

## **Private Hire Association Meeting**

**Thursday 22<sup>nd</sup> August 2019 – 10:30am**

### **1. Introductions / Welcome**

Carol Stos opened the meeting and thanked everyone for attending.

Attendees:

Carol Stos (CS)	Licensing Service Manager
Sadiya Patel (SP)	Senior Licensing Officer (Service Support)
Clare Wild (CW)	Licensing Officer (Service Support)
Nadeem Ahmed (NA)	Private Hire Owners Association
Sean Parnham (SPar)	Keighley Private Hire Association

### **2. Actions from the last meeting**

There were no actions from the last meeting.

The Association representatives had some concerns about Air Quality that were raised within the meeting. These included:

- ❖ Congestion and Infrastructure
- ❖ Affordability and help with the cost of vehicles
- ❖ Charging points for fully electric vehicles
- ❖ Charging times for vehicles
- ❖ The mileage range of vehicles
- ❖ Pollution was from a range of different sources not just vehicles
- ❖ Drivers opposing Air Quality plans in Bradford

The Licensing Service welcomes all feedback and discussions from the Trade Representatives specifically regarding matters in relation to Hackney Carriages and Private Hire. The issues around Air Quality in totality should be directed to the Air Quality team who are a dedicated team within Bradford Council. They are a specialist team writing up the plan for Air Quality in Bradford MDC. This plan will then be presented to Central Government for approval. Until this process has been completed the service and the Air Quality team will be unable to provide any feedback. When there are any developments to the Air Quality plan that directly affects the Trade this will be communicated by the Licensing Service.

A number of government grants are available to help drivers changing to electric vehicles. These are managed by the Office for Low Emission Vehicles (OLEV).

### **Home Charging Scheme**

The Electric Vehicle Homecharge Scheme (EVHS) provides grant funding of up to 75% / £500 towards the cost of installing electric vehicle charge points at domestic properties across the UK. More information can be found by clicking on the following link: [Home Charging Scheme](#)

### **Plug in Vehicle Grant**

The plug-in car grant offers up to £3,500 off the 'on the road' purchase price of eligible new pure electric cars, and up to £8,000 off the price of an eligible new van. The Plug in Taxi Grant will pay for 20% of the purchase price for these vehicles, up to a maximum of £7,500. More information can be found by clicking the following link: [Plug in Vehicle Grants](#)

### **West Yorkshire Combined Authority Electric Vehicle Charge Points**

Bradford Council is also installing a network of rapid electric vehicle charging points across West Yorkshire. These will be free to use until October 2021, with a dedicated bay for taxis and private hire vehicles. You can register to use these dedicated bays by clicking on the following link: <https://ev.engie.co.uk/> Please don't forget to include your vehicle license number when you register.

If you require any further details, Kate Smallwood, Energy & Environment Officer can be contacted via email at [eccu@bradford.gov.uk](mailto:eccu@bradford.gov.uk)

When there are any developments, the service will make every effort to communicate this immediately.

## **3. Enforcement Update**

### **3.1 5\* Base Audits Progress**

Vehicle safety sessions were held in June for Operators. During these sessions Enforcement Officers provided information in relation to the 5\* base audits, the operators responsibility with regards to vehicles, what operators are able to do if a vehicle fails an inspection and how to appeal a failure.

It was explained that to achieve the first 3 stars on the base audit, Operators must successfully pass the compliance and vehicle safety sections of the 5 star base audits. The Enforcement Team has been developing stars 4 and 5 which will include elements of equality, customer service, management procedures and environmental practices.

All supporting guidance around the 5\* base audits will be made available on the website once it is finalised, in the meantime if anyone has any questions or would like any further information you can email [taxi.testing@bradford.gov.uk](mailto:taxi.testing@bradford.gov.uk).

