

Consultation comments from a Private Hire Operator in relation to the proposed amendments to Private Hire and Hackney Carriage Licencing Policy with the responses from the Licensing Authority

SECTION 1 - INTRODUCTION				
Para.	Revision	Source	Private Hire Operator's Response	Licensing Authority's Response
Introduction	Reference to tax conditionality added	New legal requirement	Agree	
2.	Paragraph reworded	N/A	Agree	
6.	"promoting the welfare of children" added	Statutory Standards	Agree	
6. a)	"promoting the welfare of children" added	Statutory Standards	Agree	
6. b)	Reference to checking criminal records of all applicants added	Statutory Standards	Agree	
6. e)	Promoting the vision of Middlesbrough amended to reflect policy statement	Council Policy Statement	No comment	
9.	Reference to checks on tax registration and criminal records of vehicle proprietors added	New legal requirement and Statutory Standards	Agree	
10.	"on its own merits" added	Statutory Standards	Agree	
11.	Reference to consideration been given to the guidance from the Institute of Licensing and the adoption of the Statutory Taxi & Private Hire Vehicle Standards	Institute of Licensing Statutory Standards	As the IOL suitability guidance was largely, but not completely adopted by the Statutory Standards, suggest referring only to the Statutory Standards as they are made pursuant to a statutory power and post-date the IOL guidance in any event	Agree

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	recommendations as minimum core standards			
14.	New implementation date for revised policy	N/A	Agree, but also appears at 16	Noted
21.	Local business added to list of consultees	N/A	Noted	
24.	National Anti-Fraud Network added to list of partnership working to reflect current practice	N/A	Agree	
40; 41; 43	Reference to “vaping” included to no-smoking policy to reflect current terminology	N/A	Agree, but appears to relate to 41-43	
44.	“County lines exploitation” wording added	Statutory Standards	Agree	
	Paragraph deleted as deadlines expired for attending the safeguarding training	N/A	Agree	
47.	Paragraph amended as deadline for producing a policy to the council has expired	N/A	Noted	
49.	Requirement for operators to have a policy on employing ex-offenders and to carry out fit and proper checks on employees who dispatch vehicles added	Statutory Standards	There’s a genuine employment law issue in relation to existing staff when their contracts do not provide for them to be criminal record checked. If they do not agree to being checked, an employer’s only option is to terminate their employment and offer to re-employ them on new terms, ie including a requirement for a criminal record check, but this gives rise to potential unfair / constructive dismissal claims, etc. See ACAS guidance at	This is a statutory standard to protect the public and operators will need to comply with this requirement and make arrangements with their staff

			https://www.acas.org.uk/changing-an-employment-contract/employer-responsibilities . Might you also confer with the Council's HR / Personnel Team and / or Legal Team?	
52.	Wording in respect of the policy on tinted windows in licensed vehicles changed to reflect new policy	New policy adopted following consultation	Agree	
58 – 68.	New paragraphs explaining Tax Conditionality checks for hackney carriage and private hire drivers and private hire operators added to ensure they are registered for tax purposes	New legal requirement	Agree	
SECTION 2 VEHICLES – PRIVATE CARRIAGE HIRE AND HACKNEY				
Para.	Revision	Source	Trade Comments	Response
•	Criminality checks for vehicle proprietors added	Statutory Standards	Agree	
70.	Wording simplified to require vehicles to have appropriate M1 approval	N/A	Agree	
	Paragraph explaining vehicle type approval deleted	N/A	Noted	
72.	Wording changed to require vehicles needing Individual Vehicle Approval	Government guidance	Agree	
75.	Wording amended to reflect new categories of	Association of British	Agree	

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	vehicle insurance “write offs”	Insurers (ABI)		
84.	The wording “to satisfy local demand” added	N/A	Noted	
116.	Wording amended to reflect new categories of vehicle insurance “write offs”	ABI	Agree has to be included, but there should be no need for an engineer’s report or JIG report as vehicles classified as Category N (formerly Category D) are so classified because the structure of the vehicle has not been compromised by the damage. To require such reports is to place on the trade an unnecessary expense and regulatory burden in breach of the requirements of the Regulators’ Code.	Agree will not be required for Cat N unless Council garage have concerns
120.	“and Appendix D” added to direct applicants to the test criteria used by the council	N/A	Agree	
122 – 130.	New section on criminality checks on vehicle proprietors added	Statutory Standards	Agree has to be included, but urge the Council to require only one Basic DBS check a year to avoid those with multiple vehicles having to obtain potentially 12 checks a year.	Following discussions with Council’s Legal Officer the first DBS check needs to be within 1 month, Renewed annually
131.	New requirement to provide basic DBS and Certificate of Good Character (if applicable) added to application requirements	Statutory Standards	Agree has to be included and repeat comments above in relation to paras 122 – 130.	Following discussions with Council’s Legal Officer the first DBS check needs to be within 1 month, Renewed annually

