.
- ✓ Confirm your driver's name and photo.



Kind Regards

*Bob McNeill*

Bob McNeill

GMB Regional Organiser

Bob.mcneill@gmb.org.uk

## **Section D                      Summary of feedback received from the Licensing Board**

### Out of Town Vehicles and Increase in Sub-Contracting

- How could a prospective customer know that their taxi was/was not a Rotherham licensed vehicle in order to make an informed choice as to whether they accepted the journey.
- Would the passenger be informed that the driver was licensed elsewhere and possibly to an authority that did not have the same standards as Rotherham.
- Need to make it clear that a passenger had the option to cancel a journey if it was not a vehicle/driver licensed in Rotherham.
- The prospective customer should be informed that the journey was being sub-contracted out of Borough.
- Would the Licensing Board Sub-Committee face a huge workload with the zero-tolerance approach with regard to the arrangements in place for the sub-contracting of bookings to other operators.

### Vehicle Age and Emissions

- Concern that the Policy focussed on the age of the vehicle and not the mileage.
- Acknowledgement that the Covid pandemic had seen little business for the taxi trade but the vehicle still aged.

### Convictions Policy

- Inclusion of the offence of Battery.

### Low number of vehicles that are capable of carrying a passenger that is seated in a wheelchair

- No comments.

### Clarification regarding application requirements

- No comments.

### Vehicle Testing Standards and Display of Signage

- Feedback from the trade warranted more detailed consideration but should not delay the remainder of the proposals contained in the report.

The Licensing Board resolved that the following comments be fed into the consultation process:-

#### Out of Town Vehicles and Increase in Sub-Contracting

- That the private hire operator must inform a customer at the time of acceptance of the booking about the journey being sub-contracted out and that it would not be a Rotherham vehicle or a Rotherham driver and state which town it would be from.

#### Vehicle Age and Emissions

- It was acknowledged that the Covid pandemic had affected the taxi licensing trade and therefore a lot less trips undertaken. However, when the Policy was reviewed in 3 years, the age of a vehicle be taken into consideration.

#### Convictions Policy

- That the criminal offence of Battery be included in the Convictions Policy.
- That all vehicle proprietors undergo a basic level DBS check as part of the application process.

#### Low number of vehicles that are capable of carrying a passenger that is seated in a wheelchair

- That the proposal be supported.

#### Clarification regarding application requirements

- That the proposal be supported.

#### Vehicle Testing Standards and Display of Signage

- That the proposal be supported.
- That the feedback from the trade regarding signage of vehicles be subject to further detailed consideration, however, the remainder of the proposals should not be delayed whilst this investigation takes place.

**Section E                      Written responses provided by members of the local taxi trade**

*Response 1*

Feedback regarding the proposed changes to licensing policy

My name is Russell Port, I have been licensed as a driver and operator in Rotherham for almost 30 years

I would first state that I am in agreement with RMBC in that the legislation needs changing, my comments are based on what I think is appropriate in the current climate, not what ideally I would like it to be

I would also note I have read through the entire policy, not the summary, as such some of my comments are relevant to items not in the summary, and sometimes not even suggested for change

Sub contracting

Whilst I think the aim of this part of the policy is fair, RMBC doesn't seem to be taking into account how easy it is to avoid this

Firstly it needs to be understood how the booking process works and its in 3 different ways depending on the type of firm, Firstly lets take a firm that is mostly based in Rotherham but also has a Wolverhampton operators licence also, their workflow is usually

1. Take the job at the Rotherham Office
2. Put the job out for drivers to accept
3. Driver accepts, lets say it's a Wolverhampton Driver
4. Subcontract the job to the Wolverhampton Office
5. Wolverhampton dispatches to driver

At the point of taking the booking, the operator will not know which driver will be doing the job, for firms that employ out of town drivers its integral they take the booking first then allocate it to an available driver, then subcontract to that licensing authority

An easy way round it would be to simply alter the workflow to

1. Take the job at the Wolverhampton Office
2. Put the job out for drivers to accept
3. Driver accepts, lets say it's a Rotherham driver
4. Subcontract the job to the Rotherham Office
5. Dispatch to Rotherham driver

What this means is that instead of all jobs going through the Rotherham Office and being subcontracted to Wolverhampton if need be, all jobs go through the Wolverhampton Office and only the ones that are being done by a Rotherham Driver would actually go through the Rotherham Office (having been subcontracted), This would be a negative as, even if the job is Rotherham to Rotherham if its booked through the Wolverhampton Office RMBC have no control over that job whatsoever unless its subcontracted to a Rotherham licensed driver whereas at present all jobs go through the Rotherham Office, even if they are later subcontracted, its difficult to see how RMBC could stop this under the guise of "poor business practices" as its pretty much the business model firms based outside of Rotherham, such as Veezu, operate anyway

The second process involves firms who are mainly based outside of Rotherham but have a Rotherham Operator licence as well, take Veezu as an example, my understanding of how their process works (or at least worked when they were City) is similar