### **3.2 Vehicle Failure Appeals**

After your vehicle has been tested the tester will take you to the office window to notify you if your vehicle has passed/failed. If your vehicle has failed and you would like a second opinion then it is at this point you must alert the workshop staff. A second opinion will be given by a different tester at the time who will give an independent opinion.

Please do not leave the workshop as the second opinion will be given at point of test outcome only. Leaving the depot will result in no second opinion being given.

### 3.3 Decals Review

Concerns have been raised during vehicle tests and road side inspections regarding a growing number of vehicles displaying resized or unapproved decals. It has also been raised that drivers are not obtaining their decals from the Operator but are having their own printed from a print unit. This is concerning because Operators may not be aware of some vehicles displaying their decals. Drivers and Proprietors are advised to consult with their Operator before any purchase to ensure the decal will be to the correct specifications for the Operator as specified by the service.

### 3.4 Vehicle Specification

The vehicle specification was brought into effect in August 2013 there have been changes to vehicles available on the market, including the introduction of Ultra Low Emission and Electric Vehicles.

As a result the way vehicles are designed and built has changed to accommodate the battery and drive systems; this often reduces the available height and width within the vehicles.

The Licensing Service has received some requests to reconsider the vehicle specification, in particular relaxing or removing the requirements for access and egress. Following these requests the Licensing Service is reviewing the Vehicle Specification with the view to making some changes.

Any proposed changes would need to be approved by committee as it would be a change to policy. The Licensing Service will need to evidence any proposed changes and will be working with the trade and public to collect their views.

The Licensing Service will be advising shortly as to how Licensees can get involved with this engagement.

### 3.5 Plying for Hire

The Licensing Service has recently advised all Operators that complaints have been received in relation to Private Hire Drivers and Vehicles loitering outside pubs and clubs plying for hire. Following the complaints the Enforcement Team, along with colleagues from Operation Steerside conducted a Plying for Hire operation throughout the district. The operation resulted in a number of drivers picking up test purchase officers illegally.

Please be advised that legal action is now pending on those drivers and that Enforcement Officers are reviewing records and systems at the bases, this is due to concerns that staff at the base may have been assisting these activities by adding the illegal pick up to the booking records. Operators are advised to review their policies and booking systems as they are ultimately accountable for the actions of the base staff.

Remember drivers cannot book a Private Hire journey for customers themselves. The customer must make the booking through the Operator.

Staff in bases must not book in any illegal pick up sent to them by the driver; additionally drivers should not be able to book passengers themselves via their PDA.

### 3.6 National Register of Taxi and Private Hire Licence Revocations and Refusals (NR3)

An explanation was provided which explained that this is a National register and is set up by the Local Government Authority and the National Anti-Fraud Network to record details of Private Hire and Hackney Carriage licences that have been refused or revoked.

Bradford are developing NR3 policy's and processes that will allow the Licensing Service to record the details of any licence holder that is refused or revoked. The register will only hold high level information and cannot state the reasons for refusal or revocation.

If a local authority would like this information for the reasons behind a refuse/revoke then this would have be requested through a DPA request. If anyone would like to know more about the NR3 register you can find information on the following web page: [National Register](#).

A discussion took place around proprietors not getting their cars checked before a test.

- ❖ **Representative Question 1:** If a car fails its test, but you can provide evidence, will you get your money back that you were initially charged?

Response: Please refer to point 3.2 for response.

- ❖ **Representative Question 2:** The Association requested clarity on a communication from Councillor Ferriby on 11<sup>th</sup> August 2017. This was regarding a vehicle being tested up to two weeks after having an MOT and if a MOT was enough to not get charged a retest fee?

Response: As per the letter circulated by Cllr Ferriby in 2017, a licensed vehicle which has had an MOT within 14 days of a safety inspection and fails inspection due to a serious mechanical defect then the driver/proprietor will not be charged a retest fee. This is subject to providing evidence of the MOT certificate which the vehicle inspector can refer to VOSA. Please note that this does not remove the responsibility or accountability of the driver/proprietor to ensure the vehicle has been serviced and maintained to a standard appropriate for that vehicle. An MOT, which is the basic standard for a private vehicle, conducted within 14 days of a vehicle safety inspection cannot be used to mask a vehicle not being serviced/maintained correctly and where this is identified a retest fee will apply.