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133.	Additional wording added regarding the provision of an engineer's report/jig report as deemed necessary for vehicles deemed an insurance write off.	N/A	Agree has to be included, but repeat comments made in relation to para 116 above.	Agree will not be required for Cat N unless Council garage have concerns
135; 136.	New paragraphs added recommending vehicle renewal applications be made at least one month before the licence expires to ensure vehicle test dates can be secured and any renewal applications received after 28 days from the licence expiry date will not be accepted and an application for a new vehicle licence will need to be made and when specifications for new vehicle licence complied with.	Advice following court judgement (R (on the application of Exeter City Council) v Sandle	Agree	
137.	New requirement to provide basic DBS disclosure added to renewal application requirements	Statutory Standards	Agree has to be included, but repeat comments above in relation to paras 122 – 130.	Following discussions with Council's Legal Officer the first DBS check needs to be within 1 month, Renewed annually
	Paragraph deleted re renewal timescale as recommendation now included in new paragraph above	N/A	Noted	
143; 144.	New paragraph added requiring proprietors who	Statutory Standard	Agree	

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	are companies or partnerships to notify the council of any changes within 7 days and for new directors or partners to submit a basic DBS disclosure and Certificate of Good Character where applicable			
147.	Requirement to produce a basic DBS disclosure and Certificate of good Character added to process	Statutory Standards	Agree has to be included, but repeat comments above in relation to paras 122 – 130.	Following discussions with Council's Legal Officer the first DBS check needs to be within 1 month, Renewed annually
150.	New paragraph added regarding seating in stretched limousines	Best Practice Guidance	Noted	
	Paragraph re tinted window exemption deleted as no longer applicable following introduction of new policy	Council approved policy change	Agree	
166.	New policy on tinted windows defined	Council approved policy change	Agree	
169.	Wording amended to ensure compliance with any guidance re CCTV from the Information Commissioners Office and the Home Office and new sentence added requiring information that CCTV is in a vehicle must be provided on booking systems.	Statutory Standards	Agree, but note requirement to register with the ICO also applies in respect of the use of dashcams in work vehicles, such as HC & PHV	Agree, will amend to include dashcams

181.	Age policy for new vehicle applications changed from 3 to 5 years and termination period from 8 to 10 years and 10 to 12 years for London Style cabs and side loading wheelchair accessible vehicles New statistics provided on numbers of vehicles meeting the different European Emission Standards	Council approved policy change N/A	Agree	
	Paragraph on air quality standards concerns deleted as the results were disproved by the Council	N/A	Noted	
SECTION 3 DRIVERS				
Para.	Revision	Source	Trade Comments	
•	Tax conditionality added to the contents list	New legal requirement	Agree	
195.	Registration for tax and immigration status added to the “fit and proper” test criteria.	Statutory Standards	Agree	
198.	Added wording to explain that in determining the fit and proper test the onus is on the applicant to provide evidence that they are and not for the council to prove that they are not	N/A	Agree	

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202.	Proof of eligibility for drivers amended to remove the need for a driving assessment and to include the new requirement for registration for tax	N/A New legal requirement	Agree	
204.	The requirement for new applicants to have passed an approved driving assessment has been removed	N/A	Agree	
205.	Checking an applicant's immigration status and right to work has been updated to include the use of a share code from the online View and Prove Service on Gov.UK	Government guidelines	Agree	
211.	Additional paragraph added to explain the use of the new online View and Prove service on GOV.UK to generate a right to work share code to enable the council to access the online immigration checking service to verify the types of work the applicant is able to do	Government Guidelines	Noted	
214.	Knowledge of highway code removed from the knowledge test and new sentence added that tests for private hire driver's licences will not include a topographical element as it is a requirement that	Trade request	Agree	

