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**Service Director – Legal, Governance and
Commissioning**

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Wednesday 9 December 2020

Notice of Meeting

Dear Member

Licensing and Safety Committee

The **Licensing and Safety Committee** will hold a **Virtual Meeting - online** at **10.00 am on Thursday 17 December 2020.**

This meeting will be live webcast. To access the webcast please go to the Council's website at the time of the meeting and follow the instructions on the page.

The items which will be discussed are described in the agenda and there are reports attached which give more details.

A handwritten signature in black ink, appearing to read "Julie Muscroft", on a light-colored background.

Julie Muscroft

Service Director – Legal, Governance and Commissioning

Kirklees Council advocates openness and transparency as part of its democratic processes. Anyone wishing to record (film or audio) the public parts of the meeting should inform the Chair/Clerk of their intentions prior to the meeting.

The Licensing and Safety Committee members are:-

Member

Councillor Amanda Pinnock (Chair)
Councillor Carole Pattison
Councillor Karen Allison
Councillor Paola Antonia Davies
Councillor David Hall
Councillor James Homewood
Councillor Christine Iredale
Councillor Michelle Grainger-Mead
Councillor Mumtaz Hussain
Councillor Manisha Roma Kaushik
Councillor Terry Lyons
Councillor Mohan Sokhal
Councillor Kath Taylor
Councillor Michael Watson
Councillor Cathy Scott

When a Licensing and Safety Committee member cannot be at the meeting another member can attend in their place from the list below:-

Substitutes Panel

Conservative

B Armer
V Lees-Hamilton
N Patrick
R Smith
J Taylor
M Thompson

Green

S Lee-Richards

Independent

C Greaves

Labour

S Hall
W Simpson

Liberal Democrat

J Lawson
A Marchington
A Munro
A Pinnock

Agenda

Reports or Explanatory Notes Attached

Pages

1: Membership of the Committee

This is where Councillors who are attending as substitutes will say for whom they are attending.

2: Minutes of Previous Meeting

1 - 4

To approve the minutes of the meeting of the Panel held 6th January 2020.

3: Interests

5 - 6

The Councillors will be asked to say if there are any items on the Agenda in which they have disclosable pecuniary interests, which would prevent them from participating in any discussion of the items or participating in any vote upon the items, or any other interests.

4: Admission of the Public

Most debates take place in public. This only changes when there is a need to consider certain issues, for instance, commercially sensitive information or details concerning an individual. You will be told at this point whether there are any items on the Agenda which are to be discussed in private.

5: Deputations/Petitions

The Committee will receive any petitions and hear any deputations from members of the public. A deputation is where up to five people can attend the meeting and make a presentation on some particular issue of concern. A member of the public can also hand in a petition at the meeting but that petition should relate to something on which the body has powers and responsibilities.

In accordance with Council Procedure Rule 10 (2), Members of the Public should provide at least 24 hours' notice of presenting a deputation.

6: Questions by members of the Public (Written Questions)

Due to current Covid-19 restrictions, Elected Members and members of the public may submit written questions to members of Cabinet Committee Local Issues.

Any questions should be emailed to jenny.bryce-chan@kirklees.gov.uk no later than 5pm on Monday 14th December 2020. In accordance with Council Procedure Rule 51(10) each person may submit a maximum of 4 written questions.

In accordance with Council Procedure Rule 11(5), the period allowed for the asking and answering of public questions will not exceed 15 minutes. Members of the Committee will provide an oral response to any questions received, or if they are not able to do so, a written response will be provided.

7: Hackney Carriage Unmet Demand Survey 2020

7 - 120

The purpose of this report is to inform Members of the outcome of a survey to measure the demand for hackney carriages within the District.

Contact: Russell Williams, Operational Manager – Public Protection Tel: 01484 221000

8: Licensing Service - Update Report

121 -
130

The purpose of this report is to inform Members of the activities undertaken to discharge the Council's licensing functions from 1st April 2020 to 31st September 2020

Contact: Russell Williams, Operational Manager – Public Protection Tel: 01484 221000

9: Trade Engagement - Terms of Reference

131 -
136

The purpose of this report is to seek members approval for the proposed 'terms of reference' for engagement with the hackney carriage and private hire trades.

Contact: Russell Williams, Operational Manager - Public Protection Tel: 01484 221000

10: Department for Transport - Statutory Guidance

137 -
184

The purpose of this report is to inform Members of the recently published 'Statutory Taxi and Private Hire Vehicle Standards and seek approval to commence a review of the Licensing Services hackney carriage and private hire polices in light of the published standards.

Contact: Russell Williams, Operation Manager – Public Protection Tel: 01484 221000

Contact Officer: Jenny Bryce-Chan

KIRKLEES COUNCIL

LICENSING AND SAFETY COMMITTEE

Monday 6th January 2020

Present: Councillor Amanda Pinnock (Chair)
Councillor Carole Pattison
Councillor Mahmood Akhtar
Councillor Karen Allison
Councillor Paola Antonia Davies
Councillor David Hall
Councillor James Homewood
Councillor Michelle Grainger-Mead
Councillor Mohan Sokhal
Councillor Kath Taylor
Councillor Michael Watson
Councillor Cathy Scott

In attendance: Russell Williams, Group Leader
Stephanie Mashiter, Senior Licensing Officer
Nicola Sylvester, Governance Officer

Apologies: Councillor Mumtaz Hussain
Councillor Manisha Roma Kaushik
Councillor Terry Lyons
Councillor Harpreet Uppal

1 Membership of the Committee

Apologies for absence were received from Councillors Hussain, Kaushik, Iredale and Lyons.

2 Minutes of Previous Meeting

The minutes of the meeting of the Committee held on 11 June 2019 were approved as a correct record.

3 Interests

No interests were declared.

4 Admission of the Public

That all agenda items be considered in public session.

5 Deputations/Petitions

No deputations or petitions were received.

6 Public Question Time

No questions were received.

7 Proposed Revision to Statement of Licensing Policy 2020-2025

The Committee considered a report which outlined proposed revisions to the Statement of Licensing Policy, issued under the Licensing Act 2003. The Licensing Act 2003 requires the Council, in its capacity as Licensing Authority to review its statement of licensing policy every 5 years.

The Committee was informed that consultation on the revised policy was undertaken between the 4 November 2019 and the 15 December 2019 and five responses were received. In its response, West Yorkshire Trading Standards commented that section 13.5 of the revised policy, appeared to be a softening of the council's stance against counterfeit/illicit tobacco and requested that the suggested revision revert back to the original statement as outlined in the previous policy at section 13.4. The public had also raised concerns about the hours granted for some premises licences and environmental issues. (A full list of consultees was contained at appendix B of the main report).

The Committee was advised that the revisions aimed to link the policy to the council's corporate priorities and strengthen a number of areas. The key changes include:-

- The structure of the policy
- Expanding guidance around promoting the four Licensing Objectives; and work has been undertaken in conjunction with the Kirklees Safeguarding Partnership to strengthen the protection of children from harm
- Online sale of alcohol
- Adding guidance in relation to the Equalities Act 2010
- Expanding guidance on completing operating schedule
- Updating information on Closure Notices, Reviews and Expedited reviews
- Updating the guidance on safeguarding
- Highlighting the importance of ward members and applicants are encouraged to consult ward members

The Committee asked a number of questions and the responses are summarised below:-

The Licensing Authority has a role to provide advice and guidance with regard to the online sale of alcohol, however the onus is on the seller to have robust checks and safeguards in place. These safeguards should include verifying that the person accepting the delivery is over the age of 18. Nationally this is a growing concern and it will be for the government to introduce legislation.

Applicants should consult ward councillors prior to submitting an application, however this could be viewed as lobbying. To prevent this the Committee felt that every ward councillor should be made aware and given clear guidelines that spells out their limitations with regard to licensing. It was agreed that this would be taken

Licensing and Safety Committee - 6 January 2020

away by officers for further discussion with a view of producing guidelines for ward councillors.

The Licensing Authority does not have any powers under the Licensing Act to refuse a licence to reduce the cumulative impact of certain premises for example for fast food establishments. Work is being undertaken with Public Health to look at this.

Extensive training is available for businesses to enable them to comply with the policy, however there is no requirement to make it mandatory.

The Committee requested that amendments be made to the wording of section 6.30 of the revised policy, to give it more clarity.

RESOLVED - That subject to the amendments agreed at the meeting that the proposed revised Statement of Licensing policy 2020-2025 progress to Full Council on 15th January 2020 for adoption.

8 **Licensing Service - Update Report** **Licensing Service – Update Report**

The Committee received an update on the activities undertaken to discharge the Council's licensing Functions from 1st April 2019 to 1st December 2019. The Committee was advised that between April and December the following applications were processed:-

New applications – 39
Full variations – 3
Minor variations – 10
Transfers – 36
Reviews – 11

The Committee was informed that the overriding aim of the Licensing Service when carrying out its function relating to the licensing of Hackney or Private Hire Drivers, Vehicle Proprietors and Operators is the protection of the public.

In March 2019, the Committee approved the new Kirklees Taxi Policy, which included the West Yorkshire wide Fitness and Suitability Policy, and Driver Training Policy. Colleagues from the West Yorkshire Combined Authority (inc York) continue to work together on the harmonisation of certain policies in respect of the licensing of hackney and private hire trades.

The number of hackney carriage and private hire licences in force in Kirklees are:-

Hackney Carriage Vehicles – 235
Dual Drivers Licence – 3010
Private Hire Operators – 137
Private Hire Vehicles – 2026

The Committee was informed that the government has now reduced the maximum stake for fixed odd betting terminals, reducing it from £100 to £2.

RESOLVED - That the Licensing Service update report be noted.

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KIRKLEES COUNCIL				
COUNCIL/CABINET/COMMITTEE MEETINGS ETC				
DECLARATION OF INTERESTS				
Licensing and Safety Committee				
Name of Councillor				
Item in which you have an interest	Type of interest (eg a disclosable pecuniary interest or an "Other Interest")	Does the nature of the interest require you to withdraw from the meeting while the item in which you have an interest is under consideration? [Y/N]	Brief description of your interest	

Signed: Dated:

NOTES

Disclosable Pecuniary Interests

If you have any of the following pecuniary interests, they are your disclosable pecuniary interests under the new national rules. Any reference to spouse or civil partner includes any person with whom you are living as husband or wife, or as if they were your civil partner.

Any employment, office, trade, profession or vocation carried on for profit or gain, which you, or your spouse or civil partner, undertakes.

Any payment or provision of any other financial benefit (other than from your council or authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.

Any contract which is made between you, or your spouse or your civil partner (or a body in which you, or your spouse or your civil partner, has a beneficial interest) and your council or authority -

- under which goods or services are to be provided or works are to be executed; and
- which has not been fully discharged.

Any beneficial interest in land which you, or your spouse or your civil partner, have and which is within the area of your council or authority.

Any licence (alone or jointly with others) which you, or your spouse or your civil partner, holds to occupy land in the area of your council or authority for a month or longer.

Any tenancy where (to your knowledge) - the landlord is your council or authority; and the tenant is a body in which you, or your spouse or your civil partner, has a beneficial interest.

Any beneficial interest which you, or your spouse or your civil partner has in securities of a body where -

- (a) that body (to your knowledge) has a place of business or land in the area of your council or authority; and
- (b) either -

the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or

if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, or your spouse or your civil partner, has a beneficial interest exceeds one hundredth of the total issued share capital of that class.



Name of meeting: Licensing and Safety Committee

Date: 17th December 2020

Title of report: Hackney Carriage Unmet Demand Survey 2020

Purpose of report: The purpose of this report is to inform Members of the outcome of a survey to measure the demand for hackney carriages within the District.

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	No
Key Decision - Is it in the <u>Council's Forward Plan (key decisions and private reports)?</u>	No Private Report/Private Appendix – No
The Decision - Is it eligible for call in by Scrutiny?	Not applicable
Date signed off by <u>Strategic Director</u> & name Is it also signed off by the Service Director for Finance? Is it also signed off by the Service Director for Legal Governance and Commissioning?	Colin Parr – 07.12.2020 Eamonn Croston – 07.12.2020 Julie Muscroft – 07.12.2020
Cabinet member portfolio	Cllr Paul Davies

Electoral wards affected: All

Ward councillors consulted: None

Public or private: Public

Has GDPR been considered? Yes – any personal data has been redacted for the purposes of this report.

1. Summary

1.1 To consider whether the Council should continue to impose quantity restrictions of Hackney Carriage licences.

2. Information required to take a decision

2.1 Kirklees Council currently restricts the number of Hackney Carriage to 235 licences for the whole of the district; there are some 2350 licensed private hire vehicles in Kirklees.

2.2 At the meeting of the Licensing and Safety Committee on the 18th July 2017 it was resolved there be no increase in the number of hackney carriages. This was following a survey conducted in relation to whether there was any significant unmet demand for hackney carriages.

2.3 In accordance with the Department for Transport's Best Practice Guidance, that future surveys be conducted every three years, a further study has been carried out.

2.4 The 2020 study has been conducted by Ian Millership from Licensed Vehicle Surveys and Assessment ('LVSA'), Mr Millership carried out the previous study in 2017, which provides a level of consistency in how the study is conducted.

2.5 A summary of the key findings of the study will be presented to Members at the Committee by Mr Millership and a full copy of the report is attached at **appendix I**.

Methodology

2.6 The following methodology was used to conduct the study: -

- Review of relevant policies, standards etc: to understand the authority's aspirations for meeting travel needs and social inclusion and provide context to determining overall demand for travel and how this should be met,
- Extensive rank observations (421 hours) and audits of all the ranks in the Authority, including monitoring passengers' waiting time, any illegal plying for hire, use of Hackney Carriages by wheelchair users and rank audits,
- On street interviews: a survey of 200 representative people on street to obtain information about their understanding of the sector, their last taxi journey, their overall levels of taxi use, about quality and barriers to use. Consultation: including consultation with all relevant stakeholders – appropriate local authority representatives, police, trade associations, all drivers, mobility impaired, specific user groups, businesses, and other major generators of taxi trips

2.7 The above methodology incorporates developments in methodology since the last survey, and DfT Best Practice Guidance.

2.8 The present legal provision on quantity restrictions for Hackney Carriages outside London is set out in Section 16 Transport Act 1985. Until this Act local authorities had unrestricted discretion to limit the number of Hackney Carriages which they would licence. Section 16 removed this discretion and states the following.

Consultation

2.9 Public consultation took place via a twenty seven question attitude survey. Whilst full details of the survey results are detailed in the attached report the key findings will be reported in the presentation.

Overall Conclusions

2.10 The study considers observed supply and demand and concludes that at the time of the survey there is no significant unmet demand within the Kirklees licensing district.

2.11 The report states that the overall picture of demand for hackney carriages at the start of 2020 was optimistic and positive. There was also evidence of increased usage of both licensed vehicles overall and specifically of hackney carriages at some ranks. However, the overall average weekly demand reduction since the last survey of around 11% appears to relate to closure of specific demand generators.

2.12 The report, however, does note some waiting for vehicles (page 21) with longest passenger delay being 12 minutes. There were only four passengers who experienced delays of 11 or 12 minutes. Just 13, or 0.3% of the total of all passengers, had delays of six to ten minutes. 2% had delays between one and five minutes. However, this needs to be balanced against an average passenger delay of five seconds, over all passengers.

2.13 It is pleasing to see the report finds the hackney carriage trade is well-known and appreciated across the district, and that it is active in all main areas; and that the trade are working together to meet demand in developing areas of the night time economy.

2.14 The final stages of the survey were undertaken as the impact of the Covid-19 pandemic began to be felt by the trade and page seven of the survey provides further information on the position of the survey in light of national lockdown.

Guidance

2.15 The Taxi Survey being presented to the Licensing and Safety Committee contains extracts from the Department of Transport (DfT) Best Practice Guidance on the subject of quantity restrictions.

2.16 Members should note that in order to justify continuing to limit the number of hackney carriages within the District further surveys should be undertaken every three years.

Number of Hackney Carriage Licences

2.17 The report, at page 13, provides information on previous surveys undertaken and LVSA have identified a discrepancy in the numbers of hackney carriage licences in place between 2005 and 2019. Despite research into these discrepancies the service can find no explanation as to why differing number of licences in place have been reported.

2.18 As such, and for the avoidance of doubt in any future surveys and given the report states there is no significant unmet demand, Members will be asked to set the limit to 224.

3. Implications for the Council

3.1 Working with People

One of the Licensing Service key priorities is to ensure there is a raising of standards across the private hire and hackney carriage trades in order to protect the travelling public; and ensure people across West Yorkshire are transported safely and protected from harm; and that people in Kirklees experience a high quality, clean, sustainable and green environment, as well as improve the customer experience

3.2 Working with Partners

In developing its policies, the licensing services works with a number of partners, including, Kirklees Safe Guarding Children's Board, West Yorkshire Police, Public Health, Environmental Health, Overview and Scrutiny Committee, Community Safety Partnership and other West Yorkshire Authorities (inc York).

3.3 Place Based Working

There is no specific impact in the context of this report. However, a review of policies will enable the service to examine how it interacts and engages with licence holders, residents and communities.

3.4 Climate Change and Air Quality

There is no specific impact in the context of this paper. However, a review of policy will be an opportunity look at any changes that may need to be made in relation to vehicle licensing and its impact on climate change and air quality.

3.5 Improving outcomes for children

The Council wants to ensure children have the best start in life and to ensure that the people of Kirklees feel safe and are protected from harm. The Council has a duty to protect the travelling public and safeguard children travelling in licensed vehicles and in particular for the purposes of school transport.

3.6 Other (eg Legal/Financial or Human Resources) Consultees and their opinions

Legal

The principle legislation is the Town and Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976.

The purpose of taxi licensing is detailed in the Department for Transport "Taxi and Private Hire Licensing Best Practice Guide" paragraph 8 which states: "The aim of local authority licensing of the taxi and Private Hire Vehicle (PHV) trades is to protect the public."

Taxi and Private hire vehicle licensing in England and Wales is undertaken by licensing authorities, which have the responsibility for ensuring that the public travel in safe, well maintained vehicles driven by competent drivers; as well as providing a fair and reasonable service for the taxi and private hire vehicle trade. Council's following best practice will meet or communicate regularly with licensing committees and officers in neighbouring councils to ensure critical information is shared and that there is a consistent and robust in decision making.

4. Next steps and timelines

4.1 Members are asked to consider the outcome of the study and relevant guidance and have the options of:

- a) continue to limit the number of hackney carriage vehicle licences,
- b) releasing a set number of licences (possibly as Wheelchair Accessible Vehicles or Electric Vehicles),
- c) lifting quantity restrictions altogether.

4.2 Members should note that should they be minded to consider options b or c above they should only do so following formal consultation.

5. Officer recommendations and reasons

5.1 Members are recommended to -

- note the report, and the study by LVSA, and
- Take a decision as to whether to agree to limit the number of hackney carriage licences to 224

6. Cabinet Portfolio Holder's recommendations

Cllr Paul Davies welcomed the report by LVSA and its conclusions.

7. Contact officer

Russell Williams
Operational Manager – Public Protection
Tel. 01484 221000
russell.williams@kirklees.gov.uk

8. Background Papers and History of Decisions

LVSA report attached at appendix I

9. Service Director responsible

Sue Procter
Service Director – Environment
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Kirklees Council
Hackney Carriage Unmet Demand Survey

August 2020
Page 13

Executive Summary

This report title has been undertaken on behalf of Kirklees Council following the guidance of the April 2010 DfT Best Practice Guidance document, and all relevant case history in regard to unmet demand. This Executive Summary draws together key points from the main report that are needed to allow a committee to determine from the facts presented their current position in regard to the policy of limiting hackney carriage vehicle licences according to Section 16 of the 1985 Transport Act. It is a summary of the main report which follows and should not be relied upon solely to justify any decisions of a committee but must be read in conjunction with the full report below.

The level of observed unmet demand is a long way from the level that is counted as significant in terms of Section 16 of the 1985 Transport Act. The limit on vehicle numbers can therefore be retained, and there is no need to add any further plates.

The overall picture of hackney carriage demand and operations at the start of 2020 was optimistic and positive. There is evidence of increased usage of both licensed vehicles overall and specifically of hackney carriages at some ranks. However, the overall average weekly demand reduction since the last survey of around 11% appears to relate to closure of specific demand generators.

The hackney carriage trade is well-known and appreciated across the complete area, and is active in all main settlements despite there being no zoning policy in place. The hackney carriages trade is especially important to the developing night life of Holmfirth, and there is evidence the trade were working very hard to ensure that demand was met effectively.

The overall hackney carriage vehicle fleet size for this area is always likely to be higher than levels of population might suggest because there are several niche operating areas all of whom seem to have sufficient work keeping their need to move towards 'honeypot' demand to a minimum. The only exception is Holmfirth where various vehicles work together to meet the requirement there which would not otherwise be sustainable.

The present good level of service was provided with the 223 vehicles available at the time of the survey, and the option exists that the limit could be clearly set at that level, which did not result in any unmet demand that was significant.

Fresh surveys of demand would be required no later than March 2023, although consideration should also be given to early understanding of the impacts of the pandemic to ensure continued availability of vehicles to help the recovery of the industry into the 'new normal'.

Contents

Executive Summary.....	i
Contents.....	iii
1 General introduction and background	1
2 Local background and context.....	9
3 Patent demand measurement (rank surveys)	15
4 General public views.....	25
5 Key stakeholder consultation	33
6 Trade stakeholder views	35
7 Evaluation of unmet demand and its significance	41
8 Summary, synthesis and study conclusions	45
9 Recommendations	53

1 General introduction and background

Kirklees Council is responsible for the licensing of hackney carriage and private hire vehicles operating within the Council area and is the licensing authority for this complete area. Further details of the local application of Section 16 of the 1985 Transport Act with regard to limiting hackney carriage vehicle numbers is provided in further Chapters of this report. Hackney carriage vehicle licences are the only part of licensing where such a stipulation occurs and there is no legal means by which either private hire vehicle numbers, private hire or hackney carriage driver numbers, or the number of private hire operators can be limited.

The Best Practice Guidance

This review of current policy is based on the Best Practice Guidance produced by the Department for Transport in April 2010 (BPG). It seeks to provide information to the licensing authority to meet section 16 of the Transport Act 1985 “that the grant of a hackney carriage vehicle licence may be refused if, but only if, the licensing authority is satisfied that there is no significant demand for the services of hackney carriages within its local area, which is unmet.” This terminology is typically shortened to “no SUD”.

Legal Background

Current hackney carriage, private hire and operator licensing is undertaken within the legal frameworks first set by the Town Polices Clause Act 1847 (TPCA), amended and supplemented by various following legislation including the Transport Act 1985, Section 16 in regard to hackney carriage vehicle limits, and by the Local Government Miscellaneous Provisions Act 1976 with reference to private hire vehicles and operations. This latter Act saw application of regulation to the then growing private hire sector which had not been previously part of the TPCA. Many of the aspects of these laws have been tested and refined by other more recent legislation and more importantly through case law.

Beyond legislation, the experience of the person in the street tends to see both hackney carriage and private hire vehicles both as ‘taxis’ – a term we will try for the sake of clarity to use only in its generic sense within the report. We will use the term ‘licensed vehicle’ to refer to both hackney carriage and private hire.

Review of Policy and Legislation

The legislation around licensed vehicles and their drivers has been the subject of many attempts at review. The limiting of hackney carriage vehicle numbers has been a particular concern as it is often considered to be a restrictive practice and against natural economic trends. The current BPG in fact says “most local licensing authorities do not impose quantity restrictions, the Department regards that as best practice”.

The most recent reviews were by the Office of Fair Trading in 2003, through the production of the BPG in 2010, the Law Commission review which published its results in 2014, the Parliamentary Task and Finish Group which reported in September 2018, the Government Response in February 2019 and the consultation on “Protecting Users” which closed on 22 April 2019 that resulted in issue of the “Statutory Taxi and Private Hire Vehicle Standards” on 23rd July 2020 . None of these resulted in any material change to the legislation involved in licensing. Other groups have provided their comments (including the Urban Transport Group and the Competition and Markets Authority) but the upshot remains no change in legislation from that already stated above.

With respect to the principal subject of this survey, local authorities retain the right to restrict the number of hackney carriage vehicle licenses. The Law Commission conclusion included retention of the power to limit hackney carriage vehicle numbers but utilizing a public interest test determined by the Secretary of State. It also suggested the three- year horizon also be used for rank reviews and accessibility reviews. It is assumed the Government response to the Task and Finish Group is now effectively the current reaction to this extensive research.

It is also understood that the revisions resulting from the recently closed Government Consultation will eventually lead to a more comprehensive review of the sections of the BPG not affected by the February 2019 Statutory Guide, as stated in para 1.8 of that document – “A consultation on revised BPG, which focusses on recommendations to licensing authorities to assist them in setting appropriate standards (other than those relating to passenger safety) to enable the provision of services the public demand, will be taken forward once the final Statutory Guidance has been issued.” The “Statutory Taxi and Private Hire Vehicle Standards” (STPHVS) document suggests the taking forward of the wider BPG review will involve a consultation ‘later this year (2020)’ with the aim of making “clear recommendations on the measures licensing authorities should consider to enable the trade to react to the demands of passengers”. The April 2010 BPG therefore remains valid for our review.

The present background to policy

A more recent restriction, often applied to areas where there is no 'quantity' control felt to exist per-se, is that of 'quality control'. This is often a pseudonym for a restriction that any new hackney carriage vehicle licence must be for a wheel chair accessible vehicle, of various kinds as determined locally. In many places this implies a restricted number of saloon style hackney carriage licences are available, which often are given 'grandfather' rights to remain as saloon style.

Within this quality restriction, there are various levels of strength of the types of vehicles allowed. The tightest restriction, now only retained by a few authorities only allows 'London' style wheel chair accessible vehicles, restricted to those with a 25-foot turning circle, and at the present time principally the LTI Tx, the Mercedes Vito special edition with steerable rear axle, and the Metrocab (no longer produced).

Others allow a wider range of van style conversions in their wheel chair accessible fleet, whilst some go as far as also allowing rear-loading conversions. Given the additional price of these vehicles, this often implies a restriction on entry to the hackney carriage trade.

Some authorities do not allow vehicles which appear to be hackney carriage, i.e. mainly the London style vehicles, to be within the private hire fleet, whilst others do allow wheel chair vehicles. The most usual method of distinguishing between hackney carriages and private hire is a 'Taxi' roof sign on the vehicle, although again some areas do allow roof signs on private hire as long as they do not say 'Taxi', some turn those signs at right angles, whilst others apply liveries, mainly to hackney carriage fleets, but sometimes also to private hire fleets.

Some authorities are considering using deregulation in favour of more sustainable vehicle types as a further potential quality restriction given the urgent need to improve overall vehicle emission standards.

Industry standard evaluation of significance of unmet demand

After introduction of the 1985 Transport Act, Leeds University Institute for Transport Studies developed a tool by which unmet demand could be evaluated and a determination made if this was significant or not. The tool was taken forward and developed as more studies were undertaken. Over time this 'index of significance of unmet demand' (ISUD) became accepted as an industry standard tool to be used for this purpose. Some revisions have been made following the few but specific court cases where various parties have challenged the policy of retaining a limit.

Some of the application has differed between Scottish and English authority's. This is mainly due to some court cases in Scotland taking interpretation of the duty of the licensing authority further than is usual in England and Wales, requiring current knowledge of the status of unmet demand at all times, rather than just at the snap-shot taken every three years. However, the three-year survey horizon has become generally accepted given the advice of the BPG and most locations that review regularly do within that timescale.

The DfT asked in writing in 2004 for all licensing authorities with quantity restrictions to review them, publish their justification by March 2005, and then review at least every three years since then. In due course, this led to a summary of the government guidance which was last updated in England and Wales in 2010 (but more recently in Scotland).

The BPG in 2010 also provided additional suggestions of how these surveys should be undertaken, albeit in general but fairly extensive terms. A key encouragement within the BPG is that "an interval of three years is commonly regarded as the maximum reasonable period between surveys". BPG suggests key points in consideration are passenger waiting times at ranks, for street hailings and telephone bookings, latent and peaked demand, wide consultation and publication of "all the evidence gathered".

The latest STPHVS requires an update given to the DfT by the end of January 2021 in terms of consideration of the measures included in that document, principally production of a comprehensive policy document, review of if CCTV might be mandated and documentation of passenger complaints.

Case law and unmet demand

In respect to case law impinging on unmet demand, the two most recent cases were in 1987 and 2002. The first case (R v Great Yarmouth) concluded authorities must consider the view of significant unmet demand as a whole, not condescending to detailed consideration of the position in every limited area, i.e. to consider significance of unmet demand over the area as a whole.

R v Castle Point considered the issue of latent, or preferably termed, suppressed demand consideration. This clarified that this element relates only to the element which is measurable. Measurable suppressed demand includes inappropriately met demand (taken by private hire vehicles in situations legally hackney carriage opportunities) or those forced to use less satisfactory methods to get home (principally walking, i.e. those observed to walk away from rank locations).

2019 saw three challenges with respect to surveys of unmet demand. All three found in favour of the current methodology being undertaken. A key focus was the need for a robust and up to date independent survey report being available.

In one case it was made clear the current guidance is based on the 2010 BPG, whilst in another case having a valid survey meant those challenging had no case for their proposed challenge, and in the final case an authority was clearly told they could not rely on a very old survey which itself could not be produced.

Most recent changes relating to demand

The most recent changes in legislation regarding licensed vehicles have been enactment of the parts of the Equality Act related to guidance dogs (sections 168 to 171, enacted in October 2010), the two clauses of the Deregulation Act which were successful in proceeding, relating to length of period each license covers and to allowing operators to transfer work across borders (enacted in October 2015), and most recently enactment of Sections 165 and 167 of the Equality Act, albeit on a permissive basis (see below).

In November 2016, the DfT undertook a consultation regarding enacting Sections 167 and 165 of the Equality Act. These allow for all vehicles capable of carrying a wheel chair to be placed on a list by the local council (section 167). Any driver using a vehicle on this list then has a duty under section 165 to:

- Carry the passenger while in the wheel chair
- Not make any additional charge for doing so
- If the passenger chooses to sit in a passenger seat to carry the wheel chair
- To take such steps as are necessary to ensure that the passenger is carried in safety and reasonable comfort
- To give the passenger such mobility assistance as is reasonably required

This was enacted from April 2017. There remains no confirmation of any timetable for instigating either the remainder of the Equality Act or the Law Commission recommendations, or for the update of the BPG.

The current status regarding unmet demand studies

In general, industry standards suggest (but specifically do not mandate in any way) that the determination of conclusions about significance of unmet demand should take into account the practicability of improving the standard of service through the increase of supply of vehicles.

It is also felt important to have consistent treatment of authorities as well as for the same authority over time, although apart from the general guidance of the BPG there is no clear stipulations as to what this means in reality, and certainly no mandatory nor significant court guidance in this regard.

During September 2018 the All-Party Parliamentary Group on taxis produced its long-awaited Final Report. There was a generally accepted call for revision to taxi licensing legislation and practice, including encouragement for local authorities to move towards some of the practical suggestions made within the Report. The Government has broadly supported the recommendations of this Task and Finish Group.

Despite some opposition from members of the group, the right to retain limits on hackney carriage vehicle numbers was supported, with many also supporting adding a tool which would allow private hire numbers to be limited where appropriate, given reasonable explanation of the expected public interest gains. This latter option is now being taken forward in Scotland, with two studies published and the Scottish Government preparing guidance, although the Government response did not support this option.

As already stated, other groups have provided comments giving their views about licensing matters but the upshot remains no change in legislation from that already stated above. The Scottish Government are moving forward in terms of their application of the potential limiting of private hire vehicle numbers but this is specific to Scottish law and not presently relevant to the English licensing authorities.

Conclusions

In conclusion, the present legislation in England and Wales sees public fare-paying passenger carrying vehicles firstly split by passenger capacity. All vehicles able to carry nine or more passengers are dealt with under national public service vehicle licensing. Local licensing authorities only have jurisdiction over vehicles carrying eight or less passengers. Further, the jurisdiction focusses on the vehicles, drivers and operators but rarely extends to the physical infrastructure these use (principally ranks).

The vehicles are split between hackney carriages which are alone able to wait at ranks or pick up people in the streets without a booking, and private hire who can only be used with a booking made through an operator. If any passenger uses a private hire vehicle without such a properly made booking, they are not generally considered to be insured for their journey.

Drivers can either be split between ability to drive either hackney carriage or private hire, or be 'dual', allowed to drive either kind of vehicle. Whilst a private hire driver can only take bookings via an operator, with the 'triple-lock' applying that the vehicle, driver and operator must all be with the same authority, a hackney carriage driver can accept bookings on-street or by phone without the same stipulation required for private hire.

Recent legislation needing clarification has some operators believing they can use vehicles from any authority as long as they are legally licensed as private hire. At first, under the 'Stockton' case, this was hackney carriages operating as private hire in other areas (cross-border hiring). More recently, under the Deregulation Act, private hire companies are able to subcontract bookings to other companies in other areas if they are unable to fulfil their booking, but the interpretation of this has become quite wide.

The 'triple lock' licensing rule has also become accepted. A vehicle, driver and operator must all be under the same licensing authority to provide full protection to the passenger. However, it is also accepted that a customer can call any private hire company anywhere to provide their transport although many would not realise that if there was an issue it would be hard for a local authority to follow this up unless the triple lock was in place by the vehicle used and was for the area the customer contacted licensing.

Further, introduction of recent methods of obtaining vehicles, principally using 'apps' on mobile phones have also led to confusion as to how 'apps' usage sits with present legislation.

All these matters can impact on hackney carriage services, their usage, and therefore on unmet demand and its significance.

Coronavirus

The serious Covid-19 virus took hold in the UK during March 2020. Whilst life carried on almost as normal until mid-March, formal lockdown was applied from Tuesday 24th March 2020 until further notice. Significant reductions in movement had begun to bite from the previous week. The last dates in 2020 when on-street and rank surveys occurred were effectively Sunday 16th March 2020 (the rank surveys for this project).

This study had all work apart from the driver surveys (that were modified and remained running till May) and key stakeholders (which could not reasonably be undertaken now) safely completed.

All the evidence gathered above will remain valid as a snapshot of the operation of the industry immediately before the lock down and these reports have been produced on that basis, keeping in mind the developing situation as part of our considerations within analysis.

2 Local background and context

Key dates for this report title for Kirklees Council are:

- appointed Licensed Vehicle Surveys and Assessment (LVSA) on 9th January 2020
- in accordance with our proposal of November 2020
- as confirmed during the inception meeting for the survey held on 16th January 2020
- this survey was carried out between January and March 2020
- On street pedestrian survey work occurred in mid-March 2020 (on a Wednesday, Thursday and Friday)
- the video rank observations occurred in mid-March 2020
- both the above were before significant impact of the pandemic affected potential responses
- Licensed vehicle driver opinions and operating practices were canvassed using an electronically available and posted out survey during March to May 2020 (but modified to obtain results for pre-lockdown operations)
- Key stakeholders were consulted later in July due to the impacts of the Coronavirus pandemic on their availability but provided no response and it was not felt appropriate to push more than normal for response
- A draft of this Final Report was reviewed by the client during August 2020
- and reported to the appropriate Council committee following acceptance by the client.

The authority has a current population of 443,790 using the 2020 estimates currently available from the 2011 census, 2016 revision. 81% of this are estimated to be aged 15 or over and the target population for on-street interviews.

Kirklees Council is a unitary authority, and in terms of background council policy able to determine its own ranks and transport policy.

The Council currently has a "2025 Kirklees Transport Vision", an ambitious 20 year transport vision focussed on allowing sustainable transport systems to flourish. The aim is to provide improved wellbeing for its citizens and environment whilst providing the building blocks for a thriving local economy. This vision is to be reviewed regularly against changing travel patterns, technology improvements and funding opportunities. It provides:

A – a top class public transport system for everyone

B – a sustainable transport system that encourages healthy citizens, promotes social inclusion and preserves and enhances the local environment

C – a transport network that promotes a sustainable thriving economy for businesses to invest in.

Item A5 states “fully integrated hub and spoke public transport system, with feeder services linking into core routes for bus, rail and taxi”

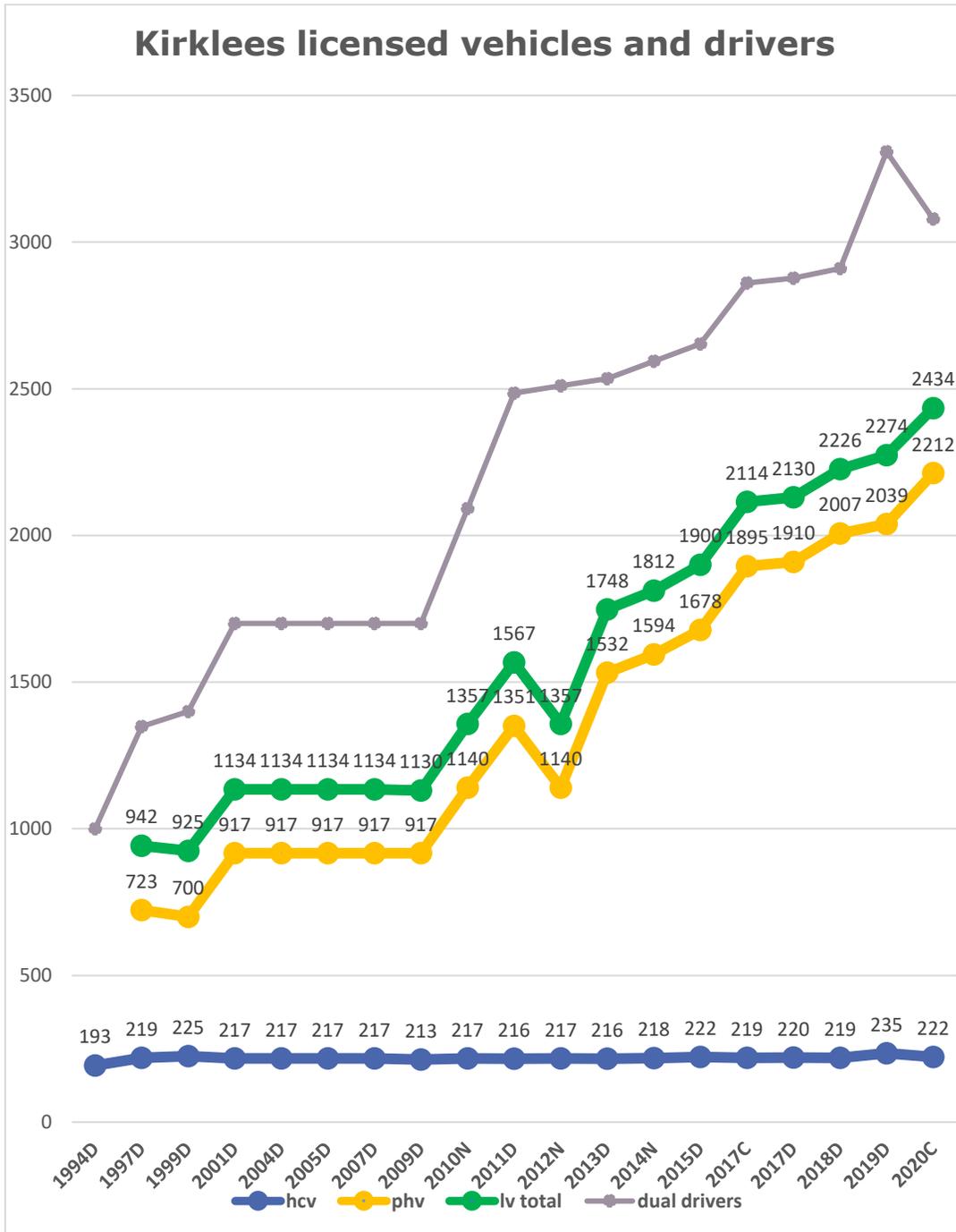
Item A6 encourages a simple through ticketing system for bus, rail and taxi.

