

Annex 2

Feedback Form – Private Hire Probationary Badges – consultation responses

Respondent	Comment
<p>#1 Sharon Bamborough</p> <p>Head of Licensing Partnership For Sevenoaks, Tunbridge Wells, Maidstone and London Borough of Bexley</p>	<p>We would welcome you dropping the probationary licence scheme and having the same requirement as the partnership so that the safeguarding requirements are the same.</p> <p>We agree that all new drivers should meet the same standards.</p> <p>We had one firm based in Swanley asking us to introduce the same thing (but we know it's because they are also using drivers as couriers, so they didn't want them all to have to do the knowledge test).</p>
<p>#2 Lorraine Neale Senior Licensing Officer Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent ME15 6JQ</p>	<p>RESPONSE TO THE CONSULTATION ON DISCONTINUING PRIVATE HIRE PROBATIONARY BADGES</p> <p>Maidstone Borough Councils Licensing Department would welcome the "scrapping" of the probationary badge scheme. We as a local authority have an increasing problem with the number of Tonbridge and Malling (T&MBC) licensed drivers and vehicles that we are finding in Maidstone.</p> <p>This problem is causing considerable enforcement issues for Maidstone Officers stretching our resources significantly. Also the licensed trade in Maidstone feel extremely resentful over T&MBC drivers being in our area, the majority without a legitimate reason to be in the place they are seen waiting.</p> <p>We believe the probationary scheme contributes to this problem as the T&MBC drivers that Maidstone</p>

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	<p data-bbox="488 225 1951 292">Officers speak to don't seem to be aware that they must comply with legislation and the policy and conditions of their licensing authority.</p> <p data-bbox="488 331 2040 472">Our drivers in Maidstone must pass the knowledge test before they can even submit an application to us. The knowledge test has sections on generic policy & law, highway code, Maidstone hackney policy & law, Maidstone places, routes and streets, numeracy, road signs and safeguarding. This ensures that they fully meet the requirements that Maidstone expects before they become licensed drivers.</p> <p data-bbox="488 512 2040 652">Local authorities have the ability to grant a three year licence and they must also have some ability to grant a licence for a lesser period and that obvious lesser period would be a year in my opinion. Licenses for lesser periods would only be considered for age, health or conduct/driving issues and not probationary purposes.</p> <p data-bbox="488 692 2040 833">There is a tendency for some local authorities to grant probationary licences but my view is that a driver is either fit and proper and they get a licence or they are not fit and proper and they don't get a licence, the industry wants people who are safe to drive taxis, the public want people who are safe to drive taxis and authorities want people who are safe to drive taxis.</p> <p data-bbox="488 873 2011 975">A Probationary licence implies that the person licensed is marginal, let's give them six months to see if they actually cause any problems or harm anyone in that period, if they don't then they are probably going to be OK, seems a dangerous idea.</p> <p data-bbox="488 1015 2040 1329">Most people are aware of the Rotherham Report and were extremely distressed by the details that emerged from it, especially that it was clear that the public perception of safety of taxis in that borough was extraordinarily low. People knew that there were nasty things going on with children and somehow in some way some of the taxi trade were involved with it. So there were an awful lot of people who were not prepared to put their children into taxis. So at all times of the day and night you had mothers and fathers, uncles and aunties, grannies and grandads driving these children around the borough to avoid putting them in a taxi. As regulators the authorities say to people the way to get home safely at the end of a night is to get a licensed hackney carriage or licensed private hire vehicle that you booked because you can trust it. I'm not convinced that probationary badges promote that safety message.</p>

