

Comment Sheet

Draft Hackney Carriage & Private Hire Licensing Policy

Contact Details

Name:	MR. MARCOF HUSSAIN		
Address:	175, BURTON RD, BRANSTON		
	BURTON ON TRENT, STAFFS, DE14 3DR		
Please keep my contact details confidential		Yes	No <input checked="" type="checkbox"/>

Are you responding as:			
Driver		Elected Member	
Proprietor	<input checked="" type="checkbox"/>		
Operator			
Other (please specify)			

I would make the following comments on the Draft Private Hire and Hackney Carriage Policy:

<p>I think the age limit should be extended on all vehicles because in the current climate it is very difficult to purchase a new vehicle according to the current age limit. Vehicle prices for a low mileage in good condition is in the region of £8,000 - £10,000 and is not possible for the majority of drivers. By extending the limit it will give drivers a lot of breathing space and chance to buy a good vehicle at a affordable price. A large portion of other counties allow a lot older vehicles to operate than ESBC. The Pro Rata system should come back into effect, because it is not fair that a plate can be licensed for 1 month or 12 months at the same price and if you need to change a vehicle during the plate period you have to nearly pay full again.</p>
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Please continue on separate sheet(s) if necessary.

Comments should be sent to: Licensing Team, East Staffordshire Borough Council, Town Hall, Burton upon Trent, Staffs, DE14 2EB or e-mailed to licensing@eaststaffsbc.gov.uk

Louise Kemplay

From: e <oldfieldscars@aol.com>
Sent: 17 October 2018 14:40
To: Louise Kemplay
Subject: Policy review consultation

Good afternoon Louise

These are the points I wish to be considered at tonight's meeting:

- Age limits for both Hackney & P/H vehicles should be standardised. Previously P/H vehicles have been converted to Hackney when 7 years old.
- Illegal pop-up rank problems exist at Uttoxeter racecourse on racedays but all the time in Uttoxeter Market Place and railway station. Private Hire trade unable to compete due to unfair practices. NO marked ranks in Uttoxeter, therefore, Hackneys create their own wherever they identify a need.
- Reception at Millers Lane unsuitable for purpose. The external buzzer does not create a welcoming reception for visitors whilst waiting outside without shelter .

I will bring a paper copy of these points with me tonight as usual.

Many thanks.

Clive Brown
Oldfields Cars

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From: Cllr A J Legg

Sent: 03 October 2018 09:59

To: Angela Wakefield <angela.wakefield@eaststaffsbc.gov.uk>

Subject: Re: Policy Review Consultation

Dear Angela

I have read the email and can I please make a comment I have no problem with the things to be considered. but would like to make the following comments please for the safety of the users and the drivers I would like to see CCTV in all taxis and hackneys I would also like to see the door panels kept please also I would like to see a mystery shopping case study this would help when ringing for taxis as well as the less able who use taxis.

thanks

kind regards

Alison

thankyou

Louise Kemplay

From: Cllr G Marjoram
Sent: 18 October 2018 18:04
To: Louise Kemplay
Subject: RE: Policy Review Consultation

Dear Louise

Thank you for this. I have just received comments from our local private hire firm from whom I requested observations. I am aware that the date for comments expires today but hopefully the observations here can be considered, albeit sent in after office hours,

1. It is suggested that the age limits for private hire and hackney should be brought into line, I understand that at the moment some vehicles are converted to hackney when 7 years old
2. Illegal pop-up rank problems exist at Uttoxeter racecourse on racedays and regularly at Uttoxeter station and market place, there are no marked ranks in Uttoxeter which makes it understandable that hackneys create their own but unfair practices make it difficult for the private hire trade to compete

Kind regards
Gordon

From: Louise Kemplay
Sent: 20 September 2018 16:32
To: DL Councillors-All <DLCouncillors-All@eaststaffsbc.gov.uk>
Subject: Policy Review Consultation

Dear Cllr,

Please see information below regarding two current Consultations regarding proposed changes to the Hackney Carriage and Private Hire Policy and the Gambling Act Policy.
In the event that you have any queries or would like further information, please do not hesitate to contact me on the number below or the Licensing Team on (01283) 508310 or by email: licensing@eaststaffsbc.gov.uk

Kind regards,

Louise Kemplay
Interim Enforcement Manager
East Staffs Borough Council
Tel: 01283 508343
Email: louise.kemplay@eaststaffsbc.gov.uk

Hackney Carriage and Private Hire Policy

East Staffordshire Borough Council proposes to review the policy that regulates the Hackney Carriage and Private Hire trades within the Borough of East Staffordshire.