The current Local Plan document, Chapter 10, confirms that the West Yorkshire Local Transport Plan 2011-2026 ‘My Journey’ was replaced by a Transport Strategy which is a 20-year vision. This uses the West Yorkshire Draft Transport Strategy Evidence Base of July 2016 which was already available at the time of the last Survey in 2017. LP paragraph 10.68 states “this policy is balanced in favour of sustainable transport modes by ensuring that the requirements of users are met to reduce the need to travel in private cars”. Para 10.71 confirms that the Council will work with all agencies that have responsibility for differing types of transport within the district”.

The Strategy document identified 1% of travel to work across West Yorkshire was by taxi, a quarter of the level by train and at the same level as bicycle and motorcycle. That document sought improved taxi facilities and environmental performance, noting that “hackney carriages and private hire vehicles are a valuable part of our transport system, providing more choice for whole or part journeys ... and a valuable service for those with a disability or mobility impairment”. Enhanced taxi ranks, strengthened safeguarding protection and greater take-up of low emission vehicles, together with delivery of mobility as a service to enhance customer experience are encouraged.

Taxi Statistics

By drawing together published statistics from both the Department for Transport (D) and the National Private Hire Association (N), supplemented by private information from the licensing authority records (C), recent trends in vehicle, driver and operator numbers can be observed. The detailed numbers supporting the picture below are provided in Appendix 1. Due to the comparative size, the operator figures are shown in the second picture.



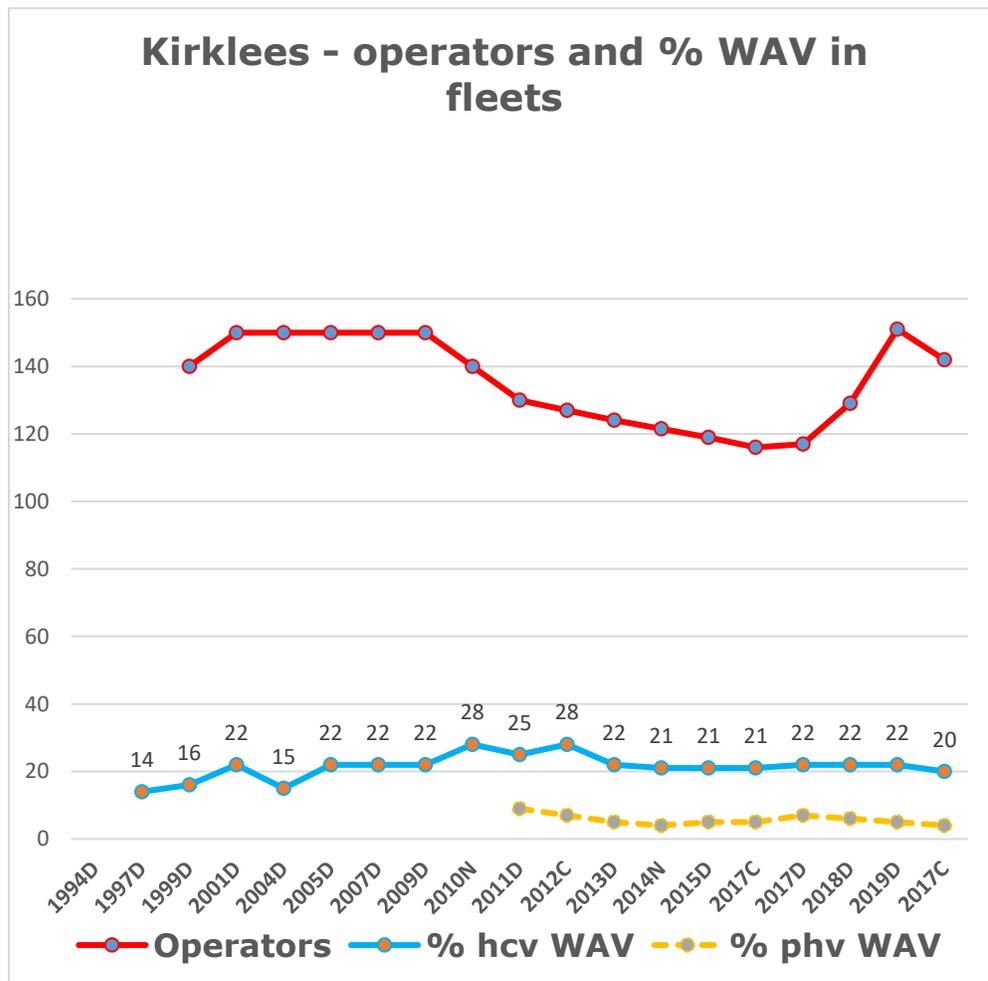
Licensing Statistics from 1994 to date

The graph shows the continued strong growth of private hire vehicle numbers. This is in comparison to the limited number of hackney carriage vehicles who have seen their numbers remain similar since around 1997. However, the formal statistics show a growth to 235 in the DfT 2019 statistics which had reduced to 222 in the actual active plates at the time of the demand survey rank observations in mid-March 2020. The actual limit in 2005 was recorded as 224 vehicles in the conclusions of the survey of that date.

These values suggest the share of the fleet that is hackney carriage continues to reduce. In 1999, the highest share for hackney carriages, the level was 24%. It is presently 9%.

The dual driver licence numbers show continued growth since the last survey, although the latest formal council numbers around the time of the rank work suggested some reduction, but still remaining at over 3,000.

Information is also available from these sources to show how the level of wheel chair accessible vehicles (WAV) has varied. It must be noted that in most cases the values for the private hire side tend to be much more approximate than those on the hackney carriage side, as there is no option to mandate for private hire being wheel chair accessible. In some areas, to strengthen the ability of the public to differentiate between the two parts of the licensed vehicle trade, licensing authorities might not allow any WAV in the private hire fleet at all. For Kirklees, recent enhancements have seen more accurate recording of which vehicles are WAV in both elements of the fleet.



Operator numbers and levels of WAV provision in the fleet

Operator numbers, having shown a decline before the last survey, have grown since that time but like driver numbers, showed a reduction in the most recent information.

The level of wheel chair accessible vehicles (WAV) in both fleets has remained similar for some while. However, there is a trend of reducing numbers, particularly in the latest information, although there has also been a review of information to ensure accuracy, which we understand may have meant some previous over-reporting of the level of such vehicles which implies the apparent reduction in the recent figures may not in fact be an actual reduction, rather a reflection towards accuracy of the numbers presented. There are a small number of WAV in the private hire element of the fleet.

Kirklees Council has chosen to utilize its power to limit hackney carriage vehicle numbers, and as far as we are aware has done so since 1974, according to records within the DfT statistical information. This was the date that Kirklees was set up as a Council within West Yorkshire. It is understood that, unlike some other Yorkshire authorities, there was no adoption of zones retaining any prior structure or limits on hackney carriages from the previous administrations. There were eleven previous districts – County Boroughs of Huddersfield and Dewsbury, municipal boroughs of Batley and Spenborough, and the urban districts of Colne Valley, Denby Dale, Heckmondwike, Holme Valley, Kirkburton, Meltham and Mirfield. There is mention in the 2005 demand survey summary that the vehicle limit was 224 at that time (see below).

Kirklees undertakes regular review of its policy to limit hackney carriage vehicle numbers in line with the BPG. The previous surveys were in 2017, 2013, 2010 and 2005. None resulted in any identification of unmet demand nor any need for additional plates to be added. The statistics, however, suggest some plates were added in 1996 or thereabouts. The summary chapter of the 2005 report suggests the limit was 224 at the time of that survey.

At the time of the last survey we were advised that there had been recent re-issue of a number of plates which had been returned but not re-issued. Whilst this appeared to add about four vehicles, within a short period the actual number on issue had returned to 219. The DfT statistics in 2019 suggested 235 licences but it is not clear if that was an active number of a quote of what was believed to be the limit at that time (but we have found no other evidence than the number of 224).

3 Patent demand measurement (rank surveys)

As already recorded in Chapter 2, control of provision of on-street ranks in Kirklees is under the full control of the highway section of the Kirklees Council itself. Appendix 2 provides a list of ranks at the time of this current survey.

Our methodology involves a current review both in advance of submitting our proposal to undertake this survey and at the study inception meeting, together with site visits where considered necessary. This provides a valid and appropriate sample of rank coverage which is important to feed the numeric evaluation of the level of unmet demand, and its significance (see discussion in Chapter 7). The detailed specification of the hours included in the sample is provided in Appendix 3. Detailed results by rank, day and hour are in Appendix 4. We do not believe there have been any changes in rank provision since the last survey apart from the possible addition of the rank in the Bus Station in Holmfirth.

Overview of rank observations

A total of 421 hours of rank observation were included in the detailed assessment of demand across the area. This was slightly increased from the 350 of the 2017 survey but did also involve some 'quick watch' observations to ensure actual usage hours of the Bus Station rank in Holmfirth were known compared to the legal hours.

These observations produced 14,155 different observations including vehicle arrivals, passenger arrivals, vehicle and passenger departures and activity of other vehicles that might impact on the rank activity. Of these observations, 10,411 related to vehicle arrivals or departures (remarkably similar to the 10,531 in 2017).

Of all the observed vehicle arrivals and departures, 71% were observed as local hackney carriage movements. The next highest proportion, 14%, were private cars, followed by 10% private hire vehicles, 4% emergency vehicles and 1% goods vehicles. No out of town taxi style vehicles were recorded in the rank observations. The level of hackney carriage observations was reduced from the 78% in 2017 with the increase shared between adding 2% each to private cars and private hire vehicles but a major increase in the level of emergency vehicles observed at ranks from a small number to 4%.

In terms of overall activities recorded, 26% of the total were at the Huddersfield Station rank, 23% at John William Street in Huddersfield, 9% each for Huddersfield Bus Station and Holmfirth Victoria Street and 8% for Huddersfield Cross Church Street. This means the top two ranks accounted for nearly half the overall activity.

When considering only hackney carriage activity in terms of total movements, Huddersfield Station provided 34%, John William Street 23%, Huddersfield Bus Station 11% and Holmfirth Victoria Street 10%. Lower Dundas Street was next with 7% of hackney carriage movements.

The highest level of usage by private cars was at Ramsden Street, Huddersfield, where 58% of vehicle movements were by private car. This rank only operates from 20:00 to 06:00 and is otherwise either loading or disabled badge holders. It is in a layby marked with white dashed lines and the usage is only defined by the single sign located in the middle of the rank. However, the rank is often used during the daytime by hackney carriages although waiting times by vehicles are not long, but never resulted in empty departures suggesting they might be booked vehicles. This suggests, as is common for mixed use ranks, there is some confusion about who can use this rank when both for the licensed vehicle fleet and for the general public.

Foundry Street, Dewsbury also saw a high percentage of cars using it, at 55% of all vehicle observations. This rank saw more hackney carriage usage but also saw a relatively high level of private hire usage as well. This rank is located near the Market and is marked by faint dashed yellow lines, a lamp post plate and a 'Taxis' sign, with the rank surface being bricks compared to the tarmac of the main road. It is a relatively long area and has parking opposite. Hackney carriages serviced the location in all hours from 09:00 with the last vehicle leaving in the 16:00 hour. Two thirds of vehicles left empty. The high level of car usage possibly arises from the fact there is high pressure on kerb space and no full-time presence of hackney carriages. Again, the relatively poor marking status may not help although it is unlikely the abuse caused much serious issue to the rank itself. The private hire usage could relate to legitimate pick-ups that probably have nowhere better to collect their passengers, again given the high pressure on kerb space.

Other rank use by private cars ranged from 38% of movements to 1%, with Huddersfield station rank seeing the least other vehicle usage.

The worst level of private hire pick-ups at a rank related to Holmfirth Bus Station although again this rank is part time, used by both hackney carriage and private hire at most times, and only marked by lamp column signs, albeit being fairly large. Cross Church Street Huddersfield also had issues, but these appeared to be related to the nearby private hire booking office and the issue of high pressure for kerb space nearby. There appeared to be a very high level of emergency vehicles using the Cleckheaton Greenside rank. This is a very long rank and is opposite a health centre which only has limited space for vehicle service along the main road.

Overall rank usage estimates

The rank observations were used to produce estimated weekly rank-based demand across the area. These estimates were compared to those from the two previous surveys.

Rank	2020		2017		2013	
	Flow	%	Flow	%	Flow	%
Railway Station	2,928	32	3,025	29	2,489	27
John William St	1,783	19	2,358	23	1,441	14
Victoria St, Holmfirth	1,312	14.1	898	9	402	4
Bus Station	1,041	11.2	995	10	636	7
Cross Church St	772	8.3	652	6	924	10
Lower Dundas St	549	5.9	449	4	636	7
South St, Dewsbury	310	3.3	255	2	727	8
Market Place, Birstall	210	2.3	540	5	548	6
Bus Station, Holmfirth	137	1.5	n/a		n/a	
Wards Hill, Batley	95	1	105	1	353	4
Foundry St, Dewsbury	50	0.5	230	2	120	1
Ramsden St	39	0.4	66	1	5	0.0
Greenside, Cleckheaton	30	0.3	60	1	121	1
Henrietta St, Batley	10	0.1	235	2	143	2
Bradford Rd, Bar St, Batley	5	0.1	0	0	55	1
Zetland St	0	0	0	0	0	0
Queen St			576	6	180	2
St Thomas Road			4	0.0	0	0
Bradford Rd, Frontier, Batley					646	7
Bradford Rd, La La's, Batley					0	0
Towngate, Holmfirth					0	0
Queensgate					0	0
Southgate					0	0
Byram St					0	0
Lord St					0	0
Venn St					0	0
Market St outside music shop					0	0
Market Sq, Batley					0	0
New North Parade					0	0
Mill St E, Asda, Dewsbury					0	0
Longcause Way and Town Hall Way, Dewsbury					0	0
North Gate, Dewsbury					0	0
Wellington St, Dewsbury					0	0
Ludgate Hill, Heckmondwike					0	0
Station Rd, Batley					0	0
Station Rd, Batley across from auction rooms					0	0
New St, Huddersfield						
Total	9,271		10,447		9,426	
Growth since previous	-11%		+13%			
Growth since 2013	-2%					

The table shows that the top two ranks in the area remain that at the Station and in John William Street, both in Huddersfield. Compared to 2017, they retain the total of just over half of all rank-based demand estimated. However, both have lost patronage although the Railway Station has lost less and therefore become more dominant, with nearly a third of all demand compared to the nearly a fifth for John William Street. These two remained the top two ranks in 2013 but only had 41% of demand.

Use of the night rank at Victoria Street in Holmfirth continues to grow. This rank is now third busiest in passenger terms and has grown in both numbers and share since both 2013 and 2017. It now has just over 14% of total passenger demand, particularly high considering the relatively limited hours of operation. This is supplemented by a further 1.5% of total demand at the Bus Station rank there (a site not previously included).

The Bus Station rank in Huddersfield has also continued to grow in usage, with the current level just over 11% of the total. Cross Church St rank has also seen growth.

The above top five ranks are the only ones with over 8.3% of passenger demand at this time. This is a similar pattern to 2017, although the top four now take 76% of all passengers compared to 71% in 2017, suggesting a focus of rank-based demand increasing at these sites.

The next two ranks in patronage level terms have all gained both passenger numbers and in share. All saw reductions from 2013 to 2017 but have now regained some of the lost passengers, but have not returned to the 2013 levels.

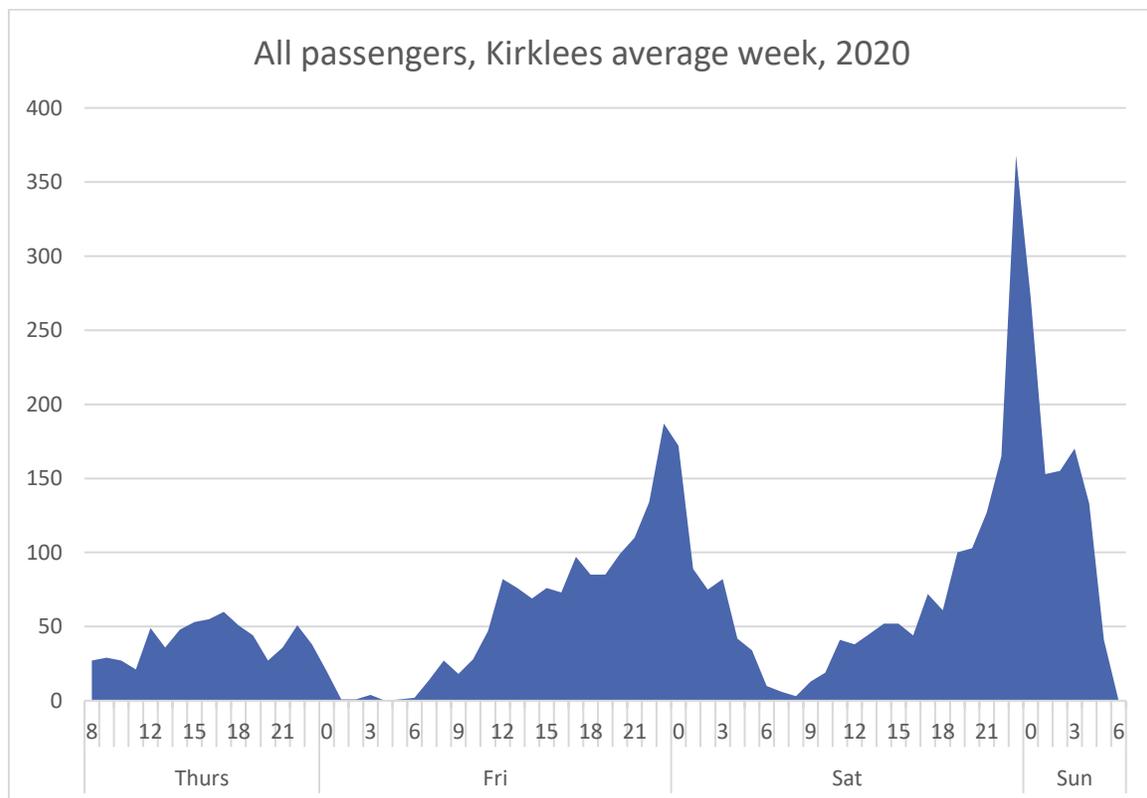
Market Place, Birstall continues to lose passengers and now has just 2.3% of demand compared to 6% in 2013. All the remaining ranks have seen quite significant reductions apart from Bar Street in Batley which saw no passengers in 2017 but a few in 2020, although this is only 0.1% of the total.

Two other ranks used in 2017 no longer see any real usage, St Thomas Road and Queen Street, the latter seeing closure of its related club and no replacement making the location redundant. Loss of clubs continues to be the main reason that rank sites cease usage. Many of those closing had long histories and long relationships to the vehicles servicing the ranks there.

Compared to 2017 (surveys at almost exactly the same weekend in March), overall passenger levels have reduced by 11% and are also 2% lower than that observed in 2013 (when surveys were in July). The increase experienced from 2013 to 2017 seems to have been reversed, although as noted above the picture is not all downwards, with some significant increases. The changes observed generally accord with expectations, with a major loss resulting from one club closure. The minor reduction at Huddersfield station might have been the beginnings of the impact of the pandemic (with rail tending to be hit first as people were encouraged to work from home when they could).

The remainder of ranks shown above have long been known to be unused, mainly arising from closure of a network of night venues many years ago. They have been included in the table for historic comparison and record. They were excluded from observation in 2017 with agreement of the Council.

The graph below shows the total flows at all ranks for all observed hours. Some ranks were not covered on all days but the overall picture shows the general trends at the ranks:

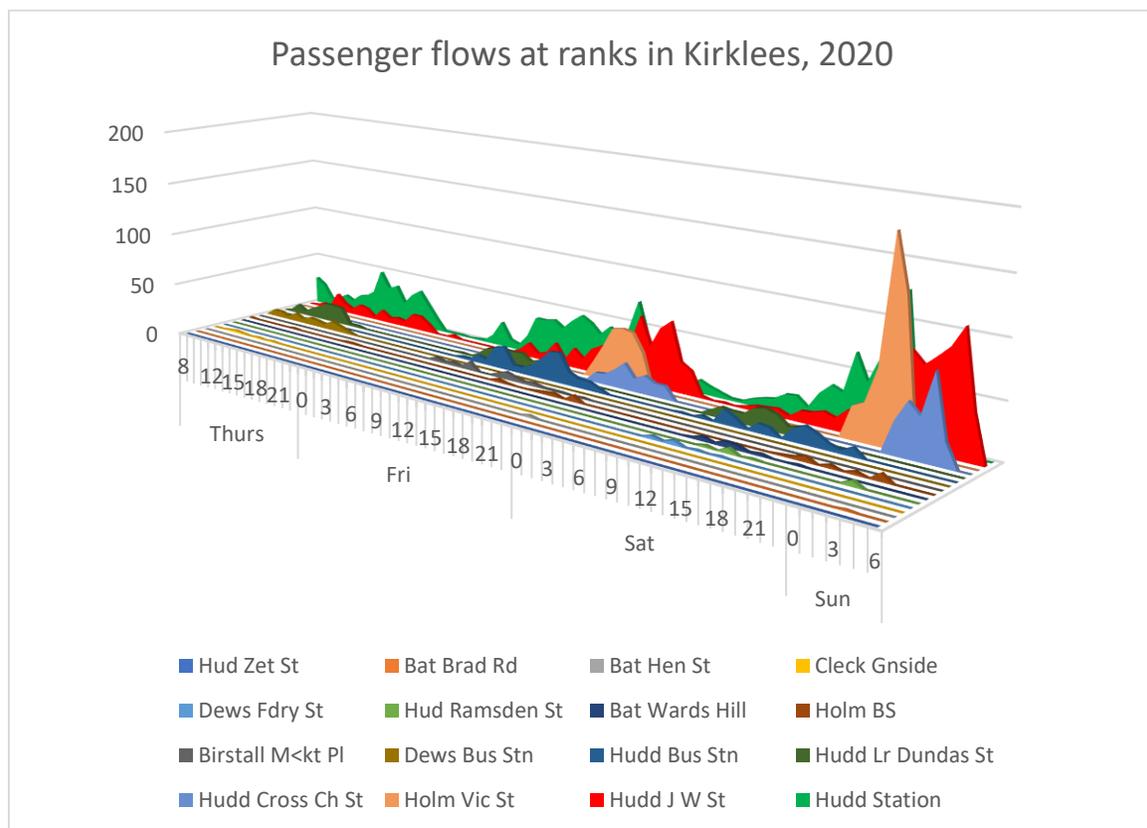


As is typical in most places, demand in total rises from Thursday to Friday to Saturday. There is very little hackney carriage rank demand through the early morning of Friday. Flows on Fridays tend to be higher than Thursday, with a peak at late night, and flows right through to Saturday. On the Saturday, flows rise more gently than on the Friday, but then rise very steeply to a peak, after which they subside more slowly and continue right through to the early hours of Sunday.

The peak flow was nearly six times the average hourly passenger flow of some 67 passengers. This was a very strong rise for the 23:00 hour on the Saturday even from the previous hour. Flows then reduced through to the 05:00 hour on the Sunday morning. The Friday night peak hour, at the same time as that on Saturday, 23:00 was half the level of the peak flows. Further, the peak flows of 110 or more were for four hours over the Friday / Saturday but 100 or more from 19:00 on the Saturday through to 04:00 on the Sunday. This suggests the area has very peaky demand (see later).

Rank usage by location and time

The further graph below considers the spread of demand over all ranks.



This graph shows that the Station rank at Huddersfield provides demand for the bulk of the working day with some overnight demand. John William Street rank also provides good levels of demand at most times and provides significant demand for relatively long periods in the early hours of Saturday and Sunday. Huddersfield Bus Station tends to provide good levels of daytime demand but reduced on Saturdays. The main Holmfirth rank provides very significant levels of passenger numbers on both Friday and Saturdays, with the Saturday through to Sunday being much higher and being the busiest rank on the Saturday in the area. Cross Church Street also provides significant late evening / early morning flows.

Other ranks across the area add to the mix of patronage albeit at very low levels.

Surveyed hours with observed unmet demand

The rank data was sorted to identify the hours with any passenger delay, listing this from the highest average passenger delay in an hour to the smallest. Just 2% of all observed hours saw an average passenger delay in that hour of a minute or more. A further 4% had average passenger delays that were under a minute.

The longest passenger delay observed was 12 minutes. There were only four passengers who experienced delays of 11 or 12 minutes. Just 13, or 0.3% of the total of all passengers, had delays of six to ten minutes. 2% had delays between one and five minutes. Over all passengers, the study average passenger delay was just five seconds, very small.

Of the eight hours when average passenger delay was a minute or more, five were at the Holmfirth ranks, with four of these at the bus station. However, most of these were in hours that were not at the peak and when flows were generally low. They may therefore be booked hackney carriage trips rather than people waiting for a vehicle on spec. There was, however, one hour at the main Victoria Street rank there that did see true unmet demand, but as the demand was reducing in the 02:00 hour on the Sunday morning.

Three other hours with over a minute of average passenger delay were at Huddersfield Bus Station and Lower Dundas Street ranks at 12:00 and 13:00 on the Friday. One of these, at Lower Dundas Street, saw the longest passenger wait of 12 minutes in the survey.

The other lesser average passenger delay hours were spread across many different ranks and times. However, the two peak hours at Holmfirth Victoria Street did see people having to wait, albeit never more than five minutes. This affected 30 people in the peak hour and 27 in the hour previous, but amazingly the resulting average passenger delay over all passengers was just 20 seconds for the busiest hour and 23 seconds for the second busiest hour. This shows excellent levels of service to this demand.

Frequency of vehicle operation during rank survey

A survey was undertaken considering the hackney carriage vehicles observed at or near ranks covering a sample of 20 hours on the expected busiest day of the survey (Saturday 14th March, 2020). The hours were split between Huddersfield, Cleckheaton, Birstall, Batley, Dewsbury and Holmfirth, all covering locations near to ranks at time it was understood those locations would see hackney carriage vehicles. All taxi-like vehicles were recorded and checked against the current valid vehicles at the time of the survey.

581 different vehicle movements were observed across the 20 sample hours of survey. 81% of the movements observed were identified to be valid local hackney carriages. 13% were identified as valid local private hire, with the remainder being plate references that did not match current vehicles in the local fleet. These vehicles were possibly misread or mistyped but were definitely identified as local vehicles rather than out of town. Just one vehicle was observed as an out of town vehicle.

When checked to the total current number of vehicles, the private hire vehicles observed amounted to just 3% of the very large local fleet. Most were seen just once, with a few seen twice. For the hackney carriage observations, 58% of the current fleet was observed, a much higher proportion than for other vehicle types but expected given the focus of the observations was at the busiest ranks at their busiest times. This is slightly reduced from the 62% of 2017.

Our sample was also designed to capture vehicles across the area, not just in Huddersfield. The average number of times each vehicle was seen was four, with the most frequent vehicle seen ten times across the sample hours.

With respect to the different periods / locations vehicles were observed, one vehicle was seen in five different periods / locations – various locations in Huddersfield plus the later observation in Holmfirth. 35% of all hackney carriage plates observed were seen in both one and two sets, 20% in three and 10% in four.

The location where least vehicles were seen was Cleckheaton. However, of the four vehicles observed, only one was only seen exclusively there. The other three had different spreads over the area, with one seen there and at both Holmfirth observations, one seen there, at the later Holmfirth and at Dundas Street, Huddersfield and the final vehicle seen there and in the late sample at Huddersfield Station.

Whilst Birstall saw the same number of vehicles as Cleckheaton (four), they were seen more often (eight times in total). However, of these, only one was seen elsewhere (in Batley). Batley saw one more vehicle but, apart from the vehicle shared with Birstall, none were seen elsewhere. This suggests the Birstall and Batley fleets are much more insular than for the other locations.

Dewsbury saw eleven different vehicles. Of these, eight were only seen there. Two were seen in Dewsbury and at Huddersfield station, with the final vehicle seen at Dewsbury and the later observations at Holmfirth. This fleet is also relatively insular, but not as strongly so as for Birstall and Batley.

This suggests more individual small fleets servicing four of the smaller locations more exclusively. This characteristic of supply implies a larger fleet would be required across the whole area than if vehicles were focussed on one location, as many seem to be getting enough custom locally and would not therefore be generally available to supplement local fleets under pressure.

However, the picture for Holmfirth was much different. Firstly, the fleet observed here was much larger, some 38 different vehicles (of which 27 were seen in both periods observed), but secondly, 24 were also seen in other locations, mainly in Huddersfield ranks. This is consistent with there being little demand other than at night, which means vehicles generally need other work.

With respect to total hackney carriage observations, 24% of all the observations were during the late night period at Huddersfield Station (remarkably similar to the 25% in 2017). The next highest proportion, 18% were the later observation at Holmfirth (increased from 16% in 2017). Next was John William Street, Huddersfield with 16%, then Holmfirth early evening with 13%. Lower proportions were seen in earlier periods whilst the smaller locations saw much smaller proportions, with 4% observed in Dewsbury, 2% in Birstall and 1% each in Cleckheaton and Batley.

The overall view in terms of vehicle activity is quite varied. Whilst there are small fleets focussed on the smaller locations, many vehicles do cover beyond Huddersfield whilst there is also clearly a high level of focus on night demand even within Huddersfield. As is typical with hackney carriage fleets, it demonstrates reaction to demand. It also demonstrates the area has hackney carriage demand not just focussed in the main central area of Huddersfield – more remarkable given there is no zoning system meaning vehicles could choose to all work in the 'honey pot' but are clearly not doing so. Yet some also choose to remain in their own local area.

This provides confidence that the current policies seem to be providing a district wide service provided by careful sensitivity of the fleet to passenger demand.

Observed usage for those with disabilities

From the detailed rank observations, 30% of the observed hackney carriage vehicles appeared to be wheel chair accessible style vehicles (increased from the 25% of 2017). When considered by total vehicle movements by hackney carriage, 69% were WAV style at John William Street, 63% at Cross Church Street, 52% at the Bus Station, 50% at Lower Dundas Street and 38% at Huddersfield station. There were very few WAV apparently active in the smaller centres, apart from at Holmfirth Bus Station which saw a third of the hackney carriages apparently WAV style.

There were seven people observed accessing ranks in wheel chairs during this survey. The largest number, three, were at Huddersfield station rank, followed by two at Lower Dundas Street, one at Ramsden Street and one at Foundry Street in Dewsbury. This is higher than the total of two users observed in 2017.

There were 58 people observed to have some other form of disability, not a wheel chair. 23 of these were at Lower Dundas Street, 16 at Huddersfield Bus Station, 7 at Huddersfield rail station, 6 at John William Street, three at Ramsden St and one each at Holmfirth Victoria Street, Cross Church Street and Wards Hill, Batley. This is also very much higher than the level of six in 2017.

4 General public views

It is very important that the views of people within the area are obtained about the service provided by hackney carriage and private hire. A key element which these surveys seek to discover is specifically if people have given up waiting for hackney carriages at ranks (the most readily available measure of latent demand). However, the opportunity is also taken with these surveys to identify the overall usage and views of hackney carriage and private hire vehicles within the study area, and to give chance for people to identify current issues and factors which may encourage them to use licensed vehicles more.

Such surveys can also be key in identifying variation of demand for licensed vehicles across an area, particularly if there are significant areas of potential demand without ranks, albeit in the context that many areas do not have places apart from their central area with sufficient demand to justify hackney carriages waiting at ranks.

These surveys tend to be undertaken during the daytime period when more people are available, and when survey staff safety can be guaranteed. Further, interviews with groups of people or with those affected by alcohol consumption may not necessarily provide accurate responses, despite the potential value in speaking with people more likely to use hackney carriages at times of higher demand and then more likely unmet demand. Where possible, extension of interviews to the early evening may capture some of this group, as well as some studies where careful choice of night samples can be undertaken.

Our basic methodology requires a sample size of at least 200 to ensure stable responses. Trained and experienced interviewers are also important as this ensures respondents are guided through the questions carefully and consistently. A minimum sample of 50 interviews is generally possible by a trained interviewer in a day meaning that sample sizes are best incremented by 50, usually if there is targeting of a specific area or group (e.g. of students, or a sub-centre), although conclusions from these separate samples can only be indicative taken alone. For some authorities with multiple centres this can imply value in using a higher sample size, such as 250 if there are two large and one moderate sized centre.

It is normal practice to compare the resulting gender and age structure to the latest available local and national census proportions to identify if the sample has become biased in any way.

More details of the results of the on-street responses are included in Appendix 5.

More recently, general public views have been enlisted from the use of council citizens' panels although the issue with these is that return numbers cannot be guaranteed. The other issue is that the structure of the sample responding cannot be guaranteed either, and it is also true that those on the panel have chosen to be there such that they may tend to be people willing to have stronger opinions than the general public randomly approached.

Finally, some recent surveys have placed an electronic copy of the questionnaire on their web site to allow interested persons to respond, although again there needs to be an element of care with such results as people choosing to take part may have a vested interest.

For this survey, 200 people were interviewed in the streets of Huddersfield, Dewsbury and Holmfirth, with the focus in the latter place later in the afternoon / early evening. The interviews were undertaken on a Wednesday (Birstall, Dewsbury and Batley)(corporately referred to as Dewsbury below), Thursday (Huddersfield) and Friday (Holmfirth, between 20:00 and 22:40) in mid-March 2020 (before any significant influence of the COVID-19 pandemic).

The general nature of those interviewed was checked against the 2020 estimates based on the 2011 census, 2016 update. For the full area, males were underrepresented by 12%, the lower and upper age groups were also underrepresented by 4% and 3% respectively whilst the middle group of age was over-estimated by 7%.

By area, Holmfirth had the best match to the gender profile with Dewsbury with the largest deficit of males; in age terms all locations followed the same difference profile although the Dewsbury sample almost matched the census whilst the Holmfirth sample was most biased to the middle group for age. None of these variations are expected to affect the overall results but are worth bearing in mind in interpretation.

Huddersfield and Dewsbury interviewees were 90-92% local whilst this level dropped to 64% for Holmfirth, as might be expected (even though this was March). For the Dewsbury area, those not from Kirklees were from Leeds, Wakefield and Bradford area postcodes. For Huddersfield they covered Leeds and Wakefield whilst for Holmfirth they were Sheffield and Wakefield.

51% in Dewsbury, 56% in Huddersfield and 84% in Holmfirth had access to a car suggesting more potential for use of licensed vehicles in Huddersfield and Dewsbury compared to Holmfirth. Again, these values are as might be expected.

All those interviewed told us their use of licensed vehicles in this area in the last three months. Across the area, 71% had used a local licensed vehicle in the last three months. This is slightly higher than the 68% in 2017. As might be expected, recent use in Dewsbury at 68% and Huddersfield at 78% is higher than that for Holmfirth at 48%.

Taking actual usage and transforming this to average monthly usage suggests 2.5 licensed vehicle trips per person per month for Dewsbury, 2.7 for Huddersfield, 0.8 for Holmfirth and an average of 2.4 across the full sample – marginally higher than the 2.3 found in 2017.

The profile of usage in each area was different. 32% of Dewsbury respondents said they used licensed vehicles one or twice weekly. But 21% of this sample said they never used them. For Huddersfield only 7% said they never used them with the peak of 28% saying once or twice monthly. For Holmfirth, the highest proportion, 40% said they never used licensed vehicles with the next highest being 24% for once or twice monthly.

People then told us how they normally obtained licensed vehicles. 93% of Huddersfield respondents gave at least one reason, with 79% of Dewsbury and 64% of Holmfirth interviewees responding. Most provided multiple responses. 1% said they used all five quoted methods, 4% gave four, 7% three, 30% two and the remaining 58% just named one single main method.

On average, half of those responses were that people got licensed vehicles by phoning. 22% said ranks, 4% hailing, 10% freephone and 13% an app. The hailing and rank values have increased from the 15% and zero respectively in 2017 whilst freephone has also gone up from 3% with the direct answer phone reducing, mainly by the impact of apps, but also from the increased level of freephone usage.

For the Dewsbury interviewees, 58% of methods used were telephone, 20% freephone and 16% an app – with none using ranks and 6% hailing. In Holmfirth, 61% phoned, 35% used ranks and 4% used an app (the first two being the highest proportions in any area). Huddersfield provided a more typical response with 44% telephone, 31% using ranks, 13% an app, 7% a freephone and 4% hailing.

These are all completely different profiles within the one licensing area. Apps have been more predominant in more urban areas as might be expected given their need for a vehicle presence in an area.

When people were asked the level of use of hackney carriages, 59% in Dewsbury and 58% in Holmfirth could not remember when they had last used a hackney carriage. This was lower in Huddersfield at 38%. The overall level averaged over the area was 48%. This is much reduced from the 61% average overall of 2017 suggesting hackney carriages have become more obvious to people more recently. There is no clear reason for this.

17% in Dewsbury could not remember seeing a hackney carriage in the area, but this value was zero for both Huddersfield and Holmfirth. The resulting usage per month was relatively low – 0.2 trips per person per month for both Dewsbury and Holmfirth but a larger (but still quite low) value of 1.1 for Huddersfield, and 0.6 overall, higher than the value of 0.3 overall from 2017.

When compared to total licensed vehicle trips, Dewsbury hackney carriage trips were about 7% of the total, Holmfirth 23% and Huddersfield 39%. For both Dewsbury and Huddersfield these proportions are similar to the 6% and 35% respectively from the “methods used” question. For Holmfirth the quoted value of 39% is much higher than the stated usage from frequencies at 23%. This matches the very low frequencies quoted for usage there, with the most often usage quoted being once or twice monthly.

