



**SUPPLEMENTARY INFORMATION**

**Taxi & General Licensing Committee**

**Tuesday 9 January 2024**

<b>Agenda Item Number</b>	<b>Page</b>	<b>Title</b>	<b>Report Author</b>	<b>Reason for delayed publication</b>
6.	(Pages 3 - 50)	<b>Private Hire and Hackney Carriage Licensing Policy 2023</b> Appendix B – All Consultation Responses	Licensing Manager	Document too large to publish within main agenda document

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Responses

<b>Response complete or incomplete</b>	<b>Count</b>	<b>Per cent</b>
Complete	103	34%
Incomplete	202	66%
<b>Total</b>	<b>305</b>	<b>100%</b>

More about you (select all that apply)

Are you?

<b>Response</b>	<b>Count</b>
A current taxi license holder	207
Applying for a taxi license	2
A resident of West Northants	93
A business owner in West Northants	19
A representative of a community or voluntary group	10
An organisation	11
Other	12
<b>Total</b>	<b>354</b>

Complete Responses	To which part of the Draft Hackney Carriage and Private Hire Policy 2023 does this comment relate to?	Comment	What is the reason for your comment	Additional Comments & Further evidence
<p>1. Current Licence Holder An Organisation A resident A business Owner</p>	<p>Private hire licences, section 102</p>	<p>Is it correct that chauffeur vehicles will now be required to have door signage, an outside plate and interior signs?</p> <p>Does WNC no longer distinguish between private hire and chauffeur services?</p> <p>While appreciating the licensing and safeguarding issues, I cannot see how this is any way a good move</p>	<p>Chauffeur services offer a premium service which differentiates from taxi and private hire. Customers like to be driven in a clean and comfortable car and many will not book vehicles that are covered with signage.</p>	
<p>2. A current licence holder</p>	<p>Vehicles</p>	<p>Hi I've read a fair bit of this new policy etc, we had a rule before , so like most of us we gave up older vehicles and replaced one way or another, then now we still see vehicles 59 plate reg ect still on the roads from mainly or all cross county plating, to me and many is unfair. I believe and should be a rule if you want to use a vehicle in northampton it has to be plated by garages in Northampton, not out northampton and is a loop hole, Or everyone could go out of town to plate old vehicles which then makes all the effort of low emissions pointless,</p>		
<p>3. A representative of a community or voluntary group</p>	<p>Equality Act &amp; Discrimination</p>	<p>Incorrect terminology has been used, when describing a non disabled person as “able bodied” this creates the wrong assumptions that disabled people are completely incapable- it’s also considered as ableist, the correct terminology is infact “non disabled” something of which a local authority should be aware of. This terminology is shown in the governments website, this shows a lacking of disability awareness within a local authority who have a responsibility to not create inequality within a community, this will need to be changed with immediate effect and the MP for the area will be informed</p>	<p>When talking about the Equality Act and disability discrimination- incorrect terminology contradicts the objective. The reason for my comment is that it’s clear a lack of disability awareness has allowed ableism to be acceptable and a local authority should not be unaware. The correct term is “non disabled” something West Northants</p>	<p>The evidence is in section 21 of the draft policy- Incorrect terminology. This information of terminologies is available via government UK and scope website.</p>

			Council should be informing all of their employees of but with the disregard of disability this is overlooked.	
4. Private Hire Chauffeur	Private hire Plates & Stickers on vehicles	<p>I am a private hire owner driver and proprietor , my business is as a chauffeur to private clients who do not want a minicab but an executive car and driver , indeed one of my clients of well over 10 years is the currant xxxx who was appalled that I would need to adorn my car with taxi stickers and plate that would make my Mercedes unsuitable for a chauffer service. I do a lot of work with him, going to country houses all over the UK as he is the head of xxxx. I have other clients with the same opinions, and frankly worry about my future in this trade. I am currently licensed by Daventry district council who supply an exemption certificate allowing me to carry the license plate inside the boot so that I am fully licensed yet not having the appearance of a taxi.</p> <p>I do not want my private phone number displayed on my car as I have no company office and would not want people from all over the country phoning me at all hours!</p>	I would no longer be able to provide the vehicle my customers require. I also provide a service for weddings, and funerals which I will no longer be able to with signs and stickers on my car.	I will also email and attach emailed views of my customers.
5. A current licence holder	51.1	<p>Hello, I have a concern about this rule in regards to side opening windows. I did speak to the council representative at the meeting and she asked me to email in my concerns. My concern is that most minibuses nine seaters do not come with side opening windows which will need to be retrofitted and usually aren't very big openings &amp; of very poor quality where the locking system is usually flimsy &amp; usually breaks. If it were a factory fitted, it would be more of a quality build, but usually the retrofit ones are very poor quality and I have yet to come across a good quality window opening. I know this from experience, also the openings are very small. You could probably just about get your head through definitely not your whole body in emergencies negating the point in having it in the first place.</p> <p>Most of the vehicles have rear air-conditioning, and with the front windows opening circulation is never an issue.</p> <p>Just as a point currently on Auto Trader, there are 205 Mercedes Vito tourer nine seater minibus' for sale not one of them has rear side opening windows.</p> <p>I have attached some images of examples of these windows that have been retrofitted.</p>	Basic availability & joined up thinking as mentioned the windows are too small.	<p>The points system</p> <p>Please reconsider theses proposals as it is very draconian &amp; for example my livelihood hood may depend on the mood on the day of a traffic warden on any given day.</p>
6. A business owner	all	<p>If you go on to the internet / Facebook you can buy an M.O.T test certificate for £40 without even taking your car to the garage !</p> <p>This is exactly what some unscrupulous driver/owner will do. As there are no checks available on them, with your new proposal unfortunately with staff cut backs with W.B.C. licensing, VOSA, making these concerns unworkable.</p> <p>You make no mention of who is going to (police) the vehicles</p>	Concern	

		<p>general condition e.g.</p> <ul style="list-style-type: none"> <li>• Bodywork,</li> <li>• Interior,</li> <li>• Council safety regulations</li> </ul> <p>the list goes on and on, so basically no one!!!</p> <p>This has all the makings of a collapse of the vehicle safety and condition requirements meaning there will be unsafe and illegal vehicles moving children, OAPs and disabled members of the public from one place to another with inherent risks to passengers it would seem that Hackney Carriages will still be up to standard, but not so Private Hire.</p> <p>These statements do not apply to all private hire vehicles, but just one unsafe vehicle is one too many,</p> <p>I can only imagine that W.N.C will be increasing its public liability insurance 'just in case' it all goes pear-shaped.</p> <p>One last old saying 'Don't try to fix what is not broken'.</p>		
<p>7. A current licence holder A resident</p>	<p>( 49/4.38)( 50/4.39) (32to44)(112)(117)119,53,125,104,119,54.112,58,</p>	<p>I'm really concerned about the new draft that has been issued for private hire and hackney carriage. Some of these new rules that the council are thinking of adding are unrealistic, costly, and not suitable for the current situation. I'd like to draw attention to a few: 10 years ban for using a mobile phone, not being able to use prius plus as a 7 seater &amp; having a car with full service history which is literally impossible. I think the council should reevaluate these new rules and consider making it suitable for our council instead of following other councils as others have different demands and requirements. If councils think that they are improving safety then is the taxi business currently not safe for the public? I would like to suggest licensing authority to rethink all of these new rules and settle on ones that make drivers and passengers safer as that is most important. The current financial situation has made things very hard for everyone so every business is in decline. For this reason, drivers Cant afford some of these changes as we are already going through a difficult time.</p> <p>There is no need for this kind of increase in driver sanctions like points penalty scheme, as there is no evidence of any major misbehaviour by drivers in the news etc instead drivers are always helpful to the public, and work under high stress levels. The requirement is instead for a verification of ID for all passengers before they use a taxi as drivers get difficult passengers all the time who can be offensive or violent and there is no way for the police to identify them. An ID check would deter this. Drivers are already quite well verified.</p>		
<p>8. A current licence holder</p>	<p>Page 32-33 points penalty scheme</p>	<p>There is no need for this kind of increase in driver sanctions like points penalty scheme, as there is no evidence of any major misbehaviour by drivers in the news etc instead drivers are always helpful to the public, and work under high stress levels. The requirement is instead for a verification of ID for all passengers before they use a taxi as drivers get difficult</p>		

		passengers all the time who can be offensive or violent and there is no way for the police to identify them. An ID check would deter this. Drivers are already quite well verified.		
9. Applying for a Taxi licence	Points system	if I was to park on double yellow lines to let a disabled customer out I don't feel it would be fair to make me have points negative towards me	too many tests a year at mot will cost double what it does now this is unfair when times are hard as it is	
10. A taxi user	Policy	At last we appreciate that this council is taking the right approach for our safety, and well being. Agree with this well thought of policy in general.  Could not see the clause about other family, or friends driving the taxi when the registered driver is not there. Could we have more investigation into that.  Also suggest there is a better dress code so can be identified as a checked and safe driver taking the ride and responsibility.	As a resident use it on ad hoc basis plus ask visitors to get one .	I.D , licence to be displayed very clearly and easily seen. not to be kept in glove compartment or some where else.  Spot, random checks to be done to make sure guidelines are followed.
11. A current licence holder A resident		I'm concerned about the new draft issued by council. It's really going to make our life harder and going to effect our earnings. Some of these changes are unrealistic and not time appropriate Car with full service history is immosiab. And point system is not appropriate for current time.		
12. A current licence holder A resident	Page 120, Maintenance and servicing,	It is a bit vague.	It says manufacturers recommendations but does that mean it needs to be serviced by the manufacturer's mechanics. The costs here could be very expensive where if we were allowed to use local mechanics the cost to us drivers can be reduced and is better for local businesses. Also mentions about being valid after implementation. Does this mean once it's implemented we need a full manufacturers service history because I believe the great majority of drivers will need new vehicles as	

			<p>they don't have a full manufacturers service history. Personally I think the servicing being inspected is unnecessary because if drivers aren't servicing their vehicles that is to their detriment. I don't see any safety issues for passengers. If a driver breaks down another driver will be sent out which is an inconvenience but a lot more of an inconvenience to the driver than the passenger.</p>	
<p>13. A resident</p>	<p>List of Offences/Breaches of Driver Code of Conduct Page 37</p>	<p>Points one and two 'Driver not clean and respectable in their dress' and 'Driver not complying with the Driver Dress Code' are too open to interpretation and abuse by council officials. One persons' idea of appropriate dress may not conform to another persons idea. As a resident of Northampton Borough who uses taxi services on a weekly basis I have never cared what the driver is wearing. This does not have any impact on driver ability or passenger safety and should not have the potential to incur penalty points and deprive an otherwise good driver of their livelihood.</p>	<p>The draft policy claims to be primarily concerned with passenger safety however this provision has absolutely nothing to do with safety and is about imposing arbitrary and pointless restrictions</p>	<p>'Driver allowing noise form radio or other similar equipment to be a source of nuisance or annoyance to any person inside or outside the vehicle' - define nuisance, if a song comes on the radio that the passenger at the time doesn't like this should not be a reason to complain about a driver</p> <p>List of Offences/Breaches of Driver Code of Conduct page 39</p> <p>'Failure to attend at appointed time or place without sufficient cause' sufficient cause needs to be defined as drivers have no control over traffic levels, proficiency of other road users or irresponsible parking by other road users. Where I live there is always at least one car double parked in the road which narrows the road and leads to congestion. This frequently blocks emergency vehicles and taxis but the drivers cannot do anything about it and should not be penalised as a result</p> <p>who decides what is sufficient cause - if this is going to be used as the basis of depriving someone of their livelihood in a cost of living crisis this needs to be clearer</p>
<p>14. A resident A business owner</p>	<p>Requirements for Spoken English and Safeguarding Training</p>	<p>These checks are imperative to ensure Licences are only issued to Fit &amp; Proper persons.</p> <p>A growing proportion of taxi drivers can only say "Postcode"</p>		