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	licensed private hire drivers have use of a fully operational sat-nav system (or similar device) in any licensed vehicle they drive at all times			
220.	Level of spoken English changed to Language Proficiency and written English included, and applicants that cannot demonstrate a reasonable level may be referred to the Licensing Committee	Statutory Standards	Agree has to be included, but the Council will have to be careful about how it implements this requirement in an appropriate, proportionate and non-discriminatory way.	Noted
230.	Requirement to provide a Certificate of Good Conduct qualified by being resident/domiciled in a country for a period of six months or more	Statutory Standards Institute of Licensing Guidelines	Noted	
237.	Period of validity of an initial DBS disclosure reduced from 6 months to 1 month before an applicant may be requested to produce a further check	N/A	Agree has to be included, but must make clear that this does not apply if an applicant has signed up to the DBS update service, which they should have done in any event.	Already clear
238.	Medical certification of fitness must be completed by a “registered” medical practitioner i.e. a doctor	DVLA	Agree	
242.	Medical assessment changed to medical declaration	N/A	Noted, but don’t believe this is a “new legal requirement”	Noted
256.	Failure to comply with a request for a drug test “without reasonable excuse	Statutory Standards	Agree	

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	will result in the revocation of the drivers licence with immediate effect”			
257 - 266	New paragraphs added explaining Tax Conditionality and tax check requirements for applicants	N/A	Agree	
267 - 275	Application procedure amended to include: <ul style="list-style-type: none"> • View an Prove Your Immigration Status Service share code • DVLA licence check code • HMRC declaration or tax-check code and to remove driving assessment certificate	N/A New legal requirement	Noted, but think this refers to 267 & 275, not 267 – 275	
277.	Recommendation added that renewal applications be made at least one month before a licence is due to expire as legislation does not allow for continuity of licence	N/A	Noted	
279.	New provision on the issuing of a short term licence, “without prejudice”, when a renewal application is received and there are grounds for concern that delays determination of that application.	Government guidelines	Agree, but might also want to consider unreported decision of Nottingham Crown Court in Cartledge v Gedling Borough Council	Noted but do not believe it is necessary to include reference to case
303.	New sentence added that voluntary surrender of a	N/A	As the Council clearly accepts that licences can be surrendered	Agree, will remove

	licence will not be accepted when the driver is subject to ongoing legal proceedings, disciplinary hearing or investigation of a complaint		(and I agree with it in that regard), there is no legal basis (and deciding to have a policy is not a legal basis, because a policy does not entitle a public body to do something that its not permitted to do by law in the first place). If a situation is so serious that the Council needs to act decisively, it should use its power to revoke with immediate effect, which will eradicate the risk of surrender. If the situation does not give rise to a public safety issue of that magnitude, is there really an issue?	
SECTION 4 PRIVATE HIRE OPERATORS				
Para.	Revision	Source	Trade Comments	Response
•	<ul style="list-style-type: none"> • Register of staff • Policy on employing ex-offenders • Tax conditionality added to the list of contents 	Statutory Standards New legal requirement	Agree	
309.	New requirement added: "and that the driver has the use of a fully operational sat-nav system (or similar device) at all times."	Trade request	Agree	
314.	Wording amended to require assessments of all staff who have contact	Statutory Standards	Agree, but contracts of existing staff probably do not provide for this, so it may not be possible to	This is a statutory standard to protect the public and operators will need to comply with

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	with the public and/or oversee the dispatching of vehicles and to include production of a basic DBS disclosure		unilaterally change staff contracts without risking staff making claims to an employment tribunal. See ACAS guidance at https://www.acas.org.uk/changing-an-employment-contract/employer-responsibilities and, if necessary, seek guidance from the Council's HR and Legal Teams.	this requirement and make arrangements with their staff
315 - 318	New paragraphs added to explain new requirements on operators to keep a register of staff that take bookings or dispatch vehicles and to produce a policy on employing ex-offenders	Statutory Standards	Agree	
326; 327; 331	Wording amended to require production of a basic DBS disclosure and Certificate of Good Character (when applicable) with new applications and annually thereafter.	Statutory Standards	Agree, but exemption should be extended to operators that have an Enhanced DBS certificate and are signed up to the update service for another purpose, such as in connection with the provision of a regulated activity in connection with the contractual transport of children and / or vulnerable adults.	Agree and amend policy
332.	New paragraph added explaining impact of having a driver licence revoked will not automatically prevent someone from holding an operator's licence	Statutory Standards	Agree	
335.	Paragraph deleted as deadline to attend	N/A	Agree	

