

# **TAXIS ACT (NI) 2008**

## **Taxi Driver Test and Periodic Training**

## **Proposals for Public Consultation**

July 2013

## **Alternative Formats**

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## Abbreviations

The table below outlines some abbreviations used within this document.

Abbreviation	Meaning / Definition
ADI	Approved Driving Instructor
DOE	Department of the Environment
DPA	Data Protection Act 1998
EQIA	Equality Impact Assessment
FOIA	Freedom of Information Act 2000
RIA	Regulatory Impact Assessment
The Act	Taxis Act (Northern Ireland) 2008
ONS	Office of National Statistics
BPH	Belfast Public Hire
RPH	Restricted Public Hire
PH	Private Hire
MID	Measuring Instruments Directive
PCO	London Public Carriage Office
LGV	Large Goods Vehicle
PCV	Passenger Carrying Vehicle

## 1 Arrangements

#### 1.1 <u>Purpose of Consultation</u>

- 1.1.1 This consultation document seeks views on proposals made by the Department of the Environment (DOE) Road Safety and Vehicle Regulation Division (RSVRD) on the introduction of a taxi driver test and periodic training requirements. It must be stressed that the issues raised in this paper are only proposals at this stage and any policy decision will not be finalised until all responses to this consultation have been fully considered.
- 1.1.2 Your views are invited on the proposals and, in particular, the likely impact of them for you or your organisation.

#### 1.2 <u>Your invitation to comment</u>

- 1.2.1 The consultation is aimed at people involved in the taxi industry in NI. This includes taxi operators, taxi drivers and consumers who use taxi services. Drivers of all types of taxi will be affected, including limousines and those providing transport for weddings and funerals.
- 1.2.2 The publication is available, upon request, in large print, Braille and audio alternative formats. Please inform us, by way of the contact details below, as soon as possible if you require a copy of the consultation in any of these formats.
- 1.2.3 An electronic copy of the consultation document and an electronic copy of the reply form can be obtained if required by using the contact details below, or by visiting the following link:

www.doeni.gov.uk/index/road\_users/taxi\_reform\_2012/taxi\_driver\_licensing.htm

- 1.2.4 All comments and views on the options outlined are welcomed. If you wish to respond to this consultation, please complete the attached form at Annex 2 and forward your comments in any of the following ways:
  - E-mail: taxisact@doeni.gov.uk
     Write to: Taxi Reform Team

     Vehicle Policy Branch
     Road Safety & Vehicle Regulation Division
     Clarence Court
     10 18 Adelaide Street
     Town Parks
     BELFAST
     BT2 8GB

     Telephone: 0300 200 7839
     Textphone: 028 9054 0642
- 1.2.5 The closing date for all responses is **27 September 2013**. Any responses which do not arrive on or before this date will not be included in the summary of responses, and thus will not be included when considering recommendations.
- 1.2.6 A copy of this consultation has been issued to the organisations listed in Annex 2. This list is not exhaustive, but is representative of the types of organisations this document has been sent to. Please advise the Department, using the details above, if you know of other organisations or individuals that you feel should be sent a copy.

1.2.7 If you are replying on behalf of an organisation or group, it would be helpful if you indicated who you are representing, what the organisation / group does and what its aims are, how many individuals' views are included in the response, as well as what steps you have taken to gather those views.

#### 1.3 Freedom of Information

- 1.3.1 Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004 (EIA).
- 1.3.2 If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.
- 1.3.3 In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.
- 1.3.4 The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

1.3.5 This focused consultation is based on the principles of the Government's "Code of Practice on Consultation", subject to the caveat mentioned above.

#### 1.4 Code of Practice on Access to Government

- 1.4.1 The Government has adopted a Code of Practice on consultations. Therefore, information supplied to the Department may be disclosed in response to a request under the Code of Practice on access to Government Information. If you consider that any such information is either confidential or commercially sensitive, you should identify the information to the Department and specify any reasons for its sensitivity. The Department will consult you about the information before making a decision on any Code of Practice on access to Government Information request received.
- 1.4.2 The Code of Practice contains seven criteria which should be reproduced in all consultation documents. Deviation from the code will at times be unavoidable, but the Government aims to explain the reasons for deviations and what measures will be used to make the exercise as effective as possible in the circumstances.

#### 1.5 <u>The Seven Consultation Criteria</u>

- When to consult. Formal consultation should take place at a stage when there is scope to influence the policy outcome.
- *Duration of consultation exercises*: Consultations should normally last for at least eight weeks with consideration given to longer timescales where feasible and sensible.

- Clarity of scope and impact: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
- Accessibility of consultation exercises: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.
- *The burden of consultation*: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' are to buy into the process.
- Responsiveness of consultation exercises: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
- *Capacity to consult*: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

## 1.6 <u>What we will do after the consultation?</u>

1.6.1 The responses to this consultation will be collated and used to further evaluate any potential impact of the proposed Regulations on the community. Where any unforeseen impact is identified, the Department will reconsider the proposals with a view to minimising any detrimental outcomes.

#### 1.7 Application within the United Kingdom

1.7.1 This consultation seeks views on proposals for a taxi driver test and periodic training requirements in Northern Ireland. The requirements will

not apply in Britain, as separate legislation outlines the requirements for taxi drivers there.

#### 1.8 <u>Help with Queries</u>

If you have any queries or require further information about this consultation, please do not hesitate to contact the Taxi Reform team at the address given in paragraph 1.2.4.

## 1.9 <u>Closing Date for Responses</u>

1.9.1 The closing date for responses is 27 September 2013.

#### 2 Taxi Driver Test Proposals

#### 2.1 Background

- 2.1.1 In 2006, DVA met with a number of representatives from the taxi industry including drivers and operators to discuss the re-introduction of a taxi driver test in Northern Ireland. These meetings informed a consultation which DVA released in 2007, and which in turn informed the drafting of the Taxis Act (NI) 2008.
- 2.1.2 Now that the Taxis Act has been introduced, the Department is reconsulting on the detail of the proposals to introduce a Taxi Driver test in Northern Ireland, and to require all taxi drivers to undertake regular periodic training prior to renewing their taxi driver licence.

#### 2.2 <u>Testing Options Considered</u>

- 2.2.1 In the initial consultation in 2007 four options were considered for those who would be affected by the Taxi Driver Test:
  - i. New Taxi Drivers only
  - New Taxi Drivers and those who did not complete the previous DVA Taxi Driver test prior to 1996
  - iii. All Taxi Drivers
  - iv. All Taxi Driver Licence holders except those currently active
- 2.2.2 The preferred option at that time was (i), given the complexities and associated costs identified with the other options. The responses to the consultation indicated that almost 82% of the consultees were in favour of the preferred option.