		<p>and refuse to take customers without the destination postcode.</p> <p>And the number of comments I've heard; a driver refused to take a teenage girl home unless she gave her mobile number, he then persistently called her asking "meet me".</p> <p>A lady in her 50s had a taxi home and the driver asked if he could come in for coffee, and these are just two of the countless times I have witnessed incidents involving PLH Drivers.</p>		
15. A resident	All the document	I support your proposed document and the changes within.	Providing further ways to improve safety for those using taxis is in no way a bad thing.	
16. A resident	21.1. All licensees must ensure that they comply with their statutory duties in relation to disabled people under the Equality Act which includes not charging disabled people any more for a particular journey than an able-bodied person would be charged.	If the passenger is unable to check/read the meter because they are print disabled in some way, how would they know?	This has happened to me as a registered blind person on numerous occasions. It's very difficult to dispute the point, because A: I can't see the meter to know the starting cost, b: I have to rely on the driver's assistance to reach my final destination, which is often dependent on his/her ability to communicate effectively in English and dependent also on their goodwill and willingness to assist.	<p>21.6. The requirement to provide mobility assistance does not apply if the driver has a certificate of exemption and the specified notice is displayed in the vehicle at the time, but that does not permit a driver to refuse to carry any disabled person.</p> <p>Again referring back to those people who are print disabled how do we know whether or not the driver has one of those certificates? We can't read them, nor the licence plate either, it's easy for a driver to claim exemption and hard for people such as guide dog owners to challenge this.d) providing such mobility assistance as is reasonably required this is often difficult to communicate to a driver who doesn't understand/speak English well enough to communicate with effectively.</p> <p>I have often been refused help and advised the driver has an exemption certificate but could not prove or disprove this. Often as a registered blind person I've been dropped and left at the wrong address, abandoned in station car parks, or the middle of a street simply because the driver does not understand the level of sight I have (none) and does not have any disability awareness.</p> <p>21.7 assistance dogs.</p> <p>Again how do I know being registered blind whether or not the driver has an exemption certificate?</p>

				I have often been refused access by drivers when travelling with my guide dog. They will not engage and simply drive off saying "no dog" When I try to explain they are breaking the license laws and discriminating against disabled people they have said in the past they don't care. I can't report them because they refuse to give me their details. Taxi companies rarely back customers when complaints are made and too frequently as a guide dog owner I've been refused, left in the street, stressed and humiliated.
17. A resident	Penalty Points System	This is an insane requirement to put on anyone providing service such as driving a taxi. There is one requirement only. Can they drive you, safely, from your location to your destination in a reasonable amount of time. Nobody but the most inane and pedantic would feel that the way the taxi driver is dressed has any bearing on their ability to do the job. Frankly, I do not care if they speak English or not. If they are able to drive the vehicle safely and get me to where I want to be, that's it. Nobody gets into a taxi looking for a lifelong friendship, just as nobody goes to a local shop expecting the same. Everyone, bar the halfwits that decided this would be a good idea, wants a safe and quick journey, nothing more.	evidence of common sense? If you need evidence of the insanity of your proposal, you would not understand any evidence presented to you	What possessed anyone to think that it was a good idea to produce a 151 page document pertaining to something that nobody wants? Point 1.4 states "The scheme will be used where operators, drivers or proprietors of vehicles fail to comply with any legislative requirement, commit a criminal offence (under legislation or byelaws) or breach conditions of licence, and following complaints  Again, basic common sense, which clearly nobody in the council has  What should have happened when this was initially proposed, is that whoever it was proposed to, ought to have said "Don't be stupid, that's a waste of time, money and effort. We have literally millions of things to care about long before we touch this". What actually happened was they said "oh yes, that sounds like something we can waste huge amounts of money on proposing something that nobody wants or needs"
18. A current licence holder	The penalty points system	We will be put on undue pressure with the points system. It's not right that I as a Private Hire Driver should be stressed about whether someone might be reporting me to the Council.	I am deeply concerned about the policy. It will have severe effect on my mental health. I will be worried about losing my livelihood because in someone's opinion I'm guilty	I will have to spend £1000's to have a chance of getting my Taxi Licence back. This is the harsh reality of what may happen to all Private Hire Drivers
19. A current licence holder		Hi Point based should be removed	If customer has all right where is the drivers right	
20. A resident	page 4 definition of assistance dog	many people have an assistance dog for purposes beyond those defined, particularly regarding mental health / anxiety. It is also true that there are increasing numbers of people who	aware of flaws in your current definition	page 63 item 90 and 91

		<p>train &amp; badge their own dogs as being assistance dogs but without any form of accreditation. Investigate whether there is any form of national accreditation that can be used to clarify.</p>		<p>should be greater restrictions on use of hands free mobile phones whilst carrying passengers.</p> <p>Far too frequently when using taxis, the driver is gossiping on their phone throughout the journey. I have been afraid to ask them to stop, as I felt it likely that they would evict me from the taxi and refuse to carry me any further. The risk of then missing a train or hospital appointment prevents me from speaking up, so I need you to prohibit all mobile phone use other than brief business related calls</p> <p>page 65 item 109</p> <p>if the booking states that the passenger requires an animal to be carried, then the driver should not be allowed to then break that contract by refusing at pick-up time.</p> <p>if a customer makes it clear that they need their dog to make the journey with them - say to the vets, then it is unreasonable for the attending driver to then refuse to carry, which could mean missing an appointment which they are then charged for. A driver who chooses not to carry a non-assistance dog should be registered as such with their controller</p> <p>page 62 item 75</p> <p>the intention here to stop the nuisance custom and practice of sounding the horn on arrival is appreciated. However, the greater nuisance is to the neighbours of the hirer - unless they were to rush outside to identify the driver, there is little prospect of warnings or punishments to be issued. Consideration should be given to a requirement on operators to identify any driver who is registered in the vicinity (postcode?) at the time. I accept this may be an onerous task for licensing body, but without that level of enforcement / investigation then the code is a toothless gesture</p>
<p>11 Page 11 11</p>				<p>No</p>

22. A current licence holder	32 to 44 penalty points scheme	Penalty points scheme is not fit for many reasons as it's not fit for many workers including council staff. It is only taxi drivers that have penalty points, no other employees or self employed has penalty points it is purely targeted taxi drivers that already doing very risk job.	The reason I object this penalty points is, it penalises taxi drivers who are already dealing very violent and abusive customer that can use this penalty points against innocent taxi driver	Taxi drivers can be easily penalised, eg if customer with muddy shoes leaves the muddy foot print in the car the next customer can complain and the taxi driver will get penalty points. That is one of many reasons that I object this penalty points scheme, as a taxi driver I have received verbal abusive and physical attack from customers that I was providing service but I never report to the council or police, because of my previous experience.
23. A current licence holder	32 to 44 penalty points scheme	Penalty points scheme is not fit for many reasons as it's not fit for many workers including council staff. it is only taxi drivers that have penalty points, no other employees or self employed have penalty points. It is purely targeted at taxi drivers.	The reason I object this penalty points is, it penalises taxi drivers who are already dealing with violent and abusive customers.	Taxi drivers can easily be penalised e.g if a customer has muddy shoes leave a footprint the next customer can complain and the taxi driver will get penalty points. That is one of the many reasons that I object this penalty points scheme, as a taxi driver who are already dealing very violent and abusive customer that can use this penalty points against innocent taxi driver.
24. A current licence holder	All	Northampton council try to implement new rules which are totally against the taxi drivers the should protect the drivers safety		
25. A current licence holder	All of it	This is a disgraceful policy which discriminates against all those that drive a private hire vehicle or a taxi	You read the 150 pages and you will find who wrote this how on earth do expect most of these drivers to understand or read this policy smoke screen costumer safety you think all those that drive a private hire vehicle or a taxi are pedophiles where was your safety all those years ago shame on you	Northampton will come to a standstill if you don't listen to us driver's are very concerned and upset about this policy which gives the alot of power
26. A current licence holder	The whole policy	I think the draft discriminate ethnic minorities. And doesn't support hard working taxi drivers at all.	To request that the draft should be abolished.	<ul style="list-style-type: none"> <li>• Point system</li> <li>• Working hours</li> <li>• 10 year ban</li> </ul>
27. A current licence holder	Policy	<p>We are strongly against this draconian and racist policy and ask you for you throw out these new recommendations which only target us drivers.</p> <p>Drivers in Northampton are not happy at all and are preparing for action which will cause logistical chaos amongst all demographics of the people in Northampton.</p> <p>We strongly ask you to scrap these policies as they are not necessary and Drivers in Northampton have a very well respected reputation for the work they deliver to the public.</p>	.	

		I look forward to hearing back from you all		
28. A current licence holder		We should have the same rights of others. No one cares about us and because the lorry driver is in more danger, then taxi driver	Everyone is caring about the passengers, but no one cares about us. We are paying taxes as well.	Tinted windows. We use the car when we are off work. We use it as a private car as well. Can't afford another one.
29. A current licence holder	Policy	Point based systems Police clearance certificate Nothing mentioned about driver safety Non of the policy make a sense , one page say something another page say another things .	This policy is truly targeting minority community. It is racist policy, this policy has no right for driver.	All of 150 pages of the draft is my evidence.
30. A current licence holder	Whole document	These a draconian policies which are being implemented on drivers. You talk about passenger safety, yet you have not addressed driver safety in your 150+ page document. You are essentially taking away any responsibilities which the operators have and penalised the drivers. You as a council have failed it's driver community. Shame	You have targed ethnic minority drivers in this document	
31. A current licence holder	All of the policy	All of the policy is not needed it's against the drivers.	The current policy the taxi drivers are following is good enough. It protects the public and the drivers don't have enough rights anyway its pretty much tight. The new policy is complete against the drivers.it is	It is very hard job for drivers when picking up public who can be very abusive and unfair and disrespectful. But drivers do need a lot of patience to be safe . Now the new policy puts them under even more stress and pressure especially with all this new point system..
32. A current licence holder	The entire policy	I don't agree with the entire policy because so many rules are repeated just another way with another words and this point system is unacceptable as we don't have any rights. It's just about the customers. We care about the customers we do our best but you should agree there is a rude and racist customers which we do not want to take in the car. There is no driver safety. We need more safety and support from the police and council. Just the other night police come to the taxi rank and left the passenger there to take a taxi and that person didn't have any money. He sat on one of the drivers car he didn't wanna leave the car and the driver rang the police and the police said sorry we can't send police car at the moment we are busy, is that fair, where is driver, safety	It's Wrong	The evidence is in the policy it's anti Taxi Drivers
33. A current licence holder	105	I thing this section is very unfair as we as taxi driver are struggling at the moment with high cost of living limiting as to work for only 10 hours a day will force as into more financial hardship .it 105 say after 19 hour take a break for hour hour or even 2 hour that is understandable		
34. A current Licence holder A resident A business owner	Whole document	I am surprised by reading the whole document is draconian, racist and disgraceful. Specially points based system, disqualification on having points on UK driving licence, full car service history policy, racist and disgraceful regulations and	Your racist and disgraceful behaviour about other cast and taxi drivers and	

