

HAMBLETON DISTRICT COUNCIL

Report To: Licensing Committee
30 July 2019

From: Principal Licensing Officer

Subject: HACKNEY CARRIAGE AND PRIVATE HIRE LICENSING POLICY – VEHICLE AGE LIMITS

All Wards
Scrutiny Committee

1.0 PURPOSE AND BACKGROUND

- 1.1 The purpose of this report is to consider a review of the hackney carriage and private hire vehicle age limit contained within the council's Hackney Carriage and Private Hire Licensing Policy in order to improve standards and practices.

2.0 INFORMATION AND ANALYSIS

- 2.1 It is vital to review policies in order to reflect changes in the industry both nationally and locally. The effectiveness of the hackney carriage and private hire licensing regime has evolved in the face of new internet and smartphone app-based technology. Licensing authorities are required to acknowledge and manage such changes to ensure that, alongside the benefits being achieved, any negatives are minimised for passengers, the trade and wider communities.

Raising standards

- 2.2 Vehicle age limits have been adopted by the vast majority of licensing authorities in North Yorkshire and throughout England and Wales. In 2016, Hambleton District Council (HDC) introduced a 10-year age limit on licensed vehicles. The age limit was imposed to promote public safety, reliability, passenger comfort and improved standards of hackney carriage and private hire services in the district.
- 2.3 In recent months, the Licensing Team has received a number of applications for driver and vehicle licences from individuals who already hold licences with neighbouring authorities. Several applicants have indicated that they are applying to take advantage of the council's comparatively-lenient vehicle age policy (i.e. by licensing vehicles with HDC when they become too old to be licensed by their current licensing authority).
- 2.4 Some drivers and vehicles licensed by HDC are known to be operating for significant periods outside the district and it is believed that the absence of a strict age policy encourages this practice. It is difficult for licensing authorities to be effective in monitoring the activities of drivers who are working in this way. The enforcement officers of one authority cannot undertake enforcement action against taxis or private hire vehicles licensed by other authorities.
- 2.5 There is anecdotal evidence to suggest that this issue is widespread. It is a source of national debate and calls have been made for an urgent review of taxi licensing legislation to address the matter.

- 2.6 Recent case law has reaffirmed the principle that a licensed hackney carriage may carry out pre-booked work anywhere in England and Wales. Furthermore, the Deregulation Act 2015 has enabled private hire operators to sub-contract bookings to operators licensed in other districts (effectively allowing the use of private hire vehicles in any location under certain circumstances). Accordingly, proprietors can legitimately use their vehicles outside the district almost free from regulation.
- 2.7 Nationally, this has led to some proprietors ‘shopping around’ to find the easiest way to obtain a licence. For example, reports suggest that it is easy to obtain a licence in Wolverhampton and that, coupled with cheap licence fees, has led to the City of Wolverhampton Council issuing 10,700 driver licences last year (compared with just 852 in 2015). Many of those drivers are currently operating in different districts across the country. Two BBC news articles relating to this matter are attached at **Annex A** and **Annex B**.
- 2.8 Although HDC has seen a slight increase in the number of applications received, it is not comparative with the situation in Wolverhampton. In light of the fact that its neighbouring authorities have stricter age policies, there is some concern that HDC may become regarded as the authority of choice for any proprietors wishing to ‘shop around’ in North Yorkshire and Cleveland. Accordingly, the council should consider reviewing its age policy.
- 2.9 At present, all vehicles must generally be under the age of 10 years in order to be licensed with HDC. This is in contrast with its neighbouring authorities, the age policies for which are shown in the table below:

	Grant applications	Renewal Applications
Hambleton	10yrs	10yrs
Darlington	3yrs	6yrs
Redcar and Cleveland	3yrs	6yrs
Middlesbrough	3yrs	8yrs
Scarborough	4yrs	8yrs
Harrogate	5yrs	9yrs
Ryedale	5yrs	10yrs
York	8yrs petrol, 3yrs diesel	8yrs petrol, 3yrs diesel
Stockton	5yrs	12yrs
Richmondshire	5yrs	7yrs

- 2.10 The council can retain the existing age limits but it should be aware of the potential risks to public safety (given that vehicles can effectively operate almost unregulated outside the district) and the potential risks to the existing trade (given that the number of drivers and vehicles licensed by HDC would be expected to continue to rise, thereby presenting a risk of oversaturating the market).
- 2.11 In February 2019, a preliminary consultation was carried out in relation to vehicle age limits with Hambleton’s hackney carriage and private hire trade (although no specific proposals were put forward). The consultation was carried out by way of a newsletter sent to all relevant licence holders. A copy of the newsletter is attached at **Annex C**.
- 2.12 Four responses were received as follows:
- Response 1: Recommended a 3-year age limit at grant and an 8-year age limit on renewal
- Response 2: Recommended a 5-year age limit
- Response 3: Recommended a 3-year age limit at grant and a 6-year age limit on renewal
- Response 4: Opposed any reduction

- 2.13 The responses are attached at **Annex D, Annex E, Annex F and Annex G**.
- 2.14 Having considered the responses, it is proposed to consult the trade further on the following specific recommendations:
- To reduce the vehicle age limit to 5 years in respect of all grant applications (new licences);
 - To reduce the vehicle age limit to 8 years in respect of all renewal applications (except in the case of an application pertaining to a vehicle licensed prior to 1st July 2019, in which case the 10-year age limit will be retained).