1. Take the job at Sheffield Office
2. Put the job out for drivers to accept
3. Driver accepts, lets say a Rotherham driver
4. Subcontract job to the Rotherham Office
5. Dispatch to Rotherham Driver

What this means is, even now RMBC have no control over any subcontracting as the

Rotherham Office does not usually subcontract jobs, all jobs are booked through the

Sheffield Office and, if it's a Rotherham driver doing the job are then subcontracted to Rotherham office, If a job is Rotherham to Rotherham and is done by a Sheffield driver it does not go near the Rotherham office, If its done by a Wolverhampton driver its booked in Sheffield, subcontracted to Wolverhampton and completed by a Wolverhampton driver, nothing to do with RMBC, so no customers would need to be informed an "out of town" car would be coming for them, they have booked an out of town car, whether they realize it or not, and the only subcontracting would be done involving Rotherham would be to the Rotherham office, not from, so your regulations are irrelevant in that case

So the new rule would make zero difference, other than confusing the public as they would expect to be told an out of town driver would be coming for them when they won't be

The final process is exclusive to uber, I'm not sure of the exact process and, to me it seems illegal but I believe TFL at the very least have done a forensic examination of ubers process and believe it's legal, presumably if not you would have taken action, anyway,

1. Customer requests a driver
2. Driver indicates availability
3. Job is booked at the office driver is licensed with
4. Job dispatched to driver

Hence, no subcontracting at all, and once again, there is no benefit it simply will confuse the public who are expecting to be informed, whether they realize it or not they have booked whichever office the driver is from, though I do believe they clearly state this on the app anyway

To summarise RMBC need to be very careful how they approach this, ultimately there is no control, whether the job is for a Rotherham customer or not, if the vehicle, driver and operator are not from Rotherham, Effectively if a firm is actually taking a booking in the Rotherham office you at least have some control, I can't see the benefit of putting policies in place that are more stringent and ultimately end up with you losing that control, to some extent if a company is unhappy with RMBC they can go elsewhere for licensing, again if a firm changes their process to avoid RMBC how can you enforce it, if its good enough for firms like Veezu its good enough for a 50 car

Rotherham firm

I also have concerns about "the customer must be informed" whilst I don't have an issue with the regulation itself RMBC needs to avoid trumpeting this as a major thing as it will create confusion in the marketplace, Customers will expect to be informed if they are in Rotherham and book a taxi, what happens if a customer books Veezu and its Veezu Sheffield and they dispatch a Sheffield Car? What about if one of the Rotherham based firms decide they don't want to do this and just run off their Wolverhampton licence? Nothing you can do to enforce that, York have been trying to stop uber running cars in York for years and they don't have an operators licence and to little success, all it means is York council have no control over them, they are still there, if the customer is expecting to be informed as RMBC have loudly announced in the press they will, this will cause confusion, Cllr Denise Lelliot was quoted in the press saying "This will make sure if someone gets into a taxi that isn't licensed in Rotherham, they will know." I'd like her to explain how that's the case if she books a Veezu taxi from Rotherham town hall to Riverside and they send a Sheffield car with a Sheffield driver which has been

dispatched from their Sheffield operator's licence? What obligation are they under to provide that information? It's nothing to with RMBC's operator licence (And that could apply to any firm)

Overall I think you need to tread very carefully, better to be able to regulate what you have than go too far and have nothing to regulate, overbearing procedures will just mean companies moving further down the Wolverhampton path to avoid RMBC regulation

I would suggest there is nothing wrong with the suggested changes, but RMBC needs to apply a light touch and not publicise them and try to work with firms as much as possible, no point hitting the mule with a stick if it's going to wander off and pull another farmers cart and isn't dependant on you for its carrot

#### Appendix A 3.7

It notes that a failure to produce all above documents at the time of application will mean the application being rejected, However it includes documents required as part of the DBS check, However if the applicant is already in the process of applying for a dbs it may be relevant to include "or proof of an ongoing application for a dbs check"

#### Appendix B

States that DBS forms etc will be supplied and should be returned to the licensing office, my understanding is this is now done by a third party (Maybe Barnsley Council?) and could indeed be done by any body that can obtain DBS checks provided the correct position is applied for, as such this wording needs altering

14.5 At least 3 years should elapse (after the restoration of the DVLA driving license), before a license would be granted (unless the reason for the removal of the license.