2.2.3 The Department considers that option (i) is still the preferred option. It would require all those wishing to obtain a taxi driver licence in Northern Ireland for the first time to complete a taxi driver test with DVA prior to their licence being issued.

Q1: Do you agree that the Taxi Driver Test should apply to new taxi drivers only, and that all current taxi driver licence holders should be exempt?

- 2.2.4 The EU Directive on the recognition of professional qualifications (2005/36/EC) states that persons who have acquired professional qualifications in a Member State should have access to the same profession and be able to pursue it in another Member State with the same rights as nationals. For this reason, the Department will treat driver licences obtained in another Member State to be recognised in Northern Ireland.
- 2.2.5 However, the Directive goes on to say that any migrant professional must comply with any non-discriminatory conditions of pursuit which might be laid down by the latter Member State, provided that these are objectively justified and proportionate. In other words, the Department would still expect those from other member states to complete the taxi driver test in the same way it would be expecting its own nationals to do so.
- 2.2.6 The Department is of the view that this is in line with the Directive, i.e. it is non-discriminatory and objectively justified. In short, the Department is of the view that even though qualifications are recognised, it does not perceive this as making an EU driver exempt from the taxi driver test and therefore the Department considers that it is complying with the

Directive.

- 2.2.7 As this is a devolved Government policy, the Department proposes that taxi drivers in other jurisdictions within GB will also be able to transfer their taxi driver licence to Northern Ireland but as with taxi drivers from other Member States will be required to take the taxi driver test.
- 2.2.8 The recognition of their qualification and/or experience as a taxi driver would be subject to them having sufficient knowledge of English to carry out the role of a taxi driver in Northern Ireland. The Department plans to require drivers to provide evidence of their knowledge of English via a recognised qualification that would equate to the equivalent of an Entry Level Certificate in English.

Q2: Do you agree that taxi drivers from other EU Member States and other jurisdictions within GB should be required to take the taxi driver test in Northern Ireland and should be required to provide evidence of their knowledge of English?

#### 2.3 Format of the Test

2.3.1 Currently DVA offers two other types of professional driving test - for LGV and PCV licences respectively. In the initial consultation in 2007, the Department considered that taxi driving is a similar profession to the above, and therefore the taxi driver test should be of a similar format to these tests. However, the Department believes that further options in relation to the Taxi Driver Test should now be included and therefore proposes the following options for consideration.

#### 2.3.2 Option 1a – Theory test only without case studies

The theory test would be specifically developed to take account of the needs of the taxi industry, disability issues and road safety issues. It would include a multiple choice test and a hazard perception test.

#### 2.3.3 Option 1b – Theory test only with case studies

As option 1a but would also include case studies based on real-life scenarios which a taxi driver might encounter in his working life. The aims of the case studies would be to test the taxi driver's practical knowledge. This is already in place for the LGV and PCV licences and the test is written by industry experts with the questions based around the case study. A sample case study from the LGV theory test is included at Annex 1 for information. The theory test is discussed in detail in Section 2.4.

#### 2.3.4 Option 2 – Practical test only

A practical test would be based on the current car test but the candidate would be expected to drive to a higher standard demonstrating their ability to drive smoothly and act in the interests of customer service, safety and comfort. The practical test is discussed in Sections 2.5 - 2.9 and also explores other issues, including wheelchair access vehicles, eligibility requirements and expired taxi driver licences.

#### 2.3.5 Option 3 – Periodic Training only

Periodic training for drivers may make the industry more professional and attractive as a career and would help to create an improved public image of the industry. It is proposed that applicants for a taxi licence would have to have completed 7 hours training for every year of the licence duration. For example, a 5 year licence would incorporate 35 hours training during the length of the licence. Training would be specified; some of which would be mandatory topics to be completed during the life of the licence. Other training would be selected from a list of relevant topics which would give an element of flexibility and would permit drivers to carry out training relevant to their needs. All drivers would be required to undertake the training. Periodic training is discussed in depth in Section 3.

#### 2.3.6 Option 4 – Options 1, 2 and 3 combined

The initial consultation in 2007 proposed the introduction of a practical driving test and theory test alongside periodic training. This would mean that all drivers wishing to obtain a taxi driver licence for the first time would have to sit both the practical and theory tests. However, it would be a mandatory requirement for all new and existing taxi drivers to participate in the periodic training.

#### 2.3.7 Option 5 – Combination of any 2 from options 1, 2 or 3

This could be, for example, one of the following options:

- A theory and practical test for new drivers only;
- A theory test for new drivers and periodic training for all drivers; or
- A practical test for new drivers and periodic training for all drivers
- 2.3.8 The Department considers that Option 4 is the most appropriate option as it would mean that the taxi driver test would provide the taxi industry with the same professional reputation as those drivers in other industries. It would also help to create consumer confidence in the ability of drivers as well as greatly improving road safety awareness for the taxi industry. Therefore, it is proposed that the taxi driver test would involve both a theory test, including case studies, and a practical test, each of which would be the same duration as the respective tests in the other

professional industries. New and existing drivers would also be required to participate in periodic training.

Q3: Do you agree that Option 4 is most appropriate to take forward for the Taxi Driver Test? If not, please state your preferred option and your reasons for choosing this particular option.

#### 2.4 <u>Taxi Driver Theory Test</u>

- 2.4.1 The theory test for an LGV and PCV driver who wishes to drive professionally involves a multiple choice test, a hazard perception test, and a further set of case study questions. Therefore three separate tests are involved.
- 2.4.2 The multiple choice questions cover specific questions relating to the category of test being taken, and questions which apply to all road users. There are 100 questions to answer in 115 minutes, and the pass mark is 85 out of 100.
- 2.4.3 The hazard perception test for professional drivers contains 19 clips which feature everyday road scenes, each lasting approximately one minute. To achieve a high score, the candidate needs to respond to a developing hazard during the early part of its development. The pass mark for the hazard perception test is 67 out of 100.
- 2.4.4 Case study questions are computer-based, each one based on real-life scenarios you may encounter in your working life. They aim to test a driver's knowledge and how they put it into practice. Each test is made up of 7 case studies, each one with 6 8 questions, with a maximum score of 50. The pass mark for the test is 40. The case studies take approximately 90 minutes to complete.

