



APSE National Transport Seminar

2019

TAXI TESTING
(HACKNEY CARRIAGE & PRIVATE HIRE)

Taxi Testing (Hackney Carriage & Private Hire)

Brendan McNamara, Transport Operations Manager

- Wakefield's Evolution: Vehicle Testing.
- Best practice in operating a test facility.
- Future direction and likely changes.





Wakefield's Evolution

Taxis (HC) & Private Hire Vehicle Compliance Testing

Taxi & PH Fleet Makeup

- Fleet Size (Number of Taxis) = 1350 approx.
- Number of Proprietors / Co = 80 approx.
- Tests Carried Out Per Year = 3000+
 - Private Hire = 44%
 - Hackney Carriage = 31%
 - New Applicants = 25%

An Inheritance

117 Bulletins
Each bulletin ranged from 2 to 20 pages

Current Bullitains

File Edit View Favorites Tools Help

Back Forward Stop Search Folders

Address G:\Technical\Workshop Operations\MOT & Taxi Testing\Taxis\WMDC Taxi Licencing Bullitains\Current Bullitains

File and Folder Tasks

- Make a new folder
- Publish this folder to the Web

Other Places

- WMDC Taxi Licencing Bullitains
- My Documents
- My Computer on WMDC-B9C8E59BA4
- My Network Places

Details

95 objects 3.25 MB Local intranet

start

Review of Testing Sta... Members Presentaion... Current Bullitains Microsoft PowerPoint ... Inbox - Microsoft Out...

09:44

What the Tester saw...



What the Tester saw...



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Child Council
working for you

What the Tester saw...

Accident Damage Chassis
Cracked



Standards of Repair (Accident Damage)



A testing point of view...



**Suspension Top
Mounting Completely
Missing**

New Applicants





SETTING A STANDARD

Where Did We Start?

1. Local Government (Miscellaneous Provisions) Act (1976)
2. House of Commons Licensing Briefing Paper (Aug 2016)
3. LGR Licensing Councillors' Handbook (Dec 2016)
4. DfT Vehicle Licensing: Best Practice Guide (March 2010)
5. PATN (FTA) National Inspection Standards

NATIONAL BEST PRACTICE GUIDE FOR

Hackney Carriage and Private Hire Vehicles
National inspection standards



Hack

Vehicle



Best Practice Guide August 2012



Produced by Hackney Carriage and Private Hire Inspection Technical Officer Group
Public Authority Transport Network (PATN)

Supported by



Delivering safe, efficient, sustainable logistics

Public Authority Transport



HT TRANSPORT ASSOCIATION

Why do we have a compliance test?

1976 Misc Provisions Act Empowered Councils

- Test upto 3 times a year
- A reflection of their commercial operation
- High mileage
- Arduous use, in comparison to private vehicles.

Where other Commercial Operations - LGV or PCV

- Vehicle Operator Licensing
- Traffic Commissionaires
- DVSA enforcement & audits
- Safety inspections - as frequent as every 4 weeks.

In comparison a 6/12 month compliance test is not un-reasonable

Legislation Governing Compliance Testing

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976: PART II

Sec 47 - Licensing of **Hackney Carriages** (Taxis')

- (1) A district council **may attach** to the grant of a license of a hackney carriage under the Act of 1847 **such conditions** as the district council may **consider reasonably necessary**.

Legislation & Compliance Testing

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976: PART II

Sec 48. Licensing of **Private Hire Vehicles**

(1) Subject to the provisions of this Part of this Act, a district council may ... not grant such a licence unless they are satisfied:

(a) That the vehicle is:

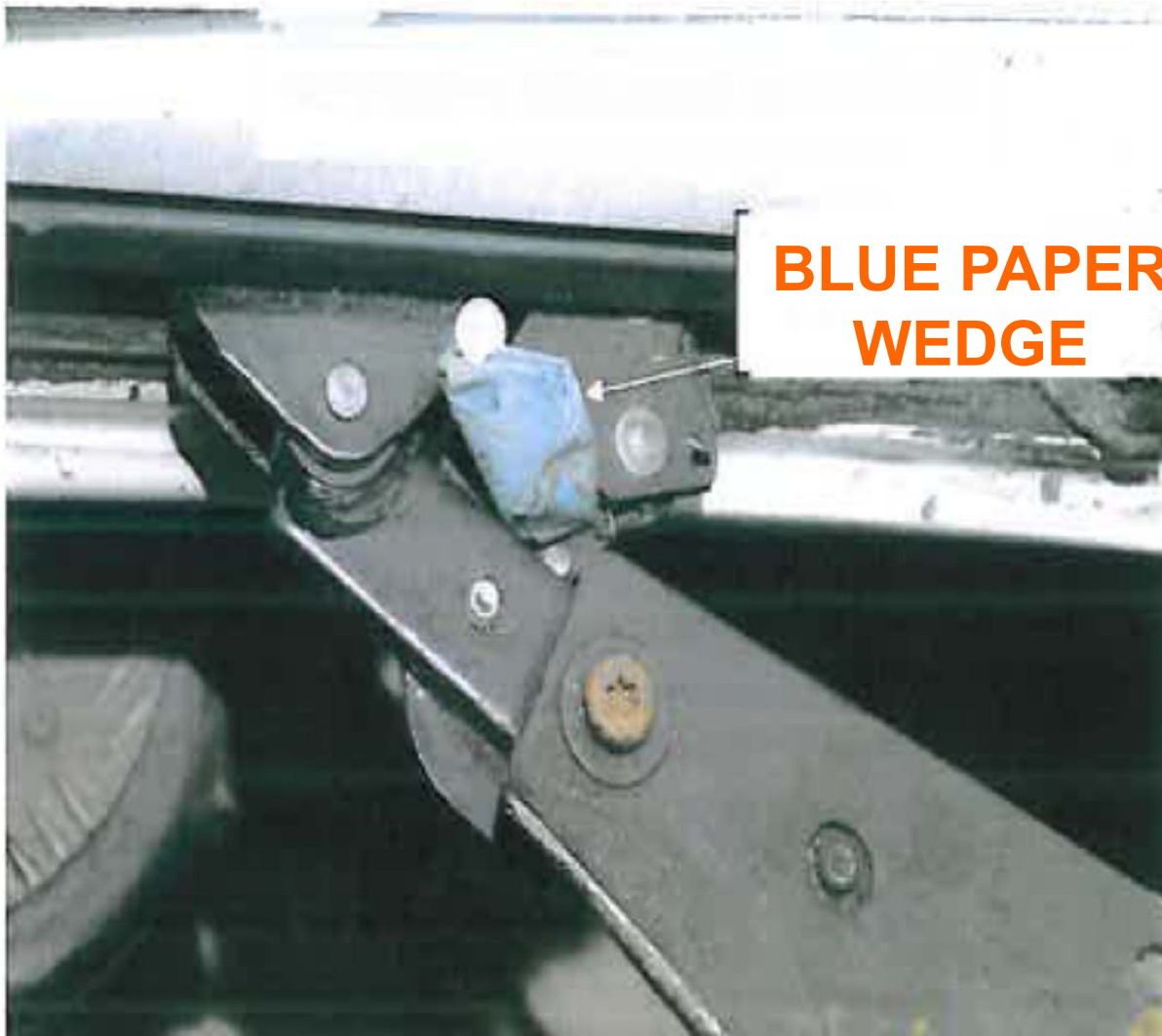
(i) Suitable in **type, size and design** for use as a PHV;

(iii) In a **suitable mechanical condition**;

(iv) **Safe**; and

(v) **Comfortable**

“But it just passed its MOT!”