A representative of a community An organisation		providing no safety to the drivers. You're pushing this town towards more failures.	providing no safety and rights to them	
35. A current licence holder		Points system on private hire licence it's unfair for taxi driver and the new proposed draft against driver right and driver safety, humble request to the council please remove this unfair draft		
36. A resident A representative of a community or voluntary group	22 complaints about licensees	Do you get to see a record of the complaints logged by the operator. A lot of passengers will go direct to the company that has took them to raise a complaint.	This could mean a lot of things being missed which may make a big difference as to the suitability of the operator, car or driver.	<p>24.3 Basic DBS I would not allow my elderly relative or child get into a taxi with someone that is not suitable and a basic DBS would not give that information. How come the drivers have to go through safeguarding training but the council is not safeguarding vulnerable passengers</p> <p>Like the hackney, I would not put an elderly relative or any other vulnerable person of any age into a taxi if they had not been checked properly there has been previous cases of abuse in authorities in the North of England. What are you doing to ensure that this does not happen in West Northants</p> <p>List of Offences/Breaches of Driver Code of Conduct</p> <p>Driver not behaving in a civil and orderly manner - D3 is open to different interpretation and 3 points may not be too lenient in certain instances</p> <p>There should be certain behaviours stated that will result in a ban. For instance someone may discriminate against someone, inappropriate touching, use of sexualised language or anything else that would really show that they should not be driving the public especially the vulnerable</p> <p>pg 45 - previous convictions</p> <p>Too general and should include certain actions for certain convictions. West Northants has it's own. Further mention in the document contradicts. Why is there repetition but with different requirements? Surely the document should be easy to follow?</p> <p>It is not safeguarding if a person that is a proven to have sexually abused someone to even be considered and should be clear</p>

				<p>that they will not be given a licence. This should also be the case for someone awaiting a trial for such instances not just for the protection of the vulnerable but if the person is not guilty, they may be subject to further false allegations which may sway the outcome of their trial and also affect their DBS.</p> <p><a href="https://www.horsham.gov.uk/licensing/taxi-and-private-hire/taxi-and-private-hire-licensing-criminal-convictions-policy">https://www.horsham.gov.uk/licensing/taxi-and-private-hire/taxi-and-private-hire-licensing-criminal-convictions-policy</a></p> <p>Just one example of an authority that I have found that asks for an enhanced DBS . How will the council know if there have been any investigations or records of concern regarding an individual. However on pg 57 there is contradiction where enhanced DBS is mentioned. Which is it?</p>
<p>37. A current licence holder</p>	<p>Page 37 3. List of Offences/Breaches of Driver Code of Conductq</p>	<p>Dear Licensing Committee Members of Northampton</p> <p>I am a Hackney Driver and proprietor of a Hackney carriage in Northampton, I have read through the draft policy and here are the following point I don't agree with:</p> <p>1)Motoring convictions; being banned for a number of years for having motoring convictions, which I believe to be completely unfair, this needs to be looked at again.</p> <p>I also urge you to ADD the following onto the policy Page 40 4. Offences / Breaches of Operator Licence Conditions - Private Hire Vehicle.</p> <p>** failure to provide Licensing officers and enforcement agency's Drivers job history and Pda history for upto 2 weeks in the event of a driver being reported to have being seen or reported illegally plying for hire** points ??</p> <p>I also urge Committee members to change the draft points system (penalty points) in regards to Page 37 3. List of Offences/Breaches of Driver Code of Conduct</p> <p>D7/ Driver of PH vehicle plying for hire 4 points.</p> <p>This needs to be changed to 6 POINTS.</p> <p>I also would like to see MANDATORY changes in appearances of private hire vehicles this includes the following:</p> <p>1)Permanent removal of yellow and red roof signs 2) Introducing reflective Magnetic signs or sign writing on</p>	<p>Protect our hackney trade</p>	<p>Increasing number of private hire illegally plying for hire due to historically high numbers of licences being issued.</p> <p>Page 40 4. Offences / Breaches of Operator Licence Conditions - Private Hire Vehicle.</p> <p>I also urge you to ADD the following onto the policy Page 40 4. Offences / Breaches of Operator Licence Conditions - Private Hire Vehicle. Page 40 4. Offences / Breaches of Operator Licence Conditions - Private Hire Vehicle.</p> <p>** failure to provide Licensing officers and enforcement agency's Drivers job history and Pda history for upto 2 weeks in the event of a driver being reported to have being seen or reported illegally plying for hire** points ??</p>

		<p>doors and bonnets stating company name and having advance bookings only written.</p> <p>As a Hackney Driver I believe these ammendments will improve our trade for the foreseeable future and improve vehicle and driver standards and passenger safety for visitors of Northampton and the local community.</p>		
38. A resident	All of it.	Don't make life difficult for taxi drivers by introducing unnecessary beaurocracy.		
39. A current licence holder	All Drivers part	<p>Most of these rules are against natural day to day service can be provided and some of the rules are against even national law, drivers feel deprive and slave to what public has been given so much power and there is not a single rule regarding safeguarding of drivers and protection of drivers as we are always on the risk of not been paid, robbing, breaking in, assaults and beaten up which has happened to many drivers and it has happened to myself so many times so far. So need withdrawal all the draft and bring something for safety and security if drivers who are serving public on risk and helping public to socialise, help them in schools shopping and lot of other things public use us. I am completely Denying the whole draft. Thank you</p>		There are so many evidences that this draft should be withdrawn
40. A current licence holder		<p>If a person has resided 15 years or more and worked as a private hire driver for 10 years already.. How can you expect them to then have to prove good character? Is the time spent not more than satisfactory of good character?</p> <p>The new rules should only apply for new applicants.</p> <p>It is difficult trying to obtain such information from Countries that do not have such processes.</p> <p>You could possibly have a minimum residence criteria where a applicant must of resided for 5 years as their main residence.</p> <p>Safeguarding requirements are a positive change.</p> <p>Driving standards, I believed this was already required. Certainly was when I first applied as was a Written test and verbal communication proven at the initial training session. You engaged with the Council representatives during the course.</p> <p>Overall, the new rules should be implemented for New applicants only.</p>		
41. Other		I have passed everything that requires for taxi and private hire and waiting for the license.		
42. A current licence holder		<p>Points section of the policy is not reflect the reality of day to day taxi driving life!</p> <p>Abolish the points system and unnecessary criminal background check after every 3 months spent outside U.K for non British citizen.</p>		



		Please include policies that safe guard private hire and hackney drivers. Theft, fare runners and verbal abuse from customers		
43. A current licence holder Other - hackney carriage driver A resident		<p>Dear Licensing Committee Members of Northampton</p> <p>I am a Hackney Driver and proprietor of a Hackney carriage in Northampton, I have read through the draft policy and here are the following point I don't agree with:</p> <p>1) Motoring convictions; being banned for a number of years for having motoring convictions, which I believe to be completely unfair, this needs to be looked at again.</p> <p>I also urge you to ADD the following onto the policy Page 40 4. Offences / Breaches of Operator Licence Conditions - Private Hire Vehicle.</p> <p>** failure to provide Licensing officers and enforcement agency's Drivers job history and Pda history for upto 2 weeks in the event of a driver being reported to have being seen or reported illegally plying for hire** points ??</p> <p>I also urge Committee members to change the draft points system (penalty points) in regards to Page 37 3. List of Offences/Breaches of Driver Code of Conduct</p> <p>D7/ Driver of PH vehicle plying for hire 4 points.</p> <p>This needs to be changed to 6 POINTS.</p> <p>I also would like to see MANDATORY changes in appearances of private hire vehicles this includes the following:</p> <p>1) Permanent removal of yellow and red roof signs 2) Introducing reflective Magnetic signs or sign writing on doors and bonnets stating company name and having advance bookings only written.</p> <p>As a Hackney Driver I believe these ammendments will improve our trade for the foreseeable future and improve vehicle and driver standards and passenger safety for visitors of Northampton and the local community.</p>		
44. A current licence holder A resident A business owner A representative of a community group or voluntary group	Whole document	<p>Dear Sir,</p> <p>I hope that you will be fine and doing well.</p> <p>I would like to place my comment about the upcoming Taxi and PH regulations. Dear sir as you know that taxi drivers are already struggling with their income because of less work and rising cost of living and on top we have to face assault, run</p>		

		<p>and abuse from the customers too. In respect of this most of the parts of regulations are completely demoralising and racist where we as a driver have been given no rights to defend ourself as a self-employed entity. Further point based system is full forceful targeting system to put ourselves in deep farm of depression, anxiety and trauma working in this town and helping the community.</p> <p>As you can see taxi drivers always come out to help the community during bank Holidays, Christmas and new year holidays as well as during bad weather. But in response we are getting no appreciation from the council, licencing or any other authority. Just imagine if there is no taxi available for school runs, hospital, airports, trains stations, work or weekend runs. Than what would you or the public do. No one take a risk of drink driving. If there are no taxi drivers than other local businesses specially pubs will be effected too for not having customers. Kids will be effected for their school runs, hospital staff and patients will be effected for not reaching to the hospitals, people will be struggling to go to airports and train stations.</p> <p>Here I would like to request you to consider the importance of having taxi and PH drivers in this town who are always there to help the community. If you have any concerns you may introduce mandatory refresher course for the drivers to attend as a reminder to adhere the health and safety rules and regulations for the public, driver as well as the vehicle instead of bringing up this pathetic and depressing policy. All the drivers and operators are ready to cooperate with the council to upgrade the trading standards through mutual trust and ownership instead of being beaten by this draconian policy where most of the drivers will be so discouraged to either leave the trade, town or decrease their number of hours to avoid having chance to become disqualified and if that happens then it will place huge impact on all the business as well as on the community. Where people will struggle to book a taxi in time.</p> <p>We strongly believe that you will consider all the above points and will take appropriate actions to discard this policy and will find a constructive way instead of punishing way to improve the trading standards in our town.</p> <p>We shall be looking forward to your positive and favourable response.</p>		
<p>44. A current licence holder A resident A business owner</p>	<p>Pretty much mostly</p>	<ol style="list-style-type: none"> <li>1- point system</li> <li>2. Tinted glasses</li> <li>3. Roof signs</li> <li>4. Magnetic door signs</li> <li>5. Removing Toyota Prius from 6 seater to 4 seater.</li> <li>Displaying too many No smoking sign inside the car.</li> <li>6. More then two MOT</li> <li>7. PA course for all drivers</li> </ol>	<p>I suffer from all these policies and many other drivers family too. Have you ever thought of these poor drivers, how to benefit them and to</p>	<p>These policies are killing people like us these are not driver friendly. These policies could put two thousand families in difficult position.</p>

			protect them from abusive customers.	
46. A current licence holder	Points systems	Hi Dear sir/madam Especially this time of the financial problem no work lots of other financial problem work problem I have read the Neue draft that's absolutely not fair. I will kindly request please response to our Corman's and strikes at this please imagine everybody go sit up there mortgages finance lots of other things I know you know better than me about those issues going on at this time I kindly request, please respond fairly for this matter. Thank you very much.	My comment is regarding about Neue taxi legislation new draft all of the taxi drivers are not happy and they can they cannot really see good future who did you draft thank you very much.	I kinda requests from the licensing authority. Please look into this matter carefully, and please do something good for the local businesses and taxis thank you very much
47. A current licence holder		Dear Licensing Committee Members of Northampton  I am a Hackney Driver and proprietor of a Hackney carriage in Northampton, I have read through the draft policy and here are the following point I don't agree with:  1)Motoring convictions; being banned for a number of years for having motoring convictions, which I believe to be completely unfair, this needs to be looked at again.  I also urge you to ADD the following onto the policy Page 40 4. Offences / Breaches of Operator Licence Conditions - Private Hire Vehicle.  ** failure to provide Licensing officers and enforcement agency's Drivers job history and Pda history for upto 2 weeks in the event of a driver being reported to have being seen or reported illegally plying for hire** points ??  I also urge Committee members to change the draft points system (penalty points) in regards to Page 37 3. List of Offences/Breaches of Driver Code of Conduct  D7/ Driver of PH vehicle plying for hire 4 points.  This needs to be changed to 6 POINTS.  I also would like to see MANDATORY changes in appearances of private hire vehicles this includes the following:  1)Permanent removal of yellow and red roof signs 2) Introducing reflective Magnetic signs or sign writing on doors and bonnets stating company name and having advance bookings only written.  As a Hackney Driver I believe these ammendments will improve our trade for the foreseeable future and improve vehicle and driver standards and passenger safety for visitors of Northampton and the local community.	It affects my job and my livelihood	