The aim of the policy is to secure the safety and amenity of the travelling public and to ensure that drivers provide taxi services while facilitating a sustainable taxi industry.

The Council, in adopting the licensing policy recognises both the needs of residents for safe, healthy, convenient, and effective taxi transport and the importance of this provision to the local economy and vibrancy of the Borough.

[View current version of the taxi policy.](#)

East Staffordshire Borough Council

Taxi / Private Hire Licensing Policy Consultation

Staffordshire County Council Response – September 2018

The County Council is a significant buyer of taxi and private hire services across the County. Taxi/Private Hire operators provide the majority of the County Council's Special Educational Needs home to school transport and a small, but nevertheless significant, proportion of mainstream home to school transport (i.e. primary, middle and secondary schools). These services are provided under contract, within an EU Framework Agreement. The County Council's conditions of contract require that all contractors adhere to a high standard of delivery, which fits closely with raising standards through revision to licensing policy. We are keen to continue working with all licensing authority partners to maintain and improve standards of service delivery.

MOTs / Certificate of Compliance

It is our strong view that reducing the frequency of MOT / Compliance Tests would compromise public safety and, therefore, should remain at least 6 monthly intervals. Private Hire Vehicles and Hackney Carriages cover extremely high mileages and are not subject to any statutory safety inspection regime in between MOT tests. This means that the MOT / Compliance Test is the only assurance available regarding the safety of vehicles.

Our experience is that the focus on vehicle maintenance and roadworthiness within the PHV and Hackney Carriage sectors is somewhat variable. In light of the high mileage and arduous work to which these vehicles are put, vehicle defects can develop quickly and become safety critical. Given the lack of structured vehicle maintenance and safety inspection in much of the industry, higher frequency MOT tests are vital.

We would, therefore, request:

- MOTs are maintained at a minimum 6 monthly interval.
- Consideration be given to increasing number of MOTs per annum to three or four for vehicles above a certain age e.g. 7 years.
- Vehicle proprietors are obliged to provide evidence of rectification for advisory defects as well as defects causing failure of MOT.
- That ESBC arrange for all MOTs to be entered as MOT tests on the DVSA system so that the results are accessible to all through the "MOT History" service on .gov.uk.

Inspections by Testing Station

The nature of the proposal is a little unclear from the matrix of changes as published. For the purposes of this response, it has been read as stating that the change proposed is for only test stations to examine vehicle defects and not Council Officers.

As understood, the proposal is not supported. It is our view that approved officers of ESBC should have ability to inspect and suspend vehicles at any location. Requiring that a vehicle proceed to a test station in the event of a defect being noted or suspected could lead to a public safety risk and the vehicle being driven in an unroadworthy condition. Placing an immediate suspension on a vehicle at the location it is inspected places a greater onus on the driver to have the vehicle recovered to a garage or attended to at that location before the vehicle is driven. Notwithstanding this, the option of an officer being able to require an immediate MOT test is a useful tool where either a defect is suspected or a vehicle cannot be safely examined at the location an officer encounters it.

Increase to Vehicle Age Limit

The proposals as set out to increasing vehicle age limits are of concern. However, some variation to age limits could be progressed with some accompanying measures to maintain a reasonable level of assurance concerning the safety of vehicles.

It is our view that the vehicle age limit could be reviewed as follows:

- Private Hire Vehicles – increased from 7 to 10 years, albeit with the frequency of MOTs increased to minimum of three per year from 7 years old.
- Hackney Carriage Vehicles – increased from 10 to 12 years for purpose built Hackney Carriages, albeit with the frequency of MOT increased to minimum of three per year from 7 years old.
- A maximum mileage limit of 500,000 after which the vehicle is no longer licensed regardless of age.
- Obligation on vehicle proprietors to address all MOT advisories to prevent minor defects from progressing into major defects.

Given the increasing emphasis being placed upon urban air quality, the age limit policy could additionally be used to incentivise the take up of electric vehicles such as the London Taxi Company TX EV. For example, a further 2 years could be allowed on top of the standard age limits for fully electric vehicles licensed as Private Hire or Hackney Carriages. This would then provide vehicle proprietors with the opportunity to offset any additional capital costs over a longer payback period whilst benefitting from lower day to day vehicle running costs.