Seems to be incomplete

#### Appendix F 2

Acceptable standards of dress

This is clearly discriminatory, in this day and age the council would have trouble in enforcing a difference between standards for males and females, not to mention people who are transgender, this needs more generalizing to something along the lines of top to cover up to approximately the neck and cover 75% of the forearms as a minimum and to cover the midriff, bottoms to be tailored and knee length as a minimum

## Signage

I am of the opinion that a front plate is unacceptable for several reasons, firstly from an environmental point of view, do we need to use more plastic? Secondly from a cost point of view, presumably it will cost another £19 per year, and finally because this can be dealt with more effectively and cheaply by other signage

I note the position regarding permanent affixing of signs, I assume this to mean magnetic door signs are acceptable until someone breaches that condition by running without the signs, in which case they would have to have permanent signage, this is problematic as we are allowed to change firms as often as we want, so I can do a job for firm 1, do my next job for firm 2, go back to firm 1 for my next job etc, provided I change the door signs between jobs, as such permanent signage would be problematic, my suggestions for this are

1. Do not implement the front signage
2. Allow signage on the front door which shows the vehicle is licensed by RMBC for private hire, the insured for advanced booking signage and any other messages RMBC wish to send to the public and the vehicle licence number, this signage should be the one that is to be made permanent should a driver break the rules- this signage could be supplied by RMBC in a similar manner to hackney signage and should only be required once for all the vehicles life as a taxi (unless lost). This would be more visible to the public than front signage, be cheaper and more environmentally friendly
3. A sign on the rear door indicating which company the driver is working for, it may be more than one firm is allowed as drivers do work for more than one firm these days, I believe this is the case in Sheffield

One of the current issues with working for more than one firm is that by swapping magnets regularly they often don't fasten properly to the door, if its cold they don't bend well, there can be dirt on the door etc, as such drivers often genuinely lose magnets simply because they are changing them a lot, splitting the signage and allowing more than one company sign on the rear would mean the front magnet would not be moved at all by many drivers, or at most at the end of a shift, meaning it is less likely to fly off, similarly for the rear signage if more than one firms signage is allowed

## Of further note

The alteration of the age policy seems to be in response to drivers going elsewhere, mainly Wolverhampton, to get licensed, they allow vehicles to go on up to 12 years old, Whilst I welcome this change I feel it does not go far enough to address the problem of Remote licensing (Often, incorrectly, referred to as cross

border hiring or out of town drivers) These are drivers who are from Rotherham but have chosen to go to another district to get a licence for whatever reason, even though they will be working mostly in Rotherham, By my estimation I reckon around 10% of the vehicles on the road in Rotherham are licensed in Wolverhampton, Rotherham is not alone in this, I believe Manchester have around a third of their drivers Wolverhampton licensed, and its affecting pretty much every licensing area in the country, whilst I agree with the position stated in 8.7 that reform is needed the question is how do RMBC manage this now?

I'm assuming that

1. RMBC accept the current situation is legal, even though they dislike it, or at the very least don't think they have a strong enough case to take it to court
2. RMBC would wish to have as many vehicles and drivers working regularly in Rotherham licensed by them, preferably to the current standards set out in this policy, but understand they may need to make compromises to meet that aim, as indicated by the alteration in age policy

However, RMBC need to accept that whatever standards they set, if a driver chooses to get licensed elsewhere there is nothing they can do, as such, whilst they may not like it they are effectively in "competition" with other licensing authorities for the drivers "custom" If the standards/costs/processes are too difficult what's the point? You will be licensing nobody; at present drivers have a "get out" of these standards, they are unenforceable to those that do not wish to be enforced

From an operators point of view RMBC are giving us a pea shooter to fight an army, what do I mean? Well I have been licensed by RMBC for nearly 30 years and have no desire to get other licenses from other areas with all the complications that involves but a taxi business works in an unusual way, Generally speaking drivers are effectively (But not legally) sub contractors, they have their own car and can work for any firm they like who will accept them, Say I'm running a taxi firm and I have a Rotherham license, I can only employ drivers who have a Rotherham license too, So say I'm very busy, what that means is I'm turning down work or running late, the nature of things is pretty much all taxi firms are busy at the same times (Weekend nights, school times) as such all turn work down at those times and need more drivers to come, those customers will try another firm if you are unavailable or frequently late, For me, I can only employ Rotherham drivers, If a Wolverhampton driver comes knocking on my door, I have to say no, What's that driver going to do? He's going to go to another firm who also have a Wolverhampton license, that means they set him on, they offer better service at those busy times and increase their customer base, whilst mine is decreasing, effectively drivers are my customers, they pay me, as an operator its becoming more and more necessary to get a Wolverhampton license to stop your business

declining, indeed to the best of my knowledge only one of the larger firms in Rotherham does not have a Wolverhampton license, principles are great but they don't pay the bills, RMBC need to give us the tools to avoid or minimize this and to allow us to make decisions based on good business sense, not principle, We need drivers to be encouraged to be licensed by Rotherham, There are presently companies that advertise to help applicants get their badge, I'm sure you can guess which area they get sent to! Most new drivers coming along are

Wolverhampton licensed and operators need to respond to this for economic reasons or die –RMBC need to support us to encourage Rotherham licensed drivers

Let's firstly examine why drivers do this, in my view there are 3 reasons a driver goes to Wolverhampton

1. Its definitely cheaper
2. Its perceived to be easier
3. Its perceived to be quicker

Let's analyze these statements, firstly is it cheaper, how it compares to Wolverhampton, this is for Private Hire only