People told us the companies they phoned for licensed vehicles. Very few companies saw quotes other than in one single location. 40 different companies were named in total (even more than the 34 of 2017). Seven of these were mentioned in Holmfirth (two of which were also named in other areas). 17 were mentioned only in Huddersfield with four others also named elsewhere. 13 were only mentioned in Dewsbury with a further three named elsewhere as well.

The largest overall company took 40% of the Huddersfield mentions. The next largest saw slightly fewer mentions but was 67% of the Dewsbury mentions. These were the only two companies with over 50 mentions each. All other companies were mentioned 18 or less times, with just four companies having 10 or more mentions. Many companies only got a single mention. This suggests high competition yet also with one dominant company in each of the three questionnaire sub-areas.

The two largest companies also used apps. The national app was only mentioned in Huddersfield, as might be expected. One other app was mentioned once in each of the other areas providing three additional but small apps mentioned across the area – providing six different app names for this survey.

People were asked about use of ranks. Again, most mentions were specific to each of the three different areas. The only location actually mentioned in all three areas was Holmfirth. However, in Holmfirth's respondents knowledge of ranks was restricted to the two ranks in Holmfirth only.

For the full sample, 57% of interviewees named at least one rank. 30% named three, 27% two and 43% just one. This suggests good knowledge of ranks overall.

Across the area, the station or various mentions of it obtained 27% of all mentions, followed by John William Street with 16% and Sainsbury's (not a rank) 12%. In 2017 the station and John William Street both obtained 14%, but there was a vote of 12% for 'bus and train station' which if added to the station value bring it close to the current value.

As might be expected, the largest quoted ranks were in Huddersfield. The station rank obtained 38% of all Huddersfield mentions. John William Street gained 23%, the Bus Station 9% with 17% saying they used a rank at Sainsbury's. Three other ranks saw minor mention plus a general 'town centre'. 5% of mentions from those interviewed in Huddersfield were of Holmfirth.

For Holmfirth, Victoria Street gained 53% of mentions and the Bus Station 47%. The largest mentions in Dewsbury only totalled six – accounting for 21% of all mentions there. A general 'Batley' and the Wards Hill rank in Batley both obtained 14%. 11 other locations were mentioned, many of which were general (and one of which was in a town outside Kirklees).

For Huddersfield, 48% of those naming locations said they used them. In Holmfirth this proportion fell to 32%, with that in Dewsbury being even lower at just 18% (but consistent with other questions).

A very small number of interviewees told us why they did not use ranks. Dewsbury respondents gave the most responses, 55% of which were that people did not use ranks at all, 41% said they were too expensive (presumably meaning use of hackney carriages) and the remaining person (4% of the response) said they normally phoned a company. Five responses were given for Huddersfield, the largest overall concern being insecurity at the Bus Station rank. There were no responses from Holmfirth interviewees.

Interviewees were asked about various aspects of their last licensed vehicle trip. Just under half those interviewed in Dewsbury provided a response, 69% of those in Huddersfield and 32% in Holmfirth. Views in the three areas were completely different.

The Dewsbury interviewees tended to have the least favourable response, with most top proportion scores being for 'average', with all factors scoring some 'very poor' responses. The only factor that had the top proportion as 'very good' was driver hygiene. Driver appearance had the top proportion for 'good', as did price, though the 'very poor' level for price was 27%, the highest score in that category. This suggests in general vehicles and drivers in the Dewsbury area tend to be more average. This was the only issue quoted for the same area in 2017, suggesting some issue with the drivers of Dewsbury, although not significant, but still worthy of note with respect to being aware of peoples' views.

In Holmfirth, there were only two areas that had any 'very poor' score, and that was minimal – being vehicle cleanliness and repair. All but price had the highest proportion saying 'good'. The most positive scores for 'very good' were 25% each for driver appearance and driver knowledge. Although price had the top score of 63% as 'average', for this area there were no 'very poor' scores for price, suggesting people here were less worried about price than elsewhere, and much more satisfied with overall service levels.

For Huddersfield, as for Holmfirth, the highest scores were 'good' with only price scoring highest for 'average' (59%). Driver knowledge again scored best in terms of levels of the 'very good' scores. The typical score for Huddersfield suggests the fleet there is generally 'good' in peoples' views.

A small number of interviewees provided further comment for areas they had scored poor or very poor. For Holmfirth there seemed to be a concern about expense of journeys but also problems with driver standards, despite the otherwise generally higher views of the fleet there. The few poor or very poor score comments for Holmfirth (all four of them) related to price, again despite the general good scores otherwise. For Huddersfield, the major concern seemed to be price, but mainly related to passengers feeling that drivers were taking them longer routes to generate higher fares.

When asked what might encourage people to use hackney carriages or to use them more often, the strongest response came from the Dewsbury set of interviews. 47% gave views. For Huddersfield, 22% provided comment and for Holmfirth 20% did. In Holmfirth, the three matters that might increase usage were better drivers (50%), price (40%) and better hygiene (10%).

The other two areas had generally similar responses although the price response was strongest for Dewsbury. Price was the highest response in both areas, with the remainder split between better vehicles, more hackney carriages available by phone, more available at ranks and better drivers. Huddersfield had a higher level of people wishing to see more hackney carriages available by phone than Dewsbury.

Most felt safe using hackney carriages in the daytime, rising from 94% in Dewsbury to 99% in Huddersfield and everyone in Holmfirth felt safe in the daytime. For nights, the values were quite a bit lower, 81%, 86% and 94% perhaps suggesting some issue with night safety concerns. A lot of these seemed to relate to an often-quoted (by those responding) incident in 2019 (more information available on request from the licensing officer). Few suggested actions but amongst them was need for lighting around the Bus Station rank and a feeling that perhaps people might be better to use booked private hire vehicles.

The dominant area response (63%) was that fares were cheap or at least fair, with few saying they were expensive. The lowest score for 'cheap' was in Holmfirth with the highest, 74% in Dewsbury.

66% across the area had no preference in regard to electric vehicles. 33% would use them as long as it did not adversely affect price and just 1% said they would use them and pay more. The highest proportion in favour was in Huddersfield, with 42% saying they would use them as long as it did not increase cost.

In terms of having opportunity to pay fares by card, those in Dewsbury and Huddersfield would both tend to still pay cash (65% and 59%). In Holmfirth, 69% would be happy to use as long as it did not increase prices.

In terms of need of adapted licensed vehicles, none in Holmfirth interviewees needed or knew anyone that needed any form of adapted vehicle. Huddersfield had 71% without need with Dewsbury 81%. This was lower than the overall value of 92% in 2017 suggesting need may have increased. In Dewsbury, the main need is for WAV style whereas in Huddersfield the split is more even though still in favour of WAV style vehicles.

When asked if they thought people in Kirklees with disabilities got a good service from hackney carriages, 42% said they did in Dewsbury, 65% said they did in the Huddersfield sample, and just 20% felt they did in Holmfirth. All others said they did not know.

Many interviewees told us their views about if there were enough hackney carriages in the area overnight. 72% said yes in Huddersfield, 78% in Dewsbury and 95% of those interviewed in Holmfirth. In 2017, the slightly different question if people could get hackney carriages when they needed them provided a response of 50% saying yes in the daytime and 47% at night. The current responses again suggest hackney carriages seem to be more available now than they were in 2017 in public views.

The issue of latent demand was investigated using the industry standard, court approved method. This invites people to say if they had ever given up either waiting for a hackney carriage at a rank, or when hailing, and if they have invites them to say where to confirm they are actually referring to hackney carriages (despite careful questioning, many often still quote giving up when having booked a private hire or hackney carriage, or name places that are not ranks, or ranks in other areas).

In Dewsbury there were six valid responses within Kirklees, suggesting a value of 1.08. In Huddersfield there were 11 valid responses, suggesting 1.11. For Holmfirth, all responded but only one said they had given up waiting at a rank, in Holmfirth Victoria Street, giving a value of 1.04. The combined area rank latent demand factor is therefore 1.09.

Only Huddersfield saw latent demand for hailing a hackney carriage, with all five responses valid, giving a factor of 1.025. The combined area latent demand factor is therefore is 1.115

These values are higher than the 1.005 estimated in 2017, albeit only for rank-based latent demand.

5 Key stakeholder consultation

The following key stakeholders were contacted in line with the recommendations of the BPG:

- Supermarkets
- Hotels
- Pubwatch / individual pubs / night clubs
- Other entertainment venues
- Restaurants
- Hospitals
- Police
- Disability representatives
- Rail operators
- Other council contacts within all relevant local councils

Comments received have been aggregated below to provide an overall appreciation of the situation at the time of this survey. In some cases, there are very specific comments from given stakeholders, but we try to maintain their confidentiality as far as is possible. The comments provided in the remainder of this Chapter are the views of those consulted, and not that of the authors of this report.

Our information was obtained by telephone, email, letter or face to face meeting as appropriate. The list contacted includes those suggested by the Council, those drawn from previous similar surveys, and from general internet trawls for information. Our target stakeholders are as far as possible drawn from across the entire licensing area to ensure the review covers the full area and not just specific parts or areas.

For the sake of clarity, we cover key stakeholders from the public side separately to those from the licensed vehicle trade element, whose views are summarized separately in the following Chapter.

Where the statistical analyses in Chapter 2 demonstrate low levels of wheelchair accessible vehicle (WAV) provision, an increased emphasis would be given to the issue in terms of the focus of stakeholders but also in specific efforts to contact disabled users and their representatives. However, it must be remembered that none of our consultation is statutory and for cost effective and fixed budget reasons we limit our attempts to contact people generally to a first attempt and reminder.

Further listing of who has responded and how is normally provided in Appendix 6 but ensuring privacy where appropriate for those contacted.

Unfortunately, this element of work was victim to the coronavirus epidemic. Once the lockdown occurred, it was not felt reasonable that we should try to consult those who might be strongly engaged in supporting people through the pandemic, or whose businesses were presently closed down or severely restricted. When in early July attempt was made to cover the supermarket group, their phone systems made it clear they were still focussing on customer need in store so would not be able to respond to other questions. Other groups were only just returning to normal so it was not felt sensible to contact them at this time. However, where email contact details were found, two attempts were made to contact such stakeholders. Whilst some confirmed receipt of emails, none made any other response.

The impact of this on the results are not likely to be significant, as it is very rare that input from key stakeholders is vastly different to the responses provided by the general public and from the rank observations. Further, the 2017 set of key stakeholder responses had generally provided positive feedback on the service with no real negative issues raised.

Appendix 7 contains the details of passenger numbers for all rail stations in the Kirklees area. The authority has 15 rail stations. The largest is Huddersfield, operated by Trans Pennine Express and 104th largest in terms of the volumes of people entering and leaving up to March 2019 (the latest year for which statistics are available). In that year there were just under 4.9 million passenger entries and exits. While this has increased by 191% since the start of collection of data in 1997/8, the last three years saw a reduction of 3% potentially following the impact of operating issues and problems with both new timetable introduction and that of new trains.

The next largest station is Dewsbury, which was 365th with just under 1.7m passenger entries and exits. Growth was similar with 207% since the start of information and -2% since the last survey. All other stations are operated by Northern and have annual passenger numbers ranging from just under 452,000 (955th, Mirfield) to just under 20,000 (2,225th out of 2,630 stations), with recent growth of -6% and no growth since statistics began. Eight stations had less than 80,000 passengers per year, or 800 leaving per week, very unlikely to generate any hackney carriage-based demand.

6 Trade stakeholder views

The BPG encourages all studies to include 'all those involved in the trade'. There are a number of different ways felt to be valid in meeting this requirement, partly dependent on what the licensing authority feel is reasonable and possible given the specifics of those involved in the trade in their area.

The most direct and least costly route is to obtain comment from trade representatives. This can be undertaken by email, phone call or face to face meeting by the consultant undertaking the study. In some cases to ensure validity of the work being undertaken it may be best for the consultation to occur after the main work has been undertaken. This avoids anyone being able to claim that the survey work was influenced by any change in behaviour.

Most current studies tend to issue a letter and questionnaire to all hackney carriage and private hire owners, drivers and operators. This is best issued by the council on behalf of the independent consultant. Usual return is now using an on-line form of the questionnaire, with the option of postal return still being provided, albeit in some cases without use of a freepost return. Returns can be encouraged by email or direct contact via representatives.

Some authorities cover private hire by issuing the letter and questionnaire to operators seeking they pass them on when drivers book on or off, or via vehicle data head communications.

In all cases, we believe it is essential we document the method used clearly and measure response levels. However, it is also rare for there to be high levels of response, with 5% typically felt to be good and reasonable.

As is the usual practice, it was planned to issue this driver survey following successful completion of the rank work, to ensure there were no undue alerts to the trade that might have led to 'playing up' to the rank work being undertaken. This was ready to be issued by Friday 20th March but in the end was not issued on that date.

However, on Monday 23rd March England was placed into full lockdown starting that evening. The questionnaire was amended to encourage drivers to complete the survey for the situation during February 2020 and issued in early April giving till mid-May for responses to be returned. Many came by the on-line link, others were returned to the licensing office, scanned and forwarded, or scanned and emailed direct to us by drivers, and a limited number were posted.

In the end, some 132 responses were received. This is around a 6% response rate from the entire driving population, a very good level for a total driver response. The responses were reviewed for any multiple responses by checking quoted driver references and no obvious duplicates were identified. This is a very much better response than that in 2017, which was just 11 and only considered as indicative.

Of the response, 69% said they drove private hire vehicles, 22% hackney carriage, 3% said they drove either vehicle and 6% said they did not drive a vehicle. This is a very strong representation from the private hire element of the trade, unusual for this kind of survey that is often believed to only be relevant to hackney carriages by those in the private hire element. However, even the indicative response from 2017 was similar with 64% of those responding saying they drove private hire.

For all respondents, the average quoted level of service in the trade in the area was 12 years (similar to the 13 of 2017). However, the hackney carriage sample had a much higher average of 20 years with the private hire lower at 10 years. However, the longest level of service of 44 years was only marginally more than the level of 39 years quoted by those from the private hire side.

86% told us how many days they had worked in the period around the rank surveys. 33% each said five and six days. 11% said seven days, 10% four days, 5% three days, 3% each two or no days, and 1% said a single day. Comparing hackney carriage and private hire working profiles, the level working six days was very similar, but more hackney carriage said they worked seven and less said they did not work, or only worked one day.

The average days worked was five. The value was marginally higher for hackney carriage compared to private hire.

Average hours worked were 35 (fairly similar to the 31 quoted in 2017), with a value slightly higher for hackney carriage only, and higher again for private hire only, but not to a significant level (36 and 37 hours respectively). The quoted longest hours worked for hackney carriage was 70 hours compared to 78 for private hire.

Most gave at least one issue that affected when they worked. Some provide multiple responses. Of all the responses received, the top value was 25% for family commitments. 19% said they worked busy times, but 17% said their hours were chosen to avoid disruptive passengers. This is a significant increase from the none saying this in 2017. 10% had their hours affected by sharing a vehicle.

79% said they owned their own vehicle and 13% said that someone else also drove the vehicle they drove. Times vehicles were used by others were equally split three ways between days, nights and weekends.

68% of private hire and 52% of hackney carriage said they accepted pre-bookings. This amounted to 55% overall of all those responding (including those who said they drove both kinds of vehicle). A range of different methods were named for how these pre-bookings were actually obtained. These ranged from passengers making a return booking when leaving a vehicle through use of diaries, PDA's and offices to online and apps. The hackney carriage responses had two that made the booking direct with the driver, and another that said most pre-bookings were people asking for a return trip. It was clear that several took bookings – many from private hire companies but others from hackney carriage only booking operations. One private hire said they had chosen to work on a private hire operation as there was not enough work to justify hackney carriage style operation.

29 different companies were named. Only eight were named more than once. The top quoted company, with 24% of mentions, was a national app-based operation. The next two highest companies obtained 18% and 13% of mentions, with another getting 4% and four others 3%, with all others just gaining a single mention, about 1% of the response. Three of the singly named companies appeared to be hackney carriage radio operations, with most others being private hire companies.

Interestingly, many of the companies had been mentioned in the on-street questions, with the top companies used by vehicles matching the top two companies quoted by the public, however with the exception of the app-based company which was less mentioned by the public than by the trade.

Drivers confirmed the ranks they made use of. Most gave more than one. There were around 11 private hire who also named ranks, many of which were in the outer areas although some quoted use of central Huddersfield ranks. Of all the mentions made, the most popular location stated to be used was Huddersfield Station, with 21% of the mentions. John William Street had 18% and the bus station 13%. Batley and Dewsbury got 6% of mentions each, with Birstall 4%, and Dewsbury Market and George Square 3% each. Four other locations, only one of which was recognisable (Cross Church Street) obtained 2% and the remainder, many of which were either out of town or unknown, obtained just 1% each. This suggests a wide range of rank usage by hackney carriages across the area.

Just one driver said they used the rank in Holmfirth. Ranks made up about a fifth of their work, but they commented that there was insufficient rank work so they worked for two private hire companies. One of the companies named was based in Huddersfield but was one of those mentioned by the public response to companies used in Holmfirth.

39% of those responding felt there were issues with operation of the ranks. Most simply suggested there were not enough spaces and too many hackney carriage vehicles. There were no real suggestions of how spaces could be added nor specification of where the shortages were, apart from one comment about the Station rank. Two private hire said there needed to be places for private hire to wait between jobs.

Many told us where they went if the rank they first went to was full. The largest proportion (23%) said they kept driving round till a space became available. One said this was preferable to getting a parking ticket. However, 19% said they went to a rank where there was space. 15% said they gave up and went home. A small number said they would go and wait at their base, with many others giving other answers. The remaining answers were hard to allocate to specific categories, being very individual to those quoting them.

Drivers were asked if the number of hackney carriages should continue to be limited. 74% said yes. This included all but one hackney carriage (who did not answer the question), 75% of those that drove both hackney carriage and private hire, and 62% of private hire. This suggests a good cross section support the limit.

People were asked how having the limit benefitted the public. Some used this question to say they did not think it did benefit. However, several said it provided a better service, that it reduced congestion and that it helped passengers be more likely to recognised their drivers.

When asked if drivers thought there were enough hackney carriages licensed in Kirklees, 84% said they thought there were.

In terms of how drivers obtained their fares, whilst 27% said they got fares exclusively from the rank, half said they got up to 25% from hailing. Most of the hackney carriages were significantly dependent on ranks, often with hailing making up the remainder.

However, for private hire only 14% got all their work from phone bookings although it was not clear what other sources they used. There were 5% that said they obtained all their bookings from ranks, but it was not clear if they had somehow misunderstood this question as there was no evidence if they actually meant this. Not many seemed to have school contracts, although these were spread between hackney carriage and private hire. One hackney

carriage said they got 80% of their fares from school contract and the remainder from the rank.

Most of the additional comments reflected that drivers thought there were too many hackney carriages and certainly no need for more. However, as always, there were a few private hire who would have liked a hackney carriage plate, and some wanting private hire vehicle numbers limited.

7 Evaluation of unmet demand and its significance

It is first important to define our specific view about what constitutes unmet demand. Our definition is when a person turns up at a hackney carriage rank and finds there is no vehicle there available for immediate hire. This normally leads to a queue of people building up, some of who may walk off (taken to be latent demand), whilst others will wait till a vehicle collects them. Later passengers may well arrive when there are vehicles there, but because of the queue will not obtain a vehicle immediately.

There are other instances where queues of passengers can be observed at hackney carriage ranks. This can occur when the level of demand is such that it takes longer for vehicles to move up to waiting passengers than passengers can board and move away. This often occurs at railway stations but can also occur at other ranks where high levels of passenger arrivals occur. We do not consider this is unmet demand, but geometric delay and although we note this, it is not counted towards unmet demand being significant.

The industry standard index of the significance of unmet demand (ISUD) was initiated at the time of the introduction of section 16 of the 1985 Transport Act as a numeric and consistent way of evaluating unmet demand and its significance. The ISUD methodology was initially developed by a university and then adopted by one of the leading consultant groups undertaking the surveys made necessary to enable authorities to retain their limit on hackney carriage vehicle numbers. The index has been developed and deepened over time to take into account various court challenges. It has now become accepted as the industry standard test of if identified unmet demand is significant.

The index is a statistical guide derived to evaluate if observed unmet demand is in fact significant. However, its basis is that early tests using first principles identified based on a moderate sample suggested that the level of index of 80 was the cut-off above which the index was in fact significant, and that unmet demand therefore was such that action was needed in terms of additional issue of plates to reduce the demand below this level, or a complete change of policy if it was felt appropriate. This level has been accepted as part of the industry standard. However, the index is not a strict determinant and care is needed in providing the input samples as well as interpreting the result provided. However, the index has various components which can also be used to understand what is happening in the rank-based and overall licensed vehicle market.

ISUD draws from several different parts of the study data. Each separate component of the index is designed to capture a part of the operation of the demand for hackney carriages and reflect this numerically. Whilst the principal inputs are from the rank surveys, the measure of latent demand comes from the public on-street surveys, and any final decision about if identified unmet demand is significant, or in fact about the value of continuing the current policy of restricting vehicle numbers, must be taken fully in the context of a careful balance of all the evidence gathered during the survey process.

The present ISUD calculation has two components which both could be zero. In the case that either are zero, the overall index result is zero, which means they clearly demonstrate there is no unmet demand which is significant, even if other values are high.

The first component which can be zero is the proportion of daytime hours where people are observed to have to wait for a hackney carriage to arrive. The level of wait used is ANY average wait at all within any hour. The industry definition of these hours varies, the main index user counts from 10:00 to 18:00 (i.e. eight hours ending at 17:59). The present index is clear that unmet demand cannot be significant if there are no such hours. The only rider on this component is that the sample of hours collected must include a fair element of such hours, and that if the value is non-zero, review of the potential effect of a wider sample needs to be considered.

The other component which could be zero is the test identifying the proportion of passengers which are travelling in any hour when the average passenger wait in that hour is greater than one minute.

If both of these components are non-zero, then the remaining components of the index come into play. These are the peakiness factor, the seasonality factor, average passenger delay, and the latent demand factor.

Average passenger delay is the total amount of time waited by all passengers in the sample, divided by the total number of passengers observed who entered hackney carriages.

The seasonality factor allows for the undertaking of rank survey work in periods which are not typical, although guidance is that such periods should normally be avoided if possible particularly as the impact of seasons may not just be on the level of passenger demand, but may also impact on the level of supply. This is particularly true in regard to if surveys are undertaken when schools are active or not.

Periods when schools are not active can lead to more hackney carriage vehicles being available whilst they are not required for school contract work. Such periods can also reduce hackney carriage demand with people away on holiday from the area. Generally, use of hackney carriages is higher in December in the run-up to Christmas, but much lower in January, February and the parts of July and August when more people are likely to be on holiday. The factor tends to range from 0.8 for December (factoring high demand level impacts down) to 1.2 for January / February (inflating the values from low demand levels upwards).

There can be special cases where summer demand needs to be covered, although high peaks for tourist traffic use of hackney carriages tend not to be so dominant at the current time, apart from in a few key tourist authorities.

The peakiness factor is generally either 1 (level demand generally) or 0.5 (demand has a high peak at one point during the week). This is used to allow for the difficulty of any transport system being able to meet high levels of peaking. It is rarely possible or practicable for example for any public transport system, or any road capacity, to be provided to cover a few hours a week.

The latent demand factor was added following a court case. It comes from asking people in the on-street questionnaires if they have ever given up waiting for a hackney carriage at a rank in any part of the area. This factor generally only affects the level of the index as it only ranges from 1.0 (no-one has given up) to 2.0 (everyone says they have). It is also important to check that people are quoting legitimate hackney carriage rank waits as some, despite careful questioning, quote giving up waiting at home, which must be for a private hire vehicle (even if in hackney carriage guise as there are few private homes with taxi ranks outside).

The ISUD index is the result of multiplying each of the components together and benchmarking this against the cut-off value of 80. Changes in the individual components of the index can also be illustrative. For example, the growth of daytime hour queueing can be an earlier sign of unmet demand developing than might be apparent from the proportion of people experiencing a queue particularly as the former element is based on any wait and not just that averaging over a minute. The change to a peaky demand profile can tend towards reducing the potential for unmet demand to be significant.

Finally, any ISUD value must be interpreted in the light of the sample used to feed it, as well as completely in the context of all other information gathered. Generally, the guide of the index will tend not to be overturned in regard to significant unmet demand being identified, but this cannot be assumed to be the case – the index is a guide and a part of the evidence and needs to be taken fully in context.

Element	2020	2017	2013
Average passenger delay	0.08	0.017	0.87
Prop travelling in hours with over 1 min APD	1.88	0.06	Zero
Off peak hours with any delay	10.10	10.26	12.12
Seasonality	1	1	1
Peakiness	0.5	0.5	1.0
Latent	1.115	1.005	1.003
Overall ISUD index estimate	0.88	0.01	Zero

The table shows the ISUD index has increased survey on survey, from a level of zero in 2013 to 0.01 in 2017 to 0.88 now. However, given the cut-off value is 80, this level remains insignificant and demonstrates no unmet demand that is significant at this point in time, and therefore no need to review either the limit, nor the level it is set at in terms of extra licences. The trend towards significance of observed unmet demand is also only very marginal.

The overall level of average passenger delay, the proportion of passengers travelling in hours with over a minute average passenger delay, and the latent demand factors have all increased. Off peak hours with delay have reduced slightly whilst all other factors have remained the same. These impacts come from the increased demand observed at Holmfirth Victoria Street, and seem logical.

Even without the impact of the coronavirus on the trade, the results give no cause for concern and provide evidence that the present limit policy is possible to be retained. Further discussion in context is provided below.

8 Summary, synthesis and study conclusions

This hackney carriage unmet demand survey on behalf of Kirklees has been undertaken following the guidance of the BPG and other recent case history regarding unmet demand and its significance. This chapter first summarises the salient points from each previous chapter, then draws the separate sources of information together and completes with a study conclusion. Specific recommendations are provided in the subsequent chapter.

Background and context

This study was undertaken principally between mid-January and mid-March 2020 over a similar timeframe to the previous work in 2017. On street interviews and rank observations were undertaken in mid-March but in advance of the main impacts of the Coronavirus epidemic resulting in the 23rd March national lockdown. Licensed vehicle driver and other trade opinions were obtained during the early part of the lockdown, but with a specific request that was generally complied with that responses were for the period in March consistent with the rank surveys. The only element that suffered strongly was the key stakeholder consultation which has not yielded any result, although this is not a significant shortfall (discussed further below).

Local council policy towards transport is within the gift of the local authority and in summary states that “hackney carriages and private hire vehicles are a valuable part of our transport system, providing more choice for whole or part journeys...and a valuable service for those with disability or mobility impairments”. There is a strong encouragement to enhance rank provision whilst encouraging take-up of low emission vehicles whilst promoting mobility as a service aspects.

Private hire vehicle numbers continue to show strong growth whilst the level of hackney carriages has remained stable with the limit policy. Hackney carriages are now 9% of the fleet compared to being 24% in 1999. Dual driver numbers remain generally growing.

There has been recent growth in the number of private hire operators based in the areas.

WAV fleet share of the total have been stable for a while but show recent slight reduction, in both fleets, although this may be catching up with reality rather than showing a real reduction given some issues with recording of which vehicles were actually WAV in the past.

This current survey is the latest in a series believed to cover at least 2005, 2010, 2013 and 2017 together with this 2020 survey. Although there is some uncertainty it is believed the formal level of the limit remains at 224 in the records available to us.

Rank observations

Rank provision has remained similar to that in 2017 although some locations have seen their principal demand generator disappear. The only possible extra location put in place was the night provision in Holmfirth Bus Station.

An element of 'quick-watch' rank data collection was added to provide confidence in operating hours current at Holmfirth Bus Station rank. This also reviewed the operation with reference to actual against legally defined hours. 71% of the observations at or near ranks related to local hackney carriage movements, with 14% being private cars and 10% private hire vehicles.

Over a quarter of observed rank activities were at Huddersfield Station and slightly less at John William Street, Huddersfield. Levels of hackney carriage vehicle recordings followed a similar pattern but with a stronger emphasis on the Station volumes. The worst level of potential misuse by private vehicles was at a rank that is part time with relatively poor marking in terms of discouraging other usage. The next worst location was in an area with high pressure on kerb space and lower levels of hackney carriage service, rarely using the relatively high capacity of rank spaces.

Apparent private hire misuse focussed on one part time rank and another rank where a private hire office is nearby, with little other locations nearby for vehicles to collect passengers.

As already noted, the top two active rank locations are Huddersfield Railway Station and John William Street, Huddersfield. The station has about a third of total passenger demand whilst John William Street has around a fifth. In 2017 these two provided half the passengers, in the current survey this total is now 41% of the total.

Holmfirth Victoria Street night rank saw continued growth taking it to being third busiest overall with just over 14% of total passengers estimated in a typical week. Both Huddersfield Bus Station and Cross Church Street rank have also seen growth in usage. The top four ranks now provide 76% of all estimated passenger demand compared to 71% in 2017. This has been at the expense of the lesser-used rank locations. Two further ranks are now redundant compared to the 2017 list, one the result of closure of its associated night life.

Net average passenger levels are estimated to be 11% lower now than in 2017 overall. Much of this was the impact of the loss of night life.

The demand profile sees growth from Thursday to Friday to Saturday, with the latter two days being most similar. However, Saturday sees a very sharp peak which defines the area as having 'peaky demand'.

The top two ranks provide all day and night demand, with the central rank operating longer hours than the station location. The bus station rank in Huddersfield focusses on daytime service whilst the Holmfirth ranks only see night demand. Despite reductions in use, the range of other ranks across the area remain important and valuable.

Just 6% of the observed rank hours saw any average passenger delay, with two thirds of this having an average over all passengers less than a minute. Across all hours there were just four examples of passenger waits of 11 or 12 minutes. 0.3% of the total experienced delays of 6-10 minutes. Average passenger delay across the full survey was just five seconds, almost nothing.

During sample observations, 58% of the hackney carriage plates were seen, compared to 62% three years ago. The results found that Birstall and Batley, and to a lesser extent Dewsbury hackney carriage fleets tended to work only in their specific areas. Holmfirth drew its vehicles in from other locations, albeit mainly Huddersfield.

24% of observations were late night at Huddersfield Railway Station rank. 18% were at Holmfirth.

Overall, the rank work suggested that hackney carriages remain providing a borough-wide service despite having freedom to service any point within the area.

There appeared to be a focus of WAV style vehicle servicing ranks, with a higher proportion seen than actually within the fleet. An increased level of seven people were observed using wheel chairs to get hackney carriages at ranks in the area, with nearly half of these at Huddersfield rail station rank.

On street public views

A robust and valid on street set of interviews essentially capture local people in the streets, although for Holmfirth just 64% said they were from the Borough, with others from Sheffield and Wakefield postcodes. Access to a car was relatively high in most places and very high in Holmfirth.

On average, 71% had used a local licensed vehicle in the last three months. This is marginally increased from 2017. Huddersfield had the highest usage at 78% with Holmfirth the lowest at 48%. The average level of trips per person per month had gone up very slightly overall since 2017. Different areas had different profiles of usage. Across the area, 22% got licensed vehicles from ranks, 13% used an app and 4% hailed. These show an increase in all values since 2017, with apps mainly taking from standard phone usage. Again specific area profiles were very different.

The smaller locations generally had more people not able to remember their last use of a hackney carriage, with the area average of 48% still a reduced level compared to the previous survey, again consistent with increased usage of hackney carriages at ranks.

Apart from Dewsbury, where a high proportion could not remember seeing a hackney carriage, there was good awareness of hackney carriages. However, overall usage levels in terms of trips per person per month were low, with even Huddersfield only producing 1.1 trips per person per month for hackney carriages.

Similarly to the hackney carriage fleet disposition, each main area tended to have its own private hire company dominant, although there were also a very high number of operators overall quoted. The two largest companies also used apps. The one national app quoted was only mentioned in Huddersfield. People also tended to keep to their own areas in terms of rank knowledge, although most people knew about the Holmfirth rank irrespective of where they were interviewed.

The top known rank was Huddersfield Station (27%) and then John William Street (16%).

Views about the service provided varied across the area, with Dewsbury interviewees having the least favourable response to their last trip.

Feelings of being safe were higher in the daytime and quite a bit lower for night – with much impacted by an apparently well-known violent attack at Huddersfield Bus Station during 2019.

There was no strong support for move to electric vehicles nor for introduction of card payment facilities.

There seemed to be a good appreciation that people with disabilities obtained a good service in the area, and some evidence that there might be relatively higher numbers needing WAV than is often the case.

The questions suggested people were more confident there were enough vehicles available at night now compared to the response three years earlier.

The estimate of overall latent demand was 1.115 with only Huddersfield seeing any latent demand for hailing.

Key stakeholder views

Despite attempts being made, the current Coronavirus situation precluded any response being made. This element of the survey rarely tends to find major issues with the service provided, and the lack of response does not reduce the robustness of the conclusions made given the strength and consistency of other evidence.

Trade views

The very good 6% response, also found to be comprehensive in terms of types of driven vehicle, found most drivers tended to work five days and 35 hours. 17% said they chose working hours to avoid disruptive passengers, a strong increase from no response saying this in 2017. Vehicle ownership levels were very high at 79%. Just over half of the hackney carriage fleet accepted pre-bookings.

The main company named as providing bookings was a national-based app company (24% of mentions), with the next two highest companies scoring 18% and 13% respectively. Some hackney carriage radio operations were named.

The ranks quoted as used were the railway station, John William Street and the bus station as the top three. Respondents also mentioned ranks in the smaller locations.

23% said if the first rank they got to was full they would drive round and find a space elsewhere. 15% said they would give up and go home.

74% supported retention of the vehicle limit. This included many private hire drivers. The trade suggested the public benefitted from this by it providing a better service for them, reducing congestion and increasing the potential for passenger to recognise drivers.

27% said they got fares exclusively from ranks, but half said they got up to 25% from hailing. There was a suggestion that many private hire servicing an app considered their pick-ups to be 'rank' based. This is a response we have found in other locations.

Formal evaluation of significance of unmet demand

Although most elements and the index of significance of unmet demand (ISUD) have increased in successive surveys, the overall value of 0.88 remains a very long way from ever suggesting the level of unmet demand is significant (at a value of 80). The trend toward significance is itself very marginal.

Synthesis

There is a consistent picture suggesting an overall general increase in usage of hackney carriages in many places in Kirklees. However, the overall picture is very dependent on several very specific sources of rank patronage, which make them very vulnerable to this source of usage. This is consistent with an increase in the level of the ISUD value although the overall level remains a long way from being significant.

Whilst a high proportion of the trade respondents were related to a national company, the public gave more precedence to local companies quite strongly. This went to the extent that they named two local apps almost to the exclusion of any national ones. Whilst there was clearly a local element both to trade operation and to public views, the overall trend was a positive view of the service provided.

Huddersfield station saw some 48,976 passengers leave the station in an average week for the latest year available. The rank passenger numbers suggests that 6% of these left in hackney carriages, assuming all the station rank passengers were from rail services. Interestingly, the growth of rank passengers at -3% was the same as the rail statistic reduction of 3% in overall patronage. This corroborates our data collection and suggests the concern that the slight reduction here might be due to the upcoming pandemic is unfounded.

All the information points clearly towards the vehicle limit policy providing public benefit across the whole of the Kirklees area. Despite the overall hackney carriage fleet level being a small proportion, it clearly provides a high level of value to people and their travel needs. It is very important to the developing Holmfirth night economy.

With reference to Holmfirth, the rank / vehicle observations, the driver survey and the public interviews all painted the same picture. Daytime demand for licensed vehicles there is very low and generally met by people booking private hire vehicles. At night a good range of hackney carriages very ably meet the specific demand there although this is almost exclusively via standard rank operation rather than through any other methods. This may relate to the night clientele being from different places around the area (supported by the public interviews there having the highest level of out of area interviewee, and also covering a wide range of postcodes). This location is also a great example of how flexible the local licensed vehicle trade are to specific demand requirements.

Conclusions

The most important conclusion is that the level of observed unmet demand is a long way from being significant in terms of Section 16 of the 1985 Transport Act. The limit on vehicle numbers can therefore be retained and there is no need to add any further plates.

The overall picture of the hackney carriage demand in Kirklees at the start of 2020 was relatively optimistic and positive. While there is evidence of increased usage both of licensed vehicles overall, and also of hackney carriages at some ranks, the overall conclusion of about 11% reduced demand compared to three years ago seems mainly to arise from specific closure of key demand generators.

The hackney carriage trade is generally well-known and appreciated across the area, and is active across all main settlements, not just focussed in Huddersfield. The hackney carriage trade is particularly important to the developing night life of Holmfirth, and the trade are working hard to ensure needs there are met.

The vehicle fleet size in the area is always likely to tend to be higher than the level of population might suggest because there are several specific niche operating areas who have sufficient work in some manner to avoid them needing to work in busier areas at any time. The exception is Holmfirth, where various vehicles work together to service that requirement, providing what is a critical and essential support to a key developing part of the economy.

9 Recommendations

On the basis of the evidence gathered in this hackney carriage unmet demand survey for Kirklees Council, our key conclusion is that there is no evidence of any unmet demand for the services of hackney carriages either patent or latent which is significant at this point in time in the licensing area. The committee is therefore able to choose to retain the present vehicle limit policy, and to do so at the present level of 228 vehicles.

Given that the level of unmet demand was far from being significant, in fact almost negligible (albeit increasing marginally), and this was obtained with the current fleet of 223 vehicles, it would be possible to reset the limit to that level and be sure this would remain sufficient to meet observed demand at least over the current life of this survey of three years.

In normal circumstances, fresh observations at ranks and new collection of a database of information to support the limit policy, would be required no later than March 2023. This target should be retained.

Consideration should be given, however, to policies and measures that ensure that the viability and supply of hackney carriages up to the current level should be encouraged and maintained to support the development of the local economy. The challenges of the current pandemic need to be faced in such a way to help the hackney carriage trade remain in a place that it will be able to support and supplement development of the economy into the new normal.