Medical Standards

As PHV / Hackney Carriage drivers are professional drivers, carrying members of the public, including vulnerable passengers, the continued adoption of Group I medical standards is opposed. It is our strong view that given the nature of the job, that Group II medical standards as applied to PSV and HGV drivers should be adopted by ESBC. We would request that the policy be amended to require a DVLA Group II medical, using a D4 or similar form. The option to acquire such a medical from a doctor other than the driver's own GP is supported.

Door Plates

It is important for public safety and safeguarding of vulnerable passengers that both Private Hire Vehicles and Hackney Carriages (where relevant) clearly display the name of the company that they are working for. This could be in the form of vinyls, magnetic signage or other sign writing on the vehicle. We do not believe that door panels of themselves are necessary providing that any vehicle working for a Private Hire Operator is carrying the Operator Licence Holder's trading name / livery prominently on the vehicle. Hackney Carriages working on their own account should remain clearly identifiable as Hackney Carriages, albeit this could be achieved by measures other than door panels.

"Vaping"

The proposal to include use of "vaping" devices, electronic cigarettes or similar within the smoke free stipulations for all Private Hire Vehicles and Hackney Carriages is fully supported.

Institute of Licencing Guidance.

The adoption of the IoL's Guidance on the suitability of applicants is fully supported. We would also request that ESBC give consideration to requiring all applicants sign up to the "DBS Update" service. This would assist in reducing administration and duplication of DBS checks between organisations. An applicant with an enhanced DBS certificate and valid update service can then use this to demonstrate to any licensing authority or employing organisation that their DBS certificate is both valid and genuine.

Knowledge Test

The extension of the knowledge test to include an oral component is fully supported. We would request that the oral component is also used to assess whether the applicant has a sufficiently reasonable knowledge of English for the role they are undertaking. It is important that drivers particularly are able to communicate with and understand vulnerable passengers so that their needs are fully met.

Comment Sheet

Draft Hackney Carriage & Private Hire Licensing Policy

Contact Details

Name:	MOHAMMED IKHLAO		
Address:	26 KINGSMEAD		
	STRETTON		
	BURTON ON TRENT		
	STAFFORDSHIRE		
Please keep my contact details confidential			
			Yes <input checked="" type="checkbox"/>
			No <input type="checkbox"/>

Are you responding as:			
Driver	✓	Elected Member	✓
Proprietor			
Operator	✓		
Other (please specify)			

I would make the following comments on the Draft Private Hire and Hackney Carriage Policy:

1.	BE ABLE TO REPLACE MECHANICAL BREAKDOWN VEHICLES WITH HIRE VEHICLE REPLACEMENT
2.	TO REMOVE ROUTE PART OF THE TEST BECAUSE WITH NEW TECHNIQUE + SAT NAVS (IN LINE WITH BIRMINGHAM CITY)
3.	TRANSFER FEES TO BE LOOKED INTO (TOO HIGH)

Please continue on separate sheet(s) if necessary.

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Comment Sheet

Draft Hackney Carriage & Private Hire Licensing Policy

Contact Details

Name:	MR MEHBOOB HUSSAIN		
Address:	49 WARREN LANE, BRANSTON		
	B.O.T., STAFFS. DE14 3EN		
Please keep my contact details confidential		Yes	No <input checked="" type="checkbox"/>

Are you responding as:			
Driver	<input checked="" type="checkbox"/>	Elected Member	
Proprietor	<input checked="" type="checkbox"/>		
Operator	<input type="checkbox"/>		
Other (please specify)			

I would make the following comments on the Draft Private Hire and Hackney Carriage Policy:

PRORATA SHOULD BE REINTERPOLATE, THIS MAKE REAL
SENSE, DUE TO THE FACT IF YOU HAVE TO CHANGE A
VEHICLE AND ITS CURRENT VEHICLE IS STILL RATED
FOR A LONG TIME, THEN A SMALL ADMIN FEE
SHOULD HAVE TO BE PAID, NOT 90% OF THE FULL
FEE AGAIN. MANY OTHER COUNCILS AROUND THE COUNTRY
HAVE LICENCE TAXES OPERATING WHICH ARE 20-15
YEARS OLD, AND MAINTAINING AND NOT RUNNING PERFECTLY.
THIS WILL ALSO CAUSE PRESSURE OF DRIVERS, BECAUSE
AT THIS MOMENT OF TIME VEHICLE PRICES ARE SKY
HIGH AND UNAFFORDABLE FOR A MAJORITY OF
DRIVERS. BY ALLOWING US TO HAVE THE EXTENDED
AGE LIMIT IT WILL DEFINITELY BENEFIT ALL IN THE
TRADE.