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	<p>There are some authorities that have much lower standards than their neighbours and that is perceived to be the place that's the easiest and cheapest place to get a licence. Hopefully over time the general standards are going to rise and there are going to be fewer authorities that license really alarming drivers and really alarming vehicles. What we need are raised standards and we want the public to feel confident in taxis. That can only be achieved by applying the fit and proper test at the outset and not in stages.</p>
<p>#3 Steven McGuirk</p>	<p>Dear Licensing team,</p> <p>Thank you for your email and for the opportunity to give our views on the PH Probationary Badge scheme. Having read through all the different view points and concerns, we feel that the PHPB is a great tool which should be continued if possible, with a few changes which may address the majority of the issues raised, but keeping the essence of why it was initially introduced.</p> <p>Along with yourselves, we as Operators, have a mutual goal to ensure the industry is as professional as possible and that standards for the clients are high in every aspect. For us to reach and maintain these standards, we need to be in a position of strength and control, and a tool like the PHPB is perfect to allow this, thus ensuring we can demand the highest standards from our driver teams. Historically, when we have been low/starved of drivers, the existing drivers feel they are in a position of strength and then they can start to lower their own standards (Over charging, rude & unhelpful to customers, running late, dirty vehicles & personal bearing to mention a few issues we have experienced) with very little consequence, as we cannot discipline them for fear of them moving to another company, weakening us both logistically & financially too. The balance is very fine and we need a constant flow of drivers to keep the balance in check otherwise the end users experience can be an unpleasant one which nobody wants.</p> <p>As you state in your Background portion, TMBC has an obligation for safeguarding the suitability of all drivers/potential drivers which is absolutely right, but this is, and should also be, a joint effort with all Operators too. We as Operators need to support TMBC in every aspect of our industry, but to do that we still need the control of our teams which only volume of drivers gives. Each Operator works to a basic framework set out by TMBC, but as independent, individual businesses we all work to our own</p>

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	<p>refined rules & standards and each company invests in themselves in their own ways in all aspects, be that their vehicles, advertising, dress codes, working hours or even their dispatch systems & internal staff training. I know TMBC cannot be seen to favour any particular companies, but surely the better working, compliant companies earn the right to a pool of drivers to aid them in keeping up the standards they attain to, and a scheme to allow them fast access to these drivers.</p> <p>The barrier to entry is high, and rightly so, but the PHPB was brought in to slightly address this problem without compromising any passenger safety etc. If this is to be raised yet again which we feel the end of the PHPB would do, it would set most companies who employ the scheme back quite drastically, and in an area of constant home building, the demand would outstrip supply and move the balance heavily to less scrupulous people and possibly even encourage people to bend rules rather than turn work away. This would be countering all the great work that has been done over the past few years.</p> <p>All the points raised in all sections are valid, but they are too many to be dealt with individually via email, but we feel that 3 simple steps can adjust all of the concerns set out and still keep the scheme alive.</p> <p>1/ TMBC introduce a course/process for ALL companies that wish to use the PHPB scheme. In this scheme, each company or company mentor must pass an assessment, course or test to ensure that they/he/she understands what they/he/she are supposed to be doing in the 6 month trial period. This would stop anyone not being trained to an acceptable standard by the end of the 6 month period and it would also ensure constant communication between the companies & TMBC, particularly when people leave the allotted company.</p> <p>2/ Introduce a knowledge test at the end of the 6 month period before a badge is issued out. This would give the mentor an end goal in training and it would also encourage the potential driver to put in effort during the PHPB period. We have encountered some new drivers who put in minimal effort or use it as a part time/casual income source, and so their efforts & attendance is not the best. From the outset, if this is explained to these new people, it would possibly deter the time wasters from even starting.</p> <p>3/ Some time ago, we had a number of driver attend an NVQ course level 2 in Road Passenger Vehicle</p>

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	<p>Driving (Accreditation No 500/3122/3). This was a very basic course but it helped those drivers understand basic customer service and passenger safety. These drivers showed a far better attitude to the industry in general and to the customers in particular, and this could also be incorporated into the PHPB 6 month scheme to ensure a far better standard of driver at the end of it.</p> <p>These points are not extreme, but we feel they would sharpen up what is already a great tool, ensuring that all new TMBC PH drivers are of the highest possible standard and also encouraging actively participating Operators adhere to their side of the scheme. This can only enhance the end users experience and it can weed out any potential drivers who aren't really in this as a professional career.</p> <p>I look forward to your views.</p> <p>Kind Regards</p> <p>Steve McGuirk</p> <p>Place2Place</p> <p>Kings Hill Cars</p>
<p>#4 Sharon Degiorgio Senior Licensing Officer, Tunbridge Wells Borough Council</p>	<p>I recall a conversation with Jim Button in 2016 (I think) where he stated that we should not issue Probationary badges. I believe this may have related to potential safeguarding issues. However following the Deregulation Act where it amended two sections of the Local Government (Miscellaneous) Act 1976 that deal with the granting of licences to drive taxis and private hire vehicles and licences to operate private hire vehicles. It states:-</p> <p>55.Subsection (2) changes the law in such a way as to establish a standard duration of three years for taxi and private hire vehicle driver licences. The section specifies that a licence may be granted for a period of less than three years but only in the circumstances of an individual case, not because of a blanket policy. Therefore in addition to impact on resources etc,</p>