<p>48. A current licence holder A resident A business owner</p>		<p>Best Regards</p> <p>I am writing to you as an Owner/Driver (Private Hire) with some concerns about the draft policy mentioned above. In principle, I welcome much of it - I fully understand the need to ensure safeguarding and customer care standards are raised and met However, I do feel that the very different environments that we collectively work in as Hackney and Private Hire have very different needs. My business is mainly airport transfers and long-distance transfers and I work very hard to offer a personalised chauffeur service. On occasion, a client may wish to get a sandwich en route which I have no problem with as there is no smell and any odd crumb would be cleaned away before the next booking. If your proposed rule 108 on page 65 of the draft document is implemented across the board you will effectively be reducing the level of choice and therefore service I can offer my clients which I respectfully submit would be at odds with your wish to improve services in my view, in my sector. My service includes carrying suitcases upstairs if required, offering to stop at a shop for milk and bread etc on the return from a holiday, picking up mail from the floor and so on.</p> <p>I hope you will see that this is a very different environment and style of customer interface to a colleague picking up people in Towns and Cities on a Friday night for example. In respect of door signage, while I fully understand the need for clients to be safe and know whose vehicle they are getting into, a large proportion of my clients are repeat bookings who therefore know me. Any new clients are guided to my website to see a picture of my car and to read reviews of the service and customer experience I offer. Is it not possible therefore to allow some dispensation on signage for those of us who only offer chauffeur services please? Finally, the requirement for having three 'No Smoking' signs in the vehicle is making the car look more like a Taxi in my opinion. I have never had anyone ask if they could smoke, or try to smoke in my vehicle and I feel it again chips away at the ambience I work hard to create. Thank you for taking the time to read this letter, and I look forward to receiving your reply in due course.</p>		
<p>49. A current licence holder</p>	<p>None of them</p>	<p>And the rules should be more easy for us because we are on the road. Do you know how hard is on the road when you're driving we should be stressfree there is so much stress on the roads and on the top you give me more stress and we are not terrorist. We are not rapist five fingers or not the same we should be treated well.</p>	<p>Not happy with council, what they're doing with the taxi drivers they don't respect us they don't treat us right we are you working hard trying to help</p>	<p>We are taxpayers, we should be treated the way you treat other citizens</p>

			we get bullied by the customer the new rules I did not see anything about the driver even if we have any problem or we are in danger. The police is not turning up they are saying it's just a taxi driver. We are paying taxes we should be treated exactly like other citizens	
50. current licence holder	16.1-16.4 Response [page 22]	<p>What is the highest standard of integrity and behaviour for taxi drivers, this description too vague not clear? This clause is implied to taxi drivers and not the passenger.</p> <p>It important to understand tha private Hire Taxi drivers perform a vital part of the public services, for example, they take the public to the hospitals, children to schools and pick up drunk and disorderly customers and office and factory workers to their destination. Private hire taxi drivers are used by medical staff, vulnerable passengers and other transport service. However, customers are rude, drunk and aggressive, violent and demanding. Many times, the taxi drivers are victims rather than perpetrators. Taxi drivers are sometimes being navigated by customers because they claim that taxi drivers overcharge them and navigate them through dangerous direction indicting shortcuts. Some taxi drivers are compelled to listen to customers due to the threat of being complained by customers to the council. Other occasions, taxi drivers are not paid for their fare and customers cause damage to their vehicle and assault them. If there is some serious crime committed by taxi driver or customers should be reported to the police and not council because police have investigating powers and not council. the focus should not be on taxi drivers but customers as well and</p>	i reported a crime of assault to the police station few month ago when i was attacked by drunk passenger	<p>Section 17-18. Response [ page 22]</p> <p>The enforcement and decision making section implies that the council want to implicate the role of tribunal or judicial courts but the council do not have the jurisdiction of tribunal or the courts. council do not have the powers to investigate allegation like the police but they can act upon the police and courts advice to remove or revoke someone licence. In many incident, the member of public make false allegation which is difficult for taxi drivers to prove, costly and its time consuming. For example, taxi drivers have been accused by customers of overcharging them but there is no evidence to suggest this. The council should not play devil advocate.</p> <p>Law and order should be investigated by police and on advice the council can act on. however, too many allegation have been proved false</p> <p>i attended few taxi meeting where i proved the members of public make false allegation</p> <p>20.3 Page 24-25 the safe guarding section Response</p> <p>All existing licensed drivers, proprietors and operators will be required to attend a successfully pass a safeguarding course and test, as required by the Council, to obtain a pass certificate which must be produced within 1 calendar year of adoption of this policy or on renewal, whichever is sooner. Failure to do so may</p>

result in suspension of the licence until successful completion of the test. This is unfair policy because many existing licenced drivers have been driving vehicle for many years and have a good understanding about safeguarding issues on children and vulnerable customers if they undergo Safe Guarding Course, a lot of existing taxi drivers unlikely to fail because of their standard of written English due to not been at school or college. The course should be free and basic for all drivers.

Section 22 S.1, page 26-complaints about licensees Response -council states If any person has any complaint about the behaviour or actions of a licensee (driver, operator or proprietor) they should read the guidance and complete the complaints form at [www.westnorthants.gov.uk](http://www.westnorthants.gov.uk) As stated that the council does not have the investigating powers but can work with the police to investigate crime of serious incident. Council can question the licence holder whether the allegation is true but the complainant must attend to give full account of the incident. The council must do background search of the complainant to determine if they are nuisance or have criminal background for their complaint to take most seriously, -the penalty point would give the customers and the council more powers to remove licence holder without the taxi driver having access impartial organisation to defend them. most taxi cannot afford a lawyer every time allegation is made against them. there is no information whether penalty point can be removed. This penalty point system will have serve impact on taxi drivers and deter them from joining private hire industry.

1.10. list 2 of page 33 is exhaustive list - Response

most taxi driver will fall into the trap of not completing one or two tasks. All these checks should be done during MOT TESTS and explained the requirements. The points system is unfair and is deterrent for existing and future taxi drivers from joining the private hire industry and conducting public service

				<p>3. page 37- list tries to take the taxi drivers independence away and being self-employed and makes the council look as they are the employers. For example, the list states that the</p> <p>Drivers must be clean and respectable in their dress code and behaving in orderly manner. Taxi must be clean always .I don't know the way in which the drivers should dress. I have not known many driver drivers not wearing good clothing. The taxi cannot stop their vehicle and constantly clean their car to impress the customer whilst they are conducting their daily private hire business.</p>
51. A current licence holder		Council are being to harsh, not thinking about driver but instead of thinking of public. If we get targeted by public council will not cover our losses nor will they help us in any ways		
52. A current licence holder	The whole draft document	The whole draft is not to improve the service but to target hard working taxi drivers.	It's not a fair document I feel that it's discriminating to minority people.	It's a discriminating document.
53. A current licence holder	Policy	The whole policy is fascist it must be scrapped ,,It seems it's targeting certain ethic group .	On the policy documents they is nothing that protects drivers ,,It's all about fighting the helpless , poor drivers who are abused ,attacked , racially abused daily, The Policy document is bad	The whole document is discriminatory ,It's about attacking drivers as pple who dont think , criminals , who must be punished by banning them from driving which bad ,, Please you need to review it
54. A current licence holder	1 year renewal	I will support the 1 year renewal plate licensing instead of 6 months	the 6 months renewal is too short and too bureaucratic. The 1 year is better	
55. A resident A business owner Other – private hire licence holder	Discreet Plates	I cannot find any comment on discreet plates which I have issued on my vehicle as I do mainly corporate and business airport runs and London bookings and my customers prefer not to have a plated vehicle Please can you advise as to where I find this information or advise me that this is still going to be an option		
56. A resident	All	It's very long. Why don't we have Uber in Northampton? Is it a bit too edgy and forward looking, for the NIMBY Tories who are in charge, to handle? Or are you just terrified someone might say something mean about Uber?	Regular disappointment as innovative and new things go to MK instead of northampton	Just look out if the window, at the state of the place

<p>57. A current licence holder</p>		<p>Please scrap the whole draft As this is a very hard time for everybody specially for taxi drivers. Rent bills food concil tax insurance fuel car parts and repairs gone up So please we can't afford any more pressure at this time If council go ahead with the draft many drivers will leave and go for another jobs So please let us live and work as we do Under the current system. Thank you With best regards</p>	<p>Because council making it harder for us at this time</p>	<p>We can't afford any more pressures. We want the draft policy to be scrap</p>
<p>58. A resident</p>		<p>I think it's a good idea taxi driving a round the town is very poor thay have no curtsey for other drivers I work around Northampton a lot any body cuts you up it's taxis</p>		
<p>59. A current licence holder A resident</p>	<p>Penalty Points Proposal</p>	<p>Points for not having 3 No smoking signs in the vehicle alongside the CCTV signs is ridiculously petty. You also need to clarify whether vehicles need to display a roof sign/door sign or both because it is not clear within the proposal and also whether cross bordering vehicles have to comply with the same regulations. Displaying of Badge Licence. The policy should read that the licence be displayed within the vehicle either around the neck of the driver or from an air vent in view of the passenger. Failure to notify Licensing Authority of serious illness/injury.</p>	<p>These days the majority of people are fully aware it is not permitted to smoke within a vehicle so 1 sign is ample as a reminder if required. Some drivers like myself display CCTV signs purely as a deterrent without actually having the equipment installed, so to penalise drivers for this is not reasonable. It is not always possible for a customer to view the left arm of a driver whilst inside the vehicle whereas it is far easier if it is around the drivers neck or attached to an air vent as it is illegal to have anything obstructing your view hanging from the internal mirror.  It is not always possible to inform the Licensing Authority of serious injury or illness in writing within 7 days, especially if you are</p>	



			hospitalised. Each case should be treated individually on merit and not wholesale as you are suggesting.	
60. A resident	Fit and proper person test	<p>This could directly or indirectly discriminate against any persons and allows the council to apply discriminatory practices when allocating licenses.</p> <p>This requirement should be scrapped.</p>		
61. A current licence holder	All	<p>In general i think this policy has far too much to comply with.</p> <p>As being a phd on and off for 24 years i have always been polite greet customers and tried to provide good customer service.</p> <p>I totally understand public safety and adhere to continuing providing good customer service.</p> <p>I do believe that some points are good to get the bad drivers off the road.</p> <p>I dont believe drivers should carry heavy luggage over 23kg for health and reasons. At the end of the day the passenger has filled suitcase and should load into car with the help of the driver.</p> <p>With terms to pick and drop passengers on double yellow lines should be removed as we only stop for the convenience to the public.</p> <p>Roof signs can be dangerous as with frost can slide off to the car behind.</p> <p>There is all to do with public safety but nothing to do with driver safety? Driver safety is also valuable as we do also have families with this day and age with knife crime we have no supprt from anyone ie council or police.</p> <p>The council should also include driver safety and ensure drivers get paid for the fare and if we have runners or no shows or the public booking multiple taxi companies. I think that the public also should be told that private hire service is alternative travel to busses or trains depending on circumstances and we are here to help the public to get to their destinations safely but with no aggressive behaviour towards us if they have their own issues and take out on drivers also included public where drugs and alcohol is involved we as a driver always gets humiliated from passengers.</p> <p>We as a driver can be a union without us there is no you and with extortionate prices and extra things we need to do i think</p>	<p>The basis on my comment is you thought about public safety and not driver safety at the end of the day we are licensed by the council or should be employed drivers and ensure both drivers and public are safe.</p>	