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	safeguarding training no longer relevant			
336.	New paragraph added informing operators that they cannot pass on their safeguarding obligations if they outsource a booking.	Statutory Standards	Agree	
343 - 352	New section added explaining the new Tax Conditionality requirements for tax checks	New legal requirement	Agree	
353.	Application procedure amended to include production of: <ul style="list-style-type: none"> • Basic DBS disclosure • Certificate of good character • Tax check • Policy on employing ex-offenders 	Statutory Standards New legal requirement	Agree	
354.	Recommendation added that renewal applications be made at least one month before a licence is due to expire as legislation does not allow for continuity of licence	N/A	Noted	
357.	New provision on the issuing of a short term licence, "without prejudice", when a renewal application is received and there are grounds for concern that	N/A	Agree, but might also want to consider unreported decision of Nottingham Crown Court in Cartledge v Gedling Borough Council,	Noted but do not believe it is necessary to include reference to case

	delays determination of that application.			
374.	Requirement to notify any changes in directors or partners added	Statutory Standards	Agree	
SECTION 7 • CONVICTIONS, CAUTIONS, AND CHARACTER				
Para.	Revision	Source	Trade Comments	Response
•	Vehicle proprietors added to list	Statutory Standards	Agree	
404.	“that pose no risk to the public and have no links to serious criminal activity” added	Statutory Standards	Agree	
406 - 410	New paragraphs added explaining reason for checking vehicle proprietors and options available to the council in respect of vehicle licences.	Statutory Standards Legislation	Agree	
411.	“and safeguarding and promoting the welfare of children and the vulnerable.” added	Statutory Standards	Agree	
413.	Wording amended to include convictions for exploitation, or a crime resulting in the death or intended to cause the death or serious	Statutory Standards	Agree	

	injury of another person, or if they appear on the children and adults barred list, applicants will not be licensed			
419.	Convictions for attempt or conspiracy will be regarded as convictions for the substantive crime	Institute of Licensing guidance	Agree	
425; 426.	New paragraphs added on fitness tests for private hire operators and vehicle proprietors	Institute of Licensing guidance	Agree	
429.	New paragraph added explaining "balance of probability"	Statutory Standards	Agree	
SECTION 8 - ENFORCEMENT, DISCIPLINE AND OFFENCES				
Para.	Revision	Source	Trade Comments	
434.	"and to revoke driver licences with immediate effect if it is considered that it is in the interests of public safety." added	Legal advice	Agree	
437.	Members of the Licensing Committee required to undertake training added	Statutory Standards	Agree	
481.	Option to attend Driver Improvement Scheme for	Legal advice	Agree	

	existing drivers incurring 9 penalty points for minor traffic offences reduced to 6 points.			
489.	Procedure for suspending or revoking a driver with immediate effect updated.	N/A	Noted	
492; 493	New paragraphs added on procedure for reissuing a licence or lifting of a suspension	Statutory Standards	Agree	
SECTION 10 - COMPLAINTS PROCEDURE				
Para.	Revision	Source	Trade Comments	Response
525.	Complaints will be recorded and monitored to identify trends or patterns of behaviour added	Statutory Standards	Agree	
Appendix B Conditions of Private Hire Vehicle Licence				
Para.	Revision	Source	Trade Comments	Response
6.	Period to notify council of convictions etc. reduced from 7 days to 48 hours	Statutory Standards	Agree	
8.	New duty to notify any change in directors or partners when applicable within 7 days to enable DBS checks	Statutory Standards	Agree	
Appendix C Conditions of Hackney Carriage Vehicle Licence				

Para.	Revision	Source	Trade Comments	Response
7.	Period to notify council of convictions etc. reduced from 7 days to 48 hours	Statutory Standards	Agree	
9.	New duty to notify any change in directors or partners when applicable within 7 days to enable DBS checks	Statutory Standards	Agree	
Appendix D Vehicle Testing Arrangements				
Para.	Revision	Source	Trade Comments	Response
1.15	Tinted window specification revised	New policy adopted following consultation	Agree	
Appendix E Private Hire Vehicle Exemption Notice Conditions				
Para.	Revision	Source	Trade Comments	Response
Additional Conditions	Condition removed as no longer applicable following revision of tinted window specification	New policy adopted following consultation	Agree	
Appendix F Table of Existing Vehicles by Age				
Para.	Revision	Source	Trade Comments	Response
	Statistics updated	Records	Noted	
Appendix G Policy on the Relevance of				