- ❖ **Representative Question 3:** Can drivers receive detailed information for what the test in the garage covers?

Response: The Service welcomes requests from Operators to bring external engineers to the workshop for a pre-arranged visit. It would be appropriate for engineers to visit only as they will understand the complexity of the engineer's duties they fulfil to carry out the test.

- ❖ **Representative Question 4:** If an Operator has a base however does not have any staff, is it legal for them to divert calls straight to drivers?

Response: This is illegal and should not be done under any circumstances. When licensed to carry out Private Hire duties you must ensure there is a clear booking of every journey dispatched. The customer must call the Operator themselves and make the booking before any Private Hire Vehicle can collect that passenger. Failure to do so is called 'plying for hire' and is illegal.

- ❖ **Representative Question 5:** It would be a good idea to have a national register for complaints too, so that we can check back on any complaints that have come in. How far are you going back with the information on the National register (NR3)?

Response: The service will carry out engagement in relation to the NR3. Further information will be provided to the Trade at the engagement period. Remember to regularly check your emails for communications from the Licensing Service. NR3 will not cover complaints.

- ❖ **Representative Question 6:** Will you be checking on the register for drivers who have been refused or revoked in other Councils at renewal stage or at a different stage?

Response: Currently, both new and existing drivers that declare they have worked at another authority are checked. Once NR3 is in place we will be checking the database regularly for all driver licenses.

## **4 Licensing Update**

### **4.1 GDPR**

SP advised that out of the 5000 drivers that are licensed with the Service we only need email addresses for 15 drivers after which we will have a registered email address for 100% of all licenses.

Please be reminded if any of your contact details change we need to be informed as soon as they can so we can keep our systems up to date. Not doing this will result in reminders being sent to the incorrect email address.

## 4.2 Plate Collection

The plate collection is going well and the service is continuously receiving positive feedback from the drivers. Everyone attending Shearbridge is stating they prefer collecting their plates straight after their test at the workshop.

There are two things that are not working so well which has resulted in the plates not being collected straight after test. There has been no insurance sent for new vehicles a minimum of 3 days before the vehicle inspection date and drivers arriving for test with no badge. Drivers, it is a legal requirement for you to wear your badge at all times. The above two examples are things that can be avoided and will result in you not having to make an additional trip to Shearbridge.

## 4.3 Vehicle Proprietor Application Form

An email was sent 2<sup>nd</sup> August 2019 informing all proprietors that we now have a new Vehicle Proprietor Application form. This positive step forward will allow the service to send a reminder to proprietors informing them their vehicle licence is due to expire; the reminder will be sent 6 weeks prior to the expiry date. This process went live on Monday 5<sup>th</sup> August 2019 and the first reminder emails were also successfully sent on this day.

This form is an application to licence/relicense only. A copy of the valid insurance certificate and page 2 and 3 of the logbook must still be sent to [taxi.testing@bradford.gov.uk](mailto:taxi.testing@bradford.gov.uk). You must send this from the email address that we have registered on the system as we are unable to arrange a vehicle inspection until the documentation has been received. For new vehicles the test will be booked without an insurance certificate however it must be received a minimum of 3 days before the vehicle test date. If the insurance is not received, the plates cannot be collected after passing the vehicle safety inspection. An email must be sent to [taxi.testing@bradford.gov.uk](mailto:taxi.testing@bradford.gov.uk) requesting a plate collection appointment. Once the insurance is received an appointment will be made.

- ❖ **Representative Question 7:** Can Operators get reminders of when drivers' renewals are coming up?