Appendix 1 – Industry statistics

Kirklees

DfT stats say limit began in 1974

	hcv	phv	lv total	dual drivers		Operators	% hcv WAV	% phv WAV
1994D	193			1000	1994D			
1997D	219	723	942	1349	1997D		14	
1999D	225	700	925	1400	1999D	140	16	
2001D	217	917	1134	1700	2001D	150	22	
2004D	217	917	1134	1700	2004D	150	15	
2005D	217	917	1134	1700	2005D	150	22	
2007D	217	917	1134	1700	2007D	150	22	
2009D	213	917	1130	1700	2009D	150	22	
2010N	217	1140	1357	<u>2093</u>	2010N	<u>140</u>	28	-
2011D	216	1351	1567	2485	2011D	130	25	9
2012N	217	1140	1357	<u>2510</u>	2012C	<u>127</u>	28	<u>7</u>
2013D	216	1532	1748	2535	2013D	124	22	<u>5</u>
2014N	218	1594	1812	<u>2594</u>	2014N	<u>122</u>	21	<u>4</u>
2015D	222	1678	1900	2653	2015D	119	21	5
2017C	219	1895	2114	2861	2017C	116	21	5
2017D	220	1910	2130	2877	2017D	117	22	7
2018D	219	2007	2226	2910	2018D	129	22	6
2019D	235	2039	2274	3308	2019D	151	22	5
2020C	222	2212	2434	3079	2017C	142	20	4

Appendix 2 – List of ranks

See table within Rank Chapter for full current list.

Appendix 3 – Timetable of rank observations

Please see separate document

Appendix 4 – Detailed rank observation results

Please see separate document

Appendix 5 – Detailed on street interview results

Please see separate document

Appendix 6 List of Stakeholders consulted

Key consultee	Response
Supermarkets	
Asda Longhill Road	U
Tesco Viaduct Street	U
Asda Aspley	U
Morrisons Penistone Road	U
Sainsburys Southgate	U
Iceland, Carpitt Road	U
Aldi, Wakefield Road	R
Sainsburys, Market St	U
Hotels	
The New Huddersfield Hotel	E
Cambridge Hotel	E
Heath Cottage Hotel	U
Briar Court Hotel	E
The Ashfield Hotel	E
Cedar Court Hotel	E
Restaurants / Cafes	
The Canton Chef, Huddersfield	U
De Sandro Pizzeria Ristorante	E
Zucchini's Restaurant Batley	U
The Sheaf	U
Poppa Piccolinos	U
Entertainment	
Lawrence Batley Theatre	U
Mecca Bingo	E
Public Houses	
Silver Birch, Cleckheaton	E
The George, Cleckheaton	Gone
The Dandy Lion	U
Horse and Jockey Birstall	U
Legends, Batley	U
Frontier, Batley	Gone
Old Turk, Dewsbury	E
Should of Mutton, Holmfirth	E
The Bridge, Holmfirth	E
The Nook	E
The Cherry Tree Wetherspoons	U
Rat and Ratchet	E
Night Clubs	
None had reopened or had contact details available.	

Key:

U – no means to contact due to pandemic changed communication policy or lack of contact email or contact form (no phones were being answered)

E – email sent but no response received despite chasing

A – email sent and acknowledged but no other response

R – refusal, due to national policy on not providing local feedback

Area / Private	Huddersfield						Dewsbury					Cleckheaton		Batley		Hours	
	Hud	Hud	Hud	Holm	Hud	Birstall	Hud	Bat	Dews	Dews	Bat	Hud	Cleck	Bat	Hud		Holm
Rank location	St Georges Sq (14) (Station)	John William St (11) incl feeder 20-04	Dundas St, o/s bus stn (7)	Victoria St (17b)	Cross Church St, 2 parts (3)	Market Place (39)	Lower Dundas St (8)	Henrietta St (30)	South Street (27) Bus Stn	Foundry St (23)	Wards Hill (29)	Ramsden St (13)	Greenside (35)	Bradford Rd, Bar St (24a)	Zetland St (16) plus inf King St	Holmfirth Bus Station	
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	
	122 feed 105	127 feed 120	130	131	118	124	108	126	129	135	125	102	113	112	133		
Operating Hours	24	24 hr	24	20-02	24	24 hr	24	20-03	24 hr	24 hr	23-3	24	24 hr	22-0630	24		
Thursday 07:00																	0
Thursday 08:00	1	1					1		1				1			1	5
Thursday 09:00	2	2					2		2				2			2	5
Thursday 10:00	3	3					3		3				3			3	5
Thursday 11:00	4	4					4		4				4			4	5
Thursday 12:00	5	5					5		5				5			5	5
Thursday 13:00	6	6					6		6				6			6	5
Thursday 14:00	7	7					7		7				7			7	5
Thursday 15:00	8	8					8		8				8			8	5
Thursday 16:00	9	9					9		9				9			9	5
Thursday 17:00	10	10					10		10				10			10	5
Thursday 18:00	11	11					11		11				11			11	5
Thursday 19:00	12	12					12		12				12			12	5
Thursday 20:00	13	13														13	2
Thursday 21:00	14	14														14	2
Thursday 22:00	15	15														15	2
Thursday 23:00	16	16														16	2
Thursday 00:00	17	17														17	2
Friday 01:00	18	18														18	2
Friday 02:00	19	19														19	2
Friday 03:00	20	20														20	2
Friday 04:00	21	21														21	2
Friday 05:00	22	22														22	2
Friday 06:00	23	23														23	2
Friday 07:00	24	24	1		1	1	13										6
Friday 08:00	25	25	2		2	2	14										6
Friday 09:00	26	26	3		3	3	15										6
Friday 10:00	27	27	4		4	4	16										6
Friday 11:00	28	28	5		5	5	17										6
Friday 12:00	29	29	6		6	6	18										6
Friday 13:00	30	30	7		7	7	19										6
Friday 14:00	31	31	8		8	8	20										6
Friday 15:00	32	32	9		9	9	21									24	6
Friday 16:00	33	33	10		10	10	22									25	6
Friday 17:00	34	34	11		11	11	23									26	7
Friday 18:00	35	35	12		12	12	24								1	27	8
Friday 19:00	36	36	13		13	13	25								2	28	8
Friday 20:00	37	37	14	1	14	14		1							3	29	9
Friday 21:00	38	38	15	2	15	15		2							4	30	9
Friday 22:00	39	39	16	3	16	16		3							5	31	9
Friday 23:00	40	40	17	4	17	17		4							6	32	9
Friday 00:00	41	41	18	5	18	18		5							7		8
Saturday 01:00	42	42	19	6	19	19		6							8		8
Saturday 02:00	43	43	20		20	20		7							9		7
Saturday 03:00	44	44	21		21										10		5
Saturday 04:00	45	45	22		22												4
Saturday 05:00	46	46	23		23												4
Saturday 06:00	47	47	24		24												4
Saturday 07:00	48	48	25				26			1		1					6
Saturday 08:00	49	49	26				27			2		2					6
Saturday 09:00	50	50	27				28			3		3					6
Saturday 10:00	51	51	28				29			4		4					6
Saturday 11:00	52	52	29				30			5	1	5					7
Saturday 12:00	53	53	30				31			6	2	6					7
Saturday 13:00	54	54	31				32			7	3	7					7
Saturday 14:00	55	55	32				33			8	4	8					7
Saturday 15:00	56	56	33				34			9	5	9					7
Saturday 16:00	57	57	34				35			10	6	10					7
Saturday 17:00	58	58	35				36			11	7	11					7
Saturday 18:00	59	59	36				37			12	8	12				33	8
Saturday 19:00	60	60	37							13	9	13				34	7
Saturday 20:00	61	61	38	7						10	14					35	7
Saturday 21:00	62	62	39	8						11	15					36	7
Saturday 22:00	63	63	40	9						12	16		1		37	8	
Saturday 23:00	64	64		10						13	17		2		38	7	
Saturday 00:00	65	65		11	25					14	18		3		39	8	
Sunday 01:00	66	66		12	26					15	19		4		40	8	
Sunday 02:00	67	67		13	27					16	20		5		41	8	
Sunday 03:00	68	68		14	28								6			5	
Sunday 04:00	69	69		15	29								7			5	
Sunday 05:00	Lost	70											8			2	
Sunday 06:00		71											9			2	
Sunday 07:00																	0
Sunday 08:00																	0
Sunday 09:00																	0
Period for sample																	396
Week day		111															
Week night		39															
Weekend day		55															
Weekend night	78	84															
Inter periods	0	50					4										421
Total hours at site	69	71	40	15	29	20	37	7	12	13	16	20	12	9	10	41	421
	16%	17%	10%	4%	7%	5%	9%	2%	3%	3%	4%	5%	3%	2%	2%	10%	

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Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hudd Station	12/3/20	8	26	26	20	1.3	0	0%	20	00:10:59	00:10:59	00:19:17						
Hudd Station	12/3/20	9	24	20	15	1.3	1	6%	16	00:46:48	00:47:13	01:36:55						
Hudd Station	12/3/20	10	7	7	6	1.2	3	33%	9	01:34:39	01:35:33	01:49:21						
Hudd Station	12/3/20	11	7	9	8	1.1	1	11%	9	01:02:53	01:02:53	01:19:02						
Hudd Station	12/3/20	12	15	14	12	1.2	2	14%	14	00:48:39	00:47:25	01:24:07						
Hudd Station	12/3/20	13	9	10	9	1.1	3	25%	12	01:00:53	00:57:57	01:08:48						
Hudd Station	12/3/20	14	9	17	13	1.3	2	13%	15	00:25:04	00:25:04	00:48:46						
Hudd Station	12/3/20	15	22	19	15	1.3	1	6%	16	00:25:47	00:26:06	00:46:31						
Hudd Station	12/3/20	16	22	25	18	1.4	0	0%	18	00:25:56	00:25:33	00:40:45						
Hudd Station	12/3/20	17	40	47	38	1.2	1	3%	39	00:15:37	00:15:37	00:28:55						
Hudd Station	12/3/20	18	36	32	29	1.1	3	9%	32	00:22:21	00:23:01	00:32:49						
Hudd Station	12/3/20	19	26	36	28	1.3	2	7%	30	00:29:16	00:30:15	00:42:41						
Hudd Station	12/3/20	20	20	20	19	1.1	2	10%	21	00:32:46	00:32:46	00:37:01						
Hudd Station	12/3/20	21	27	30	22	1.4	0	0%	22	00:37:16	00:37:16	00:48:48						
Hudd Station	12/3/20	22	23	36	29	1.2	0	0%	29	00:25:57	00:25:47	00:38:14						
Hudd Station	12/3/20	23	19	24	17	1.4	2	11%	19	00:39:27	00:40:34	00:51:20						
Hudd Station	13/3/20	0	5	12	11	1.1	3	21%	14	00:40:01	00:57:04	02:02:48						
Hudd Station	13/3/20	1	0	1	1	1	0	0%	1									
Hudd Station	13/3/20	2	3	1	1	1	1	50%	2	01:22:06	01:55:29	02:45:51						
Hudd Station	13/3/20	3	0	1	1	1	0	0%	1									
Hudd Station	13/3/20	4	1	0	0	0	0	0%	0	01:20:30	01:20:30	01:20:30						
Hudd Station	13/3/20	5	3	1	1	1	0	0%	1	01:24:06	01:24:06	01:29:20						
Hudd Station	13/3/20	6	5	2	2	1	0	0%	2	01:05:24	01:05:24	01:10:40						
Hudd Station	12/3/20		349	390	315	1.2	27	8%	342									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time	
Hudd Station	13/3/20	7	6	9	9	1	0	0%	9	00:21:13	00:21:13	00:25:50							
Hudd Station	13/3/20	8	21	23	17	1.4	0	0%	17	00:31:41	00:31:41	00:59:22							
Hudd Station	13/3/20	9	13	8	8	1	0	0%	8	01:41:14	01:41:14	01:57:16							
Hudd Station	13/3/20	10	4	5	5	1	0	0%	5	01:27:56	01:27:56	01:38:37							
Hudd Station	13/3/20	11	3	16	11	1.5	0	0%	11	00:45:34	00:45:34	00:58:27							
Hudd Station	13/3/20	12	21	35	23	1.5	0	0%	23	00:07:23	00:07:23	00:16:42							
Hudd Station	13/3/20	13	29	35	26	1.3	0	0%	26	00:09:32	00:09:32	00:18:07							
Hudd Station	13/3/20	14	31	37	28	1.3	2	7%	30	00:15:28	00:15:45	00:21:45							
Hudd Station	13/3/20	15	34	31	24	1.3	2	8%	26	00:24:21	00:24:00	00:43:24							
Hudd Station	13/3/20	16	34	40	32	1.2	1	3%	33	00:17:32	00:17:32	00:31:50							
Hudd Station	13/3/20	17	41	47	40	1.2	1	2%	41	00:18:23	00:18:23	00:30:12							
Hudd Station	13/3/20	18	32	42	33	1.3	1	3%	34	00:22:43	00:22:48	00:31:25							
Hudd Station	13/3/20	19	29	33	29	1.1	1	3%	30	00:26:47	00:26:47	00:36:03							
Hudd Station	13/3/20	20	29	42	28	1.5	2	7%	30	00:22:59	00:23:46	00:32:57							
Hudd Station	13/3/20	21	34	36	26	1.4	2	7%	28	00:38:09	00:38:09	00:51:18							
Hudd Station	13/3/20	22	22	44	31	1.4	0	0%	31	00:26:30	00:26:30	00:51:23							
Hudd Station	13/3/20	23	44	71	42	1.7	2	5%	44	00:19:12	00:19:23	00:29:35							
Hudd Station	14/3/20	0	24	37	23	1.6	6	21%	29	00:12:07	00:12:06	00:40:52							
Hudd Station	14/3/20	1	7	7	6	1.2	3	33%	9	00:24:08	00:28:46	01:10:39							
Hudd Station	14/3/20	2	3	3	2	1.5	0	0%	2	00:18:55	00:18:55	00:24:17							
Hudd Station	14/3/20	3	4	7	4	1.8	1	20%	5	00:31:06	00:36:35	01:16:55							
Hudd Station	14/3/20	4	2	2	1	2	0	0%	1	00:14:55	00:14:55	00:17:45							
Hudd Station	14/3/20	5	9	12	7	1.7	1	12%	8	00:22:03	00:23:20	00:59:22							
Hudd Station	14/3/20	6	6	8	4	2	0	0%	4	00:57:02	00:57:02	01:51:30							
Hudd Station	13/3/20		482	630	459	1.4	25	5%	484										

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time	
Hudd Station	14/3/20	7	6	5	4	1.2	0	0%	4	01:59:52	01:59:52	02:51:24							
Hudd Station	14/3/20	8	2	2	2	1	0	0%	2	01:51:14									
Hudd Station	14/3/20	9	3	2	2	1	0	0%	2	01:23:09	01:23:09	01:35:06							
Hudd Station	14/3/20	10	4	6	5	1.2	2	29%	7	00:27:40	00:30:15	00:40:01							
Hudd Station	14/3/20	11	12	9	7	1.3	3	30%	10	00:44:31	00:47:23	01:14:53							
Hudd Station	14/3/20	12	10	11	8	1.4	0	0%	8	00:49:24	00:48:39	00:58:33							
Hudd Station	14/3/20	13	13	17	10	1.7	1	9%	11	00:43:49	00:43:39	01:04:51							
Hudd Station	14/3/20	14	13	18	14	1.3	1	7%	15	00:38:16	00:38:16	01:05:46							
Hudd Station	14/3/20	15	12	10	9	1.1	1	10%	10	00:53:36	00:55:28	01:07:39							
Hudd Station	14/3/20	16	22	25	16	1.6	2	11%	18	00:46:14	00:46:47	01:04:48							
Hudd Station	14/3/20	17	19	34	22	1.5	4	15%	26	00:37:46	00:38:23	00:51:20							
Hudd Station	14/3/20	18	30	30	22	1.4	0	0%	22	00:25:06	00:25:06	00:38:54							
Hudd Station	14/3/20	19	39	66	38	1.7	0	0%	38	00:24:37	00:24:23	00:46:41							
Hudd Station	14/3/20	20	27	43	29	1.5	1	3%	30	00:28:21	00:28:21	00:40:05							
Hudd Station	14/3/20	21	34	66	31	2.1	0	0%	31	00:33:00	00:32:31	00:52:47							
Hudd Station	14/3/20	22	30	51	31	1.6	1	3%	32	00:25:32	00:25:32	00:43:23							
Hudd Station	14/3/20	23	70	125	73	1.7	1	1%	74	00:08:46	00:08:44	00:17:57							
Hudd Station	15/3/20	0	18	31	19	1.6	6	24%	25	00:28:41	00:26:06	00:43:24							
Hudd Station	15/3/20	1	10	5	3	1.7	7	70%	10	00:35:53	01:10:42	01:38:49							
Hudd Station	15/3/20	2	6	5	5	1	2	29%	7	00:46:52	00:46:52	01:48:46							
Hudd Station	15/3/20	3	0	3	2	1.5	0	0%	2										
Hudd Station	15/3/20	4	3	4	3	1.3	1	25%	4	00:10:41	00:11:15	00:15:03							
Hudd Station	14/3/20		383	568	355	1.6	33	9%	388										

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hudd J W St	12/3/20	8	1	0	0	0	1	100%	1	00:01:23								
Hudd J W St	12/3/20	9	4	1	1	1	1	50%	2	00:17:08	00:22:33	00:27:56						
Hudd J W St	12/3/20	10	6	4	4	1	1	20%	5	00:36:49	00:40:19	00:54:54						
Hudd J W St	12/3/20	11	6	3	3	1	0	0%	3	00:34:52	00:35:18	00:47:40						
Hudd J W St	12/3/20	12	9	17	11	1.5	1	8%	12	00:15:02	00:15:02	00:23:45	00:00:22	00:02:05	3			00:02:05
Hudd J W St	12/3/20	13	9	9	7	1.3	2	22%	9	00:32:11	00:31:18	00:44:35						
Hudd J W St	12/3/20	14	7	5	5	1	4	44%	9	00:10:18	00:11:21	00:30:16						
Hudd J W St	12/3/20	15	14	11	9	1.2	3	25%	12	00:07:58	00:08:53	00:30:26	00:00:09	00:01:49	1			00:01:49
Hudd J W St	12/3/20	16	8	9	7	1.3	1	12%	8	00:32:36	00:23:28	00:44:28						
Hudd J W St	12/3/20	17	5	2	2	1	3	60%	5	00:28:40	00:28:35	00:52:34						
Hudd J W St	12/3/20	18	8	11	8	1.4	1	11%	9	00:21:55	00:20:14	00:47:20						
Hudd J W St	12/3/20	19	5	5	4	1.2	1	20%	5	00:16:51	00:16:51	00:36:56						
Hudd J W St	12/3/20	20	7	7	6	1.2	0	0%	6	00:15:31	00:15:31	00:30:45						
Hudd J W St	12/3/20	21	6	5	5	1	0	0%	5	00:42:51	00:42:51	00:58:03						
Hudd J W St	12/3/20	22	7	14	8	1.8	1	11%	9	00:22:27	00:24:38	00:30:41						
Hudd J W St	12/3/20	23	10	14	11	1.3	0	0%	11	00:13:59	00:13:59	00:27:36						
Hudd J W St	13/3/20	0	10	8	3	2.7	5	62%	8	00:40:32	00:08:52	00:14:05						
Hudd J W St	13/3/20	1	1	0	0	0	1	100%	1	01:02:04								
Hudd J W St	13/3/20	2	1	0	0	0	3	100%	3	00:20:35	00:20:35	00:20:35						
Hudd J W St	13/3/20	3	1	3	2	1.5	0	0%	2	00:07:19	00:07:19	00:07:19						
Hudd J W St	13/3/20	4	0	0	0	0	0	0%	0									
Hudd J W St	13/3/20	5	0	0	0	0	0	0%	0									
Hudd J W St	13/3/20	6	0	0	0	0	0	0%	0									
Hudd J W St	12/3/20		125	128	96	1.3	29	23%	125									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hudd J W St	13/3/20	7	1	0	0	0	0	0%	0	00:10:43								
Hudd J W St	13/3/20	8	1	0	0	0	2	100%	2	00:00:27								
Hudd J W St	13/3/20	9	5	1	1	1	3	75%	4	00:18:34	00:07:16	00:07:16						
Hudd J W St	13/3/20	10	2	1	1	1	1	50%	2	00:37:32	00:37:32	00:52:10						
Hudd J W St	13/3/20	11	5	5	2	2.5	0	0%	2	00:36:03	00:39:04	00:50:55						
Hudd J W St	13/3/20	12	5	13	7	1.9	1	12%	8	00:08:04	00:08:04	00:22:16	00:00:09	00:01:57	1			00:01:57
Hudd J W St	13/3/20	13	6	5	4	1.2	1	20%	5	00:13:13	00:15:36	00:30:20						
Hudd J W St	13/3/20	14	8	8	7	1.1	0	0%	7	00:21:36	00:21:36	00:41:23						
Hudd J W St	13/3/20	15	14	19	12	1.6	1	8%	13	00:11:36	00:11:48	00:22:28						
Hudd J W St	13/3/20	16	7	5	5	1	0	0%	5	00:57:10	00:57:10	01:05:43						
Hudd J W St	13/3/20	17	6	18	12	1.5	0	0%	12	00:14:07	00:14:07	00:38:24						
Hudd J W St	13/3/20	18	13	10	9	1.1	0	0%	9	00:17:16	00:17:16	00:23:27						
Hudd J W St	13/3/20	19	14	22	14	1.6	1	7%	15	00:09:38	00:09:58	00:22:38						
Hudd J W St	13/3/20	20	18	27	18	1.5	1	5%	19	00:08:35	00:08:49	00:15:31						
Hudd J W St	13/3/20	21	18	22	13	1.7	0	0%	13	00:21:29	00:21:29	00:43:05						
Hudd J W St	13/3/20	22	13	23	15	1.5	0	0%	15	00:27:05	00:27:05	00:37:17						
Hudd J W St	13/3/20	23	26	36	23	1.6	1	4%	24	00:09:11	00:09:23	00:21:49						
Hudd J W St	14/3/20	0	37	62	38	1.6	0	0%	38	00:09:56	00:09:56	00:17:31	00:00:01	00:01:22	1			00:01:22
Hudd J W St	14/3/20	1	30	37	21	1.8	0	0%	21	00:25:29	00:25:29	00:42:06						
Hudd J W St	14/3/20	2	25	55	33	1.7	0	0%	33	00:16:53	00:16:53	00:28:02						
Hudd J W St	14/3/20	3	35	63	33	1.9	1	3%	34	00:16:24	00:16:19	00:28:43						
Hudd J W St	14/3/20	4	16	28	19	1.5	0	0%	19	00:23:25	00:23:25	00:34:15						
Hudd J W St	14/3/20	5	10	22	12	1.8	3	20%	15	00:02:51	00:03:37	00:09:53	00:00:46	00:08:56		2		00:10:33
Hudd J W St	14/3/20	6	3	2	2	1	1	33%	3	00:06:26	00:05:43	00:10:39						
Hudd J W St	13/3/20		318	484	301	1.6	17	5%	318									

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Hudd J W St	14/3/20	7	0	0	0	0	0	0%	0										
Hudd J W St	14/3/20	8	2	1	1	1	1	50%	2	00:02:04	00:03:23	00:03:23							
Hudd J W St	14/3/20	9	1	0	0	0	1	100%	1	00:03:57									
Hudd J W St	14/3/20	10	7	2	2	1	1	33%	3	00:23:04	00:20:30	00:45:24							
Hudd J W St	14/3/20	11	6	5	4	1.2	2	33%	6	00:26:36	00:31:35	00:48:02							
Hudd J W St	14/3/20	12	5	6	5	1.2	0	0%	5	00:42:39	00:41:37	00:51:36							
Hudd J W St	14/3/20	13	4	7	5	1.4	2	29%	7	00:34:04	00:35:50	00:44:13							
Hudd J W St	14/3/20	14	8	3	3	1	2	40%	5	00:31:47	00:32:05	00:54:50							
Hudd J W St	14/3/20	15	10	10	7	1.4	3	30%	10	00:27:45	00:34:08	00:48:31							
Hudd J W St	14/3/20	16	11	11	5	2.2	4	44%	9	00:36:10	00:40:44	00:56:22							
Hudd J W St	14/3/20	17	9	14	7	2	0	0%	7	00:37:17	00:37:17	00:52:19							
Hudd J W St	14/3/20	18	6	11	9	1.2	0	0%	9	00:40:52	00:38:32	00:54:26							
Hudd J W St	14/3/20	19	13	20	10	2	3	23%	13	00:17:02	00:17:02	00:28:41							
Hudd J W St	14/3/20	20	12	19	12	1.6	0	0%	12	00:29:02	00:29:02	00:36:02							
Hudd J W St	14/3/20	21	15	24	13	1.8	0	0%	13	00:22:01	00:22:01	00:31:39							
Hudd J W St	14/3/20	22	23	38	19	2	0	0%	19	00:25:49	00:25:49	00:30:26							
Hudd J W St	14/3/20	23	35	67	39	1.7	2	5%	41	00:05:05	00:05:05	00:13:49	00:00:05	00:01:30	4			00:01:57	
Hudd J W St	15/3/20	0	50	81	44	1.8	1	2%	45	00:15:11	00:15:21	00:25:03							
Hudd J W St	15/3/20	1	40	71	36	2	0	0%	36	00:23:36	00:23:36	00:32:10							
Hudd J W St	15/3/20	2	36	80	39	2.1	0	0%	39	00:22:39	00:22:39	00:30:09							
Hudd J W St	15/3/20	3	40	90	45	2	0	0%	45	00:12:56	00:12:56	00:23:25							
Hudd J W St	15/3/20	4	49	108	47	2.3	0	0%	47	00:13:49	00:13:49	00:20:50							
Hudd J W St	15/3/20	5	22	41	21	2	6	22%	27	00:27:22	00:26:44	00:35:26							
Hudd J W St	15/3/20	6	0	0	0	0	3	100%	3										
Hudd J W St	14/3/20		404	709	373	1.9	31	8%	404										

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hudd Bus Stn	13/3/20	7	4	0	0	0	3	100%	3	00:10:00	00:20:26	00:20:26						
Hudd Bus Stn	13/3/20	8	4	2	2	1	1	33%	3	00:27:07	00:35:11	00:36:10						
Hudd Bus Stn	13/3/20	9	9	2	2	1	5	71%	7	00:21:44	00:21:06	00:31:48						
Hudd Bus Stn	13/3/20	10	17	7	6	1.2	11	65%	17	00:18:01	00:19:22	00:27:25						
Hudd Bus Stn	13/3/20	11	15	5	5	1	13	72%	18	00:08:01	00:08:22	00:12:34						
Hudd Bus Stn	13/3/20	12	18	19	13	1.5	6	32%	19	00:03:57	00:03:30	00:07:54	00:01:58	00:08:15	1	5		00:10:32
Hudd Bus Stn	13/3/20	13	30	21	13	1.6	11	46%	24	00:06:27	00:05:22	00:20:29	00:01:47	00:04:28	5	1		00:06:10
Hudd Bus Stn	13/3/20	14	15	6	6	1	13	68%	19	00:21:19	00:22:00	00:28:01						
Hudd Bus Stn	13/3/20	15	23	6	5	1.2	8	62%	13	00:27:46	00:29:38	00:50:45						
Hudd Bus Stn	13/3/20	16	12	10	9	1.1	8	47%	17	00:28:47	00:32:32	00:45:13						
Hudd Bus Stn	13/3/20	17	22	18	14	1.3	9	39%	23	00:11:33	00:13:11	00:31:20						
Hudd Bus Stn	13/3/20	18	13	27	15	1.8	1	6%	16	00:10:27	00:10:27	00:18:10	00:00:17	00:02:50	3			00:02:50
Hudd Bus Stn	13/3/20	19	15	28	18	1.6	0	0%	18	00:03:45	00:03:45	00:08:06						
Hudd Bus Stn	13/3/20	20	10	12	9	1.3	0	0%	9	00:10:33	00:10:33	00:29:07	00:00:07	00:01:34	1			00:01:34
Hudd Bus Stn	13/3/20	21	6	8	5	1.6	0	0%	5	00:15:02	00:15:58	00:35:58						
Hudd Bus Stn	13/3/20	22	5	8	4	2	1	20%	5	00:17:44	00:17:44	00:29:08						
Hudd Bus Stn	13/3/20	23	2	4	3	1.3	1	25%	4	00:04:53	00:09:31	00:09:31						
Hudd Bus Stn	14/3/20	0	0	0	0	0	0	0%	0									
Hudd Bus Stn	14/3/20	1	0	0	0	0	0	0%	0									
Hudd Bus Stn	14/3/20	2	0	0	0	0	0	0%	0									
Hudd Bus Stn	14/3/20	3	0	0	0	0	0	0%	0									
Hudd Bus Stn	14/3/20	4	0	0	0	0	0	0%	0									
Hudd Bus Stn	14/3/20	5	0	0	0	0	0	0%	0									
Hudd Bus Stn	14/3/20	6	0	0	0	0	0	0%	0									
Hudd Bus Stn	13/3/20		220	183	129	1.4	91	41%	220									

Location	Date	HOUR	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Holm Vic St	14/3/20	20	24	29	17	1.7	4	19%	21	00:05:05	00:05:42	00:16:49						
Holm Vic St	14/3/20	21	23	34	17	2	1	6%	18	00:13:32	00:13:15	00:31:24						
Holm Vic St	14/3/20	22	24	65	30	2.2	2	6%	32	00:11:40	00:11:38	00:22:10	00:00:08	00:01:26	7			00:01:42
Holm Vic St	14/3/20	23	75	176	69	2.6	0	0%	69	00:01:55	00:01:55	00:07:53	00:00:20	00:01:56	30			00:02:45
Holm Vic St	15/3/20	0	57	128	61	2.1	0	0%	61	00:01:26	00:01:24	00:05:50	00:00:23	00:01:51	27			00:02:50
Holm Vic St	15/3/20	1	18	25	12	2.1	4	25%	16	00:18:31	00:18:36	00:49:39						
Holm Vic St	15/3/20	2	10	26	12	2.2	2	14%	14	00:03:45	00:04:13	00:17:48	00:02:06	00:05:28	7	3		00:11:15
Holm Vic St	15/3/20	3	0	0	0	0	0	0%	0									
Holm Vic St	15/3/20	4	0	0	0	0	0	0%	0									
Holm Vic St	14/3/20		231	483	218	2.2	13	6%	231									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hudd Cross Ch St	13/3/20	7	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20	8	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20	9	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20	10	2	2	1	2	1	50%	2	00:00:41	00:00:51	00:00:51						
Hudd Cross Ch St	13/3/20	11	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20	12	1	1	1	1	0	0%	1	00:00:18	00:00:18	00:00:18						
Hudd Cross Ch St	13/3/20	13	2	1	1	1	1	50%	2	00:00:19	00:00:23	00:00:23						
Hudd Cross Ch St	13/3/20	14	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20	15	2	1	1	1	0	0%	1	00:04:20	00:04:20	00:08:05						
Hudd Cross Ch St	13/3/20	16	0	1	1	1	0	0%	1									
Hudd Cross Ch St	13/3/20	17	1	0	0	0	1	100%	1	00:01:06								
Hudd Cross Ch St	13/3/20	18	1	0	0	0	1	100%	1	00:00:39								
Hudd Cross Ch St	13/3/20	19	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20	20	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20	21	5	9	3	3	1	25%	4	00:04:33	00:02:43	00:04:42						
Hudd Cross Ch St	13/3/20	22	7	10	6	1.7	0	0%	6	00:12:20	00:12:20	00:20:14						
Hudd Cross Ch St	13/3/20	23	9	16	10	1.6	0	0%	10	00:07:59	00:07:59	00:16:12						
Hudd Cross Ch St	14/3/20	0	13	24	12	2	0	0%	12	00:15:13	00:15:13	00:38:45						
Hudd Cross Ch St	14/3/20	1	11	12	6	2	0	0%	6	00:33:58	00:33:58	00:43:38						
Hudd Cross Ch St	14/3/20	2	9	17	11	1.5	0	0%	11	00:30:04	00:29:58	00:44:55						
Hudd Cross Ch St	14/3/20	3	5	12	8	1.5	2	20%	10	00:18:31	00:19:30	00:30:15						
Hudd Cross Ch St	14/3/20	4	4	12	4	3	0	0%	4	00:03:21	00:03:21	00:07:40						
Hudd Cross Ch St	14/3/20	5	0	0	0	0	0	0%	0									
Hudd Cross Ch St	14/3/20	6	0	0	0	0	0	0%	0									
Hudd Cross Ch St	13/3/20		72	118	65	1.8	7	10%	72									

Location	Date	HOUR	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hudd Cross Ch St	15/3/20	0	27	29	18	1.6	2	10%	20	00:07:27	00:07:36	00:15:15						
Hudd Cross Ch St	15/3/20	1	25	47	30	1.6	0	0%	30	00:09:20	00:09:20	00:14:56						
Hudd Cross Ch St	15/3/20	2	25	37	21	1.8	0	0%	21	00:10:46	00:10:46	00:15:33						
Hudd Cross Ch St	15/3/20	3	27	76	33	2.3	0	0%	33	00:03:46	00:03:46	00:07:37						
Hudd Cross Ch St	15/3/20	4	13	21	10	2.1	3	23%	13	00:02:13	00:02:08	00:05:01	00:00:38	00:04:27	3			00:04:27
Hudd Cross Ch St	15/3/20		117	210	112	1.9	5	4%	117									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Birstall Mkt Pl	13/3/20	7	5	4	3	1.3	2	40%	5	00:09:44	00:11:00	00:20:59						
Birstall Mkt Pl	13/3/20	8	3	2	2	1	0	0%	2	00:31:29	00:31:29	00:43:57						
Birstall Mkt Pl	13/3/20	9	5	3	3	1	2	40%	5	00:09:35	00:10:36	00:18:20						
Birstall Mkt Pl	13/3/20	10	4	2	2	1	1	33%	3	00:31:38	00:32:11	00:45:52						
Birstall Mkt Pl	13/3/20	11	6	8	7	1.1	1	12%	8	00:10:01	00:10:01	00:16:05						
Birstall Mkt Pl	13/3/20	12	3	0	0	0	3	100%	3	00:21:14								
Birstall Mkt Pl	13/3/20	13	1	0	0	0	0	0%	0	00:14:54								
Birstall Mkt Pl	13/3/20	14	5	3	2	1.5	3	60%	5	00:17:31	00:08:13	00:15:42						
Birstall Mkt Pl	13/3/20	15	6	7	5	1.4	2	29%	7	00:07:36	00:06:45	00:09:01						
Birstall Mkt Pl	13/3/20	16	7	4	3	1.3	1	25%	4	00:32:32	00:28:47	01:02:26						
Birstall Mkt Pl	13/3/20	17	0	2	2	1	1	33%	3									
Birstall Mkt Pl	13/3/20	18	4	3	3	1	0	0%	3	00:18:26	00:18:26	00:30:26						
Birstall Mkt Pl	13/3/20	19	2	1	1	1	1	50%	2	00:42:47								
Birstall Mkt Pl	13/3/20	20	2	1	1	1	1	50%	2	00:10:27	00:10:27	00:14:55						
Birstall Mkt Pl	13/3/20	21	3	1	1	1	1	50%	2	00:13:16								
Birstall Mkt Pl	13/3/20	22	1	0	0	0	2	100%	2	00:14:32	00:14:32	00:14:32						
Birstall Mkt Pl	13/3/20	23	2	1	1	1	2	67%	3	00:03:57								
Birstall Mkt Pl	14/3/20	0	0	0	0	0	0	0%	0									
Birstall Mkt Pl	14/3/20	1	0	0	0	0	0	0%	0									
Birstall Mkt Pl	14/3/20	2	0	0	0	0	0	0%	0									
Birstall Mkt Pl	13/3/20		59	42	36	1.2	23	39%	59									

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Hudd Lr Dundas St	12/3/20	8	0	0	0	0	0	0%	0									
Hudd Lr Dundas St	12/3/20	9	4	2	2	1	0	0%	2	00:36:21	00:36:21	00:38:09						
Hudd Lr Dundas St	12/3/20	10	8	9	8	1.1	0	0%	8	00:09:47	00:09:47	00:15:47						
Hudd Lr Dundas St	12/3/20	11	4	4	4	1	0	0%	4	00:37:40	00:37:40	00:46:55						
Hudd Lr Dundas St	12/3/20	12	6	9	6	1.5	0	0%	6	00:13:03	00:13:03	00:23:09						
Hudd Lr Dundas St	12/3/20	13	12	13	12	1.1	0	0%	12	00:09:02	00:09:02	00:15:35						
Hudd Lr Dundas St	12/3/20	14	16	17	17	1	0	0%	17	00:06:38	00:06:38	00:14:16						
Hudd Lr Dundas St	12/3/20	15	13	17	13	1.3	0	0%	13	00:07:25	00:07:25	00:19:26						
Hudd Lr Dundas St	12/3/20	16	12	16	12	1.3	0	0%	12	00:10:12	00:10:12	00:44:36						
Hudd Lr Dundas St	12/3/20	17	3	2	2	1	0	0%	2	00:26:30	00:26:30	00:49:55						
Hudd Lr Dundas St	12/3/20	18	0	2	2	1	0	0%	2									
Hudd Lr Dundas St	12/3/20	19	0	0	0	0	0	0%	0									
Hudd Lr Dundas St	12/3/20		78	91	78	1.2	0	0%	78									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hudd Lr Dundas St	13/3/20	7	1	1	1	1	0	0%	1	00:01:15	00:01:15	00:01:15						
Hudd Lr Dundas St	13/3/20	8	1	0	0	0	0	0%	0	00:35:04	00:35:04	00:35:04						
Hudd Lr Dundas St	13/3/20	9	5	4	4	1	0	0%	4	00:21:24	00:21:24	00:50:51						
Hudd Lr Dundas St	13/3/20	10	11	11	11	1	0	0%	11	00:10:16	00:10:16	00:19:35						
Hudd Lr Dundas St	13/3/20	11	12	13	12	1.1	0	0%	12	00:06:07	00:06:07	00:15:58						
Hudd Lr Dundas St	13/3/20	12	9	14	11	1.3	0	0%	11	00:02:35	00:02:35	00:06:52	00:00:06	00:01:06	1			00:01:06
Hudd Lr Dundas St	13/3/20	13	13	14	11	1.3	0	0%	11	00:05:53	00:05:53	00:16:33	00:01:11	00:05:33	2		1	00:11:59
Hudd Lr Dundas St	13/3/20	14	13	15	13	1.2	0	0%	13	00:09:04	00:09:04	00:22:44						
Hudd Lr Dundas St	13/3/20	15	8	9	7	1.3	1	12%	8	00:14:59	00:16:31	00:36:51						
Hudd Lr Dundas St	13/3/20	16	8	12	9	1.3	0	0%	9	00:10:22	00:10:22	00:25:34						
Hudd Lr Dundas St	13/3/20	17	10	12	9	1.3	0	0%	9	00:10:21	00:10:21	00:31:38	00:00:30	00:02:11	3			00:03:13
Hudd Lr Dundas St	13/3/20	18	2	3	3	1	1	25%	4	00:00:54	00:01:05	00:01:05	00:00:36	00:01:13	1			00:01:13
Hudd Lr Dundas St	13/3/20	19	0	0	0	0	0	0%	0									
Hudd Lr Dundas St	13/3/20		93	108	91	1.2	2	2%	93									