Convictions etc.				
Para.	Revision	Source	Trade Comments	Response
Purpose	Use amended to include consideration of an applicant for a private hire or hackney carriage vehicle licence or a private hire operator licence	Statutory Standards	Agree	
Overriding duty	Amended to ensure private hire operators and vehicle proprietors pose no threat to the public and have no links to organised crime and they are entrusted to ensure vehicles and drivers used to carry passengers are licensed and safe	Statutory Standards	Agree	
Information	Basic DBS disclosures	Statutory Standards	Agree	

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	will be used to determine the suitability of applicants for private hire operator's licences and private hire and hackney carriage vehicle licences added			
General	Statement amended to include: "A person with a conviction for a crime resulting in death or intention to cause death or serious injury; exploitation (including slavery, child sexual abuse, exploitation, grooming, psychological, emotional or financial abuse); or any offence involving or	Statutory Standards	Agree	

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	connected with illegal sexual activity will not be licensed."			
General	Amended to include an applicant who is on the Sex Offenders Register or on any Barred list will not be licensed	Statutory Standards	Agree	
Minor traffic offences	<p>Applicants with up to 6 valid points may have a licence granted subject to a requirement that they attend a driver improvement course instead of a warning.</p> <p>7 – 9 points, applicant must show 3 years free from conviction before being considered instead of</p>	Institute of Licensing Guidance Legal advice	Agree has to be included, but this must be balanced with the need to decide each case on its own merits – after all, a person with a number of convictions for modestly exceeding a speed limit probably poses a much lesser danger to someone who habitually significantly exceeds speed limits.	Matters will be judged on their own merits in line with the policy in accordance with the statutory standards unless a Committee considers there are good reasons/exceptional circumstances to depart from it

	<p>referral to the Licensing Committee who could grant subject to attending a driver improvement course and issue a severe warning.</p> <p>More than 9 points, applicant must show 5 years free from conviction before being considered instead of 12 months.</p> <p>Significant history of offences or disqualification through totting up procedure, applicant to demonstrate 5 years free from conviction instead of between 1-3 years</p>			
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(b) Major traffic offences	<p>Conviction for use of a mobile phone or hand held device – refused until at least 5 years elapsed since conviction or completion of any sentence or driving ban. Currently 4 years,</p> <p>If applicant has an endorsement for a major traffic offence application refused until at least 5 years have elapsed since conviction or completion of any sentence or driving ban. Currently 4 years.</p> <p>Endorsements for more than one major traffic offence then this</p>	<p>Statutory Standards</p> <p>Legal advice</p>	<p>Agree has to be included, but this must be balanced with the need to decide each case on its own merits – after all, a person who commits a single major traffic offences in exceptional circumstances may present less of a risk than a person who repeatedly commits minor traffic offences, such as exceeding speed limits.</p>	<p>Matters will be judged on their own merits in line with the policy in accordance with the statutory standards unless a Committee considers there are good reasons/exceptional circumstances to depart from it</p>
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	period will be 7 years			
(c) Alcohol Related Offences	Applicants with a conviction for drink driving must show a period of at least 7 years free from conviction since the completion of any sentence or driving ban. Currently 4 years	Statutory Standards	Agree has to be included, but this must be balanced with the need to decide each case on its own merits – after all, a conviction could result from drink spiking, for example.	Matters will be judged on their own merits in line with the policy in accordance with the statutory standards unless a Committee considers there are good reasons/exceptional circumstances to depart from it
(d) Drug related offences	Applicants with a conviction for a drug driving offence must show a period of 7 years free from conviction since the completion of any sentence or driving ban imposed. Currently 4 years. Applicants with an	Statutory Standards	Agree has to be included, but this must be balanced with the need to decide each case on its own merits.	Noted

	<p>isolated conviction for possession of drugs must show a period of 5 years free from conviction since the completion of any sentence imposed. Currently 3 years.</p> <p>If the conviction relates to the supply of controlled drugs or possession with intention to supply or production of controlled drugs the application will be refused until at least 10 years have elapsed since the completion of any sentence. Currently an application will be refused.</p>	<p>Statutory Standards</p> <p>Statutory Standards</p>		
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(f) Violence	Where an applicant has a conviction for an offence of violence against a person, or connected with any offence of violence a licence will not be granted until at least 10 years have elapsed since the completion of any sentence imposed. Currently 3 – 10 years depending upon the offence.	Statutory Standards	Agree has to be included, but this must be balanced with the need to decide each case on its own merits – after all, a person with a caution for a common assault when they have used more than reasonable force when acting in self-defence does not pose the same risk as someone convicted of causing grievous bodily harm with a weapon they were carrying.	Matters will be judged on their own merits in line with the policy in accordance with the statutory standards unless a Committee considers there are good reasons/exceptional circumstances to depart from it
Possession of a weapon	Where an applicant has a conviction for possession of a weapon or any other weapon related offence a licence will not be granted until at least 7 years free	Statutory Standards	Agree has to be included, but this must be balanced with the need to decide each case on its own merits – after all, a person with a caution for carrying a Swiss Army knife with	Matters will be judged on their own merits in line with the policy in accordance with the statutory standards unless a Committee considers there are good reasons/exceptional circumstances to depart from it