Please continue on separate sheet(s) if necessary.

Comments should be sent to: Licensing Team, East Staffordshire Borough
Council, Town Hall, Burton upon Trent, Staffs, DE14 2EB or e-mailed to
licensing@eaststaffsbc.gov.uk

Comment Sheet

Draft Hackney Carriage & Private Hire Licensing Policy

Contact Details

Name:	MANSOOR SWATI		
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	Burton on Trent.		
	DE15 9RF		
Please keep my contact details confidential <input checked="" type="radio"/> Yes <input type="radio"/> No			

Are you responding as:			
Driver	<input checked="" type="checkbox"/>	Elected Member	
Proprietor	<input checked="" type="checkbox"/>		
Operator	<input checked="" type="checkbox"/>		
Other (please specify)			

I would make the following comments on the Draft Private Hire and Hackney Carriage Policy:

<p>First of all if I can draw your attention to the fact that online comments box doesn't allow to write in the boxes. I had to print out this comments sheet and filling in now on the printed sheet.</p> <p>* I agree to the proposal of age limit to be increased to 15 years for Hackney and 10 years for the private hire.</p> <p>* I am also in favour of the proposal of Medical test should be allowed from any GP, does it doesn't have to be your own GP.</p> <p>I am also in favour of all the other proposals.</p>	
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Please continue on separate sheet(s) if necessary.

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- * I have spoken to all most of the taxi drivers.
- ⊙ In my understanding the ALL THE TAXI DRIVERS I have spoken with are in favour of 15 years and 10 years of age for Hackney Carriage and private hire respectively.

Response to the proposed changes to the Hackney Carriage and Private Hire Policy 2018 from the Enforcement Team at East Staffordshire Borough Council

Consideration	Options/Proposal/Change
The Council is permitted by law to issue a certificate of compliance confirming that a vehicle has reached the standard required to pass an MOT test plus additional requirements of the Council concerning safety, comfort and the aesthetics of the vehicle. The compliance certificate only relates to a vehicle for a maximum period of 12 months, provided that the vehicle is licensed as a hackney carriage or private hire vehicle during that period. The Council reserves the right to request that the compliance test be completed at any time at the proprietor's expense.	Representatives from the Trade have requested that the Certificate of Compliance is to be an annual process and not on a six monthly basis.

The Enforcement Team's view on this is that licensed vehicles should be tested on a six monthly basis. It would not be unusual for a licensed vehicle to travel 50000 in a twelve month period, and this has been checked as a realistic figure from existing licensing records. A new front tyre should last for 20000 miles, so a six monthly C of C would be sensible to ensure that tyres are being changed. Additionally, it is a very common practice for licensed vehicles to be fitted with part-worn tyres allowed (but would be very difficult to police), so their lifespan will be considerably shorter than 20000 miles. This being the case, even 6 monthly C of C checks would be too short a period to ensure safety; increasing the period to twelve monthly would certainly not be in the public interest.

The Policy states that vehicles will be subject to periodic, random inspections by authorised officers of the Council, or its agents to ensure the vehicle and/or its taximeter is fit for purpose. Where a delegated Officer is satisfied that a vehicle fails in any respect to meet any specification or condition of licence or the relevant construction and use regulations require by law they may suspend a vehicle licence for any specified period. Where an authorised officer of the Council has reasonable grounds to suspect that the condition of the vehicle poses a danger to either passengers or other members of the public, he/she may serve on the driver/proprietor a vehicle defect notice. In such cases the vehicle licence shall immediately be suspended until such time as the defect(s) have been remedies. The suspension shall not be lifted until it is proved	Representatives from the Trade have requested that vehicle inspections that are currently done by the Council to be undertaken by the Testing Stations to save time
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to the authorised officer that the vehicle defect has been corrected. Section 68 of the Local Government (Miscellaneous Provisions) Act 1976 refers.	
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Vehicles are inspected by Enforcement/Licensing Officers on an ad hoc basis, and we feel that this is an important part of the enforcement process. Officers regularly find a lack of compliance, with some vehicles not carrying important safety equipment such as fire extinguishers, and also failing to display plates and panels which clearly identify vehicles as being licensed, and are there for public safety. These must be done as and when, and not left to 12 monthly checks when drivers can ensure that vehicle equipment is in place just to pass the test. Other checks carried out by licensing officers, such as wheel chair safety and window tinting is also important for public safety, and is not covered by the C of C check.

