

Consultation on Taxi Driver Test and Periodic Training Requirements

Synopsis of Responses

November 2013

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Table of Contents

1. Contacting the Department	4
2. Executive Summary	5
2.1. Introduction	5
2.2. Stakeholder Engagement	5
3. Analysis of Responses to Taxi Driver Test and Periodic Training proposals	7
3.1. Proposals.....	7

1. Contacting the Department

1.1. The Taxi Driver Test and Periodic Training Requirements consultation was aimed at people involved in, or connected with, the taxi industry in Northern Ireland. This included industry representative associations and other interested parties. This document is a synopsis of the responses received as a result of the consultation.

1.2. This 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 in any of these formats.

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1.3. An electronic copy of the consultation document can be obtained, if required, by using the contact details above, or by visiting the following link:

www.doeni.gov.uk/roadsafety/index/consultations.htm

2. Executive Summary

2.1. Introduction

2.1.1. A consultation on proposals to introduce a taxi driver test and periodic training requirements was carried out between 10 July and 27 September 2013. During this period the Department received written responses from those consulted.

2.2. Stakeholder Engagement

2.2.1. The Department has liaised with a number of interested parties before and during the consultation period. Phone call and email correspondence was also utilised throughout the consultation period in order to answer queries raised and fully to engage with stakeholders.

2.2.2. The consultation was sent to all statutory consultees; and electronic versions were sent to section 75 groups, a number of single operators, and representatives from lobby groups who had registered their interest with the Department. The consultation was also posted on the DOE website. The Department also issued letters to all taxi operators notifying them of the consultation and asking that all drivers affiliated to their licence were made aware of the proposals.

2.2.3. Initially around 90 copies of the consultation were issued in both hard copy and email format. As the document is available online it was likely that many more people will have printed copies of this.

2.2.4. The consultation exercise resulted in the Department receiving 220 written responses representing the views of 2,317 people.

3. Analysis of Responses to Taxi Driver Test and Periodic Training Requirements proposals

3.1. Proposals

Consultation Question

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?

- 3.1.1. From the responses to the consultation, over 99% agreed with the proposal that the taxi driver test should apply to new taxi drivers only and that those already in the industry should have “acquired rights”.

Department’s Response

The Department notes the high level of support for the introduction of the taxi driver test for new drivers only and intends to proceed with the proposal.

Consultation Question

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?

- 3.1.2. Over 99% of views represented thought that those from other EU

Member States and other jurisdictions within GB should be required to take the taxi driver test in Northern Ireland. It was felt that knowledge of English is essential to provide a taxi service to the public.

Department's Response

The Department notes the high level of support and intends to implement this proposal.

Consultation Question

Q3: Do you agree that Option 4 (practical test, theory test and periodic training) 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.

- 3.1.3. From the responses to the consultation, 69% agreed with the proposal to introduce a practical test and a theory test for new drivers as well as periodic training for all drivers. The majority indicated that a mixture of a test for new applicants and training for everyone is the best way of creating a professional taxi industry.
- 3.1.4. Whilst the majority agreed with the proposal to introduce periodic training requirements, 31% thought that Option 4 was not the most appropriate. These respondents include those who strongly disagree with the notion of periodic training for all drivers, believing it to be unnecessary and taking the view that it is an uncalled for financial imposition upon an industry which is already experiencing financial difficulties.

Department's Response

The Department notes the majority of views expressing approval for the introduction of periodic training requirements for all drivers alongside a practical test and theory test for new drivers. The Department intends to implement this proposal and will consider the view of stakeholders in relation to the timing of its introduction.

Consultation Question

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?

- 3.1.5. From the responses to the consultation, there was a slight majority (52%) who disagreed with this proposal; however there is some evidence that the question may have been misunderstood, with some respondents commenting that the tests are incomparable.
- 3.1.6. It was felt that a driver's knowledge should be tested to the point of meeting the set requirements deemed necessary to be a taxi driver and that the Department should not be trying to match other vocational theory tests unless it is deemed necessary.