- 2.4.5 The Department considers that professional taxi drivers should be required to take a theory test that is of similar standard to that taken by other professional drivers. It is proposed that the taxi driver theory test would have multiple choice, hazard perception and case study elements with the same number of questions and pass mark as the LGV and PCV theory tests. Topics which would be assessed include legislation, the hospitality industry and road safety issues. Questions could also cover how a taxi driver can best meet the needs of disabled customers, including wheelchair users, catering for assistant dogs and assisting a customer to the vehicle.
- 2.4.6 The Department considers that disability awareness training and a securing/harnessing wheelchairs training course would ensure that a greater number of taxi drivers are equipped with the skills they need to safely and comfortably transport disabled people in taxis. Also, it is deemed that there is a high turnover of taxi drivers within the industry, particularly in rural areas of Northern Ireland which subsequently creates problems for the availability of properly trained drivers dealing with customers with certain accessibility requirements. Having a DOE/DVA approved accessible taxi driver training scheme in place, which contracting agencies and members of the public are familiar with, could help to address this.

Q4: Do you agree that the taxi driver theory test should have the same number of questions and pass mark as the LGV and PCV theory tests?

Q5: Do you agree that the taxi driver theory test should include case study questions?

2.4.7 All theory tests are displayed on-screen in English. For theory tests for

car drivers and motorcyclists an audio voice-over in 20 different languages is available. However, it is considered that professional drivers should have a sufficient command of English to enable them to complete their test in English only, and therefore the theory test for professional LGV and PCV drivers is only delivered in English. It is proposed that the taxi theory test will be available in English only for the same reasons.

Q6: Do you agree that the taxi driver theory test would only be available for completion in English?

#### 2.5 <u>Taxi Driver Practical Test</u>

- 2.5.1 The practical driving test for LGV and PCV drivers involves a 60 minute drive on the road, a set of five vehicle safety questions and a set of manoeuvring exercises, which due to the size of the test vehicle, are carried out off road.
- 2.5.2 The Department proposes that the taxi driver test would be of a similar standard to that for bus and goods vehicle drivers. Whilst there would be no need for the off road manoeuvring exercises, it is proposed the 60 minute drive of the road would be required for taxi drivers as would a set of five vehicle safety questions.

Q7: Do you agree that the practical taxi driver test should be of a similar duration to that for LGV and PCV drivers?

2.5.3 LGV and PCV drivers who wish to drive in a professional capacity are required to sit an additional practical test with DVA, called a module 4 test, designed to assess the candidate's practical ability to carry out vehicle safety checks. This test has been developed with the support and advice of the industry. In this 30 minute test drivers are required to demonstrate their knowledge and ability in the areas listed below:

- Ability to load the vehicle with due regard for safety rules and proper vehicle use
- Security of the vehicle and its contents
- Ability to prevent criminality and trafficking of illegal immigrants
- Ability to assess emergency situations
- Ability to prevent physical risk
- 2.5.4 It is proposed that similar areas related to the taxi industry are assessed within the practical driving test for a taxi driver licence, rather than require a separate test. Areas covered could include such things as assisting disabled passengers, customer care, as well as some of the areas identified above.
- 2.5.5 If such a practical assessment was included as part of the taxi driver test, consideration would need to be given whether failing one part of the driver test would result in the driver having to resist both parts again. The practical driver test could be a one part test which could result in a failure if the candidate failed either the practical driving element or the customer care element, or the test on assisting disabled passengers could be outsourced (see paragraph 2.7).
- 2.5.6 Another option would be a single event with 2 parts or 2 separate tests. If only one part is passed it could be banked until the other part is passed. Given that this would require additional test booking arrangements and for recording passes in each area, this could lead to an increase in the costs to the driver of taking the taxi driver test.

Q8: Do you agree that the practical taxi driver test should include an assessment of drivers' ability in areas relating to assisting disabled passengers, customer care, to vehicle safety and to the taxi industry as a whole? If so, should the test become a 2 part test?

2.5.7 The responses from the 2007 consultation indicated that over 71% of consultees believed that the pass criteria for a taxi driver practical test should be higher than that for a standard car driving test. Therefore the Department proposes to require a higher standard of driving in order to pass the taxi driving test than would be required for the standard category B driving licence. Candidates would be expected to display a high standard of ability and knowledge.

Q9: Do you agree that a higher standard of driving should be required to pass a taxi driver test compared to a normal car driving test?

2.5.8 The normal car practical test requires one of three specified manoeuvres to be completed. The practical test to become an Approved Driving Instructor requires four manoeuvres to be completed. The Department proposes that four specified manoeuvres would need to be completed during a taxi driver practical test.

Q10: Do you agree with the proposals for four specified manoeuvres to form part of the taxi driver practical driving test?

2.5.9 In 2007 it was proposed that during the practical driver test, taxi drivers would be assessed on their ability to drive in a smooth manner to ensure the comfort of the passenger while driving. There was 77% support for this proposal, so the Department continues to support this.

Q11: Do you agree that taxi drivers should be assessed on their ability to drive in a smooth manner to ensure the comfort of the passenger while driving?

#### 2.6 <u>Minimum Test Vehicle Requirements</u>

2.6.1 In 2007 the following minimum test vehicle requirements were proposed in the consultation:

A four-wheeled motor vehicle of no more than 3.5 tonnes, capable of at least 100km/h. The vehicle must be a saloon or estate type vehicle with a minimum engine size of 1600cc and a minimum length of 13'-0", and a minimum of four doors. It must be suitable to be licensed as a taxi. It should be fitted with front and rear seats, fully functional seat belts for the front and rear seats, an appropriate head restraint for the front passenger seat; and a suitable rear view mirror fitted for use by the examiner. A mirror fitted to the sun visor is not acceptable.

2.6.2 Of the previous responses received 85% were in support of these minimum test vehicle requirements.

Q12: Do you agree with the proposed minimum test vehicle requirements proposed for the practical taxi driver test?

#### 2.7 <u>Wheelchair Accessible Vehicle (WAV) Drivers</u>

2.7.1 On 4 July 2011 the Department released a consultation proposing that all taxis wishing to use ranks would need to be wheelchair accessible. Initially this will apply in Belfast City Centre only, as this is a current requirement to obtain a Belfast Public Hire taxi licence, but from 2016 it

would apply across Northern Ireland.