**BLUE PAPER
WEDGE**

**Dangerous
Adaptations**

Right of Appeal

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976: PART II

Sec 47 - Licensing of Hackney Carriages (Taxis')

(3) Any person aggrieved by any conditions attached to such a license **may appeal to a Magistrates' Court.**

Sec 48. Licensing of Private Hire Vehicles

the same right of appeal applies

New Testing Standards Document

1st February 2013

HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE COMPLIANCE TESTING STANDARDS

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Version 5 – 16/10/2014

Page 1

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Consultation

Supporting Comments:

“We remain open and willing to work with the taxi and private hire community but we cannot and will not compromise the safety of the public when they use taxis.”

“If a vehicle isn't fit to be on the road, it shouldn't be on the road.”



Aims of the Testing Standard

- Open & Transparent Testing Criteria.
- Aligned to DVSA MOT standards.
- Improve Safety of the
 - Public, Drivers & their Families.
- Educate & Inform
 - Drivers, Maintainers & Testers
- Improve Wakefield's Image - Tourism

Key Criteria Established

- Introduced the National Standards (PATN)
- Accessibility Standard
- IVA Standard (DVSA).



Clear & Transparent Test Criteria

2.1 STEERING CONTROL - STEERING WHEEL

Method of Inspection	Reason for Rejection
<p>With both hands rock the steering wheel from side to side at right angles to steering column and apply slight downward and upward pressure to the steering wheel rim (in line with column). Note:</p> <ul style="list-style-type: none">a. Fractures in steering wheel hub.b. Fractures in steering wheel rim.c. Steering wheel spokes loose or fractured.d. Jagged edges on steering wheel rim.e. If possible, check the retaining device on steering wheel is fitted.	<ul style="list-style-type: none">a. Steering wheel hub fractured.b. Steering wheel rim fractured.c. A steering wheel spoke loose or fractured.d. Jagged edges on steering wheel rim likely to injure the driver.e. A steering wheel hub-retaining device not fitted.

Windows - To Tint or Not to Tint?

The Law (Construction & Use)

- Vehicles first used before 1 April 1985
 - Front Windscreen and windows must let at least 70% of light through.
- Illegal to fit or sell glass (or use a vehicle already fitted with glass) that breaks the rules.
- Rear windscreen or rear passenger windows not covered.
- Local Licensing Decision under Misc Provisions Act.
 - Can be subjective

Why IVA?