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Hudd Lr Dundas St	14/3/20	7	0	0	0	0	0	0%	0										
Hudd Lr Dundas St	14/3/20	8	0	0	0	0	0	0%	0										
Hudd Lr Dundas St	14/3/20	9	6	5	4	1.2	0	0%	4	00:11:31	00:11:31	00:22:26							
Hudd Lr Dundas St	14/3/20	10	9	10	9	1.1	0	0%	9	00:09:44	00:09:44	00:20:33							
Hudd Lr Dundas St	14/3/20	11	8	9	8	1.1	0	0%	8	00:16:10	00:16:10	00:24:11							
Hudd Lr Dundas St	14/3/20	12	8	9	8	1.1	0	0%	8	00:14:08	00:14:08	00:25:51							
Hudd Lr Dundas St	14/3/20	13	11	16	12	1.3	0	0%	12	00:07:57	00:07:57	00:20:22	00:00:03	00:01:00	1			00:01:00	
Hudd Lr Dundas St	14/3/20	14	15	18	14	1.3	0	0%	14	00:07:49	00:07:49	00:15:02							
Hudd Lr Dundas St	14/3/20	15	11	15	11	1.4	0	0%	11	00:10:52	00:10:52	00:16:38							
Hudd Lr Dundas St	14/3/20	16	7	7	7	1	0	0%	7	00:15:40	00:15:40	00:30:52							
Hudd Lr Dundas St	14/3/20	17	7	10	7	1.4	0	0%	7	00:20:02	00:20:02	00:32:50							
Hudd Lr Dundas St	14/3/20	18	0	3	2	1.5	0	0%	2										
Hudd Lr Dundas St	14/3/20		82	102	82	1.2	0	0%	82										

Location	Date	HOUR	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time	
Bat Hen St	13/3/20	20	2	0	0	0	0	0%	0	00:05:26									
Bat Hen St	13/3/20	21	2	0	0	0	4	100%	4	00:02:04									
Bat Hen St	13/3/20	22	0	0	0	0	0	0%	0										
Bat Hen St	13/3/20	23	4	2	1	2	3	75%	4	00:05:49	00:13:44	00:13:44							
Bat Hen St	14/3/20	0	0	0	0	0	0	0%	0										
Bat Hen St	14/3/20	1	0	0	0	0	0	0%	0										
Bat Hen St	14/3/20	2	0	0	0	0	0	0%	0										
Bat Hen St	13/3/20		8	2	1	2	7	88%	8										

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Dews Bus Stn	12/3/20	8	11	0	0	0	6	100%	6	00:19:31	00:23:59	00:34:18						
Dews Bus Stn	12/3/20	9	17	6	6	1	9	60%	15	00:25:38	00:27:27	00:54:12						
Dews Bus Stn	12/3/20	10	9	6	6	1	4	40%	10	00:37:20	00:42:44	01:33:02						
Dews Bus Stn	12/3/20	11	9	3	3	1	7	70%	10	00:53:29	01:16:57	01:27:48						
Dews Bus Stn	12/3/20	12	5	8	6	1.3	2	25%	8	00:26:14	00:23:13	00:46:43						
Dews Bus Stn	12/3/20	13	10	4	4	1	4	50%	8	00:25:15	00:27:46	00:38:06						
Dews Bus Stn	12/3/20	14	7	7	7	1	4	36%	11	00:20:47	00:21:23	00:27:18						
Dews Bus Stn	12/3/20	15	16	6	5	1.2	5	50%	10	00:24:18	00:24:56	00:54:56						
Dews Bus Stn	12/3/20	16	7	4	4	1	4	50%	8	00:32:01	00:28:24	00:42:27						
Dews Bus Stn	12/3/20	17	12	9	8	1.1	6	43%	14	00:17:50	00:19:24	00:28:01						
Dews Bus Stn	12/3/20	18	7	6	4	1.5	1	20%	5	00:30:35	00:26:10	00:49:45						
Dews Bus Stn	12/3/20	19	3	3	3	1	5	62%	8	00:14:03								
Dews Bus Stn	12/3/20		113	62	56	1.1	57	50%	113									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time, those waiting only	Average Passenger Waiting Time in Hour	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Dews Fdry St	14/3/20	7	0	0	0	0	0	0%	0									
Dews Fdry St	14/3/20	8	0	0	0	0	0	0%	0									
Dews Fdry St	14/3/20	9	5	3	2	1.5	2	50%	4	00:05:31	00:04:03	00:07:11						
Dews Fdry St	14/3/20	10	3	1	1	1	2	67%	3	00:19:16	00:23:45	00:23:45						
Dews Fdry St	14/3/20	11	6	4	3	1.3	2	40%	5	00:14:14	00:05:33	00:07:35						
Dews Fdry St	14/3/20	12	3	0	0	0	4	100%	4	00:06:42	00:05:37	00:05:37						
Dews Fdry St	14/3/20	13	2	1	1	1	2	67%	3	00:17:12								
Dews Fdry St	14/3/20	14	6	0	0	0	4	100%	4	00:12:36	00:10:27	00:10:27						
Dews Fdry St	14/3/20	15	3	1	1	1	4	80%	5	00:05:22								
Dews Fdry St	14/3/20	16	2	0	0	0	2	100%	2	00:01:52								
Dews Fdry St	14/3/20	17	0	0	0	0	0	0%	0									
Dews Fdry St	14/3/20	18	0	0	0	0	0	0%	0									
Dews Fdry St	14/3/20	19	0	0	0	0	0	0%	0									
Dews Fdry St	14/3/20		30	10	8	1.3	22	73%	30									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Bat Wards HI	14/3/20	11	5	1	1	1	1	50%	2	00:49:17	00:25:06	00:28:27						
Bat Wards HI	14/3/20	12	4	4	2	2	3	60%	5	00:12:19	00:18:54	00:34:56						
Bat Wards HI	14/3/20	13	6	1	1	1	4	80%	5	00:11:06								
Bat Wards HI	14/3/20	14	9	5	5	1	7	58%	12	00:10:25	00:14:49	00:22:12						
Bat Wards HI	14/3/20	15	10	4	3	1.3	6	67%	9	00:08:05	00:09:31	00:13:30						
Bat Wards HI	14/3/20	16	9	1	1	1	7	88%	8	00:18:05	00:46:22	01:05:57						
Bat Wards HI	14/3/20	17	7	2	2	1	7	78%	9	00:07:11	00:11:15	00:11:15						
Bat Wards HI	14/3/20	18	1	0	0	0	0	0%	0	00:23:42								
Bat Wards HI	14/3/20	19	3	0	0	0	4	100%	4	00:06:03								
Bat Wards HI	14/3/20	20	1	1	1	1	0	0%	1	00:04:29	00:04:29	00:04:29						
Bat Wards HI	14/3/20	21	0	0	0	0	0	0%	0									
Bat Wards HI	14/3/20	22	0	0	0	0	0	0%	0									
Bat Wards HI	14/3/20	23	0	0	0	0	0	0%	0									
Bat Wards HI	15/3/20	0	0	0	0	0	0	0%	0									
Bat Wards HI	15/3/20	1	0	0	0	0	0	0%	0									
Bat Wards HI	15/3/20	2	0	0	0	0	0	0%	0									
Bat Wards HI	14/3/20		55	19	16	1.2	39	71%	55									

Location	Date	HOUR	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Hud Ramsden St	14/3/20	7	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	8	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	9	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	10	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	11	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	12	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	13	1	2	1	2	0	0%	1	00:03:06	00:03:06	00:03:06						
Hud Ramsden St	14/3/20	14	1	0	0	0	0	0%	0	00:01:31	00:01:31	00:01:31						
Hud Ramsden St	14/3/20	15	0	5	1	5	0	0%	1									
Hud Ramsden St	14/3/20	16	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	17	1	1	1	1	0	0%	1	00:02:09	00:02:09	00:02:09						
Hud Ramsden St	14/3/20	18	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	19	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	20	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	21	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	22	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20	23	0	0	0	0	0	0%	0									
Hud Ramsden St	15/3/20	0	0	0	0	0	0	0%	0									
Hud Ramsden St	15/3/20	1	3	5	3	1.7	0	0%	3	00:06:11	00:06:11	00:16:29						
Hud Ramsden St	15/3/20	2	0	0	0	0	0	0%	0									
Hud Ramsden St	14/3/20		6	13	6	2.2	0	0%	6									

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour
Cleck Gnside	12/3/20	8	1	0	0	0	0	0%	0	00:32:16			
Cleck Gnside	12/3/20	9	2	0	0	0	2	100%	2	00:20:21			
Cleck Gnside	12/3/20	10	2	1	1	1	2	67%	3	00:12:11	00:17:55	00:17:55	
Cleck Gnside	12/3/20	11	4	2	1	2	2	67%	3	00:16:34	00:20:44	00:31:15	
Cleck Gnside	12/3/20	12	1	1	1	1	0	0%	1	01:08:53			
Cleck Gnside	12/3/20	13	4	0	0	0	5	100%	5	00:06:01			
Cleck Gnside	12/3/20	14	4	1	1	1	3	75%	4	00:07:22	00:05:27	00:05:27	
Cleck Gnside	12/3/20	15	1	0	0	0	1	100%	1	00:10:27			
Cleck Gnside	12/3/20	16	1	1	1	1	0	0%	1	00:03:13	00:03:13	00:03:13	
Cleck Gnside	12/3/20	17	0	0	0	0	0	0%	0				
Cleck Gnside	12/3/20	18	0	0	0	0	0	0%	0				
Cleck Gnside	12/3/20	19	0	0	0	0	0	0%	0				
Cleck Gnside	12/3/20		20	6	5	1.2	15	75%	20				

Location	Date	Hour	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour
Bat Brad Rd	14/3/20	22	0	0	0	0	0	0%	0				
Bat Brad Rd	14/3/20	23	0	0	0	0	0	0%	0				
Bat Brad Rd	15/3/20	0	0	0	0	0	0	0%	0				
Bat Brad Rd	15/3/20	1	0	0	0	0	0	0%	0				
Bat Brad Rd	15/3/20	2	0	0	0	0	0	0%	0				
Bat Brad Rd	15/3/20	3	1	1	1	1	0	0%	1	00:00:11	00:00:11	00:00:11	
Bat Brad Rd	15/3/20	4	0	0	0	0	0	0%	0				
Bat Brad Rd	15/3/20	5	0	0	0	0	0	0%	0				
Bat Brad Rd	15/3/20	6	0	0	0	0	0	0%	0				
Bat Brad Rd	14/3/20		1	1	1	1	0	0%	1				

Location	Date	HOUR	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Holm BS	12/3/20	8	1	1	1	1	0	0%	1	00:03:05	00:03:05	00:03:05						
Holm BS	12/3/20	9	0	0	0	0	0	0%	0									
Holm BS	12/3/20	10	0	0	0	0	0	0%	0									
Holm BS	12/3/20	11	0	0	0	0	0	0%	0									
Holm BS	12/3/20	12	0	0	0	0	0	0%	0									
Holm BS	12/3/20	13	0	0	0	0	0	0%	0									
Holm BS	12/3/20	14	2	1	1	1	1	50%	2	00:00:05	00:00:05	00:00:05	00:01:00	00:01:00	1			00:01:00
Holm BS	12/3/20	15	0	0	0	0	0	0%	0									
Holm BS	12/3/20	16	0	0	0	0	0	0%	0									
Holm BS	12/3/20	17	0	0	0	0	0	0%	0									
Holm BS	12/3/20	18	0	0	0	0	0	0%	0									
Holm BS	12/3/20	19	1	0	0	0	0	0%	0	00:20:05								
Holm BS	12/3/20	20	1	0	0	0	1	100%	1	00:39:05								
Holm BS	12/3/20	21	5	1	1	1	5	83%	6	00:02:53	00:04:05	00:04:05						
Holm BS	12/3/20	22	1	1	1	1	0	0%	1	00:02:05	00:02:05	00:02:05						
Holm BS	12/3/20	23	0	0	0	0	0	0%	0									
Holm BS	13/3/20	0	0	0	0	0	0	0%	0									
Holm BS	13/3/20	1	0	0	0	0	0	0%	0									
Holm BS	13/3/20	2	0	0	0	0	0	0%	0									
Holm BS	13/3/20	3	0	0	0	0	0	0%	0									
Holm BS	13/3/20	4	0	0	0	0	0	0%	0									
Holm BS	13/3/20	5	0	0	0	0	0	0%	0									
Holm BS	13/3/20	6	0	0	0	0	0	0%	0									
Holm BS	12/3/20		11	4	4	1	7	64%	11									

Location	Date	HOUR	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Holm BS	13/3/20	15	1	3	1	3	0	0%	1	00:00:05	00:00:05	00:00:05	00:02:00	00:02:00	3			00:02:00
Holm BS	13/3/20	16	3	1	1	1	1	50%	2	00:06:25	00:00:05	00:00:05						
Holm BS	13/3/20	17	4	0	0	0	5	100%	5	00:05:20								
Holm BS	13/3/20	18	2	0	0	0	2	100%	2	00:02:42								
Holm BS	13/3/20	19	7	1	1	1	6	86%	7	00:08:21	00:06:35	00:06:35						
Holm BS	13/3/20	20	2	2	1	2	1	50%	2	00:00:31	00:00:24	00:00:24						
Holm BS	13/3/20	21	1	3	1	3	0	0%	1	00:01:11	00:01:11	00:01:11	00:07:22	00:07:22		3		00:07:22
Holm BS	13/3/20	22	1	0	0	0	1	100%	1	00:01:11								
Holm BS	13/3/20	23	3	6	2	3	1	33%	3	00:03:43	00:04:48	00:08:05						
Holm BS	13/3/20		24	16	7	2.3	17	71%	24									

Location	Date	HOUR	No of Vehicle Arrivals	Total Passenger Departures	Loaded Vehicle Departures	Average vehicle occupancy	Empty Vehicle Departures	% of vehicles leaving empty	Total Vehicle Departures	Average Vehicle Waiting Time	Average Vehicle Waiting Time (for a fare)	Maximum Vehicle Waiting Time (for a fare)	Average Passenger Waiting Time in Hour	Average Passenger Waiting Time, those waiting only	Number of people waiting 1-5 mins	Number of people waiting 6-10 mins	Number waiting 11 mins or more	Maximum passenger wait time
Holm BS	14/3/20	18	2	1	1	1	1	50%	2	00:02:13	00:03:18	00:03:18						
Holm BS	14/3/20	19	5	2	2	1	3	60%	5	00:00:58	00:01:06	00:01:52	00:01:26	00:02:53	1			00:02:53
Holm BS	14/3/20	20	4	5	3	1.7	1	25%	4	00:01:28	00:01:41	00:04:21	00:00:31	00:01:18	2			00:01:18
Holm BS	14/3/20	21	1	0	0	0	0	0%	0	00:12:40								
Holm BS	14/3/20	22	3	3	1	3	3	75%	4	00:11:27	00:11:42	00:11:42						
Holm BS	14/3/20	23	0	0	0	0	0	0%	0									
Holm BS	15/3/20	0	1	3	1	3	0	0%	1	00:03:05	00:03:05	00:03:05						
Holm BS	15/3/20	1	0	0	0	0	0	0%	0									
Holm BS	15/3/20	2	2	7	2	3.5	0	0%	2	00:00:05	00:00:05	00:00:05						
Holm BS	14/3/20		18	21	10	2.1	8	44%	18									

Maximum passenger wait time	
Number waiting 11 mins or more	
Number of people waiting 6-10 mins	
Number of people waiting 1-5 mins	
Total Passenger delay amount	06:22:07
Average Passenger Waiting Time in Hour	00:00:05
Maximum Vehicle Waiting Time (for a fare)	
Average Vehicle Waiting Time (for a fare)	
Average Vehicle Waiting Time	
Total Vehicle Departures	3593
% of vehicles leaving empty	16%
Empty Vehicle Departures	575
Average vehicle occupancy	1.6
Loaded Vehicle Departures	3018
Total Passenger Departures	4725
No of Vehicle Arrivals	3593
HOUR	421
Date	All
Location	All

Q1: Have you used a taxi in the last 3 months in the Kirklees area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Yes	51	68%	78	78%	12	48%	141	71%
No	24	32%	22	22%	13	52%	59	30%
Total	75	100%	100	100%	25	100%	200	100%

Q2: How often do you use a taxi within this area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
3 OR MORE TIMES WEEKLY	3	4%	7	7%	0	0%	10	5%
ONCE OR TWICE WEEKLY	24	32%	18	18%	2	8%	44	22%
LESS THAN 1 WEEKLY, MORE THAN 2 MONTHLY	10	13%	11	11%	2	8%	23	12%
ONCE OR TWICE MONTHLY	9	12%	28	28%	6	24%	43	22%
LESS THAN 1 MONTHLY, MORE THAN 2 YEARLY	4	5%	15	15%	1	4%	20	10%
ONCE OR TWICE YEARLY	9	12%	14	14%	4	16%	27	14%
NEVER	16	21%	7	7%	10	40%	33	17%
Total	75	100%	100	100%	25	100%	200	100%

3 or more times a week	20
once or twice a week	4
less than 1/week, but more than 2/month	2
once or twice a month	1
less than 1/month, but more than 2/year	1

Resulting estimate of trips per person per month	2.5	2.7	0.8	2.4
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Q3a. How do you normally get a taxi within this area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
AT A RANK	0	0%	51	31%	8	35%	59	22%
HAILING ON STREET	5	6%	7	4%	0	0%	12	4%
TELEPHONE	49	58%	72	44%	14	61%	135	50%
FREEPHONE	17	20%	11	7%	0	0%	28	10%
AN APP	14	16%	21	13%	1	4%	36	13%
OTHER	0	0%	0	0%	0	0%	0	0%
Total	85	100%	162	100%	23	100%	270	100%

Q4: If you book by phone, which 3 companies do you call?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
HUDDERSFIELD TAXI	0	0%	58	40%	0	0%	58	22%
OAKWELL	52	67%	0	0%	0	0%	52	20%
A1	1	1%	17	12%	0	0%	18	7%
WOODS TAXI	0	0%	17	12%	0	0%	17	6%
J R PRIVATE HIRE	0	0%	0	0%	12	28%	12	5%
VICTORIA TAXI	0	0%	0	0%	9	21%	9	3%
HOLMFIRTH TAXI	0	0%	1	1%	9	21%	10	4%
MOUNT TAXI	0	0%	7	5%	0	0%	7	3%
UBER	0	0%	7	5%	0	0%	7	3%
MARSH TAXI	0	0%	6	4%	0	0%	6	2%
TIMMYS TAXI	0	0%	6	4%	0	0%	6	2%
BOB'S TAXI	0	0%	0	0%	6	14%	6	2%
ROYAL TAXI	0	0%	5	3%	0	0%	5	2%
HONLYS TAXI	0	0%	3	2%	2	5%	5	2%
EX SERVICE	0	0%	5	3%	0	0%	5	2%
ABBEY	3	4%	1	1%	0	0%	4	2%
AMBER	4	5%	0	0%	0	0%	4	2%
DEWSBURY CARS	4	5%	0	0%	0	0%	4	2%
STATION CARS	2	3%	1	1%	0	0%	3	1%
STEVE'S TAXI	0	0%	0	0%	3	7%	3	1%
SHAW'S TAXI	0	0%	0	0%	2	5%	2	1%
A2B AIRPORT TAXIS	0	0%	2	1%	0	0%	2	1%
TONG EURO TAXIS	2	3%	0	0%	0	0%	2	1%
BYWELL CARS	2	3%	0	0%	0	0%	2	1%
THORNHILL	1	1%	0	0%	0	0%	1	0%
5 STAR TAXI	1	1%	0	0%	0	0%	1	0%
COLLINS	1	1%	0	0%	0	0%	1	0%
STANNINGLY CARS	1	1%	0	0%	0	0%	1	0%
WOODS OF BIRSTALL	1	1%	0	0%	0	0%	1	0%
ZENITH, CLECKHEATON	1	1%	0	0%	0	0%	1	0%
TOWN CARS	1	1%	0	0%	0	0%	1	0%
ELITE	1	1%	0	0%	0	0%	1	0%
ASPLAY CARS	0	0%	1	1%	0	0%	1	0%
MIRFIELD TAXI	0	0%	1	1%	0	0%	1	0%
TINGEYS TAXI, HEMSWORTH	0	0%	1	1%	0	0%	1	0%
BRIDGE TAXI	0	0%	1	1%	0	0%	1	0%
FENAY BRIDGE TAXI	0	0%	1	1%	0	0%	1	0%
TOWN TAXI	0	0%	1	1%	0	0%	1	0%
YORKYS AIRPORT	0	0%	1	1%	0	0%	1	0%
GT TAXI	0	0%	1	1%	0	0%	1	0%
Total	78	100%	144	100%	43	100%	265	100%

Q5: If you used an app or website, which one did you use?	DEWSBURY	HUDDERSFIELD	HOLMFIRTH	ALL
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OAKWELL	18	95%	0	0%	0	0%	18	33%
AMBER	1	5%	0	0%	0	0%	1	2%
FARE CHECKER	0	0%	1	3%	0	0%	1	2%
HUDDERSFIELD TAXI	0	0%	20	59%	0	0%	20	37%
UBER	0	0%	13	38%	0	0%	13	24%
BOB'S TAXI	0	0%	0	0%	1	3%	1	2%
Total	19	100%	34	100%	1	3%	54	100%

Q6: How often do you use Hackney Carriage within this area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
3 OR MORE TIMES WEEKLY	0	0%	2	2%	0	0%	2	1%
ONCE OR TWICE WEEKLY	1	2%	8	9%	0	0%	9	5%
LESS THAN 1 WEEKLY, MORE THAN 2 MONTHLY	3	5%	5	5%	0	0%	8	5%
ONCE OR TWICE MONTHLY	2	3%	9	10%	1	5%	12	7%
LESS THAN 1 MONTHLY, MORE THAN 2 YEARLY	1	2%	14	15%	3	16%	18	10%
ONCE OR TWICE YEARLY	8	13%	19	21%	4	21%	31	18%
I CANT REMEMBER WHEN I LAST USED AN HCV	37	59%	35	38%	11	58%	83	48%
CANT REMEMBER SEEING AN HCV IN THE AREA	11	17%	0	0%	0	0%	11	6%
Total	63	100%	92	100%	19	100%	174	100%

3 or more times a week	20
once or twice a week	4
less than 1/week, but more than 2/month	2
once or twice a month	1
less than 1/month, but more than 2/year	1
once or twice yearly	0.1

Resulting estimate of trips per person per month by hackney carriage	0.2	1.1	0.2	0.6
Proportion of trips made by hackney carriage=	7%	39%	23%	26%

Q7a. Which ranks are you aware of in Kirklees Council area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
RAILWAY STATION	0	0%	36	24%	0	0%	36	17%
STATION	0	0%	21	14%	0	0%	21	10%
MCDONALDS, JOHN WILLIAM STREET	0	0%	34	23%	0	0%	34	16%
SAINSBURY'S (?TELEPHONE)	0	0%	26	17%	0	0%	26	12%
BUS STATION	0	0%	13	9%	0	0%	13	6%
VICTORIA STREET	0	0%	0	0%	14	41%	14	7%
VICTORIA SQUARE	0	0%	0	0%	4	12%	4	2%
TOWN CENTRE	0	0%	9	6%	0	0%	9	4%
BUS STATION, HOLMFIRTH	0	0%	0	0%	8	24%	8	4%
NEAR POST OFFICE (BUS STATION)	0	0%	0	0%	8	24%	8	4%
HOLMFIRTH	1	4%	7	5%	0	0%	8	4%
DEWSBURY BUS STATION (SOUTH ST)	6	21%	0	0%	0	0%	6	3%
BUS STATION	2	7%	0	0%	0	0%	2	1%
DEWSBURY	2	7%	0	0%	0	0%	2	1%
BATLEY	4	14%	0	0%	0	0%	4	2%
WARDS HILL, BATLEY	4	14%	0	0%	0	0%	4	2%
COMMERCIAL STREET, BATLEY	2	7%	0	0%	0	0%	2	1%
MICK LANE, BATLEY	1	4%	0	0%	0	0%	1	0%
BRANCH ROAD, BATLEY (?HENRIETTA ST)	1	4%	0	0%	0	0%	1	0%
HIGH STREET, BATLEY	1	4%	0	0%	0	0%	1	0%
KIRKLEES	1	4%	0	0%	0	0%	1	0%
BIRSTALL	1	4%	0	0%	0	0%	1	0%
HUDDERSFIELD	1	4%	0	0%	0	0%	1	0%
HALIFAX - OUT OF AREA	1	4%	0	0%	0	0%	1	0%
CHURCH STREET	0	0%	1	1%	0	0%	1	0%
KINGSGATE	0	0%	1	1%	0	0%	1	0%
ASDA (?TELEPHONE)	0	0%	1	1%	0	0%	1	0%
Total	28	100%	149	21%	34	100%	211	45%

Q7b. If you are aware of a rank in the Kirklees Council area, please tell us if you use it?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
USE	5	18%	72	48%	11	32%	88	42%
DON'T USE	23	82%	77	52%	23	68%	123	58%
Total	28	100%	149	100%	34	100%	211	100%

Q8. If you would not use a rank for a specific reason, please tell us why?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
DON'T USE	12	55%	0	0%	0	0%	12	43%
TOO EXPENSIVE	9	41%	0	0%	0	0%	9	32%
PHONE USUAL COMPANY	1	5%	0	0%	0	0%	1	4%
STATION - THEY PRETEND THEY HAVE TO GO A DIFFERENT ROUTE SPECIALLY FOR STA	0	0%	1	17%	0	0%	1	4%
HUDDERSFIELD TAXI EASY, RELIABLE AND CHECKED PRICE IN ADVANCE	0	0%	1	17%	0	0%	1	4%
BUS STATION AT DUNDAS STREET (RAPE LAST YEAR NEAR RANK)	0	0%	1	17%	0	0%	1	4%
BUS STATION - DARK	0	0%	2	33%	0	0%	2	7%
CONVENIENCE	0	0%	1	17%	0	0%	1	4%
Total	22	100%	6	100%	0	0%	28	100%

Q9a. For your most recent trip by taxi, how would you rate the Standard of Vehicle Cleanliness?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	2	6%	0	0%	0	0%	2	2%
Poor	4	11%	3	4%	0	0%	7	6%
Average	12	33%	26	37%	2	25%	40	35%
Good	9	25%	29	41%	6	75%	44	39%
Very good	9	25%	12	17%	0	0%	21	18%
Total	36	100%	70	100%	8	100%	114	100%

Q9b. For your most recent trip by taxi, how would you rate the State of Vehicle Repair?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	1	3%	0	0%	0	0%	1	1%
Poor	2	6%	1	1%	0	0%	3	3%
Average	12	33%	23	33%	1	13%	36	32%
Good	11	31%	29	42%	6	75%	46	41%
Very good	10	28%	16	23%	1	13%	27	24%
Total	36	100%	69	100%	8	100%	113	100%

Q9c. For your most recent trip by taxi, how would you rate the State of Driver Behaviour?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	2	6%	0	0%	0	0%	2	2%
Poor	3	8%	0	0%	0	0%	3	3%
Average	13	36%	29	42%	1	13%	43	38%
Good	7	19%	29	42%	6	75%	42	37%
Very good	11	31%	11	16%	1	13%	23	20%
Total	36	100%	69	100%	8	100%	113	100%

Q9d. For your most recent trip by taxi, how would you rate the State of Driver Appearance?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	3	8%	0	0%	0	0%	3	3%
Poor	5	14%	3	4%	1	13%	9	8%
Average	9	25%	20	29%	1	13%	30	27%
Good	12	33%	36	52%	4	50%	52	46%
Very good	7	19%	10	14%	2	25%	19	17%
Total	36	100%	69	100%	8	100%	113	100%

Q9e. For your most recent trip by taxi, how would you rate the Standard of Driver Hygiene?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	6	17%	0	0%	0	0%	6	5%
Poor	4	11%	2	3%	0	0%	6	5%
Average	10	28%	25	36%	3	38%	38	34%
Good	5	14%	32	46%	5	63%	42	37%
Very good	11	31%	10	14%	0	0%	21	19%
Total	36	100%	69	100%	8	100%	113	100%

Q9f. For your most recent trip by taxi, how would you rate the Standard of Driver Professionalism?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	5	14%	0	0%	0	0%	5	4%
Poor	4	11%	2	3%	0	0%	6	5%
Average	9	25%	24	35%	3	38%	36	32%
Good	8	22%	29	42%	5	63%	42	37%
Very good	10	28%	14	20%	0	0%	24	21%
Total	36	100%	69	100%	8	100%	113	100%

Q9g. For your most recent trip by taxi, how would you rate the Standard of Driver Knowledge of the Area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	5	14%	0	0%	0	0%	5	4%
Poor	3	8%	3	4%	0	0%	6	5%
Average	10	28%	18	26%	1	13%	29	26%
Good	8	22%	29	42%	5	63%	42	37%
Very good	10	28%	19	28%	2	25%	31	27%
Total	36	100%	69	100%	8	100%	113	100%

Q9h. For your most recent trip by taxi, how would you rate the Price?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Very poor	11	27%	7	10%	0	0%	18	15%
Poor	2	5%	8	11%	1	13%	11	9%
Average	6	15%	28	39%	5	63%	39	33%
Good	12	29%	25	35%	1	13%	38	32%
Very good	10	24%	3	4%	1	13%	14	12%
Total	41	100%	71	100%	8	100%	120	100%

Q10. For any aspects that you rated poor or very poor, could you please provide further details?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
BAD HYGEINE	2	11%	0	0%	0	0%	2	7%
EXPENSIVE, DRIVERS A BIT SCRUFFY AND SMELLY	1	5%	0	0%	0	0%	1	3%
EXPENSIVE, DRIVERS LOOKED ROUGH, DIRTY AND UNPROFESSIONAL	1	5%	0	0%	0	0%	1	3%
EXPENSIVE	9	47%	1	17%	2	50%	12	41%
NO BASIC ENGLISH SKILLS	1	5%	0	0%	0	0%	1	3%
SMELLY DRIVER, CAR DISGUSTING INSIDE/OUT	5	26%	0	0%	0	0%	5	17%
EXPENSIVE, PRIVATE HIRE MORE RELIABLE	0	0%	1	17%	0	0%	1	3%
FROM STATION RANK DRIVER WENT WRONG WAY I SUSPECT ON PURPOSE HE DID IT	0	0%	1	17%	0	0%	1	3%
IF TRAFFIC IS BAD ITS EXPENSIVE AND SOME YOUNGER DRIVERS GO LONG WAY	0	0%	1	17%	0	0%	1	3%
PRETEND DIFFERENT ROUTE TO RAISE PRICE	0	0%	1	17%	0	0%	1	3%
TOO EXPENSIVE, GET DOUBLE FARE WITH USING WRONG WAY	0	0%	1	17%	0	0%	1	3%
TOO EXPENSIVE, BUSINESS APPERANCE	0	0%	0	0%	2	50%	2	7%
Total	19	100%	6	100%	4	100%	29	100%

Q11a. What would encourage you to use hackney carriages or use them more often?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Better Vehicle	11	15%	11	13%	0	0%	22	13%
More hackney carriages I could phone for	11	15%	26	31%	0	0%	37	22%
Better Drivers	13	17%	14	16%	5	50%	32	19%
More hackney carriages I could hail or get at a rank	6	8%	12	14%	0	0%	18	11%
Other	34	45%	22	26%	5	50%	61	36%
Total	75	100%	85	100%	10	100%	170	100%

Q11b. If you indicated 'Other' to Q11a, please provide further details?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
CHEAPER FARE	23	66%	12	55%	4	80%	39	63%
MORE ENGLISH SPEAKER	1	3%	0	0%	0	0%	1	2%
NOTHING	7	20%	0	0%	0	0%	7	11%
SAME PRICE AS OTHER TAXIS	3	9%	0	0%	0	0%	3	5%
STOP CHARGING DOUBLE FARE	1	3%	0	0%	0	0%	1	2%
FEEL SAFER IN BOOKED ONE, DRIVER MORE RELIABLE AND HELPFUL	0	0%	1	5%	0	0%	1	2%
NIGHT OUT	0	0%	1	5%	0	0%	1	2%
PREFER CALL ONE - HCV TEND TO GO SLOW AND STOP LONGER AT LIGHTS TO PUSH U	0	0%	1	5%	0	0%	1	2%
PREFER TO BOOK	0	0%	4	18%	0	0%	4	6%
PRICE IN ADVANCE	0	0%	2	9%	0	0%	2	3%
PRIVATE DRIVERS MORE HELPFUL	0	0%	1	5%	0	0%	1	2%
BETTER HYGIENE	0	0%	0	0%	1	20%	1	2%
Total	35	100%	22	100%	5	100%	62	100%

Q12a. Do you, or anyone you know, need an adapted licensed vehicle?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
No	55	81%	68	71%	25	100%	148	78%
Yes - WAV	0	0%	9	9%	0	0%	9	5%
Someone I know, WAV	11	16%	7	7%	0	0%	18	10%
Yes - but not WAV	0	0%	3	3%	0	0%	3	2%
Someone I know, not WAV	2	3%	9	9%	0	0%	11	6%
Other	0	0%	0	0%	0	0%	0	0%
Total	68	100%	96	100%	25	100%	189	100%

Q13a. Have you ever given up waiting or made alternative arrangements for an HC, at a rank in the Kirklees Council area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
	Yes	7	11%	11	13%	1	4%	19
No	56	89%	74	87%	24	96%	154	89%
Total	63	100%	85	100%	25	100%	173	100%

Q13b. If you indicated 'YES' to Q13a, please tell us where?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
BATLEY	2	29%	0	0%	0	0%	2	11%
BIRSTALL	1	14%	0	0%	0	0%	1	5%
GOMERSAL	1	14%	0	0%	0	0%	1	5%
HALIFAX STATION	1	14%	0	0%	0	0%	1	5%
HUDDERSFIELD	1	14%	0	0%	0	0%	1	5%
MARKET STREET, DEWSBURY	1	14%	0	0%	0	0%	1	5%
DUNDAS STREET	0	0%	1	9%	0	0%	1	5%
HOLMFIRTH	0	0%	3	27%	0	0%	3	16%
MCDONALDS, JOHN WILLIAM STREET	0	0%	3	27%	0	0%	3	16%
RAILWAY STATION	0	0%	1	9%	0	0%	1	5%
SAINSBURY'S	0	0%	2	18%	0	0%	2	11%
STATION	0	0%	1	9%	0	0%	1	5%
VICTORIA STREET	0	0%	0	0%	1	100%	1	5%
Total	7	100%	11	100%	1	100%	19	100%

Q14a. Have you ever given up waiting or made alternative arrangements for an HC, by hailing on street in the Kirklees Council area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
	Yes	1	2%	5	6%	0	0%	6
No	60	98%	77	94%	25	100%	162	96%
Total	61	100%	82	100%	25	100%	168	100%

Q14b. If you indicated 'YES' to Q14a, please tell us where?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
IN TOWN	0	0%	1	20%	0	0%	1	20%
MCDONALDS, JOHN WILLIAM STREET	0	0%	3	60%	0	0%	3	60%
SAINSBURY'S	0	0%	1	20%	0	0%	1	20%
Total	0	0%	5	100%	0	0%	5	100%

Q15. Do you feel there are enough hackney carriages in the Kirklees Council area at night (between 19:00 and 07:00)?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Yes	46	78%	48	72%	18	95%	112	77%
No	13	22%	19	28%	1	5%	33	23%
Total	59	100%	67	100%	19	100%	145	100%

Q16. Do you feel safe using taxis during the daytime (before 6pm)	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Yes	51	94%	76	99%	19	100%	146	97%
No	3	6%	1	1%	0	0%	4	3%
Total	54	100%	77	100%	19	100%	150	100%

Q17. Do you feel safe using a taxis during the night (after 6pm)	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Yes	44	81%	65	86%	17	94%	126	85%
No	10	19%	11	14%	1	6%	22	15%
Total	54	100%	76	100%	18	100%	148	100%

Q18. If you do not feel safe using taxis, please tell us anything more specific why	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
ANXIETY ISSUES	1	17%	0	0%	0	0%	1	5%
AS A SINGLE LADY I FEEL VLUNERABLE	1	17%	0	0%	0	0%	1	5%
BEEN ATTACKED BEFORE	1	17%	0	0%	0	0%	1	5%
DODGY DRIVERS	1	17%	0	0%	0	0%	1	5%
ONE OF THE TAXI DRIVERS MADE ME FEEL UNEASY BECAUSE OF HOW HE CAME ACRC	1	17%	0	0%	0	0%	1	5%
WITH A STRANGER IN THE DARK	1	17%	0	0%	0	0%	1	5%
ATTACK LAST YEAR AT DUNDAS STREET	0	0%	1	8%	0	0%	1	5%
DON'T LIKE UBER YOUNG DRIVER, PREFER TO RING COMPANY IF NIGH OUT ONE I USE	0	0%	1	8%	0	0%	1	5%
FEEL QUITE SAFE BUT PREFER TO USE PRIVATE HIRE AS RECORD OF TRIP	0	0%	1	8%	0	0%	1	5%
GET WITH MATES, AVOID ON OWN. BOOK THROUGH THE APP/KNOWN DRIVER	0	0%	1	8%	0	0%	1	5%
INCIDENT LAST YEAR	0	0%	1	8%	0	0%	1	5%
NOT SAFE AT SOME PLACES FOR WOMAN	0	0%	1	8%	0	0%	1	5%
NOT TAXI RANK NEAR HEAR TOO DARK AND ATTACK LAST YEAR	0	0%	1	8%	0	0%	1	5%
POOR STREET LIGHTING	0	0%	2	17%	0	0%	2	11%
SOMETIMES THIS WAS ABOUT YOUNGER DRIVERS NOT KNOWING THE TOWN	0	0%	1	8%	0	0%	1	5%
WOULD NOT USE BUS STATION RANK AT NIGHT	0	0%	1	8%	0	0%	1	5%
WOULDN'T USE KNOWING DRIVER	0	0%	1	8%	0	0%	1	5%
BECAUSE OF MY AGE NOT FEELING SAFE	0	0%	0	0%	1	100%	1	5%
Total	6	100%	12	100%	1	100%	19	100%