- 2.7.2 Consequently if a driver is driving a WAV, consideration needs to be given to assessing the driver on the ability to assist a wheelchair user into the vehicle and to ensure they are safely secured. If this were to be introduced into the practical driving test a wheelchair accessible vehicle would be required for all taxi driver tests. This could be overly burdensome for those drivers who do not operate from ranks and therefore use a saloon type vehicle.
- 2.7.3An alternative would be to require a separate assessment for drivers of WAVs, which would be conducted by an accredited/recognised third party who would then issue the certificate to the driver. He would be required to carry this with him in his vehicle at all times to provide evidence to enforcement of his qualification to drive a WAV. DVA would quality assure the process and would designate or approve a third party organisation(s) to carry this out on their behalf. The driver would book this test directly with the test provider, who would provide them with evidence of a test pass in a standard format approved by DVA. The fees for this test would then be set by the private sector provider, rather than by DVA. The Department proposes that this assessment is undertaken prior to each renewal of the driver's licence in line with the proposal for periodic training. More information on licence renewal and periodic training requirements is provided in Section 3 of this consultation document.

Q13: Which of the following options do you prefer?

(i) the practical driving test should include the assessment of driver's ability to assist a wheelchair user and to ensure they are secure, and all driving tests carried out in a wheelchair accessible vehicle

(ii) a separate mandatory assessment should be introduced for all drivers of WAVs and carried out by DVA

(ii) a separate mandatory assessment should be introduced for all drivers of WAVs and carried out by an external body

- 2.8 <u>Eligibility</u>
- 2.8.1 Currently in order to obtain a taxi driver licence, a driver must have held a category B licence for at least one year. The Department has no plans to change this requirement.

#### 2.9 Expired Taxi Driver Licences

- 2.9.1 Some taxi drivers in Northern Ireland may allow their taxi driver licence to lapse if they make a career change or stop driving a taxi for another reason.
- 2.9.2 The Department welcomes views on whether a taxi driver whose licence has expired for longer than a certain number of years should be required to complete the taxi driver test if they had not previously done so.
- 2.9.3 Drivers who had completed the taxi driver test, and subsequently allowed their licence to lapse, would not have to resit the test. This is in line with the current policy for other professional drivers who do not have to resit their test if the licence lapses. However, it is proposed they would have to complete the full three days periodic training requirement prior to their licence being renewed, should this requirement be introduced.

Q14: Do you agree that drivers whose taxi driver licence had expired for more than a certain number of years should have to:

(a) complete a taxi driver test if they had not already done so; or

(b) complete three days periodic training prior to licence renewal (if this were to be introduced for all drivers)

If so, after how many years do you think this requirement should be introduced?

### 3 Periodic Training

#### 3.1 <u>Period of licence validity</u>

- 3.1.1 Bus, coach and lorry drivers are required to renew their licence every five years, therefore allowing them longer between each licence renewal to complete their periodic training.
- 3.1.2 Taxi drivers' licences are also renewed every five years. The Department proposes to amend this to three-yearly renewal as this is a requirement within the Taxis Act. Once the Taxis Act is commenced the Department will not be able to issue licences with a longer validity period.

#### 3.2 <u>Training Requirements</u>

- 3.2.1 Previous consultation with the taxi industry has indicated they are in favour of requiring periodic training for drivers as it would make the industry more professional and attractive as a career. It could also improve the overall public perception of the industry if taxi driving is seen as a more professional career, generating increased custom.
- 3.2.2 Recent research undertaken by the Department that more work needs to be undertaken to improve the quality standards within the taxi industry thereby encouraging more consumers to take taxis.
- 3.2.3 Currently other professional drivers are required to undertake 35 hours

of periodic training prior to renewing their licence every five years. This equates to an average of seven hours training per year, or one day, for both bus and goods vehicle drivers. The training cannot be taken in blocks of less than seven hours at a time, but it can be taken in larger blocks, if the driver prefers, providing they are in sections of 7 hours (14, 21 hours).

3.2.4 The Department considers that the taxi industry is a professional industry and proposes similar periodic training requirements for all taxi drivers.

Q15: Do you agree with the proposals to require 21 hours training every three years to have been completed before licence renewal?

#### 3.3 <u>Content of the Training</u>

- 3.3.1 It is important that training is both industry specific and driver specific, providing the driver with the additional skills they need to do their job well and effectively. Consideration needs to be given to any potential mandatory topics that stakeholders believe the Department should require drivers to cover. This could include topics which would be mandatory for the first set of training taken by existing drivers, or topics which would be mandatory for completion every time a driver renew their licence. Drivers would also not be able to complete more than one course on the same topic within the same three-year period.
- 3.3.2 Representatives from disability groups have suggested that all taxi drivers should be required to take training on disability awareness. This would include, but not be limited to, the assistance of wheelchair users into and out of wheelchair accessible taxis. Other topics could include

assistance of those with sight and hearing difficulties, or those with limited mobility. Given that from 2016 all taxis standing at ranks in Northern Ireland will need to be wheelchair accessible, there may be merit in making disability awareness a mandatory training requirement. This would include, but not be limited to, the assistance of wheelchair users into and out of wheelchair accessible and non-wheelchair accessible taxis.

- 3.3.3 Another possible mandatory training topic could be customer service.This could contribute to increased taxi usage by the public.
- 3.3.4 The Department is seeking the views of stakeholders as to whether these, or any other topics, should be made mandatory for taxi drivers to complete. Views are also sought as to whether the Department should specify all training topics which must be delivered, without leaving any free choice to the individual driver.

Q16: Do you think that some topics should be made mandatory for taxi drivers to complete during their periodic training cycle? If yes, please list these, indicating whether they should apply for each licence renewal or just for the first.

Q17: Do you think the Department should set some or all of the topics to be covered in the taxi driver training?

#### 3.4 <u>Delivery of Training</u>

3.4.1 The Department does not envisage providing the training for the taxi industry. Periodic training for the bus and freight industries is carried out by the private sector. Training courses will be approved by DVA on the

recommendation of Joint Approvals Unit for Periodic Training (JAUPT), and drivers are free to chose where they take their training. Only approved trainers are authorised to deliver approved courses which are audited for content and delivery. Any other courses taken by drivers do not count towards periodic training.

- 3.4.2 The Department proposes that a similar process would be in place for the approval of taxi training courses. Only approved courses would be credited to the driver when it came to licence renewal. The driver would be free to choose the training provider or providers with which to take the training.
- 3.4.3 Approval would be undertaken by the DVA on behalf of the Department. The training provider would pay for an application for consideration by the Department, which would cover the cost of processing the application and assessing the training centre or course. Once approved the trainer would be free to set the price for each approved course provided to the taxi industry.