Response: This is a report that the service anticipates will be possible. We will be working towards this and will update on the progress of this in the future.

## **5 Customer Service Update**

### **Digital Forms**

The iApply suppliers have changed the name of the software and it is now called 'Digital Forms'. The application will still look and work the same. 'Digital Forms' is almost at the end of its development and testing. We are looking to make plans to come out to the district to offer training and support while giving everyone a chance to see what the system looks like, how it works and to have a go yourselves. The sessions will include a chance to practice on the system so end users can see what the system looks like. The website will be updated with help guides if you need assistance with your online application after the training.

The Customer Service Manager is planning as many sessions as possible across the district throughout October and November. No dates have yet been finalised but we will be holding the sessions at places such as Shearbridge Depot, the Leisure Centre at Keighley and other easily accessible places with plenty of parking.

The Digital Forms project plan is to have the system fully available to all applicants in January 2020, so we would like as many people as possible to attend the training sessions to make the process easier.

If anyone has any questions about the new process they can email [taxi.testing@bradford.gov.uk](mailto:taxi.testing@bradford.gov.uk) for the attention of Elisabeth Spencer (Customer Service Manager).

- ❖ **Representative Question 8:** Are the digital forms the only way you will be able to renew your licence?

Response: Currently, to apply for a new/renewal licence for your badge or vehicle is done online. From January 2020 the changes will include being able to upload documents as well make payment on the online digital forms. This is positive progress for the future as drivers and proprietors will be able to apply for their licence, upload documents and make payment all at their own convenience at a time that suits them.

## **6 Peer Review Update**

There are 3 outstanding points from the peer review and they are all on-going longer term points such as updating the conditions book, devising flowcharts for customers so they can understand the processes better and the service is reviewing its approach to English comprehension and Literacy training. The updated peer review is on our website. You can find the updated peer review on the website [here](#)

## **7 Agenda Points**

*“In relation to the council’s clean air policy. We appreciate that the council is looking at cleaner air alternatives and has an on-going consultation on the use of electric and hybrid vehicles as well as LPG, Euro 4 & Euro 6.*

*As well as considering these alternatives the PHOA would like to make certain proposals. The PHOA would like to propose a policy of average speed cameras for certain roads and would welcome the H/C departments support for such a policy.*

*We feel that speed cameras, speed ramps, built out pavements & chicanes have been proven to be ineffective measures and a better long term strategy is required if we want cleaner air for Bradford.*

*We feel that these measures tend to create excessive congestion on the roads and create harmful CO2, No2 particulate matter (PM) and other harmful gasses into the atmosphere. This is created as vehicles suddenly slow down, and then accelerate back up. The sudden acceleration tends to spew out these gasses. If vehicles are travelling at a regular speed less harmful gasses seemed to be churned out.*

*We feel that if thought could be given to this policy, it would help the people of Bradford with cleaner air, less congestion and a much better control to the flow of traffic.*

*We feel that excessive speed ramps, chicanes, and built out pavements are a blight on an area, cause unnecessary damage to vehicle suspension parts and give the impression of a rundown city and reduce parking spaces for local people and businesses to use.*

*Our findings are supported by NICE in a study conducted by Imperial College London 2015. I hope serious consideration can be given to such proposals”.*

### **Response:**

The point you have raised concerns other road users as well as Private Hire licence holders. There are specific teams throughout the Council that work on matters relating to their focused areas. The matter you have raised should be directed to the Air Quality team who are a specialist team within Bradford Council who are dedicated to working on the Air Quality plan for Bradford MDC.

If you would like to get in contact with them please email: [airqualityplan@bradford.gov.uk](mailto:airqualityplan@bradford.gov.uk) they may be able to further liaise with Highways on the points you have raised.

## **8 Date of Next Meeting**

Thursday 21<sup>st</sup> November 2019.

This meeting will be held at the Shearbridge Depot and will start promptly at 10:30am.