Department's Response

The Department notes the differing views on this proposal but from the positive experience gained during the operation of the LGV and PCV tests to date, the Department intends to implement this proposal.

Consultation Question

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

- 3.1.7. From the responses to the consultation, over 99% agreed that case studies should be included as part of any theory test as it would be important for the driver to be able to deal with any situation he might encounter in the course of a journey.

Department's Response

The Department notes the high level of support for this proposal and intends to implement this proposal.

Consultation Question

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

- 3.1.8. From the responses to the consultation, 74% agreed with this proposal with many commenting that taxi drivers in NI should be proficient in the English language. However, 26% commented that drivers may wish to take the test in Irish or another language and feel that whilst competency in English may be a requirement, it would only be fair to allow people to do the test in a language of their choice.

Department's Response

The Department notes the high level of support for this proposal.

Currently, the LGV and PCV theory test can only be undertaken in English; however, candidates can have an interpreter present. For this reason the Department does not intend to make the theory test available in other languages.

Consultation Question

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

3.1.9. From the responses to the consultation, 74% agreed with this proposal with respondents commenting that it would be necessary for the examiner fully to assess a driver's capability in handling of the vehicle on the road.

3.1.10. Whilst the majority agreed with the proposal, others felt that the Department should use common sense to assess what level of competency is needed to drive a taxi. There is no need to apply a standard above and beyond that which is necessary.

Department's Response

The Department notes the high level of support for this proposal and intends to implement this proposal.

Consultation Question

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?

3.1.11. From the responses to the consultation, over 99% agreed that these elements should be included as part of a practical test but there was no support for a 2-part test for these areas.

Department's Response

The Department notes the high level of support for these elements to be included as part of the practical test but comments that it would be difficult to assess all these areas within the practical test without increasing the test appointment slot considerably and may need to change the test vehicle to a vehicle with wheelchair access. However, the practical test can include the driver's ability to ensure the comfort of their passengers by driving smoothly. The Department intends to include these topics as part of the new periodic training regime.

Consultation Question

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?

3.1.12. From the responses to the consultation, 74% agreed that a higher standard of driving should be required to pass any taxi driver test commenting that this should be the case bearing in mind that a taxi driver is a vocational driver and that passengers are being carried for hire and reward.

3.1.13. The 26% who disagreed felt that a higher standard would not be necessary as the same type of vehicle is involved.

Department's Response

The Department notes the high level of support for this proposal and comments that there is a good argument for the taxi driver test needing to be of a higher standard to reflect the professionalism of the taxi industry. It is, therefore, the Department's intention to implement this proposal.

Consultation Question

Q10: Do you agree with the proposals for 4 specified manoeuvres to form part of the taxi driver practical driving test?

3.1.14. From the responses to the consultation, 74% agreed with this proposal with no specific comments. No views represented disagreed but 26% felt unable to comment as specific manoeuvres were not detailed. The Department would point out that the consultation did specify that the practical test to become an Approved Driving Instructor requires 4 manoeuvres to be completed, rather than one of three for the standard car test. This was the reasoning behind this proposal.

Department's Response

The Department notes the high level of support for this proposal and intends to implement it so long as the timing of the test is not overly compromised.

Consultation Question

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?

3.1.15. From the responses to the consultation, over 99% agreed with this proposal with many commenting that paying passengers expected a safe and comfortable journey.

Department's Response

The Department notes the high level of support for this proposal and intends to implement this proposal.

Consultation Question

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

3.1.16. From the responses to the consultation, over 99% agreed with this proposal with many commenting that drivers needed to understand their responsibilities in this regard.

Department's Response

The Department notes the high level of support for this proposal and intends to implement this proposal.

Consultation Question

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;

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

3.1.17. From the responses to the consultation, 74% believe that DVA should carry out a separate mandatory assessment for all drivers of WAVs, commenting that keeping this function in-house allows the Department to keep control over testing standards and direction.

3.1.18. However, 26% believed that training bodies offering recognised accessible training are best suited for this purpose. It could be counted as part of the mandatory training required.