#### 3.5 Evidence of Training

- 3.5.1 The Department has considered a number of options for how drivers would be required to provide evidence of their periodic training when it came to renewing their licence.
- 3.5.2 When training is undertaken by bus or lorry drivers, it is recorded by the training provider electronically. Once all the training is complete a Drivers Qualification Card (DQC) is issued automatically by a UK wide system. If this option were to be adopted for Northern Ireland the fees associated with the issuing of a Taxi Driver licence would have to recoup the costs of developing an NI specific IT system capable of storing the

information and being accessed by DVA licensing as well as all approved training centres. This would be very costly for the taxi industry and so this option is not proposed.

3.5.3 The Department proposes that training providers would instead issue drivers with a Departmental certificate to indicate what training had been taken. Certificates for all the training requirements would be submitted with the application for a licence renewal. These certificates would be in a standard format and would only be able to be issued by approved trainers. This will ensure drivers have met the training requirements without placing undue financial burden on the industry. Suitable penalties will be put in place to deal with fraudulent issue or use of certificates.

Q18: Do you agree that drivers would receive certificates for the training completed and these would in turn be submitted with the application for licence renewal?

#### 4 Initial Regulatory Impact Assessment

- 4.1 <u>Introduction</u>
- 4.1.1 A Regulatory Impact Assessment (RIA) is a tool that informs policy decisions. It provides a basis on which potential impacts can be identified and highlights the costs, benefits and risks of a proposal or set of proposals.
- 4.1.2 It is Government policy that all Departments and Agencies, where they exercise statutory powers and make rules that will have a general effect on others, should produce RIAs.

- 4.1.3 A full RIA will be published following the completion of the public consultation process, when all responses and opinions have been taken into account and the final policies agreed.
- 4.1.4 In turn, this initial RIA has informed the public consultation process by highlighting likely impacts and their effects.

#### 4.2 <u>Purpose and intended effect</u>

- 4.2.1 The proposals in the public consultation document are designed to create a more effective and equitable regulatory framework for the licensing of taxi drivers in Northern Ireland.
- 4.2.2 The introduction of a new taxi driver test, along with the requirement to undertake periodic training, will achieve this objective.
- 4.2.3 The key objectives are to:
  - create a fair and transparent licensing regime
  - modernise the taxi industry
  - promote road and passenger transport safety
  - promote fair competition
  - reduce illegal activity
  - improve consumer confidence in the Northern Ireland taxi industry
  - improve service standards within the taxi industry

## 4.3 <u>Background</u>

4.3.1 The Taxis Act 2008 gives the Department powers to set the criteria for those wishing to obtain a taxi driver licence. In 2007 a consultation was

released by DVA containing proposals for the re-introduction of taxi driver test and associated periodic training requirements.

4.3.2 Now that the Taxis Act has been introduced, and the economic climate has changed the Department is re-consulting on the detail of the proposals to introduce a Taxi Driver test for new taxi drivers in Northern Ireland, and to require all taxi drivers to undertake regular periodic training prior to renewing their licence.

#### 4.4 Impact of Options

- 4.4.1 *Option 1: Do nothing*: The benefits of this option are:
  - no additional cost to enter the industry
  - no additional cost for existing drivers to pay for training
  - no changes in current driver licensing regime

The cons are:

- the taxi industry is not seen as a professional organisation and taxi driving is not considered a career.
- driving standards are not assessed for those providing transport to the general public
- consumer confidence in driver ability will not be increased
- 4.4.2 Option 2a: Introduce new Taxi Driver Theory test only <u>without</u> case studies: The benefits of this option are:
  - no cost to the existing industry to undertake training
  - awareness demonstrated by new taxi drivers in dealing with hazardous situations and road safety issues
  - consumer confidence in new taxi drivers' ability is improved to some extent

- taxi drivers benefit from the increased perception of the professionalism of their industry
- addresses issues relating to the needs of disabled customers to some extent

The cons are:

- increased costs to those wishing to enter the taxi industry
- consumer confidence in the safety of existing drivers is not enhanced
- does not demonstrate the practical ability of drivers in handling road safety and improving customer care
- 4.4.3 Option 2b: Introduce new Taxi Driver Theory test only <u>with</u> case studies: The benefits of this option are:
  - no cost to the existing industry to undertake training
  - awareness demonstrated by new taxi drivers in dealing with hazardous situations and road safety issues
  - consumer confidence in new taxi drivers' ability is improved to some extent
  - taxi drivers benefit from the increased perception of the professionalism of their industry
  - addresses issues relating to the needs of disabled customers to some extent
  - evidence of knowledge and skills of taxi drivers in dealing with real-life situations

The cons are:

- increased costs to those wishing to enter the taxi industry
- consumer confidence in the safety of existing drivers is not

enhanced

- 4.4.4 *Option 3: Introduce new Taxi Driver Practical test only:* The benefits of this option are:
  - no cost to the existing industry to undertake training
  - practical evidence demonstrated by new taxi drivers in dealing with hazardous situations and road safety issues
  - consumer confidence in new taxi drivers' functional capability is improved
  - taxi drivers benefit from the increased perception of the professionalism of their industry
  - addresses practical issues relating to the needs of disabled customers

The cons are:

- costs to new drivers associated with the driving test
- consumer confidence in the safety of existing drivers is not enhanced
- 4.4.5 *Option 4: Introduce Periodic Training only:* The benefits of this option are:
  - overall public perception of the industry improved helping to generate increased custom
  - taxi drivers benefit from the increased perception of the professionalism and quality standards within their industry
  - increased awareness of road safety issues

The cons are:

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- costs for all drivers for periodic training
- costs for developing systems to allow the implementation of the requirements
- 4.4.6 Option 5: Introduce new Taxi Driver Practical and Theory Test and Periodic Training Requirements: The benefits of this option are:
  - consumer confidence in the ability of drivers is improved to a greater extent
  - taxi drivers benefit from increased professionalism of the industry
  - road safety awareness is enhanced to a greater extent

The cons are:

- costs for existing drivers for periodic training
- costs to new drivers associated with the driving test
- costs for developing systems to allow the implementation of the requirements
- 4.4.7 *Option 6: Combination of any 2 from options 2, 3 or 4*: This could be the following combinations –

Taxi Driver Practical and Theory Test: The benefits of this sub-option are:

- no cost to the existing industry to undertake training
- awareness demonstrated by new taxi drivers in dealing with hazardous situations and road safety issues
- consumer confidence in new taxi drivers' ability is improved to some extent
- taxi drivers benefit from the increased perception of the professionalism of their industry