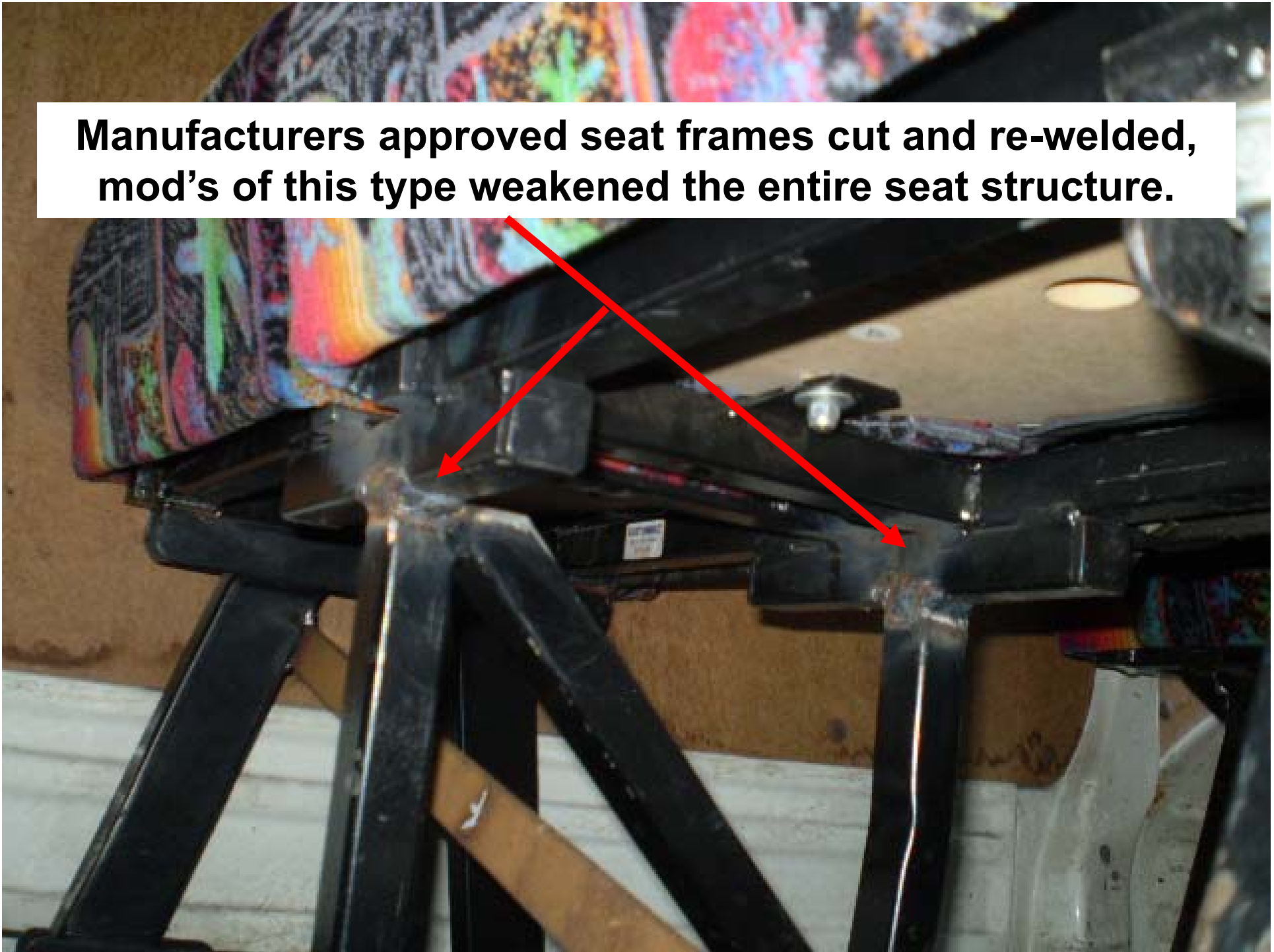
- IVA process had been aligned with C&U and EC Directives
- Ensured that testers could trust when passing a vehicle's seat / seat belts structure etc. that it is still met:
 - manufacturers original design characteristics
 - or at least an approved testing scheme (DVSA IVA).
- Remove Unreasonable Expectation on Testers.
- Needed to move away from amateur modifications to:
 - Seats
 - Seat belts
 - Floor mounting structures



Seat mountings on spacers designed for a completely different floor structure.

Bending under weight of passengers in normal use.

Manufacturers approved seat frames cut and re-welded, mod's of this type weakened the entire seat structure.



**Arbitrary modification of manufactures
approved, seat frames.**

Welding of untested extra metal flat bar.



THE TESTER

Tester Competence



Taking MOT annual training and assessments

The process each year

1



Decide how to train

2



Do at least 3 hours

3



Keep training records

4



Book annual assessment

5



Take annual assessment

6



Record result

Compliance Tester Training

- Beyond the MOT – Why a compliance test?
- Legislation & Industry Guidance
- Aims of the standards
- “The Manual & Test” - How to apply the new standards
- The IVA
- Council Core Values & Standards
- How to prepare a course
- Professional Approach
- Customer Care & Code of Conduct
- Grant & Right to Reply
- Retest & Re-measure
- Record Keeping
- Opportunity to clarify

CPD

THE TEST



How to apply the standard

- Be consistent
- Common sense
- Do not interpret – apply the rules
 - Reason for Rejection
 - If its not in the standard it does not count
 - Raise concerns with the QC or line manager
- Be sure of your diagnosis – not; just in case

Assessing Accident Damage



Optiflex reports

The two officer approach

Grandfather Rights

- Up to 5 years (**Expired from 1st Feb 2018**)
- Only eligible for existing fleet
- Not awarded to vehicles that contravene any form of legislation i.e. DVSA MOT, LOLER Regulations.
- Were transferable to a new owner – but limited life.
 - Over 30 areas...

THE RESULT



The Challenge Continues

2018		
RANKED	FAILURE ITEM	%
1st	Exhaust / Emissions	45.5%
2nd	Lights	7.2%
3rd	Signage / Markings	5.9%
4th	Body / Paintwork	4.9%
5th	Fire Extinguisher	4.6%
6th	Brakes	4.4%
7th	Fare Notice	4.2%
8th	Tyres	4.0%
9th	Suspension	3.7%
10th	Leaks	2.1%
11th	Accident Damage	2.0%

New Emissions
Standard Introduced
2 year GFR

Compliance in 2019?

- N/SF Hub Nut Loose
- Battery Insecure
- NSF Sub frame loose
- OSF Steering Track Rod
- OSF Anti Roll Bar Loose
- Lower Ball Joint Worn
- OSF tyre worn and illegal
- Emissions
- Oil Leak

TEST ABORTED



Compliance in 2019?





Future Direction & Likely Changes

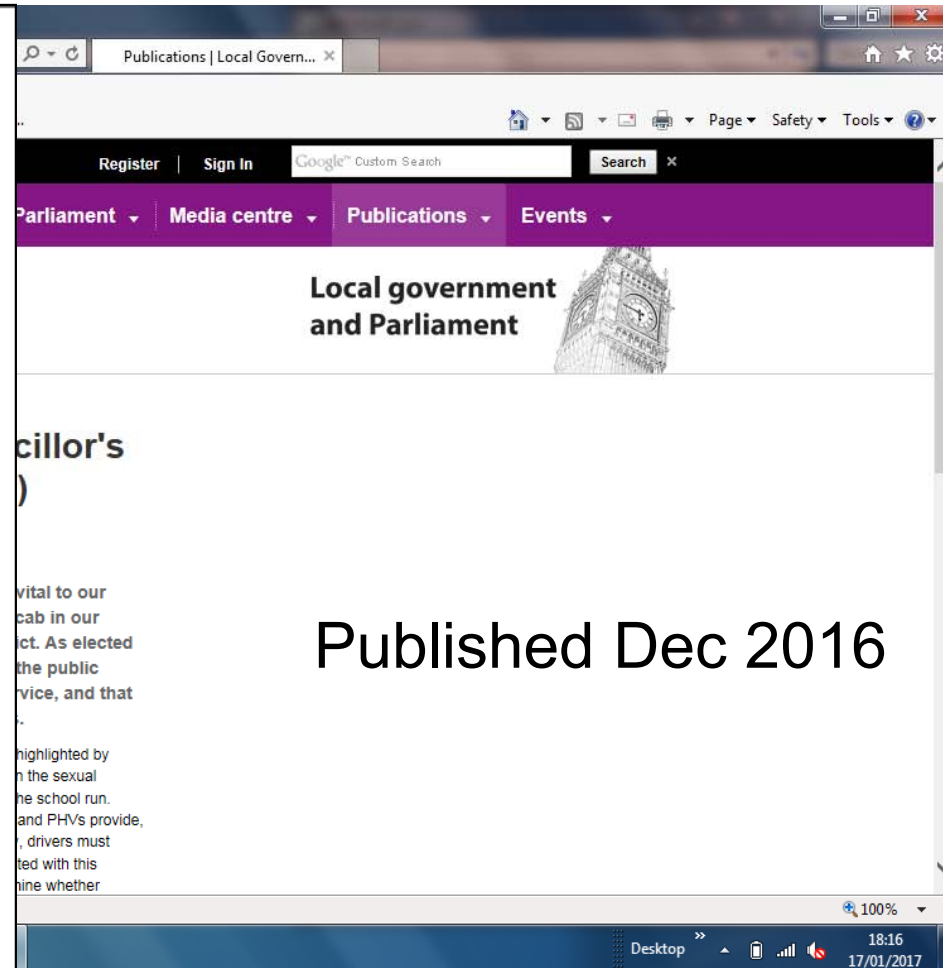
Councillors' Handbook (England and Wales)



Taxi and PHV licensing

Councillors' handbook
(England and Wales)

Revised December 2016



Published Dec 2016

Councilors' Handbook (England and Wales)

Foreword

“Unfortunately, the existing licensing system is outdated and needs urgent reform.”

- *Legislation dating from 1847.*
- *LGA is lobbying for Licensing Reform Bill*

“Until then, it is incumbent on us to do the best we can with the tools at our disposal.”

Task & Finish Group

Taxi & Private Hire Vehicle Licensing

Published Sept 2018

Professor Mohammed Abdel-Haq Chairman

Helen Chapman - Director of Licensing, Regulation & Charging, Transport for London

Rt Hon Frank Field MP - Member of Parliament for Birkenhead

Saskia Garner - Policy Officer, Personal Safety, the Suzy Lamplugh Trust

Ellie Greenwood - **Senior Adviser (Regulation), Local Government Association**

Dr Michael Grenfell - Executive Director, Enforcement, Competition and Markets Authority

Anne Main MP - Member of Parliament for St Albans

Steve McNamara - **General Secretary, Licensed Taxi Drivers' Association**

Mick Rix - National Officer for Transport and Distribution, GMB union

Donna Short - Director, National Private Hire and Taxi Association

Steve Wright MBE - **Chairman, Licensed Private Hire Car Association**

- **Submissions from 39 organisations**
- **Heard evidence from 11**
- **Resulting in 34 Recommendations to Government**

.GOV Response - Moving Britain Ahead

Published Feb 2019



Government Response
Report of the Task and Finish
Group on Taxi and Private Hire
Vehicle Licensing
Moving Britain Ahead



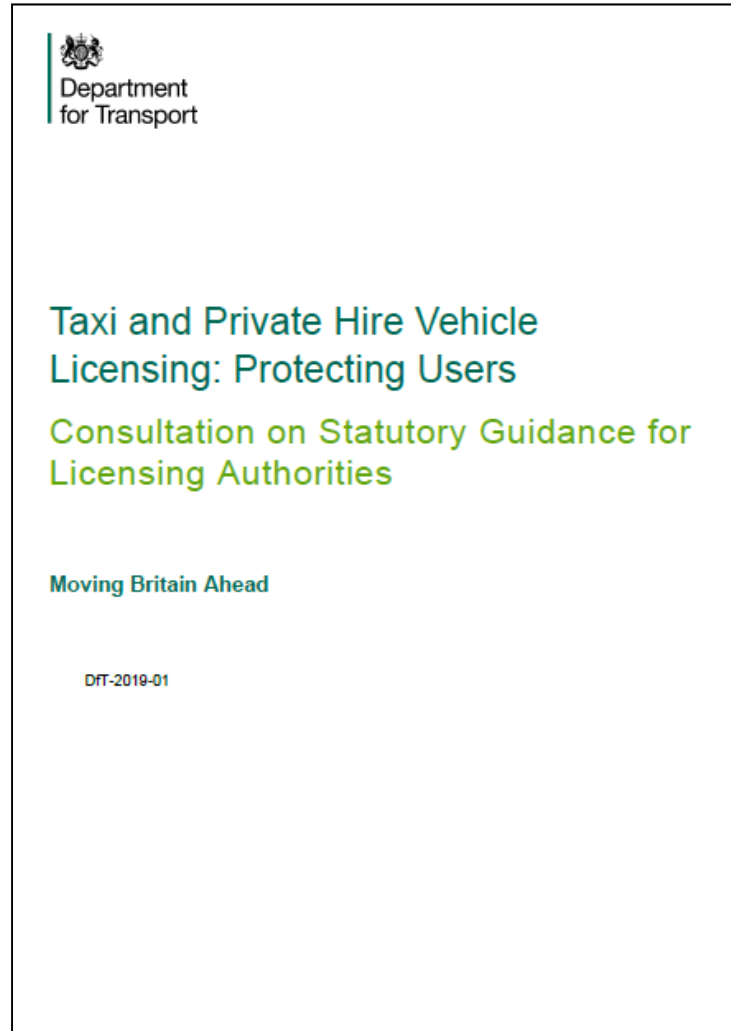
Nusrat Ghani MP
**Parliamentary Under
Secretary of State for
Transport**

