

APPENDIX D

Officer comments on Shareb response to SDC Taxi Policy consultation

1. Noted
2. Noted support of the Equo Safeguarding training : this training is a 'one-off' requirement for existing drivers.
3. We note the concerns raised and that it is intended that further information will be brought to us in due course. However, we consider that elements of the issues raised should primarily be referred to others, including Southeastern Railways and the operators. We do not consider that the issues raised focus on the key responsibilities of the Licensing Authorities, which relate to ensuring the protection of the public and the provision of a safe, accessible and affordable service for them.
4. We would not intend to duplicate employment legislation within the conditions, particularly noting our response to paragraph 3. However, we note the concern raised and **will try to clarify that there may be a distinction** in status.
5. The Local Authority carry out right to work checks on all licensed drivers. It is not, therefore, necessary for licensed Operators to undertake these checks.
6. The current national register (commissioned by the LGA) allows Councils to record details of HC or PH driver refusals, revocations, suspensions or refusals to renew licenses. This has not currently been expanded to include Operators.
7. Noted
8. (a) The Local Authority will consider and consult on any proposed increase to the taxi fare tariff rates submitted by the trade.

(b) Vehicle licence application fees are based on the Authority's costs for the processing and enforcement of such licences. The setting of fees under this regime should remain cost neutral in budgetary terms, and to reduce the costs of certain types of vehicle would incur an increase to others. All new Hackney Carriage vehicles licensed with Sevenoaks MUST be wheelchair accessible and, to date, no communication from disability groups or the general public has been received that there is a shortage.
9. See 8(a) and 8(b)
10. Noted
11. See 3
12. See 3. However, please note that it is not the statutory role of the Licensing Authority to investigate the concerns raised relating to employment and competition law.

13. Noted : although further expansion on 'minority of drivers currently not using card payment machines' and how this information was derived would be appreciated.
14. Noted
15. Noted
16. Noted
17. Noted : although comment that card payment facilities are being considered as an additional facility to cash.
18. The main fee structure for 24/25 applications remains the same.
19. Noted : The Licensing Committee are requested to consider whether to instruct Officers to contact the trade with a view to them agreeing an increase in the current tariff. The tariff was last increased in May 2022. For information : according to the Private Hire Taxi Monthly league table, and out of 344 Councils in the UK for a 2 mile fare, Sevenoaks District Council are 13th highest.
20. Noted
21. Noted
22. Noted
23. Noted
24. See 19
25. Please see our response to paragraph 3. Any specific concerns and court or tribunal findings which reflect on whether a licence holder or applicant is a fit and proper person may be brought to our attention for consideration.
26. Please see our response to paragraphs 3, 12 and 25.
27. Please see our response to paragraphs 3, 12 and 25.
28. Please see our response to paragraphs 3, 12 and 25.
29. Please see our response to paragraphs 3, 12 and 25.
30. Please see our response to paragraphs 3, 12 and 25.
31. Please see our response to paragraph 3
32. Noted
33. Please see our response to paragraph 3
34. The Council has a responsibility to keep its taxi stands under review and shall do so. This would include considering its service to customers.
35. Noted. However, please note our response to paragraph 3 and that the siting of any taxi stand on private land is subject to the consent of the owner.
36. It does not appear that this request relates primarily to our function as a Licensing Authority, but relates to possible investigation of concerns, as noted in our response to paragraph 3. It may be appropriate for you to seek independent legal advice on such matters.

37. Noted : To review taxi tariffs every 6 months will be costly : an expense which will be offset in fee structure for HCs, thus increasing the annual fees paid. Unsure this will be cost effective for the trade.
38. All matters which may relate to whether an applicant or licence holder is a fit and proper person may be considered by the Licensing Authority. The nature of potential breaches of the law is broad and the Licensing Authority currently proposes that any such matter be dealt with on its individual merits.
39. TfL licence vehicles under different legislation to all other Authorities outside London. It is considered that each individual licensing Authority be expert on their own policy and conditioning restrictions as well as covering the cost of its own service through local fee setting. Joint working relationships with neighbouring Authorities is considered important in ensuring protection of the public.
40. Noted
41. Noted : The stand at The Green, Westerham has been removed.
42. Noted
43. Please see our response to paragraph 3.