	from conviction have elapsed since the completion of any sentence imposed has been added.		their keys is unlikely to pose the same risk as a person carrying a machete, flick knife, lock knife or the like.	
Discrimination	Where an applicant has a conviction involving or connected with discrimination in any form a licence will not be granted until a period of 7 years free from conviction have elapsed since the completion of any sentence imposed has been added.	Statutory Standards	Agree has to be included, but this must be balanced with the need to decide each case on its own merits – after all, a person with a caution for racism, when their comments were self-deprecating, is not the same as when racism is used threateningly and abusively towards someone of a particular racial heritage.	
(g) Dishonesty	Period free from conviction or complaints changed from	Statutory Standards	Agree has to be included, but this must be balanced with the need to	Matters will be judged on their own merits in line with the policy in accordance with the statutory standards unless a Committee considers there are good reasons/exceptional circumstances to depart from it

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	5 years to 7 years		decide each case on its own merits – after all, a person with a caution for stealing food out of necessity is very different to those that planned and executed the Hatton Garden safety deposit burglary.	
Immigration	Where a licence holder has been served with an immigration penalty or convicted of an immigration offence the licence will be revoked immediately has been added	Statutory Standards and Home Office Guidance	Agree has to be included, but this must be balanced with the need to decide each case on its own merits.	Council will not depart from statutory standards unless exceptional circumstances warrant such a decision.
(h) Licensing offences	Period free from conviction changed from 3 years to 7 years	Institute of Licensing Guidance	Agree has to be included, but this must be balanced with the need to decide each case on its own merits.	Noted

Appendix H	Conditions of Private Hire Drivers Licence			
Para.	Revision	Source	Trade Comments	Response
8.	Convictions, charges arrests etc. to be notified to the Council within 48 hrs instead of 7 days	Statutory Standards	Agree	
Appendix I	Council Policies in respect of Hackney Carriage Drivers			
Para.	Revision	Source	Trade Comments	Response
8.	Convictions, charges arrests etc. to be notified to the Council within 48 hrs instead of 7 days	Statutory Standards	Agree	
Appendix K	Code of Conduct When working with Vulnerable Passengers			
Para.	Revision	Source	Trade Comments	Response
•	Warning signs of "County Lines" exploitation added	Statutory Standards	Agree	
Appendix L	Conditions of Private Hire Operator's Licence			
Para.	Revision	Source	Trade Comments	Response
1(a).	Ensure that all vehicles and drivers used to fulfil private hire bookings	Statutory Standards	Agree has to be included, but suggest requirement should be to use best endeavours,	Case pre dates statutory standards

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	hold appropriate and valid licences added.		applying comments made by the High Court in R (Blueline Taxis) v Northumberland County Council [2012] EWHC 1539 (Admin) at para 67.	
2.	Requirement to formulate and apply a policy on assessing the suitability of any person taking bookings or dispatching vehicles added.	Statutory Standards	Agree	
3.	Requirements relating to maintaining a register of all staff responsible for taking bookings and/or dispatching vehicles added.	Statutory Standards	Agree	
5(c).	Requirement to evidence safeguarding protections are applied by any company to which the operator outsource a booking or dispatch function.	Statutory Standards	Agree	
6.	Requirement to include name of person(s) who responded to a booking request and dispatched vehicle to booking records added.	Statutory Standards	Agree, but should acknowledge that bookings are usually dispatched automatically by the computer system, without dispatcher intervention	Agree to amend
8.	Use of drugs or alcohol added to list of complaints.		Agree	

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13.	Convictions, charges arrests etc. to be notified to the Council within 48 hrs instead of 7 days	Statutory Standards	Agree	
20.	Operator to inform hirer when a PSV is being used that the driver is subject to different checks and is not required to have an enhanced DBS check.	Statutory Standards	Agree	