For Rotherham you have to do a knowledge test, No such test for Wolverhampton

For Rotherham you have to do a BTEC, no such thing for Wolverhampton

For Rotherham you have to do a practical driving test, not in Wolverhampton

For Rotherham you have to do a safeguarding course, For Wolverhampton you do a 1 day safeguarding and training course, which has a test at the end (Which covers a lot of the same ground as the BTEC)

You need a DBS for both, I would say Rotherham's standards are a bit higher but only for people with historic offences, for example someone with a conviction for drug dealing (With no other aggravating convictions) would get licensed in

Wolverhampton after 10 years, but not in Rotherham but for more recent offences they are very similar

You need a medical for both

So firstly cost, well for Rotherham you are talking (And it's difficult to find some of these costs so some are from memory or approximate))

£274.50 for a 3 year badge £500  
approx for the BTEC

£100 for the driving test

£130 for the medical

£50 for the dbs

£13 for the update service

£20 for the written test & safeguarding (Very unsure of this)

So that's around £1100

Wolverhampton is

£98 for a 3 year badge

£40 for the training and safeguarding course

£130 for the medical

£50 for the dbs

£13 for the update service

A total of £333 (And I've assumed the medical is the same but I believe its usually cheaper for Wolverhampton because they just require the doctor to fill in a statement that the applicant has passed rather than the full Group 2 form)

So bit of a difference there

Next, standards, is Rotherham's standard higher? Well you certainly have to do more, but are all these things worthwhile? Well in my view anyone who would be incapable of getting a Rotherham license shouldn't be able to function in normal society, it's not hard, but there is a lot to do

The knowledge test is, in my view, not needed these days, sat navs are everywhere and the need to know you're a to b's is not the same as years ago, In my view this could be dispensed with, the rules and regs part of the test is necessary

The BTEC, this is the biggest problem, when I did my NVQ (as it was then) it took me 2 days to do the course, which I passed, the BTEC, when it came out, was offered by such training providers as Skills UK and took people 2 days to complete

and cost maybe £150 (initially there was funding and it was free), there was another company that did it in 1! However several years ago the government pulled funding for most training and many providers went bust and there is now only one provider approved by RMBC, that's Sheffield College, and the course takes 5 days, what I learned in 2 days now takes 5! Wolverhampton have effectively linked this in with safeguarding and it's a 1 day course which seems far more suitable, In addition the BTEC often corrects items in RMBC's policy, my son got his license a few years ago and would come home with questions as to why they were telling him one thing but the licensing policy another, over lost property, for example

Practical Driving Test, I can certainly see the benefits of this, but you would think any driver who would fail this would soon be racking up the complaints to licensing

Safeguarding course, DBS, Medical, all the same, pretty much

He also has to sit a knowledge test and do a driving test

So a RMBC driver has to basically do 7 days of training all told, but that training used to be able to be done in 3 days when there were more providers! Lack of competition has resulted in exploitation and bloating

So do those extra days of training (Which didn't used to be necessary), having to pass a multi choice knowledge test and do a driving test really make the standard higher? My view is the standards are a bit higher, but not in proportion to the extra cost and there is a lot of bloating. There is far less difference than the general perception

And finally, is it quicker, this is interesting, firstly Wolverhampton's process is fantastic, they have clearly invested heavily in their website, everything is very clear, costs are all apparent and it tells you what to do and gives you links to do it, Rotherham's is not, when I applied for my sons badge a few years ago it confused me, and I have been helping people get their badge for the best part of 30 years! However an email followed which was far clearer, but for Wolverhampton its pretty simple, each part of the process is separate, you go away, do those parts, come back THEN you apply for your badge and it gets processed and, presuming there are no complications, issued, They did offer a fast track system in which you would get your badge even quicker, a year or so ago it was possible to get a badge issued within a month of applying (assuming your dbs wasn't held up), but now its not that easy as that has been suspended due to demand, which is ridiculous, remember I said around 10% of taxis in Rotherham are Wolverhampton licensed, well that applies to most towns and cities, the numbers licensed there is unbelievable and their system is creaking under the pressure, you are looking at least 3 months to get on the 1 day training course and a month after applying

before they even start to process your application, its around 5 or 6 months at best now, they are always saying they are setting on more staff but presumably the numbers keep increasing and the backlog continues.

Now Rotherham, whilst the interface to do it online is non existent the idea is similar you go away and get all the bits and come back, but there are issues, firstly you have to wait for Sheffield college to have a course available (When you finally get through to someone – the phone number given takes you through to the wrong department and only one person seems to deal with it and they are often not available), when my son did this he first applied in May but the first course available to him was August! A 3 month wait

Next the knowledge and safeguarding course, whilst he was offered dates in June (so the following month) he was unable to attend so ended up doing so in July, however this was a major bugbear which turned out to be irrelevant in his case, to actually make the booking for the course you had to have your DBS returned and checked, The reason I was given for this was staffs safety needed to be ensured. In his case his DBS came back remarkably quickly (literally days) so it caused no issue, but It often takes 6 to 8 weeks, and that's before you can even book on for the knowledge and safeguarding! This seems massively overkill, A RMBC staff member is going into a room with several applicants in a council building who have had to provide ID, presumably that room has, or could have, CCTV but they need to ensure their safety, from someone who is basically applying for a job to be in a car on their own with a total stranger who could be a mass murderer and send them anywhere, this is ridiculously over the top and disproportionate and holds up the entire process massively, Oh and not to mention that same person is fine to book a driving test with someone who I believe is a council employee to go out in a car just the 2 of them! No DBS needed for that part, There is no consistency or logic