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<p>#5 Bob Veitch</p>	<p>Discontinuing probationary badges would be a retrograde step, that would directly affect the safety of the borough's residents, by reintroducing unlicensed drivers onto our streets. The consultation paper has completely ignored the main reason that these badges were introduced. The consultation paper acknowledges in paragraph 1.1.6 that applicants were waiting for excessive time periods to pass a knowledge test, however it ignores the fact that at least two large operators were circumnavigating the waiting period by using 'O' licenses. The use of 'O' licenses meant that there were many drivers spuriously working, having had no DBS check, no driving assessment, and no medical examination.</p> <p>Prior to the introduction of the probationary badge, I recall sitting in a meeting with the licencing officer, and the owner/operator of the largest fleet in the borough, and the operator clearly saying that if he had a free car, and a new applicant willing to drive the car, he would have no hesitation in allowing that applicant to drive the car on an 'O' licence. His justification was that he was running a business, and that his business relied on cars working.</p> <p>Prior to the introduction of probationary badges the vast majority of applicants would ask me if we had 'O' licences available, and when I said we didn't, the applicant would go straight to an operator that did.</p> <p>My understanding is that there was an unwritten agreement, and understanding that if probationary badges were allowed the larger operators would cease to use 'O' Licenses. I believe that in the main, this has happened.</p> <p>Since the introduction of probationary badges I have not had any applicants enquire about 'O' licenses.</p> <p>The consultation document seems to suggest that the reintroduction of the knowledge test would have a benefit in testing a candidate's knowledge of English, Maths, and also Safeguarding. It does not deal with the tests prime function, which is to test topographical knowledge. Again this ignores the main failing of this test when it was conducted. Tonbridge and Malling is somewhat unusual, in as</p>

Respondent	Comment
	<p data-bbox="533 225 2040 544">much as it is not centred on one town. Our drivers work in two distinctly different areas. It is very unusual for drivers from the south of the borough to work in the north, and vice versa. Consequently it is very difficult for potential drivers to gain knowledge of both areas, and indeed it is not necessary. In fact, it is not necessary for any driver to have a good topological knowledge of any area; even the most experienced driver will now rely on technology to direct them whilst working. Live traffic updates have meant that drivers with the best knowledge will put a Sat Nav on to ensure the quickest route is achieved. Many systems now give the customer a price based on the shortest route, regardless of the route taken, and consequently the quickest route is the most desirable.</p> <p data-bbox="533 580 2040 863">Should the knowledge test be used to test English, Maths, and Safeguarding? Simply, no. There is an issue with these matters, and they need to be dealt with. English and Maths can be dealt with very simply by requiring an applicant to complete the many application forms by hand, whilst in a controlled environment in the council's offices. Safeguarding is a subject that is far too important to be reduced to being dealt with by a couple of questions on a knowledge test. The licensing office has a training course already developed, and this should be attended as a requirement of the probationary period. Consequently it would only need to be delivered twice a year.</p> <p data-bbox="533 900 2040 1177">The consultation document expresses a concern that operators are not properly undertaking the responsibilities of coaching an applicant, and I am aware that we all will need to review how we approach this in future. However the current badge does require an operator to provide mentoring to new drivers. If the probationary badge is removed, there will be no such requirement. This will be detrimental to the new driver, the operator, and also, importantly, customers. Surely, if the licencing office has concerns over an operators ability to mentor new drivers properly, the privilege should be withdrawn from that operator, not all operators.</p> <p data-bbox="533 1214 2040 1327">The consultation document then tries to mislead us into believing that the cost of probationary badges has been £23,520 in the year to 21 October 2017. This calculation would imply that 168 applicants were issued with a probationary badge, but none of these were then issued with a full</p>