• addresses issues relating to the needs of disabled customers

The cons are:

- increased costs to those wishing to enter the taxi industry
- consumer confidence in the safety of existing drivers is not enhanced

Taxi Driver Practical Test and Periodic Training: The benefits of this suboption are:

- consumer confidence in the ability of drivers is improved to a greater extent
- taxi drivers benefit from increased professionalism of the industry
- road safety awareness is enhanced to a greater extent

The cons are:

- costs for existing drivers for periodic training
- costs to new drivers associated with the driving test
- costs for developing systems to allow the implementation of the requirements

Taxi Driver Theory Test and Periodic Training: The benefits of this suboption are:

- consumer confidence in the ability of drivers is improved to a greater extent
- taxi drivers benefit from increased professionalism of the industry
- road safety awareness is enhanced to a greater extent

The cons are:

- costs for existing drivers for periodic training
- costs to new drivers associated with the driving test

- costs for developing systems to allow the implementation of the requirements
- does not demonstrate the practical ability of drivers in handling road safety and improving customer care

#### 4.5 <u>Benefits and Costs</u>

- 4.5.1 Sectors and groups that will be affected by the proposed changes include:
  - all taxi drivers
  - all potential taxi drivers
  - consumers

#### **Benefits**

- 4.5.2 *Option 1: Do nothing:* The principal benefit is that no additional costs or regulatory burdens would be imposed on drivers, vehicle owners and operators. There would be no requirement for existing charging mechanisms to be amended.
- 4.5.3 Option 2a: Introduce new Taxi Driver Theory test only <u>without</u> case studies: The principal benefit is that new taxi drivers would have their theoretical driving knowledge assessed by DVA, leading to a gradual increase in consumer confidence in driver ability.
- 4.5.4 Option 2b: Introduce new Taxi Driver Theory test only with case studies: The principal benefit is that new taxi drivers would have their theoretical driving knowledge assessed by DVA. The case study element will also test their practical knowledge and how they would deal with real-life situations and as a consequence, leading to an increase in consumer

confidence in driver ability.

- 4.5.5 *Option 3: Introduce new Taxi Driver Practical test only:* The principal benefit is that new taxi drivers would have their practical driving ability assessed by DVA, leading to a gradual increase in road safety and consumer confidence in driver ability.
- 4.5.6 *Option 4: Introduce Periodic Training only:* The principal benefit is a greater increase in consumer confidence in driver ability gradually, and drivers will benefit to the increased professionalism of their industry.
- 4.5.7 Option 5: Introduce new Taxi Driver Practical and Theory Test and Periodic Training Requirements: The principal benefit is a greater increase in road safety and the consumer confidence in driver ability earlier, and drivers will benefit much sooner to the increased professionalism of their industry as they should demonstrate a distinct improvement in customer care.
- 4.5.8 Option 6: Combination of any 2 from options 2, 3 or 4:

<u>Taxi Driver Practical and Theory Test:</u> The principal benefit is that new taxi drivers would have their driving ability and knowledge assessed by DVA, leading to a gradual increase in road safety and the consumer confidence in driver ability.

<u>Taxi Driver Practical Test and Periodic Training</u>: The principal benefit is a greater increase in road safety and the consumer confidence in driver ability earlier, and drivers will benefit much sooner to the increased professionalism of their industry.

<u>Taxi Driver Theory Test and Periodic Training</u>: The principal benefit is a greater increase in road safety and the consumer confidence in driver knowledge earlier, and drivers will benefit much sooner to the increased

professionalism of their industry.

Costs

- 4.5.9 *Option 1: Do Nothing:* There would be no road safety benefits to this option, nor would the taxi industry benefit from an increased professionalism.
- 4.5.10 Option 2a: Introduce new Taxi Driver Theory test only <u>without</u> case studies: The main cost of this option is the cost to new drivers of the driving test in order to obtain their licence. This cost is likely to be the same as that for other professional industries, which is currently £50 for a theory test.
- 4.5.11 Option 2b: Introduce new Taxi Driver Theory test only with case studies: The main cost of this option is the cost to new drivers of the driving test in order to obtain their licence. This cost is likely to be the same as that for other professional industries, which is currently £50 for a theory test with an additional £30 for the case study test.
- 4.5.12 Option 3: Introduce new Taxi Driver Practical test only: The main cost of this option is the cost to new drivers of the driving test in order to obtain their licence. This cost for a practical test is likely to be the same as that for other professional industries, which is currently £66 rising to £99 on evenings and weekends.
- 4.5.13 Option 4: Introduce Periodic Training only: The main costs of this option is the cost of driver training every time the licence is to be renewed. Depending how evidence of training is recorded and stored, there could be associated system costs which would need to be recovered by DVA

through fees for trainer approval and testing. The current cost to become a training provider for LGV or PCV courses is £1500 for a period of 5 years, and £250 for each course approved for delivery by the provider renewable every year. The cost to drivers of courses delivered by the approved trainers range from £50 upwards.

4.5.14 Option 5: Introduce new Taxi Driver Practical and Theory Test and Periodic Training Requirements: The main costs of this option are those identified in options 2, 3b and 4.

## 4.5.15 Option 6: Combination of any 2 from options 2, 3 or 4:

<u>Taxi Driver Practical and Theory Test:</u> The main cost of this sub-option is the cost to new drivers of the driving test in order to obtain their licence. This cost is likely to be the same as that for other professional industries, which is currently £50 for the theory and practical test plus the additional £30 if the case study test was included. Training for the driver in advance of the test will also incur costs which are outside the Department's control and which will vary depending on the driver's skills. <u>Taxi Driver Practical Test and Periodic Training</u>: The main cost of this sub-option is the cost to new drivers of the driving test in order to obtain their licence. This cost is likely to be the same as that for other professional industries, which currently ranges from £66 - £99 for the practical test depending on when the test is conducted. Also the costs identified at option 4 would be included.

Taxi Driver Theory Test and Periodic Training: The main cost of this suboption is the cost to new drivers of the driving test in order to obtain their licence. This cost is likely to be the same as that for other professional industries, which currently ranges from £50 - £80 for the theory test depending on whether the case study test is included. Also the costs identified at option 4 would be included.