“In this response I will set out the action Government will take. At the forefront of our deliberations are the interests of passengers”

[PLAY MOVIE](#)

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DfT Consultation on Statutory Guidance



- **Published Feb closed April 2019**
- **Summary of responses, including the next steps, will be published within three months of closing.**
- **Expected July/Aug 2019**

If you have questions about his consultation please contact:

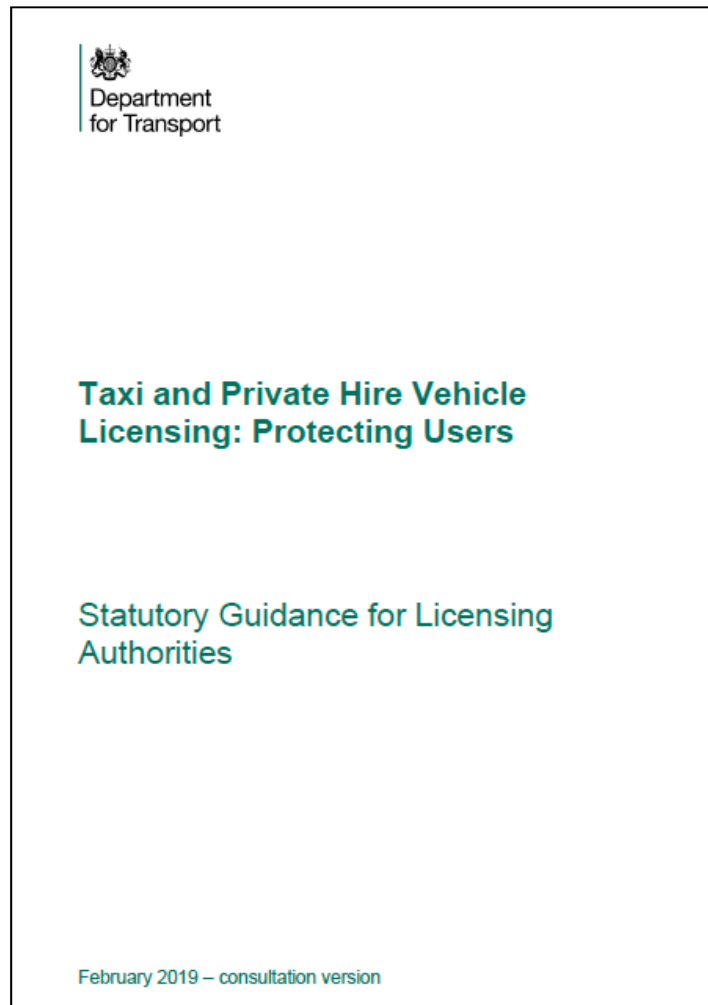
Paul Elliott

Taxis@DfT.GOV.UK

Buses and Taxis Division

Department for Transport

Proposed New Statutory Guidance



Cannot wait?

www.gov.uk/government/consultations/taxi-and-private-hire-vehicle-licensing-protecting-users

Where to find us?

Brendan McNamara, Transport Operations Manager

bmcnamara@wakefield.gov.uk

01924 306303

Our Vehicle Standards Document can be found at:

www.wakefield.gov.uk/business/licensing-and-trading/taxis/vehicle-and-operator-licences



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2009, 2010, 2013 & 2018



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