		the council should pay also council staff should also be dbs checked and have all relevent training as dealing with public on face to face		
62. A current licence holder	Page.33 to page. 44 points systems are unnecessary. No need to them things. This is harassing people.	A person while driving a vehicle he should be stress free. Also why everything is one sided. This is totally unfair. This is kind of discrimination as well. So make any mistakes please think again. Make sure rules are fair for everyone.	Well, why do you need points for, whither the serious offence rules are already there. Why do you needs for the dress code, this is only for harassing drivers. Because of there is lots of stupid customs.	Become a taxi driver he has already done practical driving test and written test. Also pick up and drop off is always customer choices not drivers. If driver doesn't, Leiston, customer will complain. And driver will get 2 points. So whose fault is that. Is there specific place for the private hire taxi? So do you have to concern about pick up or drop off. If driver can't touch any device while he's driving then how can he accept follow ups jobs. Everything is so unfair and one-sided.
63. A current licence holder		<p>Page 5 door sign I am not sure what is meant by affixed? I am assuming magnetic signs are ok? Door sign should be removeable as all drivers use their vehicle for personal use and for work. Also if the driver wants to sell the vehicle a door sign will reduce the value which is unfair.</p> <p>Pages 22, Sections 16.1-16.4: The current description of the highest standard of integrity and behaviour for taxi drivers is unclear and should be revised. This standard should apply to taxi drivers, rather than just passengers. It seems that the council is using this policy to discipline private hire and black drivers, and not placing enough emphasis on the needs and safety of the drivers themselves. Private hire taxi drivers play an essential role in public services, transporting people to hospitals, schools, and workplaces, including vulnerable passengers and those in need. However, they often face rude, drunk, and aggressive customers who may even cause damage to the driver's vehicle and threaten their safety. In some cases, customers make false allegations against drivers, which can lead to costly and time-consuming investigations. Serious crimes committed by taxi drivers or customers should be reported to the police.</p> <p>Sections 17-18: The council does not have the authority of a tribunal or judicial court, and its role should be limited to acting upon the advice of the police and courts. False allegations made by members of the public against taxi drivers can be difficult to prove, and the council should not act as a devil's advocate. Any serious allegations of wrongdoing should be reported to the police.</p> <p>Page 24, Section 19:</p>	my reason for comment because the Draft Hackney Carriage and Private Hire Policy 2023 is very unfair. This proposal has many unnecessary rules and regulations that make the work of the driver unnecessarily difficult, without adding any significant improvement to public and passenger safety.	

The council is not treating taxi driver applicants fairly and equally. The current policy is too strict and does not consider the circumstances under which taxi drivers operate, often facing abuse and threats from passengers. The policy should be revised to assist drivers with their problems, such as dealing with drunk, disorderly, and abusive passengers.

Section 19.3:

Taxi drivers treat their customers courteously, but they also need to be able to deal with difficult situations. The council should assist drivers in dealing with drunk, disorderly, and abusive passengers by providing training and support.

Pages 24-25, Section 20.3:

Requiring existing licensed drivers to attend and pass a safeguarding course and test within one year is unfair. Many existing drivers have years of experience and understand safeguarding issues, but may struggle with the written English required for the test. The course should be free and basic for all drivers.

Page 26, Section 22:

The council does not have investigating powers but can collaborate with the police to investigate serious incidents. Complaints should be thoroughly investigated and the background of the complainant should be taken into consideration. The penalty point system may give customers and the council more power to remove a license holder without impartial access to defend themselves. This system may have a significant impact on taxi drivers and discourage them from joining the private hire industry. It is not clear if the penalty points can be removed.

Page 33, Section 1.10:

The current point system for taxi drivers is unfair and may discourage drivers from joining the private hire industry. The checks required should be done during MOT tests, and the requirements should be clearly explained.

Page 37:

The council's list of requirements for taxi drivers may infringe on their independence as self-employed individuals. The dress code and cleanliness requirements for drivers and their vehicles may be difficult to maintain while conducting daily private hire business.

Page 112.

		<p>Point 34 and 35 contradicts each other. The policy needs to specify the vehicle in terms of fuel type. Or should remove point 34 and stick with 35 and 36 as those were previously agreed on thus makes point 34 extremely unfair.</p> <p>Page 120 maintenance and servicing Maintaining and servicing a vehicle according to the manufacturer's recommendations can be costly and time-consuming. Many car owners may not have the financial means or the time to do so. Additionally, some car owners may have their own trusted mechanics who they believe can maintain and service their vehicles better than the manufacturer's recommendations. Therefore, requiring inspection of the service history at every license renewal can be seen as an unnecessary burden and intrusion on the car owner's freedom of choice. It may also unfairly penalize car owners who have maintained their vehicles well but have not followed the manufacturer's recommendations exactly.</p> <p>Page 32 – 44 penalty point scheme. a point-based system for drivers puts drivers under constant pressure of losing their license. The basis of issuing these points is completely unfair, harsh, and sometimes even ridiculous. For example, Failure to display three or more “no smoking” signs in the vehicle, Driver allowing noise from radio or other similar equipment to be a source of nuisance or annoyance to any person inside or outside the vehicle, Not wearing driver badge on the upper left arm in the vehicle which is visible to passengers being conveyed in the vehicle or 2 points for not following a dress code that is not even clear in the draft. These are some the unnecessary offences amongst many more on the policy list which could easily get accumulated ending up with the driver losing his badge. Majority of the these listed offences for driver could and should be checked and enforced during MOT, vehicle plate renewal and during badge renewal. This penalty point scheme needs to be removed from the policy.</p>		
<p>64. A current licence holder</p>	<p>The whole document</p>	<p>I as a taxi driver of Northampton feel that this policy needs really looking into, you are making an already hard job harder, and impossible for drivers. The points system is very unfair, what if there is traffic, circumstances beyond my control, I'm going to be penalised for being late. What if i get held up helping previous passengers etc. Also the full service history, the ages of cars how as a citizen, in this current climate supposed to afford such luxuries. The exams/tests that your asking us to pay for to become drivers surely if you wish us to do them you should pay. I also feel that the vagueness of some of the points and the ridiculous contradictions within the policy need looking at. Also as a taxi driver i do not work for the council i am self employed, and some of the points in this</p>	<p>as a driver i feel like i need to be heard so i am opposing this</p>	

		draft policy make me become a worker, uniform, actions outside of work, reporting things to you, does this mean i get a wage, benefits, holiday sick pay.. doubt it very much so this will need looking into.		
65. A current licence holder	The whole document	<p>i do not agree with the point system, as some of the things on the point system are out of a drivers hand, and why should i be penalised for this, we have worked fine without one for so long.</p> <p>the full service history and age of cars can make it very difficult for a driver to be able to afford to get a car especially in the crisis the country is in at the minute.</p> <p>point 34 contradicts point 35 on page 22?</p> <p>door signs on vip cars make them look un vip and can damage the body work, which then will make the taxi fail its plate mot??</p> <p>what has my behaviour outside of the work place got to do with anyone but me?</p> <p>again forcing more courses on us forcing more expense on a trade that has been heavily effected because of covid. please make the points more clearer.</p> <p>why is someone who i am not employed by giving me rules that are impossible to stick by.</p> <p>this is a very strong response as i love being a driver but i feel the council are trying to stop drivers.</p>		
66. A current licence holder		<p>I hope that you are in good health and doing well.</p> <p>I would like to place my comment about the upcoming Taxi and PH regulations. Dear sir as you know that taxi drivers are already struggling with their income because of less work and the rising cost of living and on top we have to face assault, run and abuse from the customers too. In respect of this most of the parts of regulations are completely demoralising and racist where we as a driver have been given no rights to defend ourselves as a self-employed entity. Further point based system is a full forceful targeting system to put us in the deep farms of depression, anxiety and trauma working in this town and helping the community.</p> <p>As you can see taxi drivers always come out to help the community during Bank Holidays, Christmas and new year holidays as well as during bad weather. But in response, we are getting no appreciation from the council, licencing or any other authority. Just imagine if there is no taxi available for school runs, hospitals, airports, train stations, work or weekend runs. Then what would you or the public do? No one takes a risk of drunk driving. If there are no taxi drivers then other local businesses especially pubs will be affected too by not having customers. Kids will be affected by their school</p>		

		<p>runs, hospital staff and patients will be affected by not reaching the hospitals, and people will be struggling to go to airports and train stations.</p> <p>Here I would like to request you consider the importance of having taxi and PH drivers in this town who are always there to help the community. If you have any concerns you may introduce a mandatory refresher course for the drivers to attend as a reminder to adhere to the health and safety rules and regulations for the public, driver as well as a vehicle instead of bringing up this pathetic and depressing policy. All the drivers and operators are ready to cooperate with the council to upgrade the trading standards through mutual trust and ownership instead of being beaten by this draconian policy where most of the drivers will be so discouraged to either leave the trade, town or decrease their number of hours to avoid having a chance to become disqualified and if that happens then it will place huge impact on all the business as well as on the community. Where people will struggle to book a taxi in time.</p> <p>We strongly believe that you will consider all the above points and will take appropriate actions to discard this policy and will find a constructive way instead of punishing way to improve the trading standards in our town.</p> <p>We shall be looking forward to your positive and favourable response.</p>		
67. A current licence holder		The points system, no licence holder protection( we are part of the citizens of Northampton our vote matters) lateness should be left for the operators to deal with. Dress code absolutely irrelevant, waiting on a double yellow should be removed. We need protection for licence holders who get attacked and cars vandalised on the front line with no protection.	The new laws are one sided	The police and the Council get all the statistics
68. A current licence holder A resident	Entire Policy	The Entire policy makes no sense at all. it needs changing and sit down with the drivers and ask for their views.	the Point system is absolutely lunatic, makes no sense what so ever.	
69. A current licence holder	Policy	Penalty points Too harsh	It's going to make difficult some customers are rude, disrespectful and dangerous.	
70. A current licence holder A resident	Policy	Whole Policy	I disagree with the policy as it make more difficult and unnecessary things for drivers and for drivers safety there is nothing.	
71. A current licence holder A resident		Page 5 door sign	my reason for comment because the Draft Hackney	

		<p>I am not sure what is meant by affixed? I am assuming magnetic signs are ok? Door sign should be removeable as all drivers use their vehicle for personal use and for work. Also if the driver wants to sell the vehicle a door sign will reduce the value which is unfair.</p> <p>Pages 22, Sections 16.1-16.4: The current description of the highest standard of integrity and behaviour for taxi drivers is unclear and should be revised. This standard should apply to taxi drivers, rather than just passengers. It seems that the council is using this policy to discipline private hire and black drivers, and not placing enough emphasis on the needs and safety of the drivers themselves. Private hire taxi drivers play an essential role in public services, transporting people to hospitals, schools, and workplaces, including vulnerable passengers and those in need. However, they often face rude, drunk, and aggressive customers who may even cause damage to the driver's vehicle and threaten their safety. In some cases, customers make false allegations against drivers, which can lead to costly and time-consuming investigations. Serious crimes committed by taxi drivers or customers should be reported to the police.</p> <p>Sections 17-18: The council does not have the authority of a tribunal or judicial court, and its role should be limited to acting upon the advice of the police and courts. False allegations made by members of the public against taxi drivers can be difficult to prove, and the council should not act as a devil's advocate. Any serious allegations of wrongdoing should be reported to the police.</p> <p>Page 24, Section 19: The council is not treating taxi driver applicants fairly and equally. The current policy is too strict and does not consider the circumstances under which taxi drivers operate, often facing abuse and threats from passengers. The policy should be revised to assist drivers with their problems, such as dealing with drunk, disorderly, and abusive passengers.</p> <p>Section 19.3: Taxi drivers treat their customers courteously, but they also need to be able to deal with difficult situations. The council should assist drivers in dealing with drunk, disorderly, and abusive passengers by providing training and support.</p> <p>Pages 24-25, Section 20.3:</p>	<p>Carriage and Private Hire Policy 2023 is very unfair. This proposal has many unnecessary rules and regulations that make the work of the driver unnecessarily difficult, without adding any significant improvement to public and passenger safety.</p>	
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Requiring existing licensed drivers to attend and pass a safeguarding course and test within one year is unfair. Many existing drivers have years of experience and understand safeguarding issues, but may struggle with the written English required for the test. The course should be free and basic for all drivers.