Everything else is reasonable and RMBC process the application quicker than Wolverhampton at present, in my sons case it was very quick, looking at my emails it was around a week after he completed his BTEC, so just over 3 months from start to finish, however I believe he was very lucky due to the DBS and for the average person it would be more 5 or 6 months

So at the minute I would say Rotherham's system is far more clunky and needs altering but due to lower demand is slightly faster, Wolverhampton's is far more efficient but overloaded, Its quicker to get a badge in Rotherham at the minute but, due to it not being the case a year or so ago, the perception amongst drivers is its still quicker in Wolverhampton, even though that's likely inaccurate

So if you are a prospective taxi driver, where would you go? Are there any negatives to Wolverhampton? Well the main one is the distance, you have to travel to Wolverhampton a few times during the application to take the course and collect

your licence, that's obviously a pain, you also have to take your car there for compliance tests, there are also a few other benefits to being licensed in Rotherham, such as the ability to cross platform (work for more than one firm) and to do RMBC school contracts (Wolverhampton are barred due to not allowing audio recording on CCTV) but these are not likely to be apparent to an applicant, Though it may be worth RMBC promoting the school run thing

From an operators point of view years ago if someone came to you needing to get their badge you would lend them the money and give them shifts operating or similar to pay you back whilst the application was processing, all well and good if its £300 and takes a few months, it was always a risk but usually worked, risking £1100 and taking 6 months, not so much, However risking £300 for a Wolverhampton badge, probably worth the gamble, in my view there has been no regard as to the effect of these costs on the quality of applicants

So how could RMBC alter their current system to make it better and to compete?

I think at this point RMBC have to ask who do we want to be a taxi driver? What do I mean? Whilst this is a bit "back in my day" I think standards have gone down since many of these "improvements" came in, why? Because the cost and time taken is putting good quality candidates off becoming a taxi driver. Say you are unemployed, you have to find £1100 to become a taxi driver and it takes you the best part of 6 months, Who has £1100 if you are unemployed, plus the dole will be trying to get you to take other jobs in that time, There is no funding available, in that case the cost and time would put people off who would meet the standard, they just cant afford it, Operators cannot provide funding as its difficult to guarantee you will get repaid, as mentioned drivers are usually self employed

Let's take someone who is employed and is looking to change jobs, he has to find £1100 and take around 7 days off work, assuming all goes well, who's going to do that unless they really want to be a taxi driver? They will get a job at Tesco, similarly the financial and time commitment is too high for people just wanting to earn a bit extra on the weekend, that type of driver used to be everywhere but has now all but vanished, at one time if you worked days there was always a driver available to drive your car on weekend nights to earn you a bit more in rent, not any more, this has meant many cars stood at the weekend when demand is highest, its not viable for someone to get a taxi badge to do a part time job, and those part time drivers were usually the ones who worked the busier times, improving service for the public All that leaves is the unemployable, people who are unable to get a job elsewhere but have a desire to work and often get funding from their family

When I got my badge in 1994 it cost me around £60, £30 for a 3 year badge, £30 for a medical and the only other things I had to do were a knowledge/regs test and a police check, both of which were free, and the licensing office were that

accommodating I couldn't make the date for the knowledge test due to work commitments so I was allowed to do it on another date in the corner of the licensing office!, I got my badge as, at the time, I had young children and needed to earn extra money, it was only ever intended to be a part time weekend job, speaking to other people who have had their badge a similar amount of time we mostly got our badge for the same reason, part time work to earn a bit more, Using the Bank of England's inflation calculator that £60 in 1994 would be around £120 now, Would we have done the same if it cost

£1100? I had to have a half day off work to do the knowledge test, not 7 full days

As they say, the proof of the pudding is in the eating, have the increased standards fetched in around 10 years ago improved standards, in my view, the opposite has happened

With this in mind in my view each item should be examined and it decided that rather than it being a nice thing for a taxi driver to have and it sounds good in the Advertiser does it offer value for money and is it efficient and timely to book and complete.