Respondent	Comment
	<p>licence. In paragraph 1.1.5 the document acknowledges that “the vast majority were issued with a full Private Hire Drivers Licence after six months”. At the point that the full badge is issued the applicant is required to pay the extra cost, so the cost to the council of the probationary badge is negligible. It is disappointing that the licensing office has tried to mislead us in this way.</p> <p>The document acknowledges in paragraph 1.1.5 that 493 licences have been issued, and in paragraph 1.1.8 that this is more than had previously been the case. Prior to the introduction of the probationary badge, the licensing department consisted of a senior licensing officer and a part time officer. The council could not afford any more staff, and consequently no enforcement work was being carried out at all. 493 badges will have created an income of £91,205 directly, but indirectly extra income will have been received from licensing extra cars, and increased cost of operator’s licenses. This has allowed extra officers to be employed and enforcement work is now being carried out.</p> <p>The document does not address the issue of accessibility to applicants. With a probationary badge the driver receives the benefit of a mentor, but also has the additional benefit of affordability. We currently have 5 drivers that have been with us for three years, who were previously unemployed for at least two years. They were on a government backed, back to work scheme, but would not have been able to afford to become private hire drivers if the probationary route had not been available to them. 75% of our current drivers have obtained their full badge after pursuing a probationary badge.</p> <p>In summary, the abolition of the probationary badge would be detrimental to all stakeholders, current, and future. Safety of customers would be compromised by the unintentional reintroduction of ‘O’ licences. Smaller operators would have difficulty recruiting new drivers. New drivers would have to find more money to enter the industry, and loose the benefit of mentoring, and the licensing office would loose income, this would lead to a reduction in enforcement.</p> <p>R J Veitch (badge number 1952), Apollo Taxi</p>

Respondent	Comment
<p>#6 H S Taxis Mr Lawrence Sawyer Moses</p>	<p>See Attached image</p>
<p>#7 Martin Newall General Manager Streamline Kent Ltd</p>	<p>Streamline believe that the probationary badge should stay in place, it has helped our company recruit drivers whereby without it potential staff would look to work in alternative industries, We do agree that a form of English written and reading test should be in place to ensure that candidates are of a suitable level, when considering an applicant we do take measures to ascertain what language abilities the applicant has. This could be improved with a written document supplied with the application by TMBC which we could test the driver on, as we are a beneficiary of the probationary licence we would be happy to conduct this test, as I am sure other operators would too. We are currently going through a process with will allow us to be a training centre for CPC applicants and would be happy to incorporate this into our future plans.</p> <p>We also have a high level of safeguarding knowledge based around other parts of our business (we are CQC registered) and would again be willing to incorporate it into an application.</p> <p>Regards, for and on behalf of Ben Acres,</p> <p>.</p>
<p>#8 Des Keers Borough Councillor for Aylesford North and Walderslade</p>	<p>In response to your request for feedback following our last meeting I submit the following.</p> <p>I absolutely agree with your recommendation to remove and discontinue the private hire probationary badge.</p> <p>I have worked at a strategic level as you know with all licensing authorities across Kent and acknowledge that we are the only council offering this service. My understanding is that we sought to implement this system as a simple process to speed up applicants ability to start work prior to taking the National knowledge test , which was taking too long to administer. For this reason TMBC have become a target for applicants seeing a quick and easy way into the taxi licensing trade without taking the National</p>

Respondent	Comment
	<p>test but instead having this scheme to be a type of cover all with a supposed mentoring program built in.</p> <p>This has caused TMBC to bare the brunt of applicants and increased workload with it. I agreed at the meeting with comments around staffing shortages should never be a cause for ceasing a worthwhile process as it is down to team management to secure and implement alternative processes to make things work. However as this is not a must have process but a nice to have one, it does not bring value to our cause and as identified is in fact detracting from the TMBC efficiency and finances.</p> <p>I totally disagree with others at the meeting who stated that there is a risk to public safety if we stopped this process. I agree with your report in that the normal safety checks are completed in any case and the o lyrics thing missing from a probationary badge driver's portfolio is the national knowledge test. However as you explained the number of tests will be increased so that people can gain their full badges quicker than was the norm. This in my opinions brings us in line with the rest of the county and there really is no benefit whether it be financial or public safety orientated in keeping the current process.</p>
<p>#9 Alin Badea</p>	<p>I have got into this industry starting with the probationary badge because I enjoy driving and meeting new people. It was an encouraging process to obtain the taxi driver licence with the probationary badge. I have been starting with Apollo taxis in Maidstone and I have understood what means the customer service in the taxi industry. 2 years later I have decided to start my own business being an operator as a first step.</p> <p>In one year time since I have started, I could not find drivers happy to start with the full badge straight away because I could not be a mentor until 17/04/18. I think all the businesses in this sector licenced by TMBC will be struggling badly to get new drivers on the road without a probationary badge option.</p> <p>Of course, some of the businesses that are already big they will not be affected as much as I will be. Speaking of safety, I think mentors should be a bit more strict with the drivers and the price can be increased to cover the TMBC costs.</p>