Q19. If you do not feel safe using taxis, what would make you feel safer?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
PERSONAL ATTACK BUTTON	1	33%	0	0%	0	0%	1	13%
NOTHING	2	67%	0	0%	0	0%	2	25%
BETTER STREET LIGHTING	0	0%	1	20%	0	0%	1	13%
BOOK ONE IF NEEDED	0	0%	1	20%	0	0%	1	13%
LIGHTING, RECORD OF JOURNEY LIKE PRIVATE HIRE	0	0%	1	20%	0	0%	1	13%
PREBOOK THEM	0	0%	1	20%	0	0%	1	13%
PRIVATE HIRE FEELS SAFER	0	0%	1	20%	0	0%	1	13%
Total	3	100%	5	100%	0	0%	8	100%

Q20. How do you rate local hackney carriage fares?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
CHEAP	48	74%	53	60%	8	42%	109	63%
FAIR	5	8%	31	35%	0	0%	36	21%
EXPENSIVE	1	2%	2	2%	0	0%	3	2%
OTHER	11	17%	3	3%	11	58%	25	14%
DON'T HAVE AN OPINION	0	0%	0	0%	0	0%	0	0%
Total	65	100%	89	100%	19	100%	173	100%

Q21. If you had the choice of using an electric powered hackney carriage, would you use one?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
NO PREFERENCE	52	76%	53	58%	14	74%	119	66%
YES, ONLY IF IT DID NOT COST ANYMORE	15	22%	39	42%	5	26%	59	33%
YES, AND WOULD PAY 10% MORE FARE	1	1%	0	0%	0	0%	1	1%
Total	68	100%	92	100%	19	100%	179	100%

Q22a. Hackney Carriages may provide a facility to pay the fare by credit or debit card. How do you feel about this?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
I WOULD STILL PAY IN CASH	43	65%	53	59%	2	15%	98	58%
WOULD BE HAPPY AS LONG AS NO SURCHARGE	14	21%	33	37%	9	69%	56	33%
WOULD USE FOR EVERY JOURNEY	3	5%	4	4%	2	15%	9	5%
OTHER	6	9%	0	0%	0	0%	6	4%
Total	66	100%	90	100%	13	100%	169	100%

Q22b. If you indicated 'OTHER' to Q14a, please specify	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
DON'T USE	2	33%	0	0%	0	0%	2	33%
EITHER WAY	2	33%	0	0%	0	0%	2	33%
WOULD LIKE TO BE ABLE TO PAY EITHER BY CASH OR CARD	2	33%	0	0%	0	0%	2	33%
Total	6	100%	0	0%	0	0%	6	100%

Q24a. Do you think people in Kirklees who have disabilities get a good service from hackney carriage vehicles and drivers?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
YES	20	42%	48	65%	2	20%	70	53%
NO THEY DON'T (SPECIFY ISSUE)	2	4%	3	4%	0	0%	5	4%
OTHER	26	54%	23	31%	8	80%	57	43%
Total	48	100%	74	100%	10	100%	132	100%

Q24b. If you indicated 'NO THEY DON'T' to Q24a, please tell us more?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
RUDENESS	1	100%	0	0%	0	0%	1	50%
GOOD WITH TIMMYS	0	0%	1	100%	0	0%	1	50%
Total	1	100%	1	100%	0	0%	2	100%

Q24c. If you indicated 'OTHER' to Q24a, please tell us more?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
DON'T KNOW	26	100%	23	100%	8	100%	57	100%
Total	26	100%	23	100%	8	100%	57	100%

Q23. Do you have regular access to a car?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
YES	36	51%	52	56%	21	84%	109	58%
NO	35	49%	41	44%	4	16%	80	42%
Total	71	100%	93	100%	25	100%	189	100%

Q25a. Do you live in the Kirklees Council area?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
Yes	67	92%	89	90%	16	64%	172	87%
No	6	8%	10	10%	9	36%	25	13%
Total	73	100%	99	100%	25	100%	197	100%

Q24b: If you do not live in the area, please provide the first half of your postcode?	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL	
LS14	1	6%	0	0%	0	0%	1	3%
LS13	1	6%	0	0%	0	0%	1	3%
BD19	1	6%	0	0%	1	11%	2	6%
BD11	2	13%	0	0%	0	0%	2	6%
WF9	0	0%	1	13%	0	0%	1	3%
SK22	0	0%	1	13%	0	0%	1	3%
WF14	0	0%	1	13%	0	0%	1	3%
LS18	0	0%	1	13%	0	0%	1	3%
LS28	0	0%	1	13%	0	0%	1	3%
LS11	0	0%	1	13%	0	0%	1	3%
WF4	0	0%	1	13%	0	0%	1	3%
LS25	0	0%	1	13%	0	0%	1	3%
HD6	0	0%	0	0%	1	11%	1	3%
WF1	4	25%	0	0%	2	22%	6	18%
S30	0	0%	0	0%	3	33%	3	9%
WF17	7	44%	0	0%	2	22%	9	27%
Total	16	100%	8	100%	9	100%	33	100%

Q26. GENDER	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL		Census	
1. Male	22	30%	38	38%	12	48%	72	37%	49%	-12%
2. Female	51	70%	61	62%	13	52%	125	63%	51%	12%
Total	73	100%	99	100%	25	100%	197	100%		

Q27. AGE	DEWSBURY		HUDDERSFIELD		HOLMFIRTH		ALL		443,970	
1. Under 30	16	22%	17	17%	5	20%	38	19%	23%	-4%
2. 31 - 55	31	42%	48	48%	13	52%	92	47%	40%	7%
3. Over 55	26	36%	34	34%	7	28%	67	34%	37%	-3%
Total	73	100%	99	100%	25	100%	197	100%		

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Name of meeting: Licensing and Safety Committee

Date: 17th December 2020

Title of report: Licensing Service – Update Report

Purpose of report: The purpose of this report is to inform Members of the activities undertaken to discharge the Council’s licensing functions from 1st April 2020 to 31st September 2020

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	No
Key Decision - Is it in the <u>Council’s Forward Plan (key decisions and private reports)?</u>	No Private Report/Private Appendix – No
The Decision - Is it eligible for call in by Scrutiny?	Not applicable
Date signed off by <u>Strategic Director</u> & name	Colin Parr – 07.12.2020
Is it also signed off by the Service Director for Finance?	Eamonn Croston – 07.12.2020
Is it also signed off by the Service Director for Legal Governance and Commissioning?	Julie Muscroft – 07.12.2020
Cabinet member portfolio	Cllr Paul Davies

Electoral wards affected: All

Ward councillors consulted: None

Public or private: Public

Has GDPR been considered? Yes – any personal data has been redacted for the purposes of this report.

1. Summary

1.1 This report provides Members of the Licensing and Safety Committee with an update on the activities undertaken by the Council's Licensing Service from 1st April 2020 to 30th September 2020

2. Activity Undertaken

Hackney Carriage & Private Hire

2.1 The overriding aim of the licensing service, when carrying out its functions relating to the licensing of Hackney or Private Hire Drivers, Vehicle Proprietors and Operators, is the protection of the public and others who use (or can be affected by) Hackney Carriage and Private Hire services.

2.2 The legislation provides that any person must satisfy the authority that they are a fit and proper person to hold a licence and this process involves a detailed examination of their entire character in order to make a judgment as to their fitness and propriety. If an applicant cannot satisfy the authority they are a fit and proper person then legislation dictates a licence must not be granted.

2.3 These are the principals that guide officers when making decisions in relation to applications for hackney carriage and private hire licences.

2.4 The activities undertaken by the licensing services in relation to the private hire and hackney carriage trades has to be looked at in the context of the current pandemic. On the 24th March 2020, in view of Government guidance and the Councils wider response to the pandemic the service took the difficult decision to close its front facing counters at the Customer Service Centre in Huddersfield and activate its business continuity plan. This action had significant implications on all licence types but in particular the private hire and hackney carriage trades, as well as for officers.

2.5 Within two days of the decision being made to close the counters, processes had been changed, website updated, and instructions sent to licence holders on how they could submit their applications electronically. In addition to this, licensing business support officers contacted approx. 200 licence holders who had appointments booked, in the two week period following the closure of the counters, to provide one on one advice on how they could submit their applications electronically.

2.6 In addition to changes in processes, like the many other teams within the Council, licensing staff had to adapt to working from home, which brought its own challenges and pressures. The whole licensing team, but in particular the services business support officers, have gone over and above to ensure the trade can continue to work and that the travelling public are protected. They have provided newsletters, spoken to and guided licence holders on an individual basis on how to submit their applications and the processes they need to follow.

2.7 Despite teething troubles, the service and the trade have adapted well, and in the main moving to electronic submission of applications has gone well; and as a service we are grateful to the hackney carriage and private hire trades for their patience, understanding and more importantly their continued support.

2.8 Despite the challenges the service has continued to operate close to business as usual as possible, the service has been able to –

- Continue to process and issues renewals of driver, vehicle and operators' licences,
- Continue to carry out checks with the disclosure and barring service on licence holders,
- Work with colleagues in fleet services to ensure vehicles can still be tested to ensure they are safe to carry passengers,
- Communicate changes via the licensing webpages and newsletters.
- Investigate complaints,
- Carry out enforcement,

2.9 Inevitably though, given the significant restrictions in place, the service has had to make some changes, for example -

- Ceasing application for new driver and vehicle licences

Due to the NHS not being able to offer driver medicals, the Council not being able to undertake driver training, and having to reduce unnecessary contact, the service was no longer in a position to accept applications for new licences.

However, for vehicle licences exceptions were made for replacement vehicles where accidents had occurred.

- Due to IT limitations, the service was and still is not able to produce vehicle identification plates or driver badges. Instead drivers have been asked to keep their existing plates and badges and an electronic version of a licence and covering letter to produce on request.

The service accepts this is not sustainable in the long term and alternative means of issuing ID badges and vehicle identification plates, in a Covid secure manner, have now been identified and will be rolled out in the coming weeks.

2.10 The service has also had to balance its duties to protect the public against enabling the trade to remain licensed and able to work and generate a level of income. As a result, and under delegated authority, the following changes were / have been made to existing policies and procedures to assist the trade -

- Driver medical due upon renewal

Due to the NHS not being able to undertake driver medicals, a change in policy and procedure was implemented to allow existing drivers, with no pre-existing medical conditions, to sign a self-declaration as to their medical status.

- Vehicle age limits

To reduce the need for driver to purchase new vehicle, vehicles reaching the upper age limit of 10 / 12 years of age are being allowed to renew that licence for a further 12-months. This applies to all vehicles reaching the upper age limit up to the 31st March 2021.

- Accepting of applications without a fee

Due to financial difficulties, fear of the virus itself, or because a licence holder has been unable to drive, the service have adapted their method of accepting renewal applications so as to protect the rights of the licence holder and their livelihood.

2.11 The number of hackney carriage and private hire licences in force is set out in the table below: -

Type	No.
Hackney Carriage Vehicles	224
Dual Drivers Licence	2896
Private Hire Operators	147
Private Hire Vehicles	1988
Total	5255

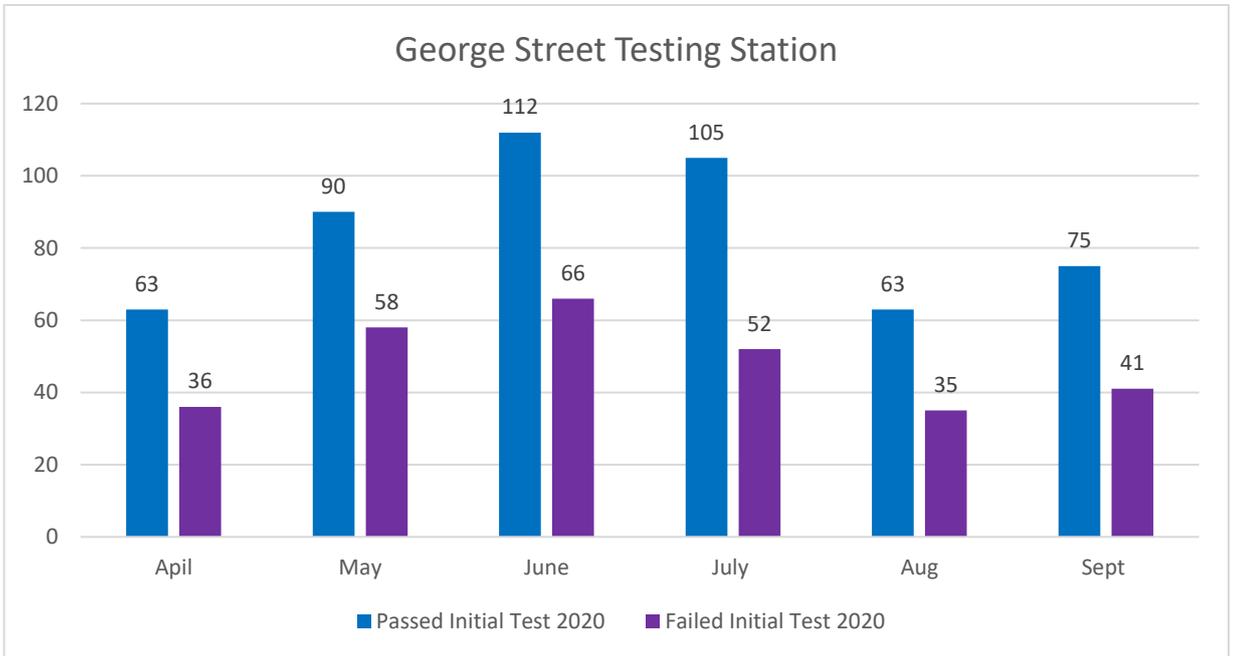
2.12 Despite the pandemic, the licensing team have continued to process applications for taxi licences. The following table sets out the number of private hire / hackney carriage applications processed by the service between 1 April 2020 and 30 September 2020, with the second column covering the same period from 2019 -

Licence Type	Application Type	2020	2019
Hackney Carriage Vehicle	Renewal	88	95
Dual Drivers Licence	New	4	225
	Renewal	886	1076
Private Hire Operator	New	7	8
	Renewal	36	40
Private Hire Vehicle	New	102	236
	Renewal	882	876
Total		2005	2556

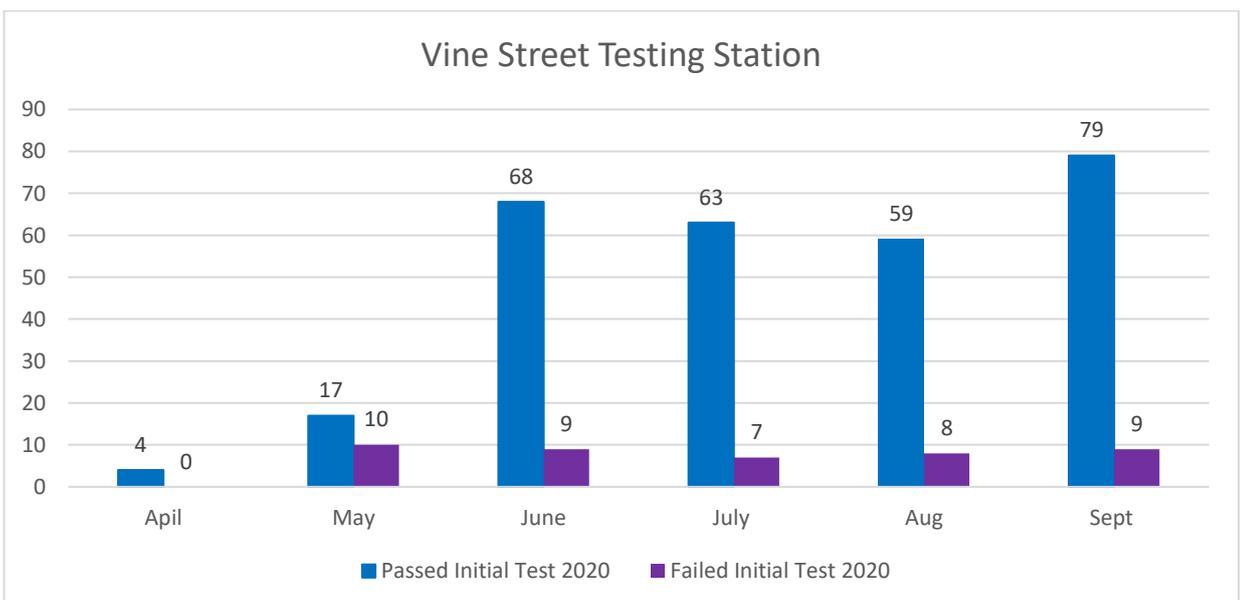
2.13 In relation to vehicle testing, Fleet Services have been able to continue to undertake private hire and hackney carriage vehicle compliance tests during the pandemic, ensuring vehicles are safe for the travelling public, with 1129 vehicle being tested. The following tables provide details of those test –

George Street Testing Station						
	April	May	June	July	Aug	Sept
Number of Tests	99	148	178	157	98	116
Passed Initial Test 2020	63	90	112	105	63	75

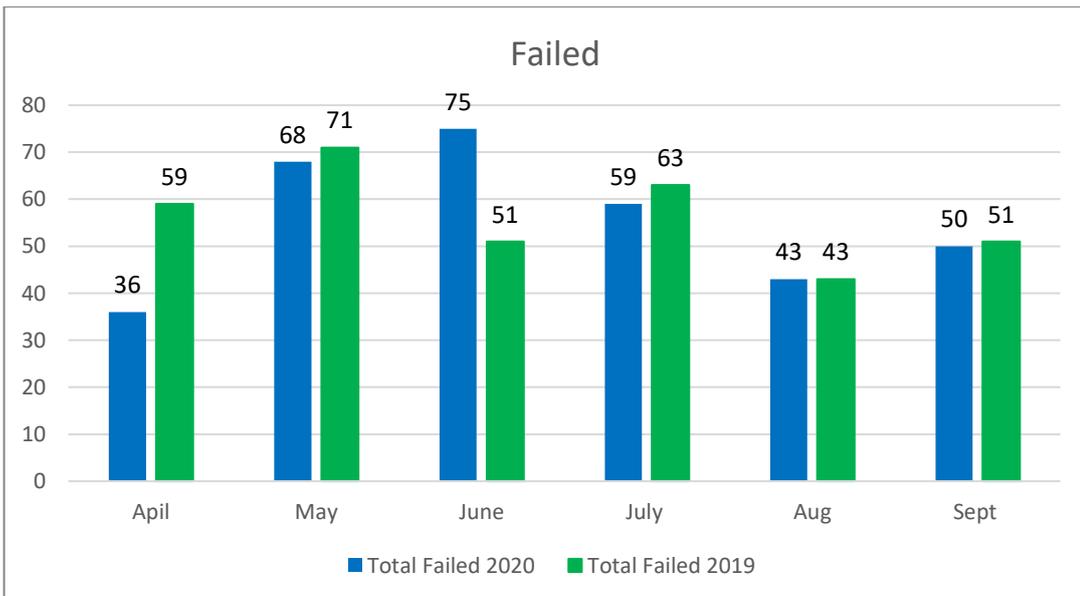
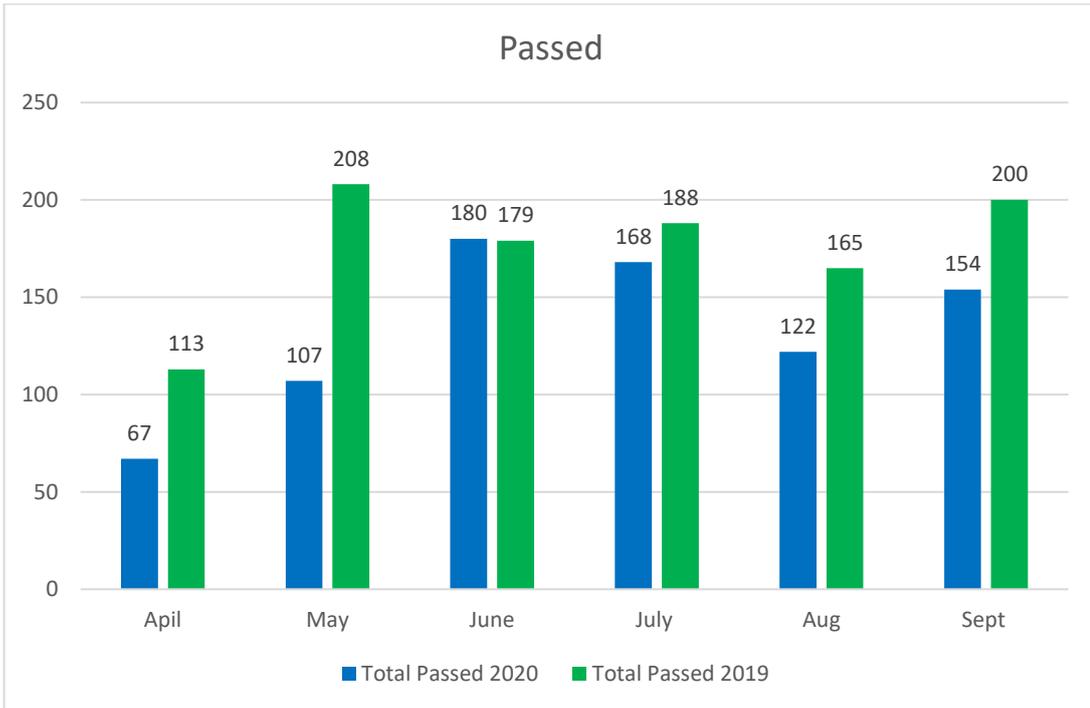
Failed Initial Test 2020	36	58	66	52	35	41
% Passed	64%	61%	63%	67%	64%	65%
% Failed	36%	39%	37%	33%	36%	35%



Vine Street Testing Station						
	April	May	June	July	Aug	Sept
Number of Tests	4	27	77	70	67	88
Passed Initial Test 2020	4	17	68	63	59	79
Failed Initial Test 2020	0	10	9	7	8	9
% Passed	100%	63%	88%	90%	88%	90%
% Failed	0%	37%	12%	10%	12%	10%



Vine Street & George Street Combined						
	April	May	June	July	Aug	Sept
Total No. Tests	103	175	255	227	165	204
Total Passed 2020	67	107	180	168	122	154
Total Failed 2020	36	68	75	59	43	50
Total % Passed	65%	61%	71%	74%	74%	75%
Total % Failed	35%	39%	29%	26%	26%	25%



Licensing Act 2003

2.14 It is a well-known fact that the coronavirus outbreak has had a crippling effect on businesses across the breadth of the Country. However, one of the hardest hit sectors has been, and continues to be the hospitality industry.

2.15 Kirklees has approx. 1600 premises licensed under the Licensing Act 2003, covering members clubs, the night-time economy right through to your local convenience store, with the biggest impact being felt by pubs, clubs, restaurants and destination venues.

2.16 It was thought the re-opening of the hospitality industry in July 2020, would see a resurgence of people visiting premises. However, given the tight restrictions under which premises were able to open, it was impossible for licensed premises to operate anywhere near the same capacity as pre-covid. Compounding matters was the reduction in income of consumers and large swathes of people having to cope with and prioritise finances while on furlough.

2.17 Cllr Pinnock and I witnessed the impact first-hand when we undertook visits to hospitality venues during the evening of the 3 October 2020. It was clear to see from the premises visited that business owners were trying their best to adapt and comply with the restrictions, so to be able to open. However, it was also plainly clear that operating under the restrictions was having a significant detrimental impact on their ability to generate income.

2.18 However, despite the pandemic, the service has continued to see applications for new premises licences be submitted but has also seen the number of notices for temporary events be drastically reduced. The following table sets out the number of applications processed by the service during the time period being reported, the second column is the equivalent for the same period in 2019 -

Application Type	2020	2019
New	25	39
Full Variation	6	3
Minor Variation	6	9
Transfer	33	47
Review	1	10
Temporary Event Notices	37	435
Total	108	543

2.19 The following applications have been considered by the Licensing Panel during the period being reported on -

Application Type	Premises	Outcome
New	Dubai Stores, Willow Lane	Granted
Review	Rose and Crown, Slaithwaite	Licence suspended
New	Ravensthorpe Off Licence, Huddersfield Road	Granted

2.20 Upon release of new legislation relating to pavement café licences, the service, in a short period of time, established new processes and procedures to be able to accept applications under the new legislation, and issue licences within the short timescales dictated by that legislation. This involved licensing officers working closely with internal and external partners including the Business Improvement District.

2.21 Licensing along with colleagues in Environmental Health continue to work with premises to provide advice and guidance on complying with ever changing regulations. In addition, pro-active joint visits have taken place between Licensing, Environmental Health and the police to again advise businesses but also monitor compliance.

2.22 Officers from Public Protection as a whole have worked tirelessly to keep businesses up-to-date on the changes to regulations and in support of that have hosted webinars, issued regular guidance letters, visited premises and circulated beer mats with key message on.

3. Implications for the Council

3.1 Working with People

One of the Licensing Service key priorities is to ensure there is a raising of standards across the private hire and hackney carriage trades in order to protect the travelling public; and ensure people across West Yorkshire are transported safely and protected from harm; and that people in Kirklees experience a high quality, clean, sustainable and green environment, as well as improve the customer experience

3.2 Working with Partners

In developing its policies, the licensing services works with a number of partners, including, Kirklees Safe Guarding Children's Board, West Yorkshire Police, Public Health, Environmental Health, Overview and Scrutiny Committee, Community Safety Partnership and other West Yorkshire Authorities (inc York).

3.3 Place Based Working

There is no specific impact in the context of this report.

3.4 Climate Change and Air Quality

There is no specific impact in the context of this paper.

3.5 Improving outcomes for children

The Council wants to ensure children have the best start in life and to ensure that the people of Kirklees feel safe and are protected from harm. The Council has a duty to protect the travelling public and safeguard children travelling in licensed vehicles and in particular for the purposes of school transport

3.6 Other (eg Legal/Financial or Human Resources) Consultees and their opinions

Legal

The principal legislation is the Town and Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976.

The purpose of taxi licensing is detailed in the Department for Transport “Taxi and Private Hire Licensing Best Practice Guide” paragraph 8 which states: “The aim of local authority licensing of the taxi and Private Hire Vehicle (PHV) trades is to protect the public.”

Taxi and Private hire vehicle licensing in England and Wales is undertaken by licensing authorities, which have the responsibility for ensuring that the public travel in safe, well maintained vehicles driven by competent drivers; as well as providing a fair and reasonable service for the taxi and private hire vehicle trade. Council’s following best practice will meet or communicate regularly with licensing committees and officers in neighbouring councils to ensure critical information is shared and that there is a consistent and robust in decision making.

4. Next steps and timelines

4.1 Not applicable – Information report only.

5. Officer recommendations and reasons

5.1 Members are asked to note the report.

6. Cabinet Portfolio Holder’s recommendations

Not applicable

7. Contact officer

Russell Williams
Operational Manager – Public Protection
Tel. 01484 221000
russell.williams@kirklees.gov.uk

8. Background Papers and History of Decisions

Not applicable

9. Service Director responsible

Sue Procter
Service Director – Environment
Tel: 01484 221000
Email: sue.procter@kirklees.gov.uk



Name of meeting: Licensing and Safety Committee

Date: 17th December 2020

Title of report: Hackney Carriage and Private Hire Trade Engagement

Purpose of report: The purpose of this report is to seek members approval for the proposed 'terms of reference' for engagement with the hackney carriage and private hire trades.

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	No
Key Decision - Is it in the <u>Council's Forward Plan (key decisions and private reports)?</u>	No
The Decision - Is it eligible for call in by Scrutiny?	Not Applicable
Date signed off by <u>Strategic Director</u> & name Is it also signed off by the Service Director for Finance? Is it also signed off by the Service Director for Legal Governance and Commissioning?	Colin Parr – 07.12.2020 Eamonn Croston – 07.12.2020 Julie Muscroft – 07.12.2020
Cabinet member portfolio	Cllr Paul Davies

Electoral wards affected: All

Ward councillors consulted: Not Applicable

Public or private: Public

Has GDPR been considered? Yes - this report does not contain personal information.

1. Summary

1.1 This report seeks Members approval on future arrangements for engaging with the private hire and hackney carriage trades. Placing meetings with the respective trade groups on a more formal and structured basis.

2. Information required to take a decision

Background

2.1 Prior to the current pandemic, the licensing service held meetings with the hackney carriage and private hire trades on an ad-hoc basis. These meetings were seen as an opportunity for licensing to pass on information around changes in policy / procedure and an opportunity for the trade to bring issues affecting them to the attention of licensing.

2.2 Although facilitated by licensing officers, the meetings have been chaired by the Chair of the Licensing and Safety Committee; and in arranging the meetings officers requested a presence from the Police and Highways.

2.3 As a result of the pandemic, arranging those meetings has not been possible and this has had a detrimental effect on how the service engages with the trade.

2.4 However, with the Council now being in a position to hold virtual meetings, the service is now able to re-commence meetings with the respective trade representatives.

2.5 As part of re-commencing the trade meetings, officers have looked at formalising those meetings and to support this have developed the proposed 'terms of reference' attached to this report at **appendix I**.

Terms of Reference

2.6 The proposed terms of reference recognise there are differences between the hackney carriage and private hire trades, not only in the issues experienced but in how policy changes impact on their respective sectors. As a result, the terms of reference propose to separate the meetings into a hackney carriage working group and private hire working group, which will enable a more focused means of engaging with the trades.

2.7 The proposed terms of reference state the meetings will have no Member involvement. This does not mean Members will not be able to attend the meetings, it means if they do it will be in a supportive role rather than as Chair. Adopting this approach will ensure there is a level of separation between the decision-making body (the Committee), and any policy issues / suggested changes that are raised at the meetings.

2.8 The proposed terms of reference set out the membership of the group, its purpose, and that it will be subject to set agenda, consisting of matters to be raised by the licensing service and matters to be raised by the trades.

2.9 Members and trade representatives alike need to be aware the proposed terms of reference do not permit discussion around individual decisions on individual

licence holders. Decisions made on individual licence holders are subject to separate and distinct formal appeals process, as set out in legislation.

3. Implications for the Council

3.1 Working with People

One of the Licensing Service key priorities is to ensure there is a raising of standards across the private hire and hackney carriage trades in order to protect the travelling public; and ensure people across West Yorkshire are transported safely and protected from harm; and that people in Kirklees experience a high quality, clean, sustainable and green environment, as well as improve the customer experience. The respective working groups will enable the licensing service and trade to meet these priorities.

3.2 Working with Partners

In developing its policies, the licensing service works with a number of partners, including, Kirklees Safe Guarding Children's Board, West Yorkshire Police, Public Health, Environmental Health, Overview and Scrutiny Committee, Community Safety Partnership and other West Yorkshire Authorities (inc York) and the hackney carriage / private hire trades.

3.3 Place Based Working

The proposed terms of reference are part of a wider review on how the licensing services interacts and engages with licence holders, residents and communities.

3.4 Climate Change and Air Quality

There is no specific impact in the context of this paper. However, the working groups established under these proposed terms of reference will enable to the licensing service, the Council's climate change team and the trade look at any changes that may need to be made in relation to vehicle licensing and its impact on climate change and air quality.

3.5 Improving outcomes for children

The Council wants to ensure children have the best start in life and to ensure that the people of Kirklees feel safe and are protected from harm. The Council has a duty to protect the travelling public and safeguard children travelling in licensed vehicles and in particular for the purposes of school transport. The respective working groups will enable the licensing service and trade to improve safeguarding and address any issues relating to such.

3.6 Other (eg Legal/Financial or Human Resources) Consultees and their opinion

Legal

The principal legislation is the Town and Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976.

The purpose of taxi licensing is detailed in the Department for Transport "Taxi and Private Hire Licensing Best Practice Guide" paragraph 8 which states: "The aim of

local authority licensing of the taxi and Private Hire Vehicle (PHV) trades is to protect the public.”

Taxi and Private hire vehicle licensing in England and Wales is undertaken by licensing authorities, which have the responsibility for ensuring that the public travel in safe, well maintained vehicles driven by competent drivers; as well as providing a fair and reasonable service for the taxi and private hire vehicle trade. Council’s following best practice will meet or communicate regularly with licensing committees and officers in neighbouring councils to ensure critical information is shared and that there is a consistent and robust in decision making.

4 Next steps and timelines

4.1 If endorsed by Members of the Licensing and Safety Committee the licensing service will look to schedule the first meetings of the working groups in January 2021.

5 Officer recommendations and reasons

5.1 Members are recommended to –

- Note the report, and
- Approve the proposed terms of reference at **appendix I**

5.2 Agreeing to these recommendations will ensure the service re-commences engagement with the trade on a more formal and structured basis, that will be of benefit to the trade and officers.

6 Cabinet Portfolio Holder’s recommendations

Cllr Paul Davies supports the review of how officers engage with the trade.

7 Contact officer

Russell Williams
Public Protection – Operational Manager
01484 221000 (ext 71367)
russell.williams@kirklees.gov.uk

8 Background Papers and History of Decisions

Not applicable

9 Service Director responsible

Sue Procter
Service Director – Environment
Tel: 01484 221000
Email: sue.procter@kirklees.gov.uk

Terms of Reference
Hackney Carriage and Private Hire Trade Engagement

Hackney Carriage Working Group

- Meeting involving recognised Hackney Carriage Association(s) from Dewsbury and Huddersfield.
- Meetings are to be held quarterly (Suggested).
- The meetings will be subject to a pre-set agenda, including items from the trade.
- No Member involvement as any recommendation would come before Licensing Committee.
- Membership to consist of: -
 - Group Leader – Licensing (Chair),
 - Licensing Service Officers,
 - Police,
 - Fleet Services,
 - Hackney Carriage Associations,
 - GMB,
- Purpose of the meeting is –
 - for officers to provide information on prospective policy changes affecting the hackney trade,
 - for officers to provide information on wider Council policies relevant to the hackney carriage trade,
 - for the associations to feed into prospective policy changes affecting the hackney carriage trade
 - for the associations to raise and discuss issues affecting the hackney carriage trade,
 - not to discuss individual cases

Terms of Reference
Hackney Carriage and Private Hire Trade Engagement

Private Hire Working Group

- Meeting involving private hire operators and recognised private hire driver representatives from Dewsbury and Huddersfield.
- Meetings are to be held quarterly (Suggested).
- The meetings will be subject to a pre-set agenda, including items from the trade.
- No Member involvement as any recommendation would come before Licensing Committee.
- Membership to consist of: -
 - Group Leader – Licensing (Chair),
 - Licensing Service Officers,
 - Police,
 - Fleet Services,
 - Private Hire Operators,
 - Recognised Private Hire Driver Representatives,
 - GMB,
- Purpose of the meeting is –
 - for officers to provide information on prospective policy changes affecting the private hire trade,
 - for officers to provide information on wider Council policies relevant to the private hire trade,
 - for the operators and driver representatives to feed into prospective policy changes affecting the private hire trade
 - for the operators and driver representatives to raise and discuss issues affecting the private hire trade,
 - not to discuss individual cases,



Name of meeting: Licensing and Safety Committee

Date: 17th December 2020

Title of report: Department of Transport – Statutory Taxi and Private Hire Standards

Purpose of report: The purpose of this report is to inform Members of the recently published ‘Statutory Taxi and Private Hire Vehicle Standards and seek approval to commence a review of the Licensing Services hackney carriage and private hire polices in light of the published standards.

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	No
Key Decision - Is it in the <u>Council’s Forward Plan (key decisions and private reports)?</u>	No
The Decision - Is it eligible for call in by Scrutiny?	Not Applicable
Date signed off by <u>Strategic Director</u> & name Is it also signed off by the Service Director for Finance? Is it also signed off by the Service Director for Legal Governance and Commissioning?	Colin Parr – 07.12.2020 Eamonn Croston – 07.12.2020 Julie Muscroft – 07.12.2020
Cabinet member portfolio	Cllr Paul Davies

Electoral wards affected: All

Ward councillors consulted: Not Applicable

Public or private: Public

Has GDPR been considered?

Yes. This report does not contain personal information.

1. Summary

1.1 The Statutory Standards set-out a range of robust measures to protect taxi and private hire vehicle passengers, particularly those most vulnerable.

1.2 Government advice is that licensing authorities must work together to ensure that, above all else, the taxi and private hire vehicle services the public use are safe.

1.3 As a result of the standards, a review of existing policies in relation to the hackney carriage and private hire trades will need to be undertaken.

2. Information required to take a decision

Background

2.1 The Council is responsible for licensing Hackney Carriage and Private Hire drivers, vehicles and operators. In undertaking those responsibilities, the Council has regard to the legislation in place including case law, relevant guidance, best practice documentation and its own policies and procedures.

2.2 On 21 July 2020 the Department for Transport ('DfT') published its "Statutory Taxi and Private Hire Vehicle Standards." The publication of these standards has been long awaited for some time and follows an extensive period of consultation by the Department for Transport following a number of high-profile incidents and issues highlighting the risk to members of the public and to drivers.

2.3 The standards reflect the significant changes within the industry in recent years, and lessons learned in respect of safeguarding children and vulnerable adults, and cases of child sexual abuse and exploitation (CSAE). The Policing and Crime Act 2017 made provisions for the Secretary of State for Transport to issue statutory guidance on exercising taxi and private hire vehicle licensing functions, to protect children and vulnerable individuals who are over 18 from harm when using these services.

2.4 Although the focus of the standards produced, is on protecting children and vulnerable adults, it is expected that any passengers of these licensed vehicles will benefit from the recommendations, which aim to better regulate the taxi and private hire vehicle sector as a whole. It is felt that these issues are, in part, a result of the significant differences in standards applied to the licensing of drivers and vehicles across the country.

2.5 A copy of the new DfT standards are attached at **appendix I** to this report.

Overview of Standards

2.6 The Standards cover a wide range of issues, including driver, vehicle and operator standards. The main areas of the statutory standards cover the following -

- Licensing Policies (paras 3.1 & 3.5) - Authorities should produce a 'cohesive policy document' that brings all policy and procedures together. When formulating policies, the overriding objective must be to protect the public. Policies should be reviewed every five years but should also consider interim reviews should there be significant issues arising in their area. Kirklees

adopted its overarching policy in March 2019, and while the guidance recommends policy are reviewed every 5-years the Council's policy will be reviewed in light of these standards.