As such

1. The BTEC is not fit for purpose as offered by Sheffield College, how can something that other companies presented in a day or 2 take 5? Is it just to justify the ridiculous £500 cost? it needs to be replaced or removed
2. The knowledge test is of no practical use in this day and age
3. The rules and regs test is necessary and fine as it is, in fact it could do with making a bit harder
4. The safeguarding course is fine
5. I think the driving test is fine but a little overkill, the cost is not excessive nor the time it takes to do it, but if RMBC are aiming to have drivers licensed by them and not go elsewhere is it really necessary
6. The DBS and medical are fine

So in my view the following should be done to streamline this system

1. The knowledge test discontinued
2. The rules and regs test, safeguarding course and relevant parts from the BTEC be available in a single 2 or 3 day course, set by RMBC and implemented either by them, a training provider or even by taxi companies, who I have no doubt would happily supply the course as it helps get drivers on the road, though of course, some oversight would be required if that were the case, this course should be presented as a priority, not on an "if we have staff available" basis and an afterthought
3. The driving test to only be compulsory if the driver has more than 3 points or less than 5 years driving experience, but a condition attached to a drivers

first 3 year license that should there be any viable complaints about his driving he has to complete the course

4. The driver should not have to wait for his dbs to come back to book on a course, each item should be booked independently then all presented to RMBC for consideration
5. Money be invested in a proper online system, the current one is terrible

I would note at this point that I would also recommend the Private Hire and Hackney

Licence be issued separately, with a hackney licence involving a knowledge test (A PH driver could upgrade his licence by doing this test), preferably one much stricter than at present, as Hackney drivers need to know local landmarks etc

I assume the higher cost for Rotherham licenses compared to Wolverhampton (triple) is, to some extent, due to volume? That being the case there would be little that could be done to reduce that cost as licensing does not make a profit, however, assuming a 2 day course could be done at a similar cost to Wolverhampton, so say £100, and removing the driving test, this would reduce the cost to along the lines of

£274.50 for a 3 year badge

£130 for the medical

£50 for the dbs

£13 for the update service

£100 for the course

Roughly £550, so around half the current cost, provided the courses were available in a timely manner and, with things that caused delays removed a driver now has a choice of staying with Rotherham, paying around £550 and getting his badge in 3 to 4 months, Or going to Wolverhampton, paying £330 having to go back and forth and it take 6 months, to me that's a much nearer choice and I would go with the Rotherham one

South Staffordshire Council have already stopped issuing taxi licenses due to a massive reduction in numbers as most drivers were applying to Wolverhampton, they just send applicants there now RMBC needs to be very careful, it doesn't matter how high your standards are if nobody has to stick to them, my view is the current policy is RMBC essentially fiddling whilst Rome burns, If changes are not made to reduce mainly the cost, but also the speed and bloating, they will end up having the highest standards in the country – with no drivers!

In my view, other than the driving test, there is no reduction in standards here, simply superfluous and wasteful items are being removed or refined

One worry here is that by altering these standards Rotherham may be as guilty as Wolverhampton in licensing vehicles to work in other areas, however this is easily avoided and is already done by Wolverhampton but for different reasons, You simply prioritise bookings on the course for local drivers, i.e. anyone with a provable Rotherham postcode where they have resided for 12 months gets the first available dates, anyone else gets offered dates from 6 months in the future, that should make Rotherham far less attractive for out of town drivers to get licensed, you need to be attractive to Rotherham drivers, but not to others, one other way to prevent this is to insist on a manned office in Rotherham, As far as I can see both Veezu and uber are allowed to run a Rotherham licence with no office in Rotherham, by doing this RMBC are encouraging firms to run "out of town" vehicles, if you see a Veezu or uber car in Rotherham its probably licensed elsewhere around 75% of the time

(Usually Sheffield) as these firms basically use Rotherham as an extension of their Sheffield business

So lets move onto vehicle licensing, here is where I think RMBC have 2 things they really wish to preserve, firstly the mandatory CCTV, which they have hung their hat on as a flagship, secondly the fact that vehicles are tested by RMBC's own testers at one specific test station

Looking at the many vehicles on the road from Wolverhampton the vast majority are not "old bangers" I have seen nearly brand new vehicles and fully electric, I'm sure some drivers will go to Wolverhampton due to the age limit, and the new rules should stop most of that as there's not much difference now, but what are the cost differences?

Well in Rotherham you have to have an annual license at a cost of £179, you also have to have intermediate tests at a cost of £46, for an older vehicle per year that's 2 of them, then its £19 for your plate, you then have to have CCTV fitted, at a cost of around £600, You also have to supply a fire extinguisher and first aid kit, at a cost of around £40 each, so £951 in total, though, of course, you don't have to renew your cctv every year, it will usually last 4 or 5 years with little issue, same with the fire extinguisher and first aid kit, I believe they have to be replaced every 3 years

Wolverhampton is £95 to apply for a license, you then have to get an MOT at one of their approved MOT stations (There is one in Rotherham and many in Sheffield) which is around £50 (Vehicles over 10 years old need 2 a year), and that's it! Though you do have to go to Wolverhampton for them to do a compliance check, that's done by a licensing officer or someone similar and its just bodywork etc,

£145 total, no fire extinguisher, no first aid kit, no cctv and presumably the cost of the plate is included in the license, and they give you a plate holder too!

Whilst lowering the age limits will help, it barely scratches the surface!