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## 4.6 <u>Small firms impact test</u>

4.6.1 Each individual taxi driver would have the same training requirements to meet, regardless of whether they were part of a large taxi company or if they operated as a sole trader. However large companies could send a group of drivers on a course which may reduce the cost per individual. They may also apply to become training providers and provide their training in-house to their own drivers. This would result in the regulations having a disproportionate effect on smaller taxi companies who could not benefit from these economies of scale. Sole traders could choose to group together to arrange training in the same way, mitigating this impact.

## 4.7 <u>Competition Assessment</u>

4.7.1 The proposal to set a taxi driver test and periodic training requirements means that everyone is competing on a level playing field.

## 4.8 Enforcement, sanctions and monitoring

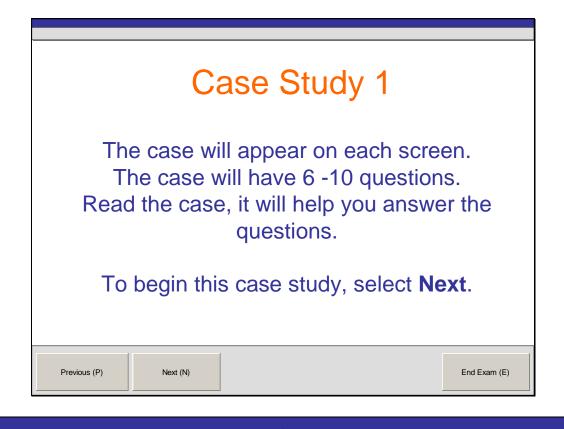
- 4.8.1 Responsibility for enforcement would rest with the Department which is responsible for ensuring that all taxi licensing legislation is complied with.
- 4.8.2 The Taxis Act contains 7 relevant offences. The maximum penalty is noted in brackets:
  - Driving without a valid taxi driver's licence (level 5 fine, currently £5000, and possible licence endorsement)
  - Operating a taxi service driven by a taxi driver without a valid taxi

driver's licence (level 5 fine)

- Owning a taxi driven by a taxi driver without a valid taxi driver's licence (level 5 fine)
- Driving without a taxi driver's licence for that class of taxi (level 3 fine, currently £1000)
- Operating a taxi service driven by a taxi driver without a valid taxi driver's licence for that class of taxi (level 3 fine)
- Owning a taxi driven by a taxi driver without a valid taxi driver's licence for that class of taxi (level 3 fine)
- Failure to wear a taxi driver's badge or display other identification (level 3 fine)
- 4.8.3 Enforcement would continue to be carried out by DVA on behalf of the Department.

Q19: Do you agree with the assumptions of the impact of the proposed changes? If not, please can you explain why and provide any evidence which supports that view?

## Annex 1: Sample Theory Test Case Study



### CASE STUDY

Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive.

Tomas arrives at work for an early shift and carries out a daily walk-round check; there is ice on the windows of the bus and the outside temperature is -4C. In the depot he notices someone that he does not recognise.

When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit.

Which of the following would be the most appropriate selection for Tomas to have for breakfast as part of a balanced diet before a driving shift?

Select the BEST option below

- A. Fried eggs and bacon.
- B. Wholemeal toast and fruit.
- C. Sausage sandwiches.
- D. Black pudding and baked beans.



Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive.

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When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit.



Previous (P)

Next (N)

In addition to a balanced diet what would assist Tomas being fit to drive?

Select **TWO** of the options below

- Drinking plenty of caffeine drinks. A.
- Β. Drinking plenty of sugary drinks.
- Eating snacks during a journey. C.
- D. Having sufficient rest between shifts.
- Taking plenty of physical exercise. Ε.



End Exam (E)

#### CASE STUDY

Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive.

Tomas arrives at work for an early shift and carries out a daily walkround check; there is ice on the windows of the bus and the outside temperature is - 4C. In the depot he notices someone that he does not recognise.

When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit.

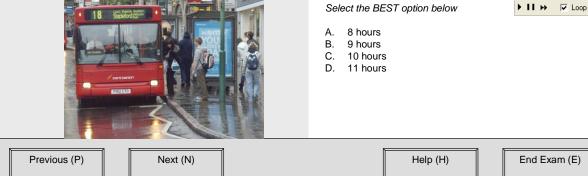
Make sure you have your headphones on then press the Plav button.

The **Play** button is the **first button** in the grey box to the right.

#### Tomas speaks to his boss.

Tomas: "Hi Boss, its Tomas here. Due to the incident I am running late and I am worried that I am getting close to my maximum driving hours for the day." Boss: "Ok, Tomas. Thanks for letting me know. You must stay within your hours and that means you can only drive for..... How long can Tomas drive for?

Select the BEST option below



Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive.

Tomas arrives at work for an early shift and carries out a daily walk-round check; there is ice on the windows of the bus and the outside temperature is -4C. In the depot he notices someone that he does not recognise.

When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit.



Previous (P)

Next (N)

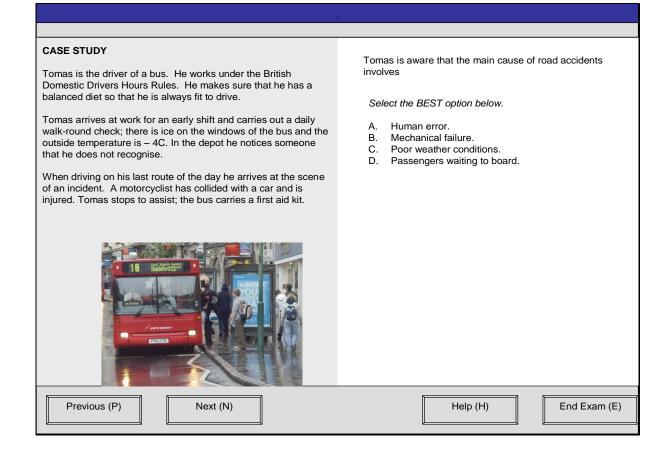
How much more stopping distance should Tomas allow than he normally would?

Select the BEST option below

- A. Two times.
- B. Four times.
- C. Eight times.
- D. Ten times

Help (H)

End Exam (E)



Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive.

Tomas arrives at work for an early shift and carries out a daily walk-round check; there is ice on the windows of the bus and the outside temperature is -4C. In the depot he notices someone that he does not recognise.

When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit.



Previous (P)

Next (N)

Use your mouse to click directly on the image below. A red X will mark the place you choose.

To change your answer, click a new place.

kerb.

Tomas has to pull into a bus stop in front of a parked car. Which part would be most likely to hit anyone stood on the



Help (H)

End Exam (E)

### CASE STUDY

Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive.