- Duration of licences (para 3.6 & 3.7) - Issuing driver licences for more than a year. Risk can be mitigated for drivers by authorities undertaking regular interim checks (e.g. regular Disclosure and Barring Service checks). The Local Government (Miscellaneous Provisions) Act 1976 (as amended) sets a standard length at three years for taxi and private hire vehicle drivers and five years for private hire operators.
- Whistleblowing (para 3.8) - Where there are concerns that policies are not being applied correctly, it is vital that these can be raised, investigated and remedial action taken if required. Licensing Authorities should have effective internal procedures in place for staff to raise concerns and for them to be dealt with openly and fairly.
- Criminal records checks (para 4.5) - Licensing Authorities should insist on licensed drivers signing up to the Disclosure and Barring Service's (DBS) Online Update Service. This allows the Licensing Authority to make checks at any time and at least every six months.
- Common Law Police Disclosures (para 4.11) - Licensing Authorities should maintain close links with the police to ensure effective and efficient information sharing procedures and protocols are in place and are being used (previously the Notifiable Occupation Scheme).
- Licensee self-reporting (para 4.12) - Licence holders should be required to notify the issuing authority within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence. An arrest for any of any of the offences within this scope should result in a review of their licence.
- Referrals to the DBS (para 4.14) - A decision to refuse or revoke a licence as the individual is thought to present a risk of harm to a child or vulnerable adult, should be referred to the DBS.
- Working with the Police (para 4.17) - action taken by the Licensing Authority as a result of information received from the Police should be fed-back to the Police.
- Sharing licensing information with other Licensing Authorities (para 4.20 & 4.21) - An applicant should also be required to disclose if they have had an application for a licence refused, or a licence revoked or suspended by any other Licensing Authority (already requested as part of the application procedure). The National Anti-Fraud Network have developed a national register of taxi and private hire vehicle driver licence refusals and revocations (known as NR 3). Tools such as NR 3 should be used by Licensing Authorities to share information on a more consistent basis to mitigate the risk of non-disclosure of relevant information by applicants.

- Multi-Agency Safeguarding Hub (MASH) (para 4.28) - All Licensing Authorities should operate or establish a means to facilitate the objectives of a MASH (i.e. the sharing of necessary and relevant information between stakeholders). Obstacles in sharing information can be a barrier to effective safeguarding.
- Overseas convictions (para 4.35) - Licensing Authorities should seek or require applicants to provide where possible criminal records information or a 'Certificate of Good Character' from overseas in this circumstance to properly assess risk and support the decision-making process.
- Paragraphs 5.1 to 5.17 – Covers the regulatory framework, decision making, training for decision makers, and a recommended convictions policy.
- Safeguarding awareness training (para 6.6) – Licensing authorities should provide safeguarding advice and guidance and require that hackney carriage and private hire drivers undertake safeguarding training.
- Language proficiency (para 6.14 & 6.15) - All licence holders to demonstrate proficiency in English language. All drivers should be able to converse with passengers to understand destination, estimates of time along with other common passenger requests. A lack of language proficiency could impact on a driver's ability to understand written documents, such as policies and guidance, relating to the protection of children and vulnerable adults and applying this to identify and act on signs of exploitation.
- Vehicle proprietors (para 7.2) - Licensing Authorities should require a basic disclosure from the DBS and that a check is undertaken annually.
- Stretched Limousines (para 7.14) - Consideration should be given to their licensing.
- In-vehicle visual and audio recording (CCTV) (para 7.9) - All Licensing Authorities should consult to identify if there are local circumstances which indicate that the installation of CCTV in vehicles would have either a positive or an adverse net effect on the safety of taxi and private hire vehicle users, including children or vulnerable adults, and taking into account potential privacy issues.
- Private Hire Vehicle operators and staff (para 8.2 & 8.8) – All operators should be subject to an annual basic DBS check. Ancillary staff that have access to booking records should also be DBS checked.
- Joint authorisation of enforcement officers (para 9.2) - Licensing Authorities should, where the need arises, jointly authorise officers from other authorities so that compliance and enforcement action can be taken against licensees from outside their area.
- Enforcement (para 9.3) - Joint authority agreements between authorities are encouraged. Drivers should be made aware of relevant policies and repercussions.

Implementation

2.7 It is important to note that it remains the decision of the Council as to whether or not the entirety of these standards should be implemented.

2.8 A full review of the current policies as recommended will allow Members to make an informed decision on which parts should be adopted. Section 2 of the Standards gives some detail of the legal framework under which the Standards are published and the effect this has in terms of the Council's decision. Members' attention is drawn particularly to sections 2.5 to 2.9 and the definitions covering the term 'must have regard'.

2.9 Members should note that in Section 2.8 of the Standards it is stated:

*Although it remains the case that licensing authorities must reach their own decisions, both on overall policies and on individual licensing matters in light of the relevant law, it may be that the Statutory Taxi and Private Hire Vehicle Standards might be drawn upon in any legal challenge to an authority's practice, and that any failure to adhere to the standards without sufficient justification could be detrimental to the authority's defence. **In the interest of transparency, all licensing authorities should publish their consideration of the measures contained in Statutory Taxi and Private Hire Vehicle Standards, and the policies and delivery plans that stem from these.** The Department has undertaken to monitor the effectiveness of the standards in achieving the protection of children and vulnerable adults (and by extension all passengers).*

2.10 At Section 1.3 the Standards say:

*Whilst the focus of the Statutory Taxi and Private Hire Vehicle Standards is on protecting children and vulnerable adults, all passengers will benefit from the recommendations contained in it. There is consensus that common core minimum standards are required to regulate better the taxi and private hire vehicle sector, and the recommendations in this document are the result of detailed discussion with the trade, regulators and safety campaign groups. **The Department therefore expects these recommendations to be implemented unless there is a compelling local reason not to.***

2.11 It is clear there is an expectation that these new Standards are implemented. Setting the Standards does, however, remain the decision of the Council and where good reason can be found to depart from the new Statutory Standards it is possible to do so providing there is clear justification for the decision.

2.12 Members should also note, these are minimum standards, and nothing within the guidance prevents a licensing authority going over and above the recommendations made by the DfT.

3. Implications for the Council

3.1 Working with People

One of the Licensing Service key priorities is to ensure there is a raising of standards across the private hire and hackney carriage trades in order to protect the travelling

public; and ensure people across West Yorkshire are transported safely and protected from harm; and that people in Kirklees experience a high quality, clean, sustainable and green environment, as well as improve the customer experience.

1.2 Working with Partners

In developing its policies, the licensing services works with a number of partners, including, Kirklees Safe Guarding Children's Board, West Yorkshire Police, Public Health, Environmental Health, Overview and Scrutiny Committee, Community Safety Partnership and other West Yorkshire Authorities (inc York).

1.3 Place Based Working

There is no specific impact in the context of this report. However, a review of policies will enable the service to examine how it interacts and engages with licence holders, residents and communities.

1.4 Climate Change and Air Quality

There is no specific impact in the context of this paper. However, a review of policy will be an opportunity look at any changes that may need to be made in relation to vehicle licensing and its impact on climate change and air quality.

1.5 Improving outcomes for children

The Council wants to ensure children have the best start in life and to ensure that the people of Kirklees feel safe and are protected from harm. The Council has a duty to protect the travelling public and safeguard children travelling in licensed vehicles and in particular for the purposes of school transport

1.6 Other (eg Legal/Financial or Human Resources) Consultees and their opinion

Legal

The principal legislation is the Town and Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976.

The purpose of taxi licensing is detailed in the Department for Transport "Taxi and Private Hire Licensing Best Practice Guide" paragraph 8 which states: "The aim of local authority licensing of the taxi and Private Hire Vehicle (PHV) trades is to protect the public."

Taxi and Private hire vehicle licensing in England and Wales is undertaken by licensing authorities, which have the responsibility for ensuring that the public travel in safe, well maintained vehicles driven by competent drivers; as well as providing a fair and reasonable service for the taxi and private hire vehicle trade. Council's following best practice will meet or communicate regularly with licensing committees and officers in neighbouring councils to ensure critical information is shared and that there is a consistent and robust in decision making.

Equality Implications

The Equality Act 2010 creates the Public Sector Equality Duty (PSED) and in order to fulfil the PSED the Council is required to assess the impact of any proposed action on the equality objectives set out above. The way in which the Council approaches this task is to conduct a Integrated Impact Assessment.

While there are no specific equality implications in the context of this report, an integrated Impact Assessment will be carried out as part of the review of the services policies.

2 Next steps and timelines

4.1 In a letter to Local Authorities introducing the Standards, the DfT made it clear that Local Authorities are expected to act upon the Standards without delay. However, since the publication of the Standards on 21 July 2020 there has been an upturn in cases of coronavirus both at a local and national level. It was hoped that post initial lockdown the economy was on the verge of commencing recovery and the aspiration was businesses may be returning to some form of normality.

4.2 However, as Members will be more than aware, this is not now the case and more restrictions have been placed on businesses and individuals. Councils have a key role to play both in terms of enforcing the Covid-19 restrictions imposed and supporting local communities. Resources to develop and implement new taxi policies may be restricted, as may be communities' abilities to respond to consultations on any draft proposals.

4.3 The Council will need to review its taxi licensing policies and standards so that as a minimum they meet the standards outlined in the DfT document. However, any standards adopted must be appropriate for Kirklees local needs, and the Council will need to be transparent in explaining the reasons for the standards it adopts.

4.4 As a result, the review that Officers recommend will see the service examine in detail its existing policies with a view to presenting a more detailed proposals of matters for consideration to Members of the Committee in June 2021. This will include any relevant information if the proposals brought for consideration depart from, or vary, the expected standards.

4.5 At the Licensing and Safety Committee meeting in June 2021, officers will be asking Members to consider the detailed proposals with a view to commencing formal consultation on any changes to policy. A further report will then be presented to Members of the Licensing and Safety Committee with the results of the consultation and any changes made as a result.

3 Officer recommendations and reasons

5.1 Members are recommended to –

- Note the report and the standards at **appendix I**,
- Instruct officers to commence a review of its policies in relation to hackney carriage and private hire licensing,
- Present the result of that review to Members of the Licensing and Safety Committee in June 2021

5.2 Agreeing to these recommendations will ensure the service can meet its obligations to consider the statutory standards taking into account resources available to carry out this review.

4 Cabinet Portfolio Holder's recommendations

Cllr Paul Davies supports a review of hackney carriage and private hire polices in light of the statutory guidance.

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6 Background Papers and History of Decisions

Department for Transport Statutory Standards as attached at appendix I

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Department
for Transport

Statutory Taxi & Private Hire Vehicle Standards

Contents

	Page
1. Introduction.....	4
2. Consideration of the Statutory Taxi and Private Hire Vehicle Standards.....	6
3. Administering the Licensing Regime.....	8
Licensing polices	8
Duration of licences	9
Whistleblowing.....	9
Consultation at the local level	10
Changing licensing policy and requirements	10
4. Gathering and Sharing Information.....	12
The Disclosure and Barring Service	12
The Disclosure and Barring Service Update Service	13
Common Law Police Disclosure	13
Licensee self-reporting	13
Referrals to the Disclosure and Barring Service and the Police	14
Working with the Police	15
Sharing licensing information with other licensing authorities.....	15
Multi-agency Safeguarding Hub (MASH).....	16
Complaints against licensees	17
Overseas convictions	17
5. Decision Making	19
Administration of the licensing framework	19
Training decision makers.....	19
The regulatory structure	20
Fit and proper test	21
Criminal convictions and rehabilitation	21
6. Driver Licensing.....	23
Criminality checks for drivers.....	23
Safeguarding awareness.....	23
‘County lines’ exploitation	24
Language proficiency	25

7. Vehicle Licensing.....	26
Criminality checks for vehicle proprietors	26
In-vehicle visual and audio recording – CCTV.....	27
Stretched Limousines	28
8. Private Hire Vehicle Operator Licensing	29
Criminality checks for private hire vehicle operators.....	29
Booking and dispatch staff.....	30
Record keeping	31
Use of passenger carrying vehicles (PCV) licensed drivers	31
9. Enforcing the Licensing Regime	33
Joint authorisation of enforcement officers	33
Setting expectations and monitoring.....	33
Suspension and revocation of driver licences.....	33
Annex – Assessment of Previous Convictions	35
Annex – Disclosure and Barring Service information	37
Annex – CCTV Guidance	38
Annex - Staying Safe: Guidance for Passengers	40

1. Introduction

- 1.1 There is evidence to support the view that taxis and private hire vehicles are a high-risk environment. In terms of risks to passengers, this can be seen in abuse and exploitation of children and vulnerable adults facilitated and in some cases perpetrated by the trade and the number of sexual crimes reported which involve taxi and private hire vehicle drivers. Links between the trade and child sexual abuse and exploitation have been established in many areas and other investigations continue. Data on reported sexual assaults by taxi and private hire vehicle drivers evidence the risk to passengers; data from [Greater Manchester](#) and [Merseyside](#) suggest that, if similar offence patterns are applied across England, 623 sexual assaults per year are reported. These figures do not however account for the under reporting of crime which is estimated to be as high as 83 percent in the [Crime Survey for England and Wales](#).
- 1.2 The Policing and Crime Act 2017 enables the Secretary of State for Transport to issue statutory guidance on exercising taxi and private hire vehicle licensing functions to protect children and vulnerable individuals who are over 18 from harm when using these services. For the purposes of this document, a child is defined as anyone who has not yet reached their 18th birthday; and the term “vulnerable individual” has the same meaning as the definition of a ‘vulnerable adult’ for the purpose of section 42 of the [Care Act 2014](#), which applies where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident there):
- (a) has needs for care and support (whether or not the authority is meeting any of those needs),
 - (b) is experiencing, or is at risk of, abuse or neglect, and
 - (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- 1.3 Whilst the focus of the Statutory Taxi and Private Hire Vehicle Standards is on protecting children and vulnerable adults, all passengers will benefit from the recommendations contained in it. There is consensus that common core minimum standards are required to regulate better the taxi and private hire vehicle sector, and the recommendations in this document are the result of detailed discussion with the trade, regulators and safety campaign groups. **The Department therefore expects these recommendations to be implemented unless there is a compelling local reason not to.**
- 1.4 It should be noted that as policing and criminal justice is not a devolved matter, the Statutory Taxi and Private Hire Vehicle Standards issued under the Policing and Crime Act 2017 will continue to have effect in Wales although responsibility for taxi and private hire vehicle policy was devolved to the Welsh Assembly in April 2018. Should the Welsh Government introduce legislation to regulate on these issues, the standards in this document would, cease to apply.

- 1.5 All local authorities and district councils that provide children's and other types of services, including licensing authorities, have a statutory duty to make arrangements to ensure that their functions and any services that they contract out to others are discharged having regard to the need to safeguard and promote the welfare of children. This means that licensing authorities should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children. This includes clear whistleblowing procedures, safe recruitment practices and clear policies for dealing with allegations against people who work with children, as set out in the [Working Together to Safeguard Children](#) statutory guidance.
- 1.6 The Statutory Taxi and Private Hire Vehicle Standards reflect the significant changes in the industry and lessons learned from experiences in local areas since the 2010 version of the Department's Best Practice Guidance. This includes extensive advice on checking the suitability of individuals and operators to be licensed; safeguarding children and vulnerable adults; the Immigration Act 2016 and Common Law Police Disclosure (which replaced the Notifiable Occupations Scheme).
- 1.7 The standards in this document replace relevant sections of the Best Practice Guidance issued by the Department in 2010, where there is a conflict between the Statutory Taxi and Private Hire Vehicle Standards and the Best Practice Guidance the Department issue on taxi and private hire vehicle licensing, the standards in this document take precedence.

Terminology

Taxis are referred to in legislation, regulation and common language as 'hackney carriages', 'black cabs' and 'cabs'. The term '**taxi**' is used throughout this document and refers to all such vehicles. Taxis can be hired immediately by hailing on the street or at a rank.

Private hire vehicles include a range of vehicles including minicabs, executive cars, chauffeur services, limousines and some school and day centre transport services. All private hire vehicle journeys must be pre-booked via a licensed private hire vehicle operator and are subject to a 'triple licensing lock' i.e. the operator fulfilling the booking must use vehicles and drivers licensed by the same authority as that which granted its licence. The term 'private hire vehicle' is used throughout this document to refer to all such vehicles.

2. Consideration of the Statutory Taxi and Private Hire Vehicle Standards

- 2.1 The past failings of licensing regimes must never be repeated. The Department has carefully considered the measures contained in the Statutory Taxi and Private Hire Vehicle Standards and recommend that these should be put in to practice and administered appropriately to mitigate the risk posed to the public. The purpose of setting standards is to protect children and vulnerable adults, and by extension the wider public, when using taxis and private hire vehicles.
- 2.2 The Government set out in the [Modern Crime Prevention Strategy](#) the evidence that where Government, law enforcement, businesses and the public work together on prevention, this can deliver significant and sustained cuts in certain crimes. That is good news for victims and communities and it makes clear economic sense too. Educating the public on the risks of using unlicensed drivers and vehicles, how to identify the licensed trade and appropriate measure to take when using these services will protect help all passengers, more information is annexed to this document (Annex - Staying safe: guidance for passengers).
- 2.3 The Strategy committed to protect children and young people from the risk of child sexual abuse and exploitation (CSAE), by working with local authorities to introduce rigorous taxi and private hire vehicle licensing regimes. Both the [Jay](#) and [Casey](#) reports on CSAE highlighted examples of taxi/private hire vehicle drivers being directly linked to children that were abused, including instances when children were picked up from schools, children's homes or from family homes and abused, or sexually exploited.
- 2.4 The Casey Report made clear that weak and ineffective arrangements for taxi and private hire vehicle licensing had left the children and public at risk. The Department for Transport has worked with the Home Office, Local Government Association (LGA), personal safety charities, trade unions and trade bodies,

holding workshops, forums, and sharing evidence and good practice with local authorities to assist in the setting of the standards.

- 2.5 This document is published by the Secretary of State for Transport under section 177(1) of the Policing and Crime Act 2017 following consultation in accordance with section 177(5).
- 2.6 The document sets out a framework of policies that, under section 177(4), licensing authorities “**must have regard**” to when exercising their functions. These functions include developing, implementing and reviewing their taxi and private hire vehicle licensing regimes. “Having regard” is more than having a cursory glance at a document before arriving at a preconceived conclusion.
- 2.7 “Having regard” to these standards requires public authorities, in formulating a policy, to give considerations the weight which is proportionate in the circumstances. **Given that the standards have been set directly to address the safeguarding of the public and the potential impact of failings in this area, the importance of thoroughly considering these standards cannot be overstated.** It is not a question of box ticking; the standards must be considered rigorously and with an open mind.
- 2.8 Although it remains the case that licensing authorities must reach their own decisions, both on overall policies and on individual licensing matters in light of the relevant law, it may be that the Statutory Taxi and Private Hire Vehicle Standards might be drawn upon in any legal challenge to an authority’s practice, and that any failure to adhere to the standards without sufficient justification could be detrimental to the authority’s defence. **In the interest of transparency, all licensing authorities should publish their consideration of the measures contained in Statutory Taxi and Private Hire Vehicle Standards, and the policies and delivery plans that stem from these.** The Department has undertaken to monitor the effectiveness of the standards in achieving the protection of children and vulnerable adults (and by extension all passengers).
- 2.9 The Statutory Taxi and Private Hire Vehicle Standards does not purport to give a definitive statement of the law and any decisions made by a licensing authority remain a matter for that authority.

3. Administering the Licensing Regime

Licensing policies

- 3.1 The Department recommends all licensing authorities make publicly available a cohesive policy document that brings together all their procedures on taxi and private hire vehicle licensing. This should include but not be limited to policies on convictions, a 'fit and proper' person test, licence conditions and vehicle standards.
- 3.2 When formulating a taxi and private hire vehicle policy, the primary and overriding objective must be to protect the public. The importance of ensuring that the licensing regime protects the vulnerable cannot be overestimated. This was highlighted in the [report by Dame Louise Casey CB](#) of February 2015 on safeguarding failings.

“It will be evident from this report that in many cases the activities of perpetrators take place in spheres which are regulated by the Council – taxis have been the focus of particular concern. Persistent and rigorous enforcement of the regulatory functions available to the council, including the placing of conditions on private hire taxi operator licences where appropriate, would send a strong signal that the trade is being monitored and would curtail the activities of opportunistic perpetrators whereby taxi drivers have solicited children to provide sex in return for cigarettes, alcohol or a fare free ride.”

- 3.3 The long-term devastation caused by CSAE was summarised in the same report:

“Victims suffer from suicidal feelings and often self-harm. Many become pregnant. Some have to manage the emotional consequences of miscarriages and abortions while others have children that they are unable to parent appropriately. The abuse and violence continues to affect victims into adulthood. Many enter violent and abusive relationships. Many suffer poor mental health and addiction.”

- 3.4 Rotherham Metropolitan Borough Council ('Rotherham Council') provides an example of how the systematic review of policies and procedures and the implementation of a plan to drive improvements in practice can result in a well-functioning taxi and private hire vehicle sector that is rebuilding local confidence in the industry. The history of past failings here and elsewhere is well known, but it is the transparency and resolution that Rotherham Council has demonstrated and the high standards they now require that are rebuilding public confidence.
- 3.5 One of the key lessons learned is that it is vital to review policies and reflect changes in the industry both locally and nationally. **Licensing authorities should review their licensing policies every five years, but should also consider interim reviews should there be significant issues arising in their area, and their performance annually.**

Duration of licences

- 3.6 A previous argument against issuing licences for more than a year was that a criminal offence might be committed, and not notified, during this period; this can of course also be the case during the duration of a shorter licence. This risk can be mitigated for drivers by authorities to undertaking regular interim checks. To help authorities monitor licensees' suitability, licensing authorities should engage with their police force to ensure that when the police believe a licensee presents a risk to the travelling public they use their Common Law Police Disclosure powers (see paragraphs 4.9 - 4.11) to advise them.
- 3.7 The Local Government (Miscellaneous Provisions) Act 1976 (as amended) sets a standard length at three years for taxi and private hire vehicle drivers and five years for private hire vehicle operators. Any shorter duration licence should only be issued when the licensing authority thinks it is appropriate in the specific circumstances of the case, if a licensee has requested one or where required (e.g. when the licence holder's leave to remain in the UK is time-limited) or when the licence is only required to meet a short-term demand; they should not be issued on a 'probationary' basis.

Whistleblowing

- 3.8 It is in the application of licensing authority's policies (and the training and raising of awareness among those applying them) that protection will be provided. Where there are concerns that policies are not being applied correctly, it is vital that these can be raised, investigated and remedial action taken if required. **Licensing authorities should have effective internal procedures in place for staff to raise concerns and for any concerns to be dealt with openly and fairly.**

A report into the licensing of drivers by South Ribble Borough Council highlights the implications of not applying the agreed policies. In early August 2015, concerns were raised regarding decisions to renew the licences of drivers where there were potential incidents of child sexual exploitation. An internal review concluded that there had been failings in local investigatory procedures which might have affected the ability of the General Licensing Committee to make proper decisions, and information sharing with the police and data recording was not satisfactory.

- 3.9 The external investigation in South Ribble concluded “that there had been a lack of awareness and priority given to safeguarding and the safety of taxi [and private hire vehicle] passengers in the manner in which licensing issues were addressed”. We are pleased to note that the [report](#) concludes, “The Council have been active at every stage in responding to issues and concerns identified. It has taken steps to address operational issues in the licensing function and has engaged fully with other agencies in so doing. In the light of the above, it is not necessary to make any further recommendations.”
- 3.10 It is hoped that all licensing authorities will have learnt from these mistakes but to prevent a repeat, **local authorities should ensure they have an effective ‘whistleblowing’ policy and that all staff are aware of it.** If a worker is aware of, and has access to, effective internal procedures for raising concerns then ‘whistleblowing’ is unlikely to be needed.
- 3.11 The Public Interest Disclosure Act 1998 (PIDA), commonly referred to as whistleblowing legislation, provides protection for those that have a reasonable belief of serious wrongdoing, including failure to comply with professional standards, council policies or codes of practice/conduct. The PIDA is part of employment law. In the normal course of events, if a worker reveals information that his employer does not want revealed it may be a disciplinary offence. If someone leaked their employer’s confidential information to the press, they might expect to be dismissed for that. The PIDA enables workers who ‘blow the whistle’ about wrongdoing to complain to an employment tribunal if they are dismissed or suffer any other form of detriment for doing so. It is a qualified protection and certain conditions would have to be met for the worker to be protected. More information is available online for [employees](#) and [employers](#):

Consultation at the local level

- 3.12 Licensing authorities should consult on proposed changes in licensing rules that may have significant impacts on passengers and/or the trade. Such consultation should include not only the taxi and private hire vehicle trades but also groups likely to be the trades’ customers. Examples are groups representing disabled people, Chambers of Commerce, organisations with a wider transport interest (e.g. the Campaign for Better Transport and other transport providers), women’s groups, local traders, and the local multi-agency safeguarding arrangements. It may also be helpful to consult with night-time economy groups (such as Pubwatch) if the trade is an important element of dispersal from the local night-time economy’s activities.
- 3.13 Any decision taken to alter the licensing regime is likely to have an impact on the operation of the taxi and private hire vehicle sector in neighbouring areas; and **licensing authorities should engage with these areas to identify any concerns and issues that might arise from a proposed change.** Many areas convene regional officer consultation groups or, more formally, councillor liaison meetings; this should be adopted by all authorities.

Changing licensing policy and requirements

- 3.14 **Any changes in licensing requirements should be followed by a review of the licences already issued.** If the need to change licensing requirements has been identified, this same need is applicable to those already in possession of a licence. That is not however to suggest that licences should be automatically revoked overnight, for example if a vehicle specification is changed it is proportionate to allow those that would not meet the criteria to have the opportunity to adapt or change their vehicle. The same pragmatic approach should be taken to driver licence changes - if requirements are changed to include a training course or qualification, a reasonable time should be allowed for this to be undertaken or gained. The implementation schedule of any changes that affect current licence holders must be transparent and communicated promptly and clearly.
- 3.15 Where a more subjective change has been introduced, for example an amended policy on previous convictions, a licensing authority must consider each case on its own merits. Where there are exceptional, clear and compelling reasons to deviate from a policy, licensing authorities should consider doing so. Licensing authorities should record the reasons for any deviation from the policies in place.

4. Gathering and Sharing Information

- 4.1 Licensing authorities must consider as full a range of information available to them when making a decision whether to grant a licence and to meet their ongoing obligation to ensure a licensee remains suitable to hold a licence.

The Disclosure and Barring Service

- 4.2 The Disclosure and Barring Service (DBS) provides access to criminal record information through its disclosure service for England and Wales. The DBS also maintains the lists of individuals barred from working in regulated activity with children or adults. The DBS makes independent barring decisions about people who have harmed, or where they are considered to pose a risk of harm to a child or vulnerable person within the workplace. The DBS enables organisations in the public, private and voluntary sectors to make safer employment decisions by identifying candidates who may be unsuitable for certain work, especially that which involves vulnerable groups including children.
- 4.3 Enhanced certificates with a check of the barred lists include details of spent and unspent convictions recorded on the Police National Computer (PNC), any additional information which a chief officer of police believes to be relevant and ought to be disclosed, as well as indicating whether the individual is barred from working in regulated activity with children or adults. Spent convictions and cautions are disclosed on standard and enhanced certificates according to rules set out in legislation. Convictions which resulted in a custodial sentence, and convictions or cautions for a specified serious offence such as those involving child sexual abuse will always be disclosed on a standard or enhanced certificate. Full details of the disclosure rules, and those offences which will always be disclosed, are available from the [DBS](#). As well as convictions and cautions, an enhanced certificate may include additional information which a chief police officer reasonably believes is relevant and ought to be disclosed. Chief police officers must have regard to the [statutory guidance](#) issued by the Home Office when considering disclosure. A summary of the information provided at each level of DBS checks is annexed to this document (Annex – Disclosure and Barring Service information).
- 4.4 It should be noted that licensing authorities must not circumvent the DBS process and seek to obtain details of previous criminal convictions and other information that may not otherwise be disclosed on a DBS certificate. Whilst data protection legislation (not just the Data Protection Act 2018 or General Data Protection Regulation (GDPR)) gives individuals (or data subjects) a 'right of access' to the personal data that an organisation holds about them, it is a criminal offence to require an individual to exercise their subject access rights so as to gain information about any convictions and cautions. This could potentially lead to the authority receiving information to which it is not entitled. The appropriate way of accessing an individual's criminal records is through an enhanced DBS and barred lists check.

The Disclosure and Barring Service Update Service

- 4.5 Subscription to the DBS Update Service allows those with standard and enhanced certificates to keep these up to date online and, with the individual's consent, allows nominees to check the status of a certificate online at any time. Subscription to the service removes the need for new certificates to be requested, reduces the administrative burden and mitigates potential delays in relicensing.
- 4.6 The DBS will search regularly to see if any relevant new information has been received since the certificate was issued. The frequency varies depending on the type of information; for criminal conviction and barring information, the DBS will search for updates on a weekly basis. For non-conviction information, the DBS will search for updates every nine months.
- 4.7 Licensing authorities are able to request large numbers of status checks on a daily basis. The DBS has developed a Multiple Status Check Facility (MSCF) that can be accessed via a web service. The MSCF enables organisations to make an almost unlimited number of Status Checks simultaneously. Further information on the MSCF is available from the [DBS](#).
- 4.8 Should the MSCF advise that new information is available the DBS certificate should no longer be relied upon and a new DBS certificate requested.

Common Law Police Disclosure

- 4.9 The DBS is not the only source of information that should be considered as part of a fit and proper assessment for the licensing of taxi and private hire vehicle drivers. Common Law Police Disclosure ensures that where there is a public protection risk, the police will pass information to the employer or regulatory body to allow them to act swiftly to mitigate any danger.
- 4.10 Common Law Police Disclosure replaced the Notifiable Occupations Scheme (NOS) in March 2015 and focuses on providing timely and relevant information which might indicate a public protection risk. Information is passed on at arrest or charge, rather than on conviction which may be some time after, allowing any measures to mitigate risk to be put in place immediately.
- 4.11 This procedure provides robust safeguarding arrangements while ensuring only relevant information is passed on to employers or regulatory bodies. **Licensing authorities should maintain close links with the police to ensure effective and efficient information sharing procedures and protocols are in place and are being used.**

Licensee self-reporting

- 4.12 Licence holders should be required to notify the issuing authority within 48 hours of an arrest and release, charge or conviction of any sexual offence, any offence involving dishonesty or violence and any motoring offence. An arrest for any of the offences within this scope should result in a review by the issuing authority as to whether the licence holder is fit to continue to do so. This must not

however be seen as a direction that a licence should be withdrawn; it is for the licensing authority to consider what, if any, action in terms of the licence should be taken based on the balance of probabilities. Should an authority place an obligation on licensees to notify under these circumstances, authorities should also ensure appropriate procedures are in place to enable them to act in a suitable timeframe if and when needed.

- 4.13 Importantly, a failure by a licence holder to disclose an arrest that the issuing authority is subsequently advised of might be seen as behaviour that questions honesty and therefore the suitability of the licence holder regardless of the outcome of the initial allegation.

Referrals to the Disclosure and Barring Service and the Police

- 4.14 In some circumstances it may be appropriate under the Safeguarding Vulnerable Groups Act 2006 for licensing authorities to make referrals to the DBS. **A decision to refuse or revoke a licence as the individual is thought to present a risk of harm to a child or vulnerable adult, should be referred to the DBS.** The power for the licensing authority to make a referral in this context arises from the undertaking of a safeguarding role. Further guidance has been provided by the [DBS](#).

- 4.15 The Department recommends that licensing authorities should make a referral to the DBS when it is thought that:

- an individual has harmed or poses a risk of harm to a child or vulnerable adult;
- an individual has satisfied the '[harm test](#)'; or
- received a caution or conviction for a relevant offence and;
- the person they are referring is, has or might in future be working in regulated activity;

if the above conditions are satisfied, the DBS may consider it appropriate for the person to be added to a barred list.

- 4.16 These referrals may result in the person being added to a barred list and enable other licensing authorities to consider this should further applications to other authorities be made. Further information on referrals to DBS is [available](#).

Working with the Police

- 4.17 The police are an invaluable source of intelligence when assessing whether a licensing applicant is a 'fit and proper' person. It is vital that licensing authorities have a partnership with the police service to ensure that appropriate information is shared as quickly as possible. As part of building an effective working relationship between the licensing authority and the police, **action taken by the licensing authority as a result of information received should be fed-back to the police.** Increasing the awareness among police forces of the value licensing authorities place on the information received, particularly on non-conviction intelligence, will assist furthering these relationships and reinforce the benefits of greater sharing of information.
- 4.18 This relationship can be mutually beneficial, assisting the police to prevent crime. The police can gain valuable intelligence from drivers and operators, for example, the identification of establishments that are selling alcohol to minors or drunks, or the frequent transportation of substance abusers to premises.
- 4.19 To aid further the quality of the information available to all parties that have a safeguarding duty, a revocation or refusal on public safety grounds should also be advised to the police.

Sharing licensing information with other licensing authorities

- 4.20 As has been stated elsewhere in this document, obtaining the fullest information minimises the doubt as to whether an applicant or licensee is 'fit and proper'. An obvious source of relevant information is any previous licensing history. **Applicants and licensees should be required to disclose if they hold or have previously held a licence with another authority. An applicant should also be required to disclose if they have had an application for a licence refused, or a licence revoked or suspended by any other licensing authority.** Licensing authorities should explicitly advise on their application forms that making a false statement or omitting to provide the information requested may be a criminal offence.
- 4.21 The LGA's Councillors' [Handbook on taxi and private hire vehicle licensing](#) advises that those responsible for licensing should "*communicate regularly with licensing committees and officers in neighbouring councils to ensure critical information is shared and that there is a consistency and robustness in decision-making. By working together, local government can make sure that this vital service is safe, respected, and delivering for local communities.*". While this approach may aid consistency and robustness in decision-making within regions, it has obvious inherent limitations as it is unlikely such protocols could be established between all licensing authorities. The LGA commissioned the National Anti-Fraud Network to develop a national register of taxi and private hire vehicle driver licence refusals and revocations (the register is known as 'NR3'). **Tools such as NR3 should be used by licensing authorities to share information on a more consistent basis to mitigate the risk of non-disclosure of relevant information by applicants.**

- 4.22 For these processes to be beneficial, all licensing authorities must keep a complete and accurate record as to the reasons for refusal, suspension or revocation of a licence in order that this might be shared if requested and appropriate to do so.
- 4.23 Data protection legislation provides exemption from the rights of data subjects for the processing of personal data in connection with regulatory activities. This includes taxi and private hire vehicle licensing. The exemption applies only to information processed for the core regulatory activities of appropriate organisations; it may not be used in a blanket manner. The exemption applies only to the extent that the application of the rights of data subjects to the information in question would be likely to prejudice the proper discharge of the regulatory functions. The Information Commissioner's Office has published [guidance](#) to assist organisations to fully understand their obligations and suggest good practice.
- 4.24 If notification under paragraph 4.20 or 4.21 of a refused or revoked licence is disclosed, the relevant licensing authority should be contacted to establish when the licence was refused, suspended or revoked and the reasons why. In those circumstances, the relevant licensing authority must consider whether it should disclose any information in relation to the previous decision, consistent with its obligations under data protection legislation. If information is disclosed, it can then be taken into account in determining the applicant's fitness to be licensed. The relevance of the reason for refusing/revoking a licence must be considered. For example, if any individual was refused a licence for failing a local knowledge test, it does not have any safeguarding implications. Conversely, a revocation or refusal connected to indecency would. Licensing authorities should not simply replicate a previous decision, authorities must consider each application on its own merits and with regard to its own policies.
- 4.25 Should a licensing authority receive information that a licence holder did not disclose the information referred to in paragraph 4.20, for example by checking the NR3 register, the authority should consider whether the non-disclosure represents dishonesty and should review whether the licence holder remains 'fit and proper'.

Multi-agency Safeguarding Hub (MASH)

- 4.26 Multi-Agency Safeguarding Hubs are a way to improve the safeguarding response for children and vulnerable adults through better information sharing and high quality and timely safeguarding responses. MASHs (or similar models) should operate on three common principles: information sharing, joint decision making and coordinated intervention.
- 4.27 The Home Office report on [Multi Agency Working and Information Sharing](#) recommended that effective multi-agency working still needs to become more widespread. The Children's Commissioner's 2013 [Inquiry into Child Sexual Exploitation in Gangs and Groups](#) found that both police and local authorities still identified the inability to share information as a key barrier to safeguarding children from sexual abuse and exploitation.

4.28 All licensing authorities should operate or establish a means to facilitate the objectives of a MASH (i.e. the sharing of necessary and relevant information between stakeholders). As has been emphasised throughout this document, one of the most effective ways to minimise the risk to children and vulnerable adults when using taxis and private hire vehicles is to ensure that decisions on licensing individuals are made with the fullest knowledge possible.

Complaints against licensees

4.29 Complaints about drivers and operators provide a source of intelligence when considering the renewal of a licence or to identify problems during the period of the licence. Patterns of behaviour such as complaints against drivers, even when they do not result in further action in response to an individual complaint, may be indicative of characteristics that raise doubts over the suitability to hold a licence. **All licensing authorities should have a robust system for recording complaints, including analysing trends across all licensees as well as complaints against individual licensees.** Such a system will help authorities to build a fuller picture of the potential risks an individual may pose and may tip the 'balance of probabilities' assessment that licensing authorities must take.

4.30 Licensees with a high number of complaints made against them should be contacted by the licensing authority and concerns raised with the driver and operator (if appropriate). Further action in terms of the licence holder must be determined by the licensing authority, which could include no further action, the offer of training, a formal review of the licence, or formal enforcement action.

4.31 To ensure that passengers know who to complain to, licensing authorities should produce guidance for passengers on making complaints directly to the licensing authority that should be available on their website. Ways to make complaint to the authority should be displayed in all licensed vehicles. This is likely to result in additional work for the licensing authority but has the advantage of ensuring consistency in the handling of complaints. Currently, it is more likely that a complaint against a taxi driver would be made directly to the licensing authority whereas a complaint against a private hire vehicle driver is more likely to be made to the operator. An effective partnership in which operators can share concerns regarding drivers is also encouraged.

4.32 Importantly, this approach will assist in the directing of complaints and information regarding the behaviour of drivers who may be carrying a passenger outside of the area in which the driver is licensed to the authority that issued the licence. In order for this to be effective licensing authorities must ensure that drivers are aware of a requirement to display information on how to complain and take appropriate sanctions against those that do not comply with this requirement.

4.33 In terms of investigating complaints CCTV footage of an incident can provide an invaluable insight, providing an 'independent witness' to an event. This can assist in the decision whether to suspend or revoke a licence. The potential benefits of mandating CCTV in vehicles is discussed in paragraphs 7.7 - 7.12.