In my view the following should be applied

1. Removal of fire extinguisher and first aid kit – most LA's don't have these anyway
2. For vehicles under 5 years old the intermediate test be removed, just the one annual test
3. For vehicles over 5 years old, just the annual and one intermediate
4. One free retest for any items that would qualify for a free retest on a normal MOT (Bulbs etc)

That would fetch the cost of a new driver plating a car down a bit to £825 (for an older car), of course the annual cost, if you were to spread the cost of the cctv over 3 years, is more like £425 per year, but a driver still has to find the full amount up front, and however you look at it, way more than Wolverhampton

In summary at present it costs a Rotherham licensed driver around £2000 to get on the road, paying to get his badge and plate his vehicle – and that's without buying a vehicle (Which has to be under 5 years old at present) and insuring it, In Wolverhampton its nearer £500 in total, and he can use a car up to 12 years old

Even with the reductions I've suggested it would still be around £1500, the only way to reduce it further would be to remove the CCTV, you are unlikely to do that, however what's the point in having CCTV if there are no cars licensed with it in? Would it be better just to insist on CCTV for vehicles doing school contract runs for RMBC?

Speaking of school contract runs RMBC currently have the position (Quite correctly) that any driver or vehicle doing a RMBC school contract should be up to RMBC's licensing standards so, for example, a Sheffield private hire could do a school contract for RMBC provided it had CCTV and was under 10 years old (There may be other standards too but they are the main ones – though it should be insisted all drivers do the BTEC but I don't believe it is) It is impossible for a Wolverhampton car to meet these standards as Wolverhampton do not allow recording of audio – at all – as such no Wolverhampton car can do RMBC school runs, If the number of Wolverhampton cars increase what are you going to do? It's clearly going to be inflationary with a cost element to RMBC, less cars qualified to do school runs means higher prices, but what if you end up with not enough cars? I believe Corporate Transport are struggling to some extent now to cover

contracts, take another 10% of RMBC licensed cars out of the system and replace them with cars who can't do the school contract, How will you get the kids to school then? It would be great to say RMBC think we should have all taxis as Rolls Royce's, customers would love it – till they couldn't get a taxi!

Speaking of school contracts, whilst not directly a licensing matter I would like to take this opportunity to raise a matter in which RMBC compromise their own standards when it suits them, that of community transport doing school runs, So to do a school contract for RMBC as a taxi driver you have to do all the things mentioned above, pass a driving test, a written test, BTEC etc to get your badge, you could also do a school contract as a PCV driver, in which case you would have to pass the PCV driving test and do your CPC, however community transport companies are exempt from some of the PCV regulations as they are classed as "Not for profit" (even though the directors get paid a wage, you say wage, I say profit, it still amounts to money in your pocket) as such to drive for community transport on a RMBC school contract you have to have held a normal driving licence before 1997 (or around then) as it has D1 entitlement not for hire or reward, which more recent licence holders do not have even though you are getting paid as the company is not for profit its classed as not for hire or reward, Community Transport insist on these drivers (and all PCV drivers having a DBS check but other than that you could have someone who has failed his Wolverhampton knowledge test 20 times, try for his Rotherham badge, not be able to pass the driving test, nor the knowledge test, nor the BTEC but he can walk through the door at Community Transport and as soon as his DBS check is back he can drive on a school contract for RMBC with no further driving test or test of any kind, this undermines the value of a RMBC taxi drivers licence, I know many drivers who have let their badge expire and have gone on to drive for community transport as its easier and cheaper whilst still doing jobs for RMBC who supposedly want higher standards, madness! RMBC should have a condition of contract on any future tenders that all drivers who drive a PCV vehicle, even if it's licensed under the community transport exemption, hold a full PCV licence

Back to the matter at hand, RMBC need to accept whatever standards they would like, its no good having them if no ones following them, they need to compromise, even if its through gritted teeth, or they may as well just let Wolverhampton do all licensing for them, that's where it will head eventually, you need to help us operators by removing all surplus items and trimming the fat and improving your systems, hopefully then the "negatives" (in terms of cost) from being licensed in Rotherham which RMBC seem to deem the most important (CCTV, Specific testing station) Along with those costs you cannot help (increased fees) will offset the hassle of going to Wolverhampton and the current wait for a badge and at least be somewhat competitive, at present, If its somewhat closer most operators would prefer drivers to get a Rotherham badge as they can do RMBC school runs, but the gap is that vast at the moment its untenable

There are other small things RMBC could do to help Rotherham licensed drivers, you could issue a LTRO to allow "local" private hire to use bus lanes, which would mean only RMBC licensed ones could use them, for example

As an operator do I really need RMBC to decide the standards of drivers for me? Obviously things like the DBS and safeguarding are necessary, but if a driver is that poor he would fail the driving test that's likely to cost me customers and that's a business decision I have to make, is that driver a net asset or negative to my firm? Does he need to spend 5 days learning stuff on a BTEC? Shouldn't I be the one who decides if he is good enough to work for me provided he meets the minimum standards? If I ran a shop and the cashier was rude and bad at their job I would sack them, if I didn't my business would decline, that's the nature of business

In considering this I ask councillors to ask themselves one question, if you wanted to get a taxi badge, bearing in mind the information I have given, where would you go? In my view there's really only one choice and if you also think you would go to Wolverhampton then the standards need reforming further as I have suggested here

If not, well get your fiddle out, Rome's burning!