Respondent	Comment
	<p>I am trying to provide best customer service for my business and I am very careful what drivers I am choosing to be on the road without tolerating any mistakes.</p> <p>With all this, the probationary badge is the most important element of my business and I will be very disappointed if this is being discontinued.</p> <p>Kindest Regards</p> <p>Alin Badea</p>
<p>#10 Name : Nael Habboush badge no PB 443</p> <p>Operator : Express</p>	<p>Dear Sir/Madam,</p> <p>Thank you for this consultation , I would say everyone deserve a try , I know some people have got no manners or how to deal with people but the decent ones should not suffer because of few who does not deserve it , I am not getting enough jobs now due to the increase no of badges been issued , I would say best to deal with every case individually that's my suggestion</p> <p>Kind Regards, Nael Habboush</p>
<p>#11 Ann Kemp</p>	<p>I am exceedingly concerned by this proposal. The knowledge that new private hire licences have been for a 6 month probationary period with an established company, has for several years been an assurance to the Licensing panels that checks were being made to make sure drivers were competent and suitable before the granting of a full licence which would allow them to "go it alone". If one of the reasons for discontinuing this practice is that this was not working, I consider that to be a separate matter which needs to be urgently addressed.</p> <p>I would have no objection to the idea that applicants should be required to sit a knowledge test prior to the issuing of a license, but feel this should be in addition to a 6 month probationary period with a</p>

Respondent	Comment
	<p>mentor. The instigation of this requirement may slow the number of applicants, which in turn, may ease the workload of the licensing department.</p> <p>The safety and wellbeing of passengers must not be compromised so must be at the forefront of any decision, cost cutting and workload of the department, whilst important should not be used as a reason to jeopardise out high standards.</p>
<p>#12 Colin King crs-services</p>	<p>Comments on the licence charges/restrictions:</p> <p>1/ I think it should continue and more tests/ restrictions be put in place.</p> <p>2/ Regards to the cost, even though it is only a 6 month licence, if it costs £185 to produce the licence why should you charge anything less than that. You should charge all those wishing to be licenced the £185 charge, this may put some off, but equally large number of new in-experienced drivers are coming to Tonbridge & Malling from out of the area as their local council are not issuing new licences, and it is common knowledge Tonbridge & Malling have no caps in place and are freely handing out new licences with minimal restrictions and costs. (Info from new driver from out of the area)</p> <p>Comments regarding Private hire / hackney carriages working off the rank:</p> <p>Comments I have got from some of my regulars referring to standard of cars and drivers working off the rank, they are not knowing where they are going even on local trips.</p> <p>They talk on their telephones to family members and friends whilst they have a fare on board.</p> <p>They engage in in-appropriate chat with young ladies, asking for telephone members/email addresses etc.</p> <p>Over pricing/pretending to forget to put meter on and then guessing at a price, which is normally over inflated.</p> <p>The cabs are filled with smoke.</p> <p>Customers do not feel able to complain to ask for driver's badge numbers for free of the implications, they may have been dropped at their home address etc.</p>

Respondent	Comment
	<p>I have witnessed bad standards of driving and general awareness of the Highway Code, drivers have mounted kerbs and performed illegal U-turns in the road in the race to get back to the rank.</p> <p>Under the circumstances, rather than to lower standards to allow more drivers to be licenced cheaply and quickly, the council should have more stringent checks in place and only licence those that are going to uphold the standards.</p> <p>I hope this helps I have had my own business for 13 years now and have a nice customer base and tend to get a lot of feed back about the local drivers</p> <p>Regards</p> <p>Colin King</p>
<p>#13 Roger Roud</p>	<p>I have a number of concerns regarding this issue.</p> <ol style="list-style-type: none"> 1. If it was deemed necessary for drivers to have a probationary licence, what has changed significantly to now consider it not necessary? 2. The possibility of putting the public at risk is there if the probationary licence is discontinued. Public safety is paramount. 3. I don't think that we should abandon this licence simply because we don't have time to process them is a good enough reason to do away with the probationary licence. Is this simply down to finances. It should not be! I believe councillor Sullivan made a comment to this effect at the meeting of the Licencing committee. 4.If some mentors are not up to training their probationers correctly then we could end up with a substandard quantity of drivers who in time might become substandard mentors themselves. 5. At the recent Licencing committee meeting we were advised that TMBC were the only borough in Kent using this system. Surely we should be encouraging other boroughs to adopt a similar system since their drivers working in T & M may be putting our public at risk. <p>Hope you find my comments helpful.</p>