Overseas convictions

- 4.34 The DBS cannot access criminal records held overseas, only foreign convictions that are held on the Police National Computer may, subject to the disclosure rules, be disclosed. Therefore, a DBS check may not provide a complete picture of an individual's criminal record where there have been periods living or working overseas; the same applies when an applicant has previously spent an extended period (three or more continuous months) outside the UK. It should however be noted that some countries will not provide an 'Certificate of Good Character' unless the individual has been resident for six months or more
- 4.35 Licensing authorities should seek or require applicants to provide where possible criminal records information or a 'Certificate of Good Character' from overseas in this circumstance to properly assess risk and support the decision-making process (. It is the character of the applicant as an adult that is of particular interest, therefore an extended period outside the UK before the age of 18 may be less relevant. As with all licensing decisions, each case must be considered on its own merits. For information on applying for overseas criminal record information or 'Certificates of Good Character' please see the Home Office [guidance](#).
- 4.36 Where an individual is aware that they have committed an offence overseas which may be equivalent to those listed in the annex to this document (Annex – Assessment of previous convictions), licensing authorities should advise the applicant to seek independent expert or legal advice to ensure that they provide information that is truthful and accurate.

5. Decision Making

Administration of the licensing framework

- 5.1 A policy is only effective if it is administered properly. The taxi and private hire vehicle licensing functions of local councils are non-executive functions i.e. they are functions of the council rather than the executive (such as the Cabinet). The functions include the determination of licence applications, reviews and renewals, along with the attachment of conditions when considered appropriate. The function may be delegated to a committee, a sub-committee or an officer – which should be set out within a clear scheme of delegation. In London the taxi and private hire vehicle licensing function is undertaken by Transport for London.
- 5.2 Licensing authorities should ensure that all individuals that determine whether a licence is issued or refused are adequately resourced to allow them to discharge the function effectively and correctly.

Training decision makers

- 5.3 **All individuals that determine whether a licence is issued should be required to undertake sufficient training.** As a minimum, training for a member of a licensing committee should include: licensing procedures, natural justice, understanding the risks of CSAE, disability and equality awareness and the making of difficult and potentially controversial decisions. Training should not simply relate to procedures, but should include the use of case study material to provide context and real scenarios. All training should be formally recorded by the licensing authority and require a signature from the person that has received the training. Training is available from a number of organisations including the Institute of Licensing and Lawyers in Local Government; the LGA may also be able to assist in the development of training packages.
- 5.4 Public safety is the paramount consideration but the discharge of licensing functions must be undertaken in accordance with the following general principles:
- policies should be used as internal guidance, and should be supported by a member/officer code of conduct.
 - any implications of the Human Rights Act should be considered.
 - the rules of natural justice should be observed.
 - decisions must be reasonable and proportionate.
 - where a hearing is required it should be fairly conducted and allow for appropriate consideration of all relevant factors.
 - decision makers must avoid bias (or even the appearance of bias) and predetermination.
 - data protection legislation.

5.5 When a decision maker has a prejudicial interest in a case, whether it be financial or a personal relationship with those involved they should declare their interest at the earliest opportunity; this must be prior to any discussions or votes and, once declared, they must leave the room for the duration of the discussion or vote.

The regulatory structure

5.6 It is recommended that councils operate with a Regulatory Committee or Board that is convened at periodic intervals to determine licensing matters, with individual cases being considered by a panel of elected and suitably trained councillors drawn from a larger Regulatory Committee or Board. This model is similar to that frequently adopted in relation to other licensing matters. To facilitate the effective discharge of the functions, less contentious matters can be delegated to appropriately authorised council officers via a transparent scheme of delegation.

5.7 It is considered that this approach also ensures the appropriate level of separation between decision makers and those that investigate complaints against licensees, and is the most effective method in allowing the discharge of the functions in accordance with the general principles referred to in 5.4. In particular, the Committee/Board model allows for:

- Each case to be considered on its own merits. It is rare for the same councillors to be involved in frequent hearings – therefore the councillors involved in the decision making process will have less knowledge of previous decisions and therefore are less likely to be influenced by them. Oversight and scrutiny can be provided in relation to the licensing service generally, which can provide independent and impartial oversight of the way that the functions are being discharged within the authority.
- Clear separation between investigator and the decision maker – this demonstrates independence, and ensures that senior officers can attempt to resolve disputes in relation to service actions without the perception that this involvement will affect their judgement in relation to decisions made at a later date.

5.8 Avoidance of bias or even the appearance of bias is vital to ensuring good decisions are made and instilling and/or maintaining confidence in the licensing regime by passengers and licensees.

5.9 Unlike officers, elected members are not usually involved in the day to day operation of the service and as such do not have relationships with licence holders that may give the impression that the discharge of a function is affected by the relationship between the decision maker and the licence holder.

5.10 Some licensing authorities may decide to operate a system whereby all matters are delegated to a panel of officers; however, this approach is not recommended and caution should be exercised. Decisions must be, and be seen to be, made objectively, avoiding any bias. In addition, it may be more difficult to demonstrate compliance with the principles referred to above due to the close

connection between the officers on the panel, and those involved in the operational discharge of the licensing functions.

- 5.11 Whether the structure proposed is introduced or an alternative model is more appropriate in local circumstances, the objective should remain the same - to separate the investigation of licensing concerns and the management of the licence process. Regardless of which approach is adopted, **all licensing authorities should consider arrangements for dealing with serious matters that may require the immediate revocation of a licence.** It is recommended that this role is delegated to a senior officer/manager with responsibility for the licensing service.

Fit and proper test

- 5.12 Licensing authorities have a duty to ensure that any person to whom they grant a taxi or private hire vehicle driver's licence is a 'fit and proper' person to be a licensee. It may be helpful when considering whether an applicant or licensee is fit and proper to pose oneself the following question:

Without any prejudice, and based on the information before you, would you allow a person for whom you care, regardless of their condition, to travel alone in a vehicle driven by this person at any time of day or night?

- 5.13 If, on the balance of probabilities, the answer to the question is 'no', the individual should not hold a licence.
- 5.14 Licensing authorities have to make difficult decisions but (subject to the points made in paragraph 5.4) the safeguarding of the public is paramount. All decisions on the suitability of an applicant or licensee should be made on the balance of probability. This means that an applicant or licensee should not be 'given the benefit of doubt'. If the committee or delegated officer is only "50/50" as to whether the applicant or licensee is 'fit and proper', they should not hold a licence. The threshold used here is lower than for a criminal conviction (that being beyond reasonable doubt) and can take into consideration conduct that has not resulted in a criminal conviction.

Criminal convictions and rehabilitation

- 5.15 In considering an individual's criminal record, licensing authorities must consider each case on its merits, but they should take a particularly cautious view of any offences against individuals with special needs, children and other vulnerable groups, particularly those involving violence, those of a sexual nature and those linked to organised crime. In order to achieve consistency, and to mitigate the risk of successful legal challenge, licensing authorities should have a clear policy for the consideration of criminal records. This should include, for example, which offences would prevent an applicant from being licenced regardless of the period elapsed in all but truly exceptional circumstances. In the case of lesser offences, a policy should consider the number of years the authority will require to have elapsed since the commission of particular kinds of offences before they will grant a licence.

- 5.16 Annexed to this document are the Department's recommendations on the assessment of previous convictions (Annex – Assessment of previous convictions). This draws on the work of the Institute of Licensing, in partnership with the LGA, the National Association of Licensing Enforcement Officers (NALEO) and Lawyers in Local Government, in publishing its guidance on determining the suitability of taxi and private hire vehicle licensees.
- 5.17 These periods should be taken as a starting point in considering whether a licence should be granted or renewed in all cases. The Department's view is that this places passenger safety as the priority while enabling past offenders to sufficiently evidence that they have been successfully rehabilitated so that they might obtain a licence. Authorities are however reminded that applicants are entitled to a fair and impartial consideration of their application.

6. Driver Licensing

Criminality checks for drivers

- 6.1 Licensing authorities are entitled to request an enhanced criminal record certificate with check of the barred lists from the DBS for all driver licence holders or applicants. The DfT's 2019 [survey of taxi and private hire vehicle licensing authorities](#) shows that all licensing authorities in England and Wales have a requirement that an enhanced DBS check is undertaken at first application or renewal.
- 6.2 All individuals applying for or renewing a taxi or private hire vehicle drivers licence licensing authorities should carry out a check of the children and adult Barred Lists in addition to being subject to an enhanced DBS check (in section x61 of the DBS application 'Other Workforce' should be entered in line 1 and 'Taxi Licensing' should be entered at line 2). All licensed drivers should also be required to evidence continuous registration with the DBS update service to enable the licensing authority to routinely check for new information every six months. Drivers that do not subscribe up to the Update Service should still be subject to a check every six months.
- 6.3 Driving a taxi or private hire vehicle is not, in itself, a regulated activity for the purposes of the barred list. This means that an individual subject to barring would not be legally prevented from being a taxi or private hire vehicle driver but the licensing authority should take an individual's barred status into account alongside other information available. **In the interests of public safety, licensing authorities should not, as part of their policies, issue a licence to any individual that appears on either barred list.** Should a licensing authority consider there to be exceptional circumstances which means that, based on the balance of probabilities they consider an individual named on a barred list to be 'fit and proper', the reasons for reaching this conclusion should be recorded.
- 6.4 Drivers working under an arrangement to transport children may be working in 'regulated activity' as defined by the [Safeguarding Vulnerable Groups Act 2006](#). It is an offence to knowingly allow a barred individual to work in regulated activity. The [guidance on home-to-school travel and transport](#) issued by the Department for Education should be considered alongside this document. Please see [guidance](#) on driver DBS eligibility and how to apply.

Safeguarding awareness

- 6.5 Licensing authorities should consider the role that those in the taxi and private hire vehicle industry can play in spotting and reporting the abuse, exploitation or neglect of children and vulnerable adults. As with any group of people, it is overwhelmingly the case that those within the industry can be an asset in the detection and prevention of abuse or neglect of children and vulnerable adults. However, this is only the case if they are aware of and alert to the signs of potential abuse and know where to turn to if they suspect that a child or vulnerable adult is at risk of harm or is in immediate danger.

6.6 All licensing authorities should provide safeguarding advice and guidance to the trade and should require taxi and private hire vehicle drivers to undertake safeguarding training. This is often produced in conjunction with the police and other agencies. These programmes have been developed to help drivers and operators:

- provide a safe and suitable service to vulnerable passengers of all ages;
- recognise what makes a person vulnerable; and
- understand how to respond, including how to report safeguarding concerns and where to get advice.

6.7 Since 2015, the Department for Education (DfE) has run a nationwide campaign – *‘Together, we can tackle child abuse’* which aims to increase public understanding of how to recognise the signs to spot and encourage them to report child abuse and neglect. The DfE continues to promote and raise awareness of the campaign materials through its [online toolkit](#), for local authorities, charities and organisations for use on their social media channels.

‘County lines’ exploitation

6.8 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

6.9 Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to transport (and store) drugs and money between locations. Children aged between 15-17 make up the majority of the vulnerable people involved in county lines, but they may also be much younger. We know that both girls and boys are groomed and exploited and offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children exploited by county lines gangs may have vulnerabilities besides their age, such as broader mental health issues, disrupted or chaotic homes, substance misuse issues, being excluded from school or frequently going missing.

6.10 The National Crime Agency’s 2018 county lines threat assessment set out that the national road network is key to the transportation of county lines victims, drugs and cash; with hire vehicles being one of the methods used for transportation between locations.

6.11 Safeguarding awareness training should include the ways in which drivers can help to identify county lines exploitation. Firstly, they should be aware of the following warning signs:

- Children and young people travelling in taxis or private hire vehicles alone;

- travelling at unusual hours (during school time, early in the morning or late at night);
- travelling long distances;
- unfamiliar with the local area or do not have a local accent;
- paying for journeys in cash or prepaid.

6.12 The Home Office is working with partners to raise awareness of county lines and has provided [material](#) to help taxi and private vehicle hire staff to identify victims and report concerns to protect those exploited through this criminal activity.

6.13 Drivers (or any person) should be aware of what to do if they believe a child or vulnerable person is at risk of harm. If the risk is immediate they should contact the police otherwise they should:

- use the local safeguarding process, the first step of which is usually to contact the safeguarding lead within the local authority;
- call Crime Stoppers on 0800 555 111.

Language proficiency

6.14 A lack of language proficiency could impact on a driver's ability to understand written documents, such as policies and guidance, relating to the protection of children and vulnerable adults and applying this to identify and act on signs of exploitation. Oral proficiency will be of relevance in the identification of potential exploitation through communicating with passengers and their interaction with others.

6.15 A licensing authority's test of a driver's proficiency should cover both oral and written English language skills to achieve the objectives stated above.

7. Vehicle Licensing

7.1 As with driver licensing, the objective of vehicle licensing is to protect the public, who trust that the vehicles dispatched are above all else safe. It is important therefore that licensing authorities are assured that those granted a vehicle licence also pose no threat to the public and have no links to serious criminal activity. Although vehicle proprietors may not have direct contact with passengers, they are still entrusted to ensure that the vehicles and drivers used to carry passengers are appropriately licensed and so maintain the safety benefits of the licensing regime.

Criminality checks for vehicle proprietors

7.2 Enhanced DBS and barred list checks are not available for vehicle licensing. **Licensing authorities should require a basic disclosure from the DBS and that a check is undertaken annually.** Any individual may apply for a basic check and the certificate will disclose any unspent convictions recorded on the Police National Computer (PNC). Licensing authorities should consider whether an applicant or licence holder with a conviction for offences provided in the annex to this document (Annex – Assessment of previous convictions), other than those relating to driving, meet the ‘fit and proper’ threshold.

7.3 However, it is important that authorities acknowledge that in many cases individuals that license a vehicle may already be licensed as a driver. An authority which undertakes the biannual DBS checks recommended for its drivers should not require those seeking to licence a vehicle to provide a basic DBS check as part of the application process; a basic DBS would not provide any information in addition to that disclosed under the enhanced DBS and barred lists check used for the driver assessment. In these circumstances, the authority should instead rely on the fact that the applicant is considered as fit and proper to hold a driver licence when considering their suitability to hold a vehicle licence. Should the individual cease to hold a driver licence a basic certificate should be required immediately.

7.4 A refusal to license an individual as a driver or to suspend or revoke a driver licence does not automatically mean that that individual cannot be issued or continue to hold a vehicle or private hire vehicle operator licence; these decisions must be independent of a driver licence refusal and based on the appropriate information i.e. it should not consider information that would only be available via an enhanced DBS check but instead that which would be disclosed on a basic check. DBS certificate information can only be used for the specific purpose for which it was requested and for which the applicant’s full consent has been given.

7.5 Private hire vehicle operator and vehicle licences may be applied for by a company or partnership; licensing authorities should apply the ‘fit and proper’ test to each of the directors or partners in that company or partnership. For this to be effective private hire vehicle operators and those to whom a vehicle licence should be required to advise the licensing authority of any change in directors or partners.

7.6 As explained earlier in the context of driver licensing, the DBS cannot access criminal records held overseas so other checks must be considered where and applicant has lived or worked overseas (see paragraph 4.34 - 4.36).

In-vehicle visual and audio recording – CCTV

7.7 Government has acknowledged the potential risk to public safety when passengers travel in taxis and private hire vehicles. It is unfortunately the case that no matter how complete the information available to licensing authorities is when assessing whether to issue any taxi or private hire vehicle licence, nor how robust the policies in place are and the rigor with which they are applied, it will never completely remove the possibility of harm to passengers by drivers.

7.8 The Department's view is that CCTV can provide additional deterrence to prevent this and investigative value when it does. The use of CCTV can provide a safer environment for the benefit of taxi/private hire vehicle passengers and drivers by:

- deterring and preventing the occurrence of crime;
- reducing the fear of crime;
- assisting the police in investigating incidents of crime;
- assisting insurance companies in investigating motor vehicle accidents.

7.9 All licensing authorities should consult to identify if there are local circumstances which indicate that the installation of CCTV in vehicles would have either a positive or an adverse net effect on the safety of taxi and private hire vehicle users, including children or vulnerable adults, and taking into account potential privacy issues.

7.10 While only a small minority of licensing authorities have so far mandated all vehicles to be fitted with CCTV systems, the experience of those authorities that have has been positive for both passengers and drivers. In addition, the evidential benefits of CCTV may increase the level of reporting of sexual offences. According to the [Crime Survey for England and Wales](#) only 17 percent of victims report their experiences to the police, 28 percent of rape or sexual assault victims indicated that a fear they would not be believed as a factor in them not reporting the crime. The evidential benefits CCTV could provide are therefore an important factor when considering CCTV in vehicles.

7.11 The mandating of CCTV in vehicles may deter people from seeking a taxi or private hire vehicle licence with the intent of causing harm. Those that gain a licence and consider perpetrating an opportunistic attack against a vulnerable unaccompanied passenger may be deterred from doing so. It is however unfortunately the case that offences may still occur even with CCTV operating.

7.12 CCTV systems that are able to record audio as well as visual data may also help the early identification of drivers that exhibit inappropriate behaviour toward passengers. Audio recording should be both overt (i.e. all parties should be aware when recordings are being made) and targeted (i.e. only when passengers (or

drivers) consider it necessary). The recording of audio should be used to provide an objective record of events such as disputes or inappropriate behaviour and must not be continuously active by default and should recognise the need for privacy of passengers' private conversations between themselves. Activation of the audio recording capability of a system might be instigated when either the passenger or driver operates a switch or button.

- 7.13 Imposition of a blanket requirement to attach CCTV as a condition to a licence is likely to give rise to concerns about the proportionality of such an approach and will therefore require an appropriately strong justification and must be kept under regular review. More information and guidance on assessing the impacts of CCTV and on an authority mandating CCTV is annexed to this document (Annex – CCTV guidance).

Stretched Limousines

- 7.14 Licensing authorities are sometimes asked to license small (those constructed or adapted to carry fewer than nine passengers) limousines as private hire vehicles, these vehicles may be used for transport to 'school proms' as well as for adult bookings. It is suggested that licensing authorities should approach such requests on the basis that these vehicles – where they have fewer than nine passenger seats - have a legitimate role to play in the private hire trade, meeting a public demand. It is the Department's view that it is not a legitimate course of action for licensing authorities to adopt policies that exclude limousines as a matter of principle thereby excluding these services from the scope of the private hire vehicle regime and the safety benefits this provides. A blanket policy of excluding limousines may create an unacceptable risk to the travelling public, as it may lead to higher levels of unsupervised operation. Public safety considerations are best supported by policies that allow respectable, safe operators to obtain licences on the same basis as other private hire vehicle operators.
- 7.15 Stretched large limousines which clearly seat more than eight passengers should not be licensed as private hire vehicles because they are outside the licensing regime for private hire vehicles. However, in some circumstances a vehicle with space for more than eight passengers can be licensed as a private hire vehicle where the precise number of passenger seats is hard to determine. In these circumstances, the authority should consider the case on its merits in deciding whether to license the vehicle under the strict condition that the vehicle will not be used to carry more than eight passengers, bearing in mind that refusal may encourage illegal private hire operation.

8. Private Hire Vehicle Operator Licensing

8.1 As with driver licensing, the objective in licensing private hire vehicle operators is to protect the public, who may be using operators' premises and trusting that the drivers and vehicles dispatched are above all else safe. It is important therefore that licensing authorities are assured that those that are granted a private hire vehicle operator also pose no threat to the public and have no links to serious criminal activity. Although private hire vehicle operators may not have direct contact with passengers, they are still entrusted to ensure that the vehicles and drivers used to carry passengers are appropriately licensed and so maintain the safety benefits of the driver licensing regime.

Criminality checks for private hire vehicle operators

8.2 Enhanced DBS and barred list checks are not available for private hire vehicle operator licensing. **Licensing authorities should request a basic disclosure from the DBS and that a check is undertaken annually.** Any individual may apply for a basic check and the certificate will disclose any unspent convictions recorded on the Police National Computer (PNC). Licensing authorities should consider whether an applicant or licence holder with a conviction for offences provided in the annex to this document (Annex – Assessment of previous convictions), other than those relating to driving, meet the 'fit and proper' threshold.

8.3 However, it is important that authorities acknowledge that in many cases individuals that license as a private hire vehicle operator may already be licensed as a driver. An authority which undertakes the biannual DBS checks recommended for its drivers should not require those seeking a private hire vehicle operator licence to provide a basic DBS check as part of the application process; a basic DBS would not provide any information in addition to that disclosed under the enhanced DBS and barred lists check used for the driver assessment. In these circumstances, the authority should instead rely on the fact that the applicant is considered as fit and proper to hold a driver licence when considering their suitability to hold a vehicle licence. Should the individual cease to hold a driver licence a basic certificate should be required immediately

8.4 Refusal to license in individual as a driver or to suspend or revoke a driver licence does not automatically mean that that individual cannot be issued or continue to hold a private hire vehicle operator licence; this decision must be independent of a driver licence refusal and based on the appropriate information i.e. it should not consider information that would only be available via an enhanced DBS check but instead that which would be disclosed on a basic check. DBS certificate information can only be used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

8.5 A private hire vehicle operator licence may be applied for by a company or partnership; licensing authorities should apply the 'fit and proper' test to each of the directors or partners in that company or partnership. For this to be effective

private hire vehicle operators should be required to advise the licensing authority of any change in directors or partners.

- 8.6 As explained earlier in the context of driver licensing, the DBS cannot access criminal records held overseas. Further information on assessing the suitability of those that have spent extended periods in overseas is provided in paragraphs 4.34 - 4.36.

Booking and dispatch staff

- 8.7 Private hire vehicle drivers are not the only direct contact that private hire vehicle users have with private hire vehicle operators' staff, for example a person taking bookings (be it by phone or in person). A vehicle dispatcher decides which driver to send to a user, a position that could be exploited by those seeking to exploit children and vulnerable adults. It is therefore appropriate that all staff that have contact with private hire vehicle users and the dispatching of vehicles should not present an undue risk to the public or the safeguarding of children and vulnerable adults.
- 8.8 Licensing authorities should be satisfied that private hire vehicle operators can demonstrate that all staff that have contact with the public and/or oversee the dispatching of vehicles do not pose a risk to the public. **Licensing authorities should, as a condition of granting an operator licence, require a register of all staff that will take bookings or dispatch vehicles is kept.**
- 8.9 Operators should be required to evidence that they have had sight of a Basic DBS check on all individuals listed on their register of booking and dispatch staff and to ensure that Basic DBS checks are conducted on any individuals added to the register and that this is compatible with their policy on employing ex-offenders. DBS certificates provided by the individual should be recently issued when viewed, alternatively the operator could use a '[responsible organisation](#)' to request the check on their behalf. When individuals start taking bookings and dispatching vehicles for an operator they should be required, as part of their employment contract, to advise the operator of any convictions while they are employed in this role.
- 8.10 The register should be a 'living document' that maintains records of all those in these roles for the same duration as booking records are required to be kept, this will enable cross-referencing between the two records. A record that the operator has had sight of a basic DBS check certificate (although the certificate itself should not be retained) should be retained for the duration that the individual remains on the register. Should an employee cease to be on the register and later re-entered, a new basic DBS certificate should be requested and sight of this recorded.
- 8.11 Operators may outsource booking and dispatch functions but they cannot pass on the obligation to protect children and vulnerable adults. Operators should be required to evidence that comparable protections are applied by the company to which they outsource these functions.

8.12 Licensing authorities should also require operators or applicants for a licence to provide their policy on employing ex-offenders in roles that would be on the register as above. As with the threshold to obtaining a private hire vehicle operators' licence, those with a conviction for offences provided in the annex to this document (Annex – Assessment of previous convictions), other than those relating to driving, may not be suitable to decide who is sent to carry a child or vulnerable adult unaccompanied in a car.

Record keeping

8.13 Section 56 of the [Local Government \(Miscellaneous Provisions\) Act 1976](#) requires private hire vehicle operators to keep records of the particulars of every booking invited or accepted, whether it is from the passenger or at the request of another operator. **Licensing authorities should as a minimum require private hire vehicle operators to record the following information for each booking:**

- the name of the passenger;
- the time of the request;
- the pick-up point;
- the destination;
- the name of the driver;
- the driver's licence number;
- the vehicle registration number of the vehicle;
- the name of any individual that responded to the booking request;
- the name of any individual that dispatched the vehicle.

8.14 This information will enable the passenger to be traced if this becomes necessary and should improve driver security and facilitate enforcement. It is suggested that booking records should be retained for a minimum of six months.

8.15 Private hire vehicle operators have a duty under data protection legislation to protect the information they record. The Information Commissioner's Office provides comprehensive on-line guidance on registering as a data controller and how to meet their obligations.

Use of passenger carrying vehicles (PCV) licensed drivers

8.16 PCV licensed drivers are subject to different checks from taxi and private hire vehicle licensed drivers as the work normally undertaken, i.e. driving a bus, does not present the same risk to passengers. Members of the public are entitled to expect when making a booking with a private hire vehicle operator that they will receive a private hire vehicle licensed vehicle and driver. **The use of a driver who holds a PCV licence and the use of a public service vehicle (PSV) such**

as a minibus to undertake a private hire vehicle booking should not be permitted as a condition of the private hire vehicle operator's licence without the informed consent of the booker.

- 8.17 Where a private hire vehicle is unsuitable, for example where a larger vehicle is needed because more than eight passenger seats required or to accommodate luggage, the booker should be informed that a PSV is necessary, and that a PCV licenced driver will be used who is subject to different checks and not required to have an enhanced DBS check.

9. Enforcing the Licensing Regime

9.1 Implementing an effective framework for licensing authorities to ensure that as full a range of information made available to suitably trained decision makers that are supported by well-resourced officials is essential to a well-functioning taxi and private hire vehicle sector. These steps will help prevent the licensing of those that are not deemed 'fit and proper' but does not ensure that those already licensed continue to display the behaviours and standards expected.

Joint authorisation of enforcement officers

9.2 Licensing authorities should, where the need arises, jointly authorise officers from other authorities so that compliance and enforcement action can be taken against licensees from outside their area. An agreement between licensing authorities to jointly authorise officers enables the use of enforcement powers regardless of which authority within the agreement the officer is employed by and which issued the licence. This will mitigate the opportunities for drivers to evade regulation. Such an agreement will enable those authorities to take action against vehicles and drivers that are licensed by the other authority when they cross over boundaries. A model for agreeing joint authorisation is contained in the [LGA Councillors' handbook](#).

Setting expectations and monitoring

9.3 Licensing authorities should ensure that drivers are aware of the policies that they must adhere and are properly informed of what is expected of them and the repercussions for failing to do so. Some licensing authorities operate a points-based system, which allows minor breaches to be recorded and considered in context while referring those with persistent or serious breaches to the licensing committee. This has the benefit of consistency in enforcement and makes better use of the licensing committee's time.

9.4 The provision of a clear, simple and well-publicised process for the public to make complaints about drivers and operators will enable authorities to target compliance and enforcement activity (see paragraphs 4.29 - 4.33). This will provide a further source of intelligence when considering the renewal of licences and of any additional training that may be required. It is then for the licensing authority to consider if any intelligence indicates a need to suspend or revoke a licence in the interests of public safety.

Suspension and revocation of driver licences

9.5 Section 61 of the Local Government (Miscellaneous Provisions) Act 1976 provides a licensing authority with the ability to suspend or revoke a driver's licence on the following grounds: -

(a) that he has since the grant of the licence—

- (i) been convicted of an offence involving dishonesty, indecency or violence; or
- (ii) been convicted of an offence under or has failed to comply with the provisions of the Act of 1847 or of this Part of this Act;
- (aa) that he has since the grant of the licence been convicted of an immigration offence or required to pay an immigration penalty; or
- (b) any other reasonable cause

9.6 Licensing authorities have the option to suspend or revoke a licence should information be received that causes concern over whether a driver is a fit and proper person. Where the licence holder has been served an immigration penalty or convicted of an immigration offence the licence should be revoked immediately. [Guidance for licensing authorities](#) to prevent illegal working in the taxi and private hire vehicle sector has been issued by the Home Office. As with the initial decision to license a driver, this determination must be reached based on the balance of probabilities, not on the burden of beyond reasonable doubt.

9.7 Before any decision is made, the licensing authority must give full consideration to the available evidence and the driver should be given the opportunity to state his or her case. If a period of suspension is imposed, it cannot be extended or changed to revocation at a later date.

9.8 A decision to revoke a licence does not however prevent the reissuing of a licence should further information be received that alters the balance of probability of a decision previously made. The decision to suspend or revoke was based on the evidence available at the time the determination was made. New evidence may, of course, become available later.

9.9 New evidence may be produced at an appeal hearing that may result in the court reaching a different decision to that reached by the council or an appeal may be settled by agreement between the licensing authority and the driver on terms which, in the light of new evidence, becomes the appropriate course. If, for example, the allegations against a driver were now, on the balance of probability, considered to be unfounded, a suspension could be lifted or, if the licence was revoked, an expedited re-licensing process used.

9.10 A suspension may still be appropriate if it is believed that a minor issue can be addressed through additional training. In this instance the licence would be returned to the driver once the training has been completed without further consideration. This approach is clearly not appropriate where the licensing authority believes that, based on the information available at that time, on the balance of probability it is considered that the driver presents a risk to public safety.

Annex – Assessment of Previous Convictions

Legislation specifically identifies offences involving dishonesty, indecency or violence as a concern when assessing whether an individual is 'fit and proper' to hold a taxi or private hire vehicle licence. The following recommendations to licensing authorities on previous convictions reflect this.

Authorities must consider each case on its own merits, and applicants/licensees are entitled to a fair and impartial consideration of their application. Where a period is given below, it should be taken to be a minimum in considering whether a licence should be granted or renewed in most cases. The Department's view is that this places passenger safety as the priority while enabling past offenders to sufficiently evidence that they have been successfully rehabilitated so that they might obtain or retain a licence.

Crimes resulting in death

Where an applicant or licensee has been convicted of a crime which resulted in the death of another person or was intended to cause the death or serious injury of another person they will not be licensed.

Exploitation

Where an applicant or licensee has been convicted of a crime involving, related to, or has any connection with abuse, exploitation, use or treatment of another individual irrespective of whether the victim or victims were adults or children, they will not be licensed. This includes slavery, child sexual abuse, exploitation, grooming, psychological, emotional or financial abuse, but this is not an exhaustive list.

Offences involving violence against the person

Where an applicant has a conviction for an offence of violence against the person, or connected with any offence of violence, a licence will not be granted until at least 10 years have elapsed since the completion of any sentence imposed.

Possession of a weapon

Where an applicant has a conviction for possession of a weapon or any other weapon related offence, a licence will not be granted until at least seven years have elapsed since the completion of any sentence imposed.

Sexual offences

Where an applicant has a conviction for any offence involving or connected with illegal sexual activity, a licence will not be granted.

In addition to the above, the licensing authority will not grant a licence to any applicant who is currently on the Sex Offenders Register or on any barred list.

Dishonesty

Where an applicant has a conviction for any offence where dishonesty is an element of the offence, a licence will not be granted until at least seven years have elapsed since the completion of any sentence imposed.

Drugs

Where an applicant has any conviction for, or related to, the supply of drugs, or possession with intent to supply or connected with possession with intent to supply, a licence will not be granted until at least 10 years have elapsed since the completion of any sentence imposed.

Where an applicant has a conviction for possession of drugs, or related to the possession of drugs, a licence will not be granted until at least five years have elapsed since the completion of any sentence imposed. In these circumstances, any applicant may also have to undergo drugs testing for a period at their own expense to demonstrate that they are not using controlled drugs.

Discrimination

Where an applicant has a conviction involving or connected with discrimination in any form, a licence will not be granted until at least seven years have elapsed since the completion of any sentence imposed.

Motoring convictions

Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the granting of a licence. However, applicants with multiple motoring convictions may indicate that an applicant does not exhibit the behaviours of a safe road user and one that is suitable to drive professionally.

Any motoring conviction while a licensed driver demonstrates that the licensee may not take their professional responsibilities seriously. However, it is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence may not necessitate the revocation of a taxi or private hire vehicle driver licence providing the authority considers that the licensee remains a fit and proper person to retain a licence.

Drink driving/driving under the influence of drugs

Where an applicant has a conviction for drink driving or driving under the influence of drugs, a licence will not be granted until at least seven years have elapsed since the completion of any sentence or driving ban imposed. In the case of driving under the influence of drugs, any applicant may also have to undergo drugs testing at their own expense to demonstrate that they are not using controlled drugs.

Using a hand-held device whilst driving

Where an applicant has a conviction for using a held-hand mobile telephone or a hand-held device whilst driving, a licence will not be granted until at least five years have elapsed since the conviction or completion of any sentence or driving ban imposed, whichever is the later.

Annex – Disclosure and Barring Service information

Table 1: Information included in criminal record checks

Information included	Type of check			
	Basic check	Standard DBS check	Enhanced DBS check	Enhanced DBS (including barred list) check
Unspent convictions	Yes	Yes	Yes	Yes
Unspent cautions ¹	Yes	Yes	Yes	Yes
Spent convictions ²	No	Yes	Yes	Yes
Spent cautions ^{1 & 2}	No	Yes	Yes	Yes
Additional police Information ³	No	No	Yes	Yes
Barred list(s) Information ⁴	No	No	No	Yes

1. Does not include fixed penalty notices, penalty notices for disorder or any other police or other out-of-court disposals.
2. Spent convictions and cautions that have become protected under the Rehabilitation of Offenders Act 1974 (Exceptions Order) 1975, as amended, are not automatically disclosed on any level of certificate. Further guidance is available [the DBS filtering guide](#).
3. This is any additional information held by the police which a chief police officer reasonably believes to be relevant and considers ought to be disclosed.
4. This is information as to whether the individual concerned is included in the children's or adults' barred lists maintained by the Disclosure and Barring Service (DBS).

Annex – CCTV Guidance

It is important to note that, in most circumstances, a licensing authority which mandates the installation of CCTV systems in taxis and private hire vehicles will be responsible for the data – the data controller. It is important that data controllers fully consider concerns regarding privacy and licensing authorities should consider how systems are configured, should they mandate CCTV (with or without audio recording). For example, vehicles may not be exclusively used for business, also serving as a car for personal use - it should therefore be possible to manually switch the system off (both audio and visual recording) when not being used for hire. Authorities should consider the Information Commissioner's view on this matter that, in most cases, a requirement for continuous operation is unlikely to be fair and lawful processing of personal data.

The Home Office '[Surveillance Camera Code of Practice](#)' advises that government is fully supportive of the use of overt surveillance cameras in a public place whenever that use is:

- in pursuit of a legitimate aim;
- necessary to meet a pressing need;
- proportionate;
- effective, and;
- compliant with any relevant legal obligations

The Code also sets out 12 guiding principles which, as a 'relevant authority' under section 33(5) of the [Protection of Freedoms Act 2012](#), licensing authorities must have regard to. It must be noted that, where a licence is granted subject to CCTV system conditions, the licensing authority assumes the role and responsibility of 'System Operator'. The role requires consideration of all guiding principles in this code. The failure to comply with these principles may be detrimental to the use of CCTV evidence in court as this may be raised within disclosure to the Crown Prosecution Service and may be taken into account.

The Surveillance Camera Commissioner (SCC) has provided guidance on the Surveillance Camera Code of Practice in its '[Passport to Compliance](#)' which provides guidance on the necessary stages when planning, implementing and operating a surveillance camera system to ensure it complies with the code. The Information Commissioner's Office (ICO) has also published a [code of practice](#) which, in this context, focuses on the data governance requirement associated with the use of CCTV such as data retention and disposal, which it is important to follow in order to comply with the data protection principles. The SCC provides a [self-assessment tool](#) to assist operators to ensure compliance with the principles set out in the Surveillance Camera Code of Practice. The SCC also operate a [certification scheme](#); authorities that obtain this accreditation are able to clearly demonstrate that their systems conform to the SCC's best practice and are fully compliant with the Code and increase public confidence that any risks to their privacy have been fully considered and mitigated.

The [Data Protection Act 2018](#) regulates the use of personal data. Part 2 of the Data Protection Act applies to the general processing of personal data, and references and supplements the General Data Protection Regulation. Licensing authorities, as data controllers, must comply with all relevant aspects of data protection law. Particular attention should be paid to the rights of individuals which include the right to be informed, of access

and to erasure. The ICO has provided detailed [guidance](#) on how data controllers can ensure compliance with these.

It is a further requirement of data protection law that before implementing a proposal that is likely to result in a high risk to the rights and freedoms of people, an impact assessment on the protection of personal data shall be carried out. The ICO recommends in [guidance](#) that if there is any doubt as to whether a Data Protection Impact Assessment (DPIA) is required one should be conducted to ensure compliance and encourage best practice. A DPIA will also help to assess properly the anticipated benefits of installing CCTV (to passengers and drivers) and the associated privacy risks; these risks might be mitigated by having appropriate privacy information and signage, secure storage and access controls, retention policies, training for staff how to use the system, etc.

It is essential to ensure that all recordings made are secure and can only be accessed by those with legitimate grounds to do so. This would normally be the police if investigating an alleged crime or the licensing authority if investigating a complaint or data access request. Encryption of the recording to which the licensing authority, acting as the data controller, holds the key, mitigates this issue and protects against theft of the vehicle or device. It is one of the guiding principles of data protection legislation, that personal data (including in this context, CCTV recordings and other potentially sensitive passenger information) is handled securely in a way that 'ensures appropriate security', including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

All passengers must be made fully aware if CCTV is operating in a vehicle. Given that audio recording is considered to be more privacy intrusive, it is even more important that individuals are fully aware and limited only to occasions when passengers (or drivers) consider it necessary. The recording of audio should be used to provide an objective record of events such as disputes or inappropriate behaviour and must not be continuously active by default and should recognise the need for privacy of passengers' private conversations between themselves. Activation of the audio recording capability of a system might be instigated when either the passenger or driver operates a switch or button. As well as clear signage in vehicles, information on booking systems should be introduced. This might be text on a website, scripts or automated messages on telephone systems; the Information Commissioner's Office (ICO) has issued guidance on privacy information and the right to be informed on its website.

Annex - Staying Safe: Guidance for Passengers

Licensing authorities should provide guidance to assist passengers in identifying licensed vehicles and the increased risks of using unlicensed vehicles. The guidance might include advice on:

- how to tell if a taxi or private hire vehicle is licensed.

Educate the public in the differences between taxis and private hire vehicles e.g.:

- a taxi can be flagged down or pre-booked.
- a private hire vehicle that has not been pre-booked should not be used as it will not be insured and may not be licensed.
- what a private hire vehicle should look like e.g. colour, signage, licence plates etc.
- the benefit of pre-booking a return vehicle before going out.
- arrange to be picked up from a safe meeting point.
- requesting at the time of booking what the fare is likely to be.

When using a private hire vehicle, passengers should always:

- book with a licensed operator.
- confirm their booking with the driver when s/he arrives.
- note the licence number.
- sit in the back, behind the driver.
- let a third party know details of their journey.

When using a taxi, passengers should where possible:

- use a taxi rank and choose one staffed by taxi marshals if available.