<p>When granting and renewing vehicle licences and providing all requirements are met, the Council will issue a 12 month vehicle licence for vehicles under 7 years old for a private hire vehicle and non-wheelchair accessible hackney carriages and 10 years old for a purpose built hackney carriage and providing it has passed a Council compliance test at an appointed test station. In the final year of licensing the Council will issue a licence until the day before the vehicle is 7 years old for a Private Hire Vehicle and non-wheelchair accessible Hackney Carriages and 10 years old for a purpose built Hackney Carriage.</p> <p>Private hire and non-wheelchair accessible hackney carriage vehicles over 3 years of age will be issued with a yearly licence but will be required to be compliance tested after six months of the licence being issued. Wheelchair accessible hackney carriages over 5 years will be required to be compliance tested after six months of the licence being issued. The pass certificate from that test must be produced as evidence that the vehicles still meets the required standard.</p>	<p>Representatives from the Trade have requested that the age limits in respect of all vehicles to be increased to ten years for Private Hire and fifteen years for Hackney Carriage vehicles</p>
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As already stated above, licensed vehicles can travel for 50000 miles , so allowing some vehicles to be licensed for 15 years, would potentially allow them to be on the road for 750000 miles. This would not be in the public interest.

The Council adopted the Group I medical standards for fitness to drive hackney carriages/private hire vehicles in accordance with the DVLA and Department for Transport best practice guidance. All medicals for	Representatives from the Trade have requested that the Policy is amended to include the right to visit any GP and not just the applicant's own
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<p>applications for a hackney carriage or private hire driver's licence must be carried out by the applicant's own GP or another doctor in the same practice. Further medicals will be required every three years unless specified by the GP. Medicals will not be accepted if they are over 3 months old. The certificate is for the confidential use of the Council and any fee charged is payable by the applicant.</p>	
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We think it is important that a GP has access to a patient's medical records before declaring them fit to drive a licensed vehicle. These days, it is common for patients to be seen by any one of numerous GPs based at a surgery, but the GPs all will have access to the patients records. If a driver attends a surgery other than his/her own, then it must continue to be the case that the examining GP has full access to the drivers records. If this cannot be guaranteed, then we should keep the requirement that the driver attends his own GP clinic.

<p>The Council requires hackney carriages and private hire vehicles to clearly indicate to the public that they are licensed vehicles. Hackney carriage and private hire vehicles must be clearly distinguishable to allow the public to clearly identify them from other vehicles and each other. The Council accepts that clear signage and door panels can achieve this. The Council has set standards on the acceptable type of signage for hackney carriages and private hire vehicles; they include:</p> <ul style="list-style-type: none"> • The permitted position of licence plates • Colours to be used for licence plates • Permitted positioning of door panels for private hire vehicles • Permitted positioning of door panels for hackney carriage vehicles • Requirements for internal signage such as display of tariff in hackney carriage vehicles and no smoking signage. <p>The Council does not permit advertising on hackney carriage and private hire vehicles. Hackney carriage and private hire proprietors must use the design of door panels provided by the Council. The acceptable size for the door panels are 35cm by 25cm. A template will be provided to all proprietors on submission of an application for a vehicle licence. The company name on the door panels must be exactly the same as the name on the operator's licence. The door panels must be displayed at all times. The only exemption is when the vehicle is parked outside the address to which the vehicle</p>	<p>Representatives from the Trade have requested that plate and door panels to be optional</p>
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is licensed or there is plate/panel exemption in force. Door panels are subject to approval being received from licensing officers.	
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Displaying Hackney and Private Hire Plates is a legal requirement and cannot be made optional.

Door panels clearly identify licensed vehicles as such, and should remain in place for public safety.

The proprietor of the vehicle can only apply to licence a vehicle from a hire company if the vehicle is not in a roadworthy condition and is suspended or the vehicle is going into a garage for repair.	Representatives from the Trade have asked that where a hire company vehicle is used, can a licensed vehicle plate be granted on a yearly basis instead of an individual basis each time a vehicle is hired.
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We have no comment regarding this proposed change.