Tomas arrives at work for an early shift and carries out a daily walk-round check; there is ice on the windows of the bus and the outside temperature is -4C. In the depot he notices someone that he does not recognise.

When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit.

Due to the road conditions; Tomas must pay particular attention when he is

Select the BEST option below

- A. applying the brake.
- B. changing gear.
- C. collecting passengers.
- D. applying the handbrake.

 Previous (P)
 Next (N)
 Help (H)
 End Exam (E)

Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive.

Tomas arrives at work for an early shift and carries out a daily walk-round check; there is ice on the windows of the bus and the outside temperature is -4C. In the depot he notices someone that he does not recognise.

When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit.



Previous (P)

Next (N)

Having stopped at the scene of the collision what actions should Tomas take to ensure that the injured people are safe?

Select TWO of the options below

- A. Take details from any witnesses to find who was at fault.
- B. Turn on the bus' hazard warning lights to warn other road users.
- C. Telephone the emergency services giving full details.
- D. Move any injured people away from their vehicles.
- E. Drive back to the depot to get assistance.

Help (H)

End Exam (E)

## CASE STUDY What action should Tomas take when he sees the person in the depot? Tomas is the driver of a bus. He works under the British Domestic Drivers Hours Rules. He makes sure that he has a balanced diet so that he is always fit to drive. Select the BEST option below Tomas arrives at work for an early shift and carries out a daily Greet them politely and depart on his shift. Α. walk-round check; there is ice on the windows of the bus and the Confront them and ask them what they are doing. В. outside temperature is - 4C. In the depot he notices someone that C. Report the person to his supervisor. he does not recognise. D. Ask them to show his their ID card. When driving on his last route of the day he arrives at the scene of an incident. A motorcyclist has collided with a car and is injured. Tomas stops to assist; the bus carries a first aid kit. Previous (P) End Exam (E) Next (N) Help (H)

# **Annex 2: List of Consultees**

The following is not an exhaustive list, but is indicative of the types of organisations this document was sent to.

DOE DVA PSNI Equality Consultees NIPSA House of Lords Library House of Commons Library Northern Ireland Assembly Library MP's and MEP's MLAs Northern Ireland Party Leaders All PSV'd vehicle owners Taxi industry representatives Road Safety Organisations Individuals/Organisations who requested further information.

# Annex 3: Reply Form

Please note: The Dep	artment is unable to consider any views submitted
anonymously. We wo	ould therefore be grateful if the following details
could be completed.	
Name	
Address	
Postcode	
Email address	
Do you hold a valid tax	xi driver licence? (Delete as appropriate)
Yes	No
BUSINESS DETAILS	(IF APPLICABLE)
Name of group / comp	bany
Address (if different	
from above)	
Postcode	
Email address	
No. of views represen	ted
Measures taken to gat	ther these views

The following reply form contains a 'tick box' style answer sheet, with room for additional comments. If you need to use a separate sheet, please ensure the sheet is cross referenced with the question number.

Q1: Do you agree that the Taxi Driver Test should apply Ye	′es
--	-----

to new taxi drivers only, and that all current taxi driver	No	
licence holders should be exempt?		

Q2: Do you agree that taxi drivers from other EU Member	Yes	
States and other jurisdictions within GB should be required to take the taxi driver test in Northern Ireland and	No	
should be required to provide evidence of their knowledge		
of English?		
	L	

Q3: Do	you a	gree that Option 4 is most appropriate to	Yes	
take forv	vard fo	or the Taxi Driver Test? If not, please state		
your pre	ferred	option and your reasons for choosing this	No	
particula	r optic	on.		
Option	✓	Reasons for choosing particular option		
1a				
1b				
2				
3				
5				

Q4: Do you agree that the taxi driver theory test should	Yes	
have the same number of questions and pass mark as the	No	
LGV and PCV theory tests?		

Q5: Do you agree that the taxi driver theory test should		
include case study questions?		
	I	

Q6: Do you agree that the taxi driver theory test would		
only be available for completion in English?		
	I	

Q7: Do you agree that the practical taxi driver test should be	Yes	
of a similar duration to that for LGV and PCV drivers?	No	

Q8: Do you agree that the practical taxi driver test should	Yes	

include an assessment of drivers' ability in areas relating	No	
assisting disabled passengers, customer care, to vehicle		
safety and to the taxi industry as a whole? If so, should		
the test become a 2 part test?		

Q9: Do you agree that a higher standard of driving should	Yes	
be required to pass a taxi driver test compared to a	No	
normal car driving test?		

Q10: Do you agree with the proposals for four specified	Yes	
manoeuvres to form part of the taxi driver practical driving	No	
test?		
	·	

Q11: Do you agree that taxi drivers should be assessed	Yes	
on their ability to drive in a smooth manner to ensure the	No	
comfort of the passenger while driving?		

Q12:	Do	you	agree	with	the	proposed	minimum	test	Yes	

vehicle requirements proposed for the practical taxi driver	No	
test?		
	L	L

Q13: Which of the following options do you prefer?	(i)	
(i) the practical driving test should include the assessment		l
of driver's ability to assist a wheelchair user and to ensure		
they are secure, and all driving tests carried out in a	(ii)	
wheelchair accessible vehicle	(")	
(ii) a separate mandatory assessment should be		1
introduced for all drivers of WAVs and carried out by DVA		
(ii) a separate mandatory assessment should be	(iii)	1
introduced for all drivers of WAVs and carried out by an		1
external body		1

Q14: Do you agree that drivers whose taxi driver licence	Yes	
had expired for more than a certain number of years	No	
should have to:		
(a) complete a taxi driver test if they had not already done		
so; or		
(b) complete three days periodic training prior to licence		
renewal (if this were to be introduced for all drivers)		
If so, after how many years do you think this requirement		
should be introduced?		

Q15: Do you agree with the proposals to require 21 hours	Yes	
training every three years to have been completed before	No	
licence renewal?		

Q16: Do you think that some topics should be made		
mandatory for taxi drivers to complete during their	No	
periodic training cycle? If yes, please list these, indicating		
whether they should apply for each licence renewal or just		
for the first.		

Q17: Do you think the Department should set some or all	Yes	
of the topics to be covered in the taxi driver training?	No	

							receive		
certifi	cates	s for	the tr	aining	comple	eted ar	nd these	Yes, some	

would in turn be submitted with the application for	No	
licence renewal?		

Q19: Do you agree with the assumptions of the impact of	Yes	
the proposed changes? If not, please can you explain why	No	
and provide any evidence which supports that view?		