Response 2

Hi

Looking at the proposed additions to the policy. I strongly disagree with them all.

Every time a policy is up for review the council just wants to make it harder for local drivers thinking out of town drivers will go away.

This is not the case and unless the government do this RMBC can not do anything to stop them.

Yes the council is working to get rid of out of town taxis but what good is this if the council do not work to keep RMBC badge holders. Work with the trade and get betterment for drivers.

Many drivers have dual badges including with other council as RMBC policies have been so stringent, difficult and harder everytime. You are not working with the trade you are losing trade I would say. My point of view is as follows: -

Increase the age limit of taxis to 15 years as most cars are euro 6 equivalent, having new cars costs alot and they have been well looked after and made to a better spec

Reward the drivers in extending the age limits other councils have increased age limits in such hard times

I do not agree with fire extinguishers and first aid kits as never used them and fire extinguishers are safety hazard

Costs us extra £75 every 3 years for no reason and we are told you can not use them

Every 3 years got to get new ones which is additional cost for no reason

Take away 3rd mot test per year and adhere to, this is the only council that has 3 tests per year what is the need. Pushing drivers away

Listen to the drivers

Vehicle up to 7 years = 1 test

7 -15 years = 2 tests

3 tests are extra cost for no reason, normal cars do plenty miles but still have one test per year. 2 tests are sufficient what difference is 6 months test and 4 months. These stringent testing is pushing drivers away to get badges and plated elsewhere

Why give stress and inconvenience and be fair

Front grill do not bring in, as safety hazard, people throwing stones, and vandalising when been driven. Plus front headlights will not bring in ease for customers to see if it is a taxi. Customers can ring and message driver when

booking taxi with new technology, stickers on sides, back plate and front docket on windscreen is enough. Also extra cost not needed for driver side in these tough times as having plate will be cost on us.

People are plating cars in wolverhampton and working in rotherham. Rotherham has stringent standards why should i work for rotherham plated car when wolverhampton less tests per year, less fees, less training and work is equal field for both.

Work with us to keep the drivers or else soon all drivers will go elsewhere and local drivers and council will lose out

Give postive initiaitives for us to stay here and work with rmhc plated taxis

Improve better badges as they are dangerous and too big

Many thanks

Mohammed

Response 3

Hi

Being an operator phoenix taxi in Rotherham for the past 20 years, I have seen different changes that have occurred from the council. Every year has been getting harder and harder for us, especially.

Owning a company which consists of quite a good percentage of drivers licensed in RMBC Council.

I would like to give my input on the challenges that drivers have come upto me and said.

Looking at the proposed additions to the policy. I strongly disagree with them all.

Every time a policy is up for review the council just wants to make it harder for local drivers thinking out of town drivers will go away.

This is not the case and unless the goverment do this, RMBC can not do anything to stop them.

Yes the council is working to get rid of out of town taxis but what good is this if the council do not work to keep RMBC badge holders. Work with the trade and get betterment for drivers.

Many drivers have dual badges including with other council as RMBC policies have been so stringent, difficult and harder everytime. You are not working with the trade you are losing drivers day by day, I would say. My point of view is as follows: -

Increase the age limit of taxis to 15 years as most cars are euro 6 equivalent, having new cars costs alot and they have been well looked after and made to a better spec

Reward the drivers in extending the age limits other councils have increased age limits in such hard times

I do not agree with fire extinguishers and first aid kits as never used them and fire extinguishers are safety hazard

Costs us extra £75 every 3 years for no reason and we are told you can not use them

Every 3 years got to get new ones which is additional cost for no reason

Take away 3rd mot test per year and adhere to, this is the only council that has 3 tests per year what is the need. Pushing drivers away

Listen to the drivers

Vehicle up to 7 years = 1 test

7 -15 years = 2 tests

3 tests are extra cost for no reason, normal cars do plenty miles but still have one test per year. 2 tests are sufficient what difference is 6 months test and 4 months. These stringent testing is pushing drivers away to get badges and plated elsewhere

Why give stress and inconvenience and be fair

Front grill do not bring in, as safety hazard, people throwing stones, and vandalising when been driven. Plus front headlights will not bring in ease for customers to see if it is a taxi. Customers can ring and message driver when booking taxi with new technology, stickers on sides, back plate and front docket on windscreen is enough. Also extra cost not needed for driver side in these tough times as having plate will be cost on us.

People are plating cars in wolverhampton and working in rotherham. Rotherham has stringent standards why should i work for rotherham plated car when wolverhampton less tests per year, less fees, less training and work is equal field for both.

Work with us to keep the drivers or else soon all drivers will go elsewhere and local drivers and council will lose out

Give positive initiatives for us to stay here and work with rmhc plated taxis

Improve better badges as they are dangerous and too big

Many thanks

Phoenix Taxis