The Health Act 2006 requires all vehicles used for public vehicles to be smoke free at all times which includes when they do not have passengers. The purpose of this is for the passenger to know absolutely that they will be able to remain free from the risk of second hand smoke exposure.	The Enforcement Team have requested the existing Policy be amended to include the exclusion of electronic cigarettes or 'vapes' from being used inside licensed vehicles
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The Enforcement Team have certainly asked for this to be included in the policy. It is not unusual to see drivers travelling past whilst appearing to be smoking, but it is too easy at present for them to claim that it is an e-cigarette. Without actually smelling the smoke, it is virtually impossible to prove the offence. Vaping is not allowed in many public buildings now, and we feel that this is a logical step to prevent drivers from vaping in licensed vehicles.

In the final year of licensing the Council will issue a licence until the day before the vehicle is seven years old for a Private Hire Vehicle and non-wheelchair accessible Hackney Carriages and ten years old for purpose built Hackney Carriages. The same work is carried out by the Licensing Officer irrespective of whether the licence fee is for 12 months or less and currently the fee is not set on a pro rata basis.	Representatives from the Trade have requested the introduction of a pro rata fee for vehicles that require less than 12 months licence.
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There may be some argument for a reduced fee, but we understand that it costs ESBC just as much to produce a 12 month license as it does a 2 month one, so any reduction would be slight.

<p>The Institute of Licensing have introduced Guidance on determining the suitability of applicants and licensees in the hackney carriage and private hire trade</p>	<p>To adopt the Guidance issued by the Institute of Licensing on determining the suitability of applicants and licensees in the hackney and private hire trades :</p> <ul style="list-style-type: none"> • To amend the term 'fit and proper' to 'safe and suitable' • In the event an applicant has, from the age of ten years, spent six months or more living outside the UK, evidence of a Criminal Record check from the country/countries covering the relevant period should be required
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The Enforcement Team supports this proposal.

<p>Before any application for a vehicle licence can be accepted, the vehicle, which is intended to be licensed, has to meet all aspects of the licensing authority vehicle specifications. This is achieved by making an appointment for a vehicle inspection with the Licensing Team and also by presenting the vehicle to one of the Council's appointed testing stations where the vehicle will be subjected to the licensing authority vehicle compliance test. All vehicles must pass this test and be awarded a compliance test pass certificate by the testing station. Once received the test pass certificate shall only be valid for a period of 14 days. If a licence is not granted within that time, the vehicle must be presented for a further test and a new compliance test pass certificate obtained.</p>	<p>Representatives from the Trade have requested the 14 day validity of the test pass certificate to be extended.</p>
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We have no comment regarding this proposal.

<p>The Council requires all applicants to demonstrate certain competencies in relation to their knowledge of East Staffordshire and importantly customer care. These competencies are achieved by completing a Knowledge test conducted by a Licensing Officer. The knowledge test will be a written assessment and will be split into SIX four parts, part one conditions test, part two a receipt exercise, part three identification of landmark/premises locations and part four identification of routes. Part five will include recognising and reporting child sexual</p>	<p>To extend the Knowledge test to include an oral test.</p>
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<p>exploitation and part six will be in respect of Disability Discrimination and customer care. Verbal knowledge tests will be considered however the applicant should have undertaken the written test in the first instance.</p>	
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The Enforcement Team support this proposal and are aware that it is already used by other Councils.

<p>The Policy currently states: Production of documents following licensing. It is the vehicle proprietor's responsibility to ensure that continuous cover of insurance and compliance test certificates are produced to the licensing office. One telephone reminder will be made to the proprietors on the working day prior to the document expiring, but this is just a courtesy service. No further calls will be made.</p>	<p>Proposed wording of the Policy to be amended to: Text reminders will be sent from the Licensing Office before the document expires. This is just a courtesy service. It is the proprietor's responsibility to ensure that documents are submitted to the Licensing Office in time. Documents can be submitted via email or in person by prior appointment.</p>
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The Team's view is that as professional licensed drivers, the vehicle, driving licence, insurances and Certificate of Compliance should be foremost in the driver's minds. The Licensing Team currently send text reminders to the drivers and the Enforcement Team have no issue with the proposed wording.