Respondent	Comment
<p>#14 Martyn de Young</p>	<p>Comments</p> <p>I gained a TMBC probationary license in September 2014. Being long-term unemployed at the time, I couldn't have afforded anything more. I was well supported and tutored during that time (and indeed, since) by my mentor, Bob Veitch at Apollo.</p> <p>I have recently had to relinquish my PH career due to a deteriorating eye condition, but I'm hoping to stay in the industry and currently training as a controller at Apollo, so I hope my contribution will still count towards your consultation.</p> <p>The past three and a half years has been the most fun I have ever had at work - ever - and although a complete beginner at the start, I have gained a lot of useful experience.</p> <p>Whilst I can see the cost implications of the scheme to TMBC, perhaps pricing the probationary licence higher could be considered? Maybe £150, with a £50 discount off of the full licence if the probationer stays on? This would still cost a little, but make a saving on the present cost structure</p> <p>I do hope you are able to save the probationary scheme in some form. To drivers such as myself, it is a veritable life-line.</p> <p>Regards,</p> <p>Martyn de Young, former TMBC Licenced PH Driver No. 63.</p>
<p>#15 Tom Veitch Apollo Taxis</p>	<p>I feel that the probationary badges are vital to getting people into the trade, They allow people to get into work quickly whilst still carrying out the legal checks needed.</p> <p>I think that a 3 month check to make sure they are performing to a good standard would be beneficial, and on a personal note I think that I need to be tighter on the forms I sign. If people are caught working for another operator with the a probationary badge that is not registered to them then action should be</p>

Respondent	Comment
	<p>taken against the operator.</p> <p>In terms of safe guarding I think an online training programme would be perfect as an operator I would be more than happy to carry out this training and sign it off as part of the mentoring scheme. Safeguarding training would be hugely beneficial as we have had a couple of issue's (with experienced drivers it has to be said and both licensed with a different authority) where a bit of safeguarding would have benefited from changing slightly what they said.</p> <p>I don't feel that making people go through the processes of getting the full badge will create any benefit when it comes to being out on the road as they still will be inexperienced, at least with the probation period they are responsible to one person who should be keeping an eye on things.</p> <p>An English test would be great again maybe online as this would be helpful as Katie knows I have been caught out with this before and it is embarrassing when the customer complains and does not look good for any one.</p> <p>In the main the probation period has been very successfully and Apollo has gained a lot of drivers who are an asset to both us and yourselves.</p>

#6 - H S Taxis Mr Lawrence Sawyer Moses

**Consultation discontinuing Private Probationary Badges.
Consultation Response.**

To The Licensing Team (TMBC)

Name: Mr Lawrence Sawyer Moses
Email Address; hst.booking@gmail.com
Operator name if you Have an Operator's Licence Mr Lawrence Sawyer Moses
Driver Badge Number [REDACTED]

In response to your email, I would firstly like to thank the Licensing Committee for allowing consultation about discontinuing Private Hire Probation Drivers' Badges. After having read all the concerns expressed by the TMBC regarding this matter, I would like to offer my thoughts and proposals as a way forward to enable a satisfactory conclusion to all concerned.

Problems in relation to safeguarding and costs are apparently the issues being raised and I would like to offer the following suggestions:

After a 6 months trial an appropriate test should be given together with an interview to ascertain suitability for all aspects of a Private Hire licence. Failure to satisfy the requirements would mean an extension of the probationary period for a further 6 months at the expense of the driver.

Full badges should not be issued to drivers until after the applicants reach mandatory requirements.

The operator should have at least 5 years experience in the taxi business before recommending any drivers for probationary badges and have a bona fide operating address with the local council. Probationary badges should not be issued to operators who are using residential addresses as their base. I am aware of instances where this has been the case.

Operators should not be allowed to put probationary drivers forward for the purpose of school runs only.

On the issue of costs, the price for probationary badges should increase to £150.00. This will also help to reduce the number of applications.

Operators should be made more responsible to ensure awareness of laws.

As a stakeholder, it would have a negative impact on my taxi business should the Private Hire probationary badges be discontinued. It is inevitable that some drivers will move on from their original operators. However, more closely guarded monitoring and probationers meeting extra costs would resolve problems. I sincerely hope that, as a licensing authority, due consideration will be given to the proposals I have put forward.

Kind Regards

[REDACTED]
Lawrence Sawyer Moses