Air quality

- 2.15 HDC has a duty under Local Air Quality Management (LAQM), introduced by Part IV of the Environment Act 1995, to regularly review and assess air quality in their areas. HDC declared an Air Quality Management Area in Bedale in November 2017 as a result of poor air quality. Monitoring results from across the district also show areas of Northallerton and Thirsk, particularly in the town centres, to be close to exceeding the air quality objectives.
- 2.16 The Department for Transport (DfT) advises licensing authorities to consider how far their hackney carriage and private hire vehicle licensing policies can support any local environmental initiatives.
- 2.17 European emission standards (which are designed to become more stringent over time) define the acceptable limits for exhaust emissions of new vehicles sold in the European Union and EEA member states. In relation to all motor cars with up to 8 passenger seats (and light goods vehicles which form the basis for many vehicle conversions), the standards are as follows:
- Euro I technology – became mandatory for new passenger cars from 1993 (light goods vehicles 1994)
 - Euro II technology – became mandatory for new passenger cars from 1997 (light goods vehicles 1998)
 - Euro III technology – became mandatory for new passenger cars from 2001 (light goods vehicles 2002)
 - Euro IV technology – became mandatory for new passenger cars in January 2006
 - Euro V technology – became mandatory for new passenger cars in September 2010
 - Euro VI technology – became mandatory for new passenger cars in September 2015

- 2.18 By virtue of the existing Hackney Carriage and Private Hire Licensing Policy, vehicles currently licensed by HDC may possess Euro IV, Euro V or Euro VI technology. The introduction of the proposals contained within paragraph 2.14 would ensure that all vehicles first licensed from September 2020 would possess Euro VI technology.

Wheelchair accessible vehicles

- 2.19 Wheelchair accessible vehicles (WAVs) licensed by HDC are not currently subject to any age restrictions. Licensing authorities are encouraged to 'level the playing field' by mitigating additional costs faced by the trade where a wider social benefit is provided - wheelchair accessible vehicles are used as an example¹.

¹ Department for Transport - Government Response Report of the Task and Finish Group on Taxi and Private Hire Vehicle Licensing – February 2019

- 2.20 In England, 58% of all taxis were wheelchair accessible in 2018. In Hambleton, just 7.6% of licensed vehicles are wheelchair accessible.
- 2.21 The age limit exemption was applied in order to ensure that the existing financial realities of purchasing and running WAVs do not discourage proprietors from licensing such vehicles to the detriment of wheelchair users. Without this exemption, there is a very real risk that the already low number of WAVs would be reduced further as time goes on. On that basis, there are no plans to change the existing policy in this regard.

3.0 EQUALITY AND DIVERSITY

- 3.1 The Council's equality duty has been considered and any implications have been addressed from paragraph 2.19 to paragraph 2.21 of the report.

4.0 FINANCIAL IMPLICATIONS AND EFFICIENCIES

- 4.1 The proposals should have no significant financial implications for the council. The cost of the consultation process will be recovered from licence fees in the normal course of business.
- 4.2 The proposals may have a financial impact on hackney carriage and private hire vehicle proprietors licensed by the council. At present, all licensed vehicles must be under the age of 10 years at the time of application unless the proprietor of a licensed vehicle can demonstrate that the specific circumstances of his/her case would justify a departure from the general policy. The current proposals would impose further restrictions on any licensed vehicles that fall outside the parameters of the suggested policy. If a revised policy is adopted, some applicants may be required to invest in newer vehicles in order to comply and therefore Members are asked to balance the benefits to the public against the cost to the hackney carriage and private hire trade.
- 4.3 The existing hackney carriage and private hire trade should be given sufficient time to make the necessary arrangements where applicable and therefore the proposal includes continuation rights (subject to the limitations contained within the existing policy) in respect of currently licensed vehicles. The recommendation is intended to introduce the revised limits in the near future but to ensure that existing proprietors can continue to use their vehicles until they reach the age of 10 years (as would have been expected at the time of the purchase).

5.0 RECOMMENDATION:

- 5.1 Members are asked to authorise a full consultation to be carried out in relation to the hackney carriage and private hire vehicle age