Page 26, Section 22:

The council does not have investigating powers but can collaborate with the police to investigate serious incidents. Complaints should be thoroughly investigated and the background of the complainant should be taken into consideration.

The penalty point system may give customers and the council more power to remove a license holder without impartial access to defend themselves. This system may have a significant impact on taxi drivers and discourage them from joining the private hire industry. It is not clear if the penalty points can be removed.

Page 33, Section 1.10:

The current point system for taxi drivers is unfair and may discourage drivers from joining the private hire industry. The checks required should be done during MOT tests, and the requirements should be clearly explained.

Page 37:

The council's list of requirements for taxi drivers may infringe on their independence as self-employed individuals. The dress code and cleanliness requirements for drivers and their vehicles may be difficult to maintain while conducting daily private hire business.

Page 112.

Point 34 and 35 contradicts each other. The policy needs to specify the vehicle in terms of fuel type. Or should remove point 34 and stick with 35 and 36 as those were previously agreed on thus makes point 34 extremely unfair.

Page 120 maintenance and servicing  
Maintaining and servicing a vehicle according to the manufacturer's recommendations can be costly and time-consuming. Many car owners may not have the financial means or the time to do so. Additionally, some car owners may have their own trusted mechanics who they believe can maintain and service their vehicles better than the manufacturer's recommendations. Therefore, requiring inspection of the service history at every license renewal can be seen as an unnecessary burden and intrusion on the car owner's freedom of choice. It may also unfairly penalize car owners who have maintained their



		<p>vehicles well but have not followed the manufacturer's recommendations exactly.</p> <p>Page 32 – 44 penalty point scheme.  a point-based system for drivers puts drivers under constant pressure of losing their license. The basis of issuing these points is completely unfair, harsh, and sometimes even ridiculous. For example, Failure to display three or more “no smoking” signs in the vehicle, Driver allowing noise from radio or other similar equipment to be a source of nuisance or annoyance to any person inside or outside the vehicle, Not wearing driver badge on the upper left arm in the vehicle which is visible to passengers being conveyed in the vehicle or 2 points for not following a dress code that is not even clear in the draft. These are some the unnecessary offences amongst many more on the policy list which could easily get accumulated ending up with the driver losing his badge. Majority of the these listed offences for driver could and should be checked and enforced during MOT, vehicle plate renewal and during badge renewal. This penalty point scheme needs to be removed from the policy.</p>		
72. A current licence holder		<p>Penalty point scheme is not fit for many reasons as it's not fit many workers including council staff . It is only taxi drivers that have penalty points , no other employees or self-employed has penalty points it is purely targeted taxi drivers that already doing .</p>	<p>The reason I object this penalty points is , it penalises taxi drivers who are already dealing very violent and abusive customer that can .</p>	<p>Taxi drivers can be easily penalised , eg if customer with muddy shoes leaves the muddy footprint in the car the next customer can . Can dealing very violent and abusive customer that can use this penalty points against innocent taxi driver .</p> <p>complain and taxi driver will get penalty points that is one of many reasons that I object this penalty points scheme as a taxi driver . I taxi driver who are already dealing very violent and abusive customer that can use this penalty points against taxi driver .</p>
73. A current licence holder A resident	page 33 to page 44, page 63.	dressing code, penalty point. D1, D2, D3, D4, D6, D8.	<p>the policy is not fair, it did not protect drivers and their lively hood. those areas of drivers concern should be look at and addressed .</p>	
74. A current licence holder	It's to do with the whole policy.	<p>The drivers where not involved in marking the policy. This is to do with the people who working in the industry. I personally believe to improve something you need to engage the people who are working in it. I personally believe some of the things are right but need to adjust.</p>	<p>Most of the items in the policy can be reduced and make small, The policy should be apolicy not a set of pernsment rules.</p>	
75. A current licence holder	Policy	<p>The policy as a whole is complicated .the penalty points scheme is petty.on a bad day I could accumulate 20 points.</p>	<p>As for full service history on vehicles. When I buy a</p>	Driving test

			<p>vehicle the financial responsibility is mine not the council therefore the choice buying with full service history is mine.as long as the vehicle passes the mot. That should be enough. My first private hire vehicle was 4 years old with full service history and it failed first time and it 4 weeks to fix and the financial burden was mine not the council.</p>	<p>When I got my private hire badge 15 years ago I had a knowledge and driving test. I agree that new drivers should have a test or driving course but in one section you say new and existing drivers require a test but in another you say just new drivers. Driving licence</p> <p>With cameras everywhere now especially in cities it can be easy to incur points when you are trying to follow a sat navigation with drunk customers and watching your back which has happened quite often to me while working nights. Getting 6 points with the possibility of a ban is unfair and stressful to the driver. Incurring 6 or more points on a phv insurance is very expensive and should be enough of a deterrent.</p> <p>The policy</p> <p>The previous policy should have been kept with a few additional ammendments. There were a few more issues I had but I work 6 to 7 nights a week so my time is limited.</p>
<p>76. A current licence holder</p>		<p>Page 5 door sign I am not sure what is meant by affixed? I am assuming magnetic signs are ok? Door sign should be removeable as all drivers use their vehicle for personal use and for work. Also if the driver wants to sell the vehicle a door sign will reduce the value which is unfair.</p> <p>Pages 22, Sections 16.1-16.4: The current description of the highest standard of integrity and behaviour for taxi drivers is unclear and should be revised. This standard should apply to taxi drivers, rather than just passengers. It seems that the council is using this policy to discipline private hire and black drivers, and not placing enough emphasis on the needs and safety of the drivers themselves. Private hire taxi drivers play an essential role in public services, transporting people to hospitals, schools, and workplaces, including vulnerable passengers and those in need. However, they often face rude, drunk, and aggressive customers who may even cause damage to the driver's vehicle and threaten their safety. In some cases, customers make false allegations against drivers, which can lead to costly and time-consuming investigations. Serious crimes committed by taxi drivers or customers should be reported to the police.</p> <p>Sections 17-18: The council does not have the authority of a tribunal or judicial court, and its role should be limited to acting upon the advice</p>	<p>my reason for comment because the Draft Hackney Carriage and Private Hire Policy 2023 is very unfair. This proposal has many unnecessary rules and regulations that make the work of the driver unnecessarily difficult, without adding any significant improvement to public and passenger safety.</p>	

of the police and courts. False allegations made by members of the public against taxi drivers can be difficult to prove, and the council should not act as a devil's advocate. Any serious allegations of wrongdoing should be reported to the police.

Page 24, Section 19:

The council is not treating taxi driver applicants fairly and equally. The current policy is too strict and does not consider the circumstances under which taxi drivers operate, often facing abuse and threats from passengers. The policy should be revised to assist drivers with their problems, such as dealing with drunk, disorderly, and abusive passengers.

Section 19.3:

Taxi drivers treat their customers courteously, but they also need to be able to deal with difficult situations. The council should assist drivers in dealing with drunk, disorderly, and abusive passengers by providing training and support.

Pages 24-25, Section 20.3:

Requiring existing licensed drivers to attend and pass a safeguarding course and test within one year is unfair. Many existing drivers have years of experience and understand safeguarding issues, but may struggle with the written English required for the test. The course should be free and basic for all drivers.

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Point 34 and 35 contradicts each other. The policy needs to

		<p>specify the vehicle in terms of fuel type. Or should remove point 34 and stick with 35 and 36 as those were previously agreed on thus makes point 34 extremely unfair.</p> <p>Page 120 maintenance and servicing Maintaining and servicing a vehicle according to the manufacturer's recommendations can be costly and time-consuming. Many car owners may not have the financial means or the time to do so. Additionally, some car owners may have their own trusted mechanics who they believe can maintain and service their vehicles better than the manufacturer's recommendations. Therefore, requiring inspection of the service history at every license renewal can be seen as an unnecessary burden and intrusion on the car owner's freedom of choice. It may also unfairly penalize car owners who have maintained their vehicles well but have not followed the manufacturer's recommendations exactly.</p> <p>Page 32 – 44 penalty point scheme. a point-based system for drivers puts drivers under constant pressure of losing their license. The basis of issuing these points is completely unfair, harsh, and sometimes even ridiculous. For example, Failure to display three or more “no smoking” signs in the vehicle, Driver allowing noise from radio or other similar equipment to be a source of nuisance or annoyance to any person inside or outside the vehicle, Not wearing driver badge on the upper left arm in the vehicle which is visible to passengers being conveyed in the vehicle or 2 points for not following a dress code that is not even clear in the draft. These are some the unnecessary offences amongst many more on the policy list which could easily get accumulated ending up with the driver losing his badge. Majority of the these listed offences for driver could and should be checked and enforced during MOT, vehicle plate renewal and during badge renewal. This penalty point scheme needs to be removed from the policy.</p>		
77. A current licence holder	Over all	<p>The point system introduced is too much. The results can be achieved by fining the drivers. Also it is only for the customers and nothing any thing for the safety of drivers.</p> <p>Totally disagreed.</p>	The policy is so complicated to digest. We will be all the time making ensure that these 100s of requirements are met. Always be in fear that something is not missing.	
78. A current licence holder A resident		Yes		
79. A current licence holder	Policy	The whole of the new policy is too restrictive. It feels to me that the council is acting as judge, jury and executioner. In my opinion some of the legislations have no legal power to withdraw my employment. The taxi driver is not employed by the council, we are self employed.	According to the new legislation I could accumulate 12 points in one day easily and would lose my license for 5	2 points, car not clean. 2 points, not smartly dressed (no definition of what smartly dressed is) 2 points for picking up customer on double yellow line. 2 points for being late in picking up customer etc etc. This is just a few things

			years. In no other profession would this be the case.	
80. A current licence holder A resident	All	<p>*N'ampton Council*</p> <ul style="list-style-type: none"> <li>* New legislation is an assault order</li> <li>* Taxi drivers are also humans</li> <li>* Stop bullying taxi drivers</li> <li>* Create love not fear</li> <li>* Be respectful with taxi drivers</li> <li>* Do you want taxi drivers to become jobless</li> <li>* Where is taxi drivers rights &amp; safety</li> <li>* Whome is there to protect taxi driver</li> <li>* Stop putting Taxi drivers and there families under fear &amp; anxiety</li> </ul>	No respect from council for the taxi drivers. We are already taking too much hate, threat and bullyness from the customer and on top our council is further pressing us and want us to die on the job by giving us depression anxiety and pressure through this policy. Therefore the whole policy should be abolished.	
81. A current licence holder	I don't exactly remember 151 pages ....	Customer oriented draft but why not driver oriented!!! Customers are good in making stories so you will believe on them ???	The whole draft is pathetic and against drivers rights.	<p>Simply don't agree with anything new all the existing laws are enough and keep it simple as they are ... where you guys think that your general public need more safety from us...</p> <p>Whole draft is waste of time and money from council</p> <p>Please spend your energies and money on more concerning issues .i.e Schools ,Northampton General hospital,Roads are in worst state, need more housing . Lack of planning in whole town and you guys are after taxi drivers and new laws to implement because we are easy target!!!</p>
82. A current licence holder	Majority of the policy	<p>Personally, along with all other taxi drivers, I am not happy with most parts of this proposal draft. The requirements are made specifically against the taxi drivers.</p> <p>I want to request that you all sit down carefully and read just how many parts of this proposal will benefit us taxi drivers and how much of it won't.</p> <p>I'm sure you'll come to the conclusion yourselves of how unfair it is to us.</p> <p>We agree with some points like being presentable &amp; keeping the taxi clean etc. And we strongly agree with the part mentioned about having no insurance - that breach should receive the deserved penalty points &amp; disqualification. However majority of the points mentioned are very minor things and the penalties given are too harsh.</p> <p>For example - touching the phone. This is necessary to accept jobs, however if the device is on hand then the penalty is</p>	This is my livelihood. I am an unskilled person who won't be able to go into normal work as I have no qualifications or other experience. I am the sole breadwinner for my big family. I don't want to ask the government for financial help, but would rather work for my earnings.	