Department's Response

The Department notes the support for the introduction of a separate mandatory assessment for all WAV drivers and comments that option (iii) would be the Department's preferred option as there are organisations that will have more experience in this area of work. It is, therefore, intended to implement option iii.

Consultation Question

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?

3.1.19. From the responses to the consultation, over 99% agreed that drivers with expired licences should have to sit either a taxi driver test or complete periodic training.

3.1.20. 45% of those who responded believe that a 3 year gap from the taxi industry should trigger a 3 day training necessity before a new licence can be issued.

3.1.21. 27% of views represented commented that there should be 2 years' grace before a test has to be taken – these respondents are those who disagree with the introduction of any form of periodic training.

3.1.22. 28% of views represented felt that drivers should have to take a test and undergo training after 1 year's expiry.

Department's Response

The Department notes the high level of support for some level of testing/training to be carried out after a driver has returned to the

industry. In general terms, the Department is of the view that if someone has passed the former taxi driver test they should not have to take the new one, however a certain amount of periodic training should be taken to ensure skills are up-to-date.

The Department will consider such issues further when developing the scheme.

Consultation Question

Q15: Do you agree with the proposal to require 21 hours training every 3 years to have been completed before licence renewal?

3.1.23. From the responses to the consultation, 69% agreed with this proposal, commenting on the benefits to consumers of ensuring consistently high standards of customer service from the taxi industry. They support the Department's efforts to improve the standards of accessibility, customer care and road safety across the industry to the benefit of passengers and other road users.

3.1.24. 31% of views represented fundamentally disagree with the proposal to introduce periodic training and see it as another financial imposition on the industry. Drivers are already suffering financially from costs for driving licence, PSV, operator licence, insurance, tax, running costs and vehicle maintenance which already have a detrimental effect on livelihood.

Department's Response

The Department notes that the majority of views represented, including consumer and disability groups, agree with the

Department's proposal to require periodic training be completed before the renewal of a licence. The Department intends to implement this proposal and will consider the view of stakeholders in relation to the timing of its introduction.

Consultation Question

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.

3.1.25. 74% of views represented agreed that there should be mandatory topics included as part of the periodic training requirements. Some of the topics included:

- customer service,
- tourist welcome training,
- disability awareness,
- wheelchair assistance,
- smooth driving,
- hazard perception,
- road safety,
- vehicle and personal presentation, and
- basic car maintenance.

3.1.26. The 26% who disagreed with this proposal were those who are completely against the idea of periodic training.

Department's Response

The Department notes the high level of support for the inclusion of mandatory topics in periodic training requirements and welcomes the examples given by respondents, which will be considered during the development of the scheme.

Consultation Question

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

3.1.27. From the responses to the consultation, 45% believe that the Department should set the topics to be covered in order to retain control of the system.

3.1.28. 27% believe that the Department should work with representative bodies such as consumer and disability groups in order to develop training topics.

3.1.29. A further 28% are those who are completely against the idea of periodic training.

Department's Response

The Department notes the high level of support for it to either set the periodic training topics or develop them in conjunction with other bodies. It will take those topics as detailed at 3.1.25 into consideration in the development of the scheme in conjunction with those in the disability and consumer sectors.

Consultation Question

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?

3.1.30. From the responses to the consultation, 74% agreed with this proposal with no specific comments received.

3.1.31. The remaining 26% are those who are completely against the idea of periodic training.

Department's Response

The Department notes the high level of support for this proposal. It also intends to consider electronic forms of certification before finalising a policy position.

Consultation Question

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.

3.1.32. From the responses to the consultation, 69% agreed with the Department's assumptions of the impact of the proposed changes, which seek to raise service standards within the industry, deter unlicensed operators and to improve consumer protection, safety and accessibility.

3.1.33. The 31% who disagreed are those who, whilst agreeing to the introduction of a taxi driver test for new drivers, remain fundamentally opposed to the introduction of any periodic training requirements.

3.1.34. These respondents commented that having to pay for training courses on top of all the other taxi costs will have physical, mental and financial impacts on drivers and will leave them no option but to leave their jobs and claim benefits.

Department's Response

The Department notes the high level of support for its assumptions of the impact of the proposed changes.