		<p>understandable.  For minor things like pick up &amp; drop off on double yellow lines I believe there should be fines put in place rather than points added every time. Fines stop the drivers from making the same mistakes in the future whereas points will take away their whole livelihood.</p>	<p>If this policy comes out - my whole family will suffer the effects of it which is the reason I am adamantly against this policy.  It is very sorrowful that over minor things, there is a plan to remove hardworking individuals from the job they've been doing their whole lives.  As taxi drivers, our job goes much further than just driving people around. It includes a lot of manual work and excellent customer service.  After having many qualities &amp; putting in so much effort, do you think it's fair to put workers out of their jobs over such trivial things?</p>	
83. A current licence holder	Points system, no driver protection,	We will loose our bread and butter if this racist policy are implemented	Unfair laws no regards for licence holders on the receiving end	
84. A current licence holder	Whole of it	West Northamptonshire Council should reconsider that new draft policy, we do agree that council is trying to put more safety measures but what about the drivers. Nothing mentioned about safety of drivers how about drunk rude or racist customers attacking drivers who will take care of drivers, police doesn't help as they say its civil matter Council doesn't help and if drivers try to take matter in their own hands council is ready to act against drivers with severe penalties also taxi drivers are not employed by council that they have to inform cou council about their circumstances, if that so will the taxi drivers be getting sick pay holiday pay and all the other benefits, would a member of West Northamptonshire council please explain	This whole policy is racist and draconian	There is no need for the new draft as the system is already working why change it
85. A resident	Disability Discrimination / Literacy Requirements	Whilst there is a large portion of the document ensuring that those with disabilities are accomodated properly, there is little to ensure that drivers have an understanding. As a relative of someone who has an intelectual disability and uses taxis to attend day services, this concerns me and has lead to problems. Basic learning disability and autism awareness training is available as short and even online courses and this	On one occasion the driver picked up the wrong person instead of my brother and took them to his address because the driver	

		<p>is undertaken in public facing jobs not just in the public sector. Even customer service positions and large companies train their employees on this nowadays.</p>	<p>took the person saying their name as confirmation of his question when infact it had been misunderstood.</p> <p>On another occasion, whilst working for a local organisation looking after people with disabilities, the driver dropped me off at the place I worked and they commented to me that he would "only work in a place like that if I was given a weapon to use."</p> <p>Whilst some of this may be down to other factors I feel that even a basic understanding of people with autism and learning disabilities could have helped in these instances.</p>	
86. A resident	sections 11-12 and 15-16	<p>Fully support these measures. They will make me feel more comfortable and confident in using taxis in West Northamptonshire. I also feel that the stricter regulations will also be beneficial as both a pedestrian and road user. While most taxi drivers in the area are fine I have had a few incidents over the years and a more robust regulatory and complaints system will hopefully sort out the 'bad apples'.</p>		
87. An organisation		<p>This new WNC licensing in its inception was an ideal opportunity to merge the 3 licensing districts within West Northants under one unitary body. Initially, we were told that due to the varying and sometimes conflicting conditions across the 3 authorities this course of action was necessary and unavoidable, however the council have used this as an opportunity to apply draconian measures against the trade including drivers and operators alike.</p> <p>The document has been inspired by the Institute of licensing and is NOT I repeat NOT statutory regulation, but only advice. This document in varying forms has been successfully challenged against by a number of organisations (including the LHPCA of which members of our association are affiliated with), in a number of towns and cities across the country, where clearly common sense prevailed.</p> <p>We believe that this proposal demonstrates local government</p>		

		<p>overreach at a level never seen before, and the realisation of authoritarian overreach seems to be omni present.</p> <p>In 2020 Bounds taxis lost a worker rights claims in the high court against two drivers at a significant financial loss to the company, in excess of £30,000 in costs plus legal expenses. The councils licensing proposal document opens up an array of opportunity for legal proceedings being bought by drivers against operators citing worker rights status claims. It is totally unacceptable and reckless for WNC to enforce these conditions to operators.</p> <p>There are a number of blatant examples ie, driver working hours. Any notion that an operator can control a drivers working hours implies worker rights status. Another example is the maintainance of vehicles need to be checked by the operator, once again this demonstrates that the controller is indeed responsible for the drivers working conditions, clearly both of these examples would both be easily challenged and won by any competent barrister.</p> <p>The licensing officers at WNC have stated that public safety is their primary concern and that these new recommendations provide this. Public safety is paramount and in everyone's consideration and is not the reserve WNC. As operators we have spent decades building our business's providing a virtual seamless major cog in the transport solutions for Northampton. We could only have achieved this with public safety as a non negotiable requirement.</p> <p>We urge the licensing committee to reject these proposals wholesale, the full implications have not been considered anywhere near enough and the potential loss of business and livelihoods under the veil of public safety is totally irresponsible and a disaster waiting to happen.</p> <p>In conclusion, I would like the committee to consider that the taxi trade in this town as many others across the country are the unsung heroes, providing transport solutions for the people of the county. We are the wheels that convey commerce and we need all the help to protect our vastly underrated transport support structure.</p> <p>We are the 4th emergency service not the AA. How many times have the AA taken someone to hospital or taken your children to school or took you to the train station for work. I suggest never, and without the taxi trade our town STOPS.</p> <p>There's an old adage 'Be carefull what you wish for, you could get it'.</p>		
<p>88. A current licence holder A resident A business owner A representative of a community or voluntary group An organisation Other - Drivers Representative</p>	<p>page 119 paragraph 55 d)</p>	<p>Complete service history for vehicle. Almost impossible to achieve for nearly all used vehicles. I have been involved in the taxi industry in Northampton for nearly 35 years, most of that time hiring out vehicles to drivers. I do not think that I have ever been able to obtain a vehicle with a full service history. Part history yes, service book stamped for the first two years (the warranty period) yes. Some receipts yes. What about imports. Never a service history with them (except maybe in Japanese). I can see the point of a service record. I have always done this</p>		<p>page 118 paragraph 51 p)</p> <p>Seat width of 1.29 metres. This started off at 1.3 metres in the original draft. Reduced to 1.29 metres after it was pointed out to Licensing that a Toyota Prius 2009 onwards has a rear seat width of 1.29 metres. It is now clear that the Toyota Corolla Estate 2020 onwards (which is the front</p>



Northampton Private Hire Association

as I needed to know what and when work was done on any specific vehicle that I owned. But before I owned it, not required.  
I feel owners would be obtaining service books and getting them stamped by fraudulent means, is the licencing going to be checking all the entries in the book to see if they are legitimate.

runner to take over from the Prius) has a rear seat width of 1.25 metres.  
In your own document, page 113 paragraph 42 c), a seat width of 410 mm per person is given. Resulting in 1.23 metres. Incidentally this has been industry standard for more than 40 years. Why change it.

Page 32 onwards

Penalty Points Scheme.

I can see the object to some degree, but someone appears to have gone points crazy.

It is not clear if the maximum points is 20 points (page 59 paragraph 55), or 12 points (page 33 paragraph 1.8), or a fixed 12 months or a rolling twelve months.

An overzealous officer could load a driver with many points over just one minor incident.

I was recently stopped on double yellow lines waiting for a booking. An over-zealous traffic warden could have me for D3 for arguing, D7 for plying for hire, D47 using the phone (trying to contact customer), D51 failing to co-operate. All in one go.

The operators are going to have their own problems with this system as they will be given points for items which are not their fault.

Operator Penalty Points

Page 40 to 41. The document lays out a penalty points scheme that lays out sanctions for operators for items that are clearly way beyond their responsibility or control. 'Failure to obtain or maintain insurance on vehicle' (O2) and 'failure to produce evidence of insurance cover to the Licensing Authority' (O3), surely the responsibility of the vehicle owner.

'Displaying the word Taxi or Cab on a private hire vehicle, or other advertising without the permission from the Council' (O22), surely again the responsibility of the vehicle owner. The penalty points scheme even compounds on this with 'Late to provide evidence of insurance or interim MOT' (O29) (O30). That's the operators licence gone, 12 or 18 points, (whichever the officer decides) for something that is clearly a vehicle owners responsibility.

The penalty points system needs either a radical rewrite, or to be discarded completely.

Page 145 paragraph 79 d)

Vehicle Maintenance.  
How could an operator be expected to keep a record of the maintenance history of private hire vehicles owned not by the operator but by another entity. A self employed owner/driver buys, prepares, licenses and maintains the vehicle, totally independently of the operator. If the owner/driver does not inform the operator of any maintenance or repairs to their vehicle, how could the operator possibly know.  
Again this is the Council making the operator responsible over something of which they have absolutely no control or responsibility.

Page 146 paragraph 81 d)

Address issues  
Again putting the responsibility or failure of a driver to inform WNC of a change of address onto the operator. If a driver fails to inform the operator of a change of address, how could they possibly know. Yet again this should be the responsibility of the driver, and the driver alone.

Page 148 paragraph 98

Advertising.  
The word TAXI has been part of the company name of BOUNDS TAXIS since 1972.  
Provision should be made for this, as has been done in other districts.

Page 89 paragraph 71 k)

Tinted windows.  
Although the requirement for the removal of rearward tinted windows has been removed from the Private Hire requirements, it is still in the Hackney Carriage requirements.  
Despite the difficulty of obtaining vehicles without tinted windows, most higher grade vehicles come with them as standard fitting, changing them for windows of 70%

				<p>clear can cost upward of £2000 for what I can see as no good reason. That is of course if they can be obtained at all.</p> <p>Page 125 paragraph 102</p> <p>Door signs Why bother. If door signs are fitted they should meet certain standards, but they should be optional. Executive vehicles won't use them. Probably others too. TFL doesn't bother with it, but appears to allow there use.</p>
<p>89. A current licence holder A resident</p>	The whole NEW DRAFT	I think the POINT SYSTEM and the whole DRAFT should be scrap	Because DRIVERS are not protected, for example a customer can be rude or racist to the driver and at the same time the driver can lose his batch for standing up to the customer.	I have given evidence at the above column.
<p>90. A current licence holder A resident A business owner</p>	The whole draft should be revised.	<p>1 - Page 49 4.38 why would a driver lose their badge for 10 years by WNC when there are national laws to deal with this offence ?.</p> <p>2 - Page 32 to 44. I don't think that the proposed point system is reasonable nor fair.</p> <p>3 - Page 117, 51i. I don't agree that all PHV should have opening rear window.</p> <p>4 - Page 119, 53 and Page 125 104. I don't agree that MPV type vehicles should only be plated as 4 seaters. if the vehicle is manufactured to carry 6 passengers and insured for 6 passengers why would then WNC plate it for only 4? this sounds like someone in the council had a bad experience in a PVH and decided to ruin our work to his satisfaction.</p> <p>5 - Page 119, 55d and Page 1,58a. Its not visible for all new vehicles to have fully documented service history, what purpose would it serve? some vehicles are imported already used how can they have fully documented Service History ?</p> <p>6 - Page 125, 101. Definitely NO.</p>	<p>1 - The Taxi &amp; PHV business is struggling as it is now and the WNC is only interested to making it even more difficult , WHY?</p> <p>2 - A lot of drivers don't get a lot of help from WNC apart from licensing . so many drivers are robbed and assaulted, lose earnings while they recover from their ordeal, where is the council?.</p> <p>3 - We get parking tickets left right and centre while we offer a Service ,where is the council.</p> <p>4 - WNC already has rigorous checks in place including MOT's twice a year, why aren't they ensuring compliance on</p>	

			already existing regulations rather than the New ones being suggested ?	
91. A current licence holder	All policy		This policy is not fair it doesn't cover the driver's safety. Doesn't concern the driver's livelihood and it gives the public authority that can end driver's carrier with even false allegation or hate.	
92. A current licence holder	page 75 Paragraph 189	<p>Our trading name is Bounds Taxis ( Northampton Ltd), as is the name on the licence issued by Northampton Borough Council on 31st January 2021, I have many concerns.</p> <p>1) A major part of the company's intellectual property rights (IPRs) and the value of those IPRs are in the company's trading name, its good reputation and history. I believe this is therefore a major constraint of trade and a devaluation of their IPR, which we would seek the Competition and Markets Authority's (CMA's) opinion on.</p> <p>2) There is no justification on safety grounds for the prohibition of these words or signs.</p> <p>3) We doubt whether a regulatory and/or equality impact assessment has evaluated this particular section of the policy adequately if indeed these were undertaken at all.</p> <p>4) The company do run hackney carriages; therefore, they are a taxi company.</p> <p>5) They are of course also a minicab company too, so prohibiting that in their signage is probably another constraint of trade and restricted practice.</p> <p>6) The word taxi, is a worldwide known expression, which in the Cambridge Dictionary is defined as: A car with a driver who you pay to take you somewhere.</p> <p>This section of the policy in my view is also not fit for purpose because many companies actually run mixed fleets of Hackney and PHV services throughout England and Wales with their name integral to what they do.</p>	Bounds has been known as Bounds Taxis since its inception in 1958 and has been running with this name now for 65 years. We do have a mixture of both Hackney carriage vehicles and Private Hire vehicles working on our fleet for this whole period of time. The removal of the word Taxi from our business would severely impact our Intellectual property rights.	Our licence has been with Northampton Borough Council since the company inception and we have been based in Bradshaw Street for that whole period of time.
93. A current licence holder	All	<p>Dear Anna Earnshaw,</p> <p>It is with regret that I am writing to West Northampton Council concerning the proposed future WNC Private Hire and Hackney Carriage Policy 2023.</p> <p>I have been involved with the Private Hire and Taxi industry in</p>	The document is open for many legal future challenges	Can your legal team truly confirm that all is satisfactory with this 151 page document?

Northampton for over 40 years holding various licenses to include Private Hire Driver, Hackney Carriage Driver, Combined Driver, Private Hire Vehicle, Hackney Carriage Vehicle and Private Hire Operator licenses. This immensely badly written WNC Document content is riddled throughout with such an insulting, Barbaric, vindictive, inhumane, discrimination against the Taxi trade at all levels. All legal Barrister's will be rubbing their hands together for the extra work as they write easily over a million words against the legalities of this document.

There are so many legal issues, so for starters, I would like to highlight the two separate points schemes as of the following:-

Firstly, the document states that any driver gaining more than 6 DVLA points will be banned from holding a WNC Private Hire/Taxi driving license for a very excessive five plus years. The statute laws of the UK allow all experienced Driving License holders including Heavy Goods drivers, Bus/Coach drivers as well as the General Motorists up to 12 points before a driving ban is issued on a DVLA license. A five plus years ban is very rarely issued through the courts. The law courts also allow under exceptional conditions of hardship for a driver to keep their license with 12 or more totting up points on some occasions depending on the circumstances surrounding the driver. Heavy Goods drivers, Bus/Coach drivers as well as the General Motorists are licensed by DVLA (Central Government Directives) and 333 responsible Local Authorities in England is given the privilege of licensing Private Hire and Taxi Drivers. The vast majority of the 333 Local Authorities in England run with the statute law of the land, 12 points. A totting 12 points usually commands a six months ban through the Courts, not five plus years. There are no statute laws in England stating 6 points on experienced drivers requiring a ban punishment. Is WNC a responsible Local Authority to differ from the majority of Local Authorities in England?

Secondly, the 151 page document starts on page 32 stating the proposed conditions of WNC new internal Penalty Points Scheme. Some of the Offences are very open ended. For example, Driver Code D1 "Driver not clean and respectable in their dress" (2 Points) Who is going to be judgemental on this to be consistent? Driver Code D2 "Driver not complying with the Driver Dress Code" (2 Points) What is the Driver Dress Code? Operator Code O7 "Failure to provide a prompt, efficient or reliable service" (2 Points) & Operator Code O8 "Failure to attend a booking at appointed time or place without sufficient cause" (2 Points) Who again is going to be judgemental on this to be consistent? When the driver or operator has a total of 12 points within a year they can be banned. Are these reasonable conditions, for example, if these conditions applied to our Train Operators they would be shut down immediately, as the train service runs late every day. All operators try there best to look after customers.

		<p>Now we come to my biggest concern that the banned refusals and revocations of Driver's/Operator's will be placed on a national database NR3, etcetera. The vast majority of the 333 Local Authorities in England do not adhere to the same criteria as WNC but are being influenced with such an insulting, Barbaric, vindictive, inhumane, discrimination against the Taxi trade at all levels operating under the regulations of WNC. This kind of points scheme can easily be manipulated as a form of constructive dismissal. The Private Hire/Taxi Trade is very disappointed with WNC concerning this document, to put things mildly. Just imagine this Penalty Points scheme structure being tailored to all WNC workers, would it be acceptable?</p> <p>I am in agreement that all Private Hire and Taxi vehicles should be Licensed for 12 Months.</p> <p>I am in agreement that all Taxi vehicles in Northampton should be allowed to Licence saloon vehicles equal to licensed Daventry Taxi vehicles by West Northamptonshire Council on the basis of equality.</p> <p>Has any equality assessments been carried out before this draft document was presented for consultation?</p> <p>This document needs to cease with immediate effect as its to extreme.</p> <p>Hopefully a reply will be forthcoming in the very near future.</p>		
<p>94. A current licence holder</p>	<p>Private Hire</p>	<p>I am against all the draft proposal of northampton council.</p>	<p>We need a fair proposal and cancel all your draft. If not i will be a discrimination again us.</p>	
<p>95. A current licence holder</p>		<p>Dear Licensing Committee Members of Northampton</p> <p>I am a Hackney Driver and proprietor of a Hackney carriage in Northampton, I have read through the draft policy and here are the following point I don't agree with:</p> <p>1) Motoring convictions; being banned for a number of years for having motoring convictions, which I believe to be completely unfair, this needs to be looked at again.</p> <p>I also urge you to ADD the following onto the policy Page 40 4. Offences / Breaches of Operator Licence Conditions - Private Hire Vehicle.</p> <p>** failure to provide Licensing officers and enforcement agency's Drivers job history and Pda history for upto 2 weeks in the event of a driver being reported to have being seen or reported illegally plying for hire** points ??</p>		

		<p>I also urge Committee members to change the draft points system (penalty points) in regards to Page 37 3. List of Offences/Breaches of Driver Code of Conduct</p> <p>D7/ Driver of PH vehicle plying for hire 4 points.</p> <p>This needs to be changed to 6 POINTS.</p> <p>I also would like to see MANDATORY changes in appearances of private hire vehicles this includes the following:</p> <p>1)Permanent removal of yellow and red roof signs 2) Introducing reflective Magnetic signs or sign writing on doors and bonnets stating company name and having advance bookings only written.</p> <p>As a Hackney Driver I believe these ammendments will improve our trade for the foreseeable future and improve vehicle and driver standards and passenger safety for visitors of Northampton and the local community.</p> <p>Best Regards</p>		
<p>96. A business owner</p>	<p>Disagreeing with number of points in draft policy</p>	<p>Withdraw points-based penalty enforcement management system. If not withdrawn it should be rationalised to remove redundancy. (see below)</p> <ul style="list-style-type: none"> <li>• Code of conduct should be modified to define 'fit and proper' criterion. (see below)</li> <li>• Withdraw the overseas certificate of good conduct requirements as disproportionate and unnecessary. Operators and drivers should anyway meet the same standard of checks.</li> <li>• Convictions related revocation should be applied for criminal convictions relating to sexual and violence relate offending only with all other convictions to be considered on their merits on a case-by-case basis.</li> <li>• Operators should be required to prove they are in compliance with all employment law to be considered fit and proper.</li> <li>• Operators should be required to record all physical assaults and hate crime against drivers and report to the regulator within 48 hours.</li> <li>• Operators should be required to document and present to the regulator an operational safety and risk management system.</li> <li>• Operators must uphold equalities law to provide unfettered service to disabled passengers. To facilitate this, operators must provide an option for disabled passengers to declare their disability needs in the booking process on line and if the booking is made by telephone the operator must ask if there any disability needs. This information must be transmitted by the operator to the driver before pick up.</li> <li>• Operators must abide by section 56 of the 1976 Act and confirm to all passengers that the parties to the contract for</li> </ul>	<p>Please consult ADCU documentation for details on every individual points</p>	

		<p>transport provision is exclusively between the operator and passenger and that the driver is not a party to this contract. Operators must require a clear, standard DBS for any passenger intending to share pooled, rideshare services with other passengers.</p> <ul style="list-style-type: none"> <li>• Withdraw the convictions policy requirement to ban for five years a driver caught using a handheld device. This is disproportionate.</li> <li>• Operators should make a declaration that the personal data, including inferred data, must not be used to profile drivers or passengers in any automated decision making relating to fares or pay.</li> <li>• Council must immediately conduct and publish an equalities impact assessment. Failure to do so undermines the integrity and legitimacy of the process</li> </ul>		
97. A current licence holder	To all of them are, the hours of work, the double line pick up and drop off, point system	If you implement these draconian rules most of private hire and Hackney driver will lose their badges in first year.	Being as private hire driver myself.	The DVLA allowed us to have 12 points before the take away our driving licence but in some circumstances you can still carry on driving while you have 12 points.
98. A resident	12.5	This seems to be inconsistent with 2.9, which says that existing holders have no rights, and therefore failure to meet the deadline in 12.5 cannot compromise them.		<p>12.1</p> <p>The statement that "That duty overrides any data protection protections" is too broad and probably inaccurate. Rather, the policy should note that compliance with the legislation requires that some of the protections under Data Protection Legislation do not apply, and ideally should specify which. For example, it is difficult to see how some of the protected characteristics can be impacted by this policy and they will therefore apply in full, which means that the word "any" is inappropriate.</p> <p>13.6</p> <p>What justification is there for the requirement that "All licence fees must be paid by credit/debit card"? Since many other council charges can be paid by bank transfer it is unclear why this should not be the case here.</p>
99. A current licence holder	Policy	<p>Point based systems</p> <p>Police clearance certificate</p> <p>Nothing mentioned about driver safety</p> <p>Non of the policy make a sense , one page say something another page say another things .</p>	This policy is truly targeting minority community. It is racist policy, this policy has no right for driver.	All of 150 pages of the draft is my evidence.
100. A current licence holder	All	Main point is the point system doesn't sit as it not fair in many way	It to long 153 pages	
101. A current licence holder		Points system is really unnecessary rules which will harassing people. If you put them rules then why do you put driving test to become a taxi driver. Also with with this point system driver can't drive comfortably. It will effect safety. Because this is a stress. "Stansted customer services " what does it mean. Why	Unnecessary rules making peoples life in danger.	



		drivers are taking all the responsibilities where is after 10pm most of customers are drunk. And why door signs do you need where is roof signs is already on. So drivers need 2 cars at all the time. Who's gonna pay for the personal car then. Without reason just make new rules to make peoples life more complex. Should stop all the unnecessary hustle now.		
102. A resident	Point 16	Unacceptable behaviour (rude to me because couldn't locate pickup address - provided him with post code and road name address) Standards (loud music)	Driver was rude and seemingly didn't understand english, was listening loud music and could not find the address as he didn't have navigation, when tried to show him on my phone the address location he took my phone without a word and gave it back by the end of the travel.	
103. A current licence holder	Section 72 Page 121	Section relates to drivers of private hire vehicle and states only licensed private hire drivers can drive the vehicle	For safety reasons it is some times required that a trained mechanic test drives a vehicle firstly to diagnose an issue that may have second to ensure that any repair has rectified any issues before the public are taken in the vehicle After all most taxi drivers are not trained mechanics we may know something is not quite right but a problem only be detected by actually driving the  Therefore as per my insurance dispensation should be made for when a vehicle is in the care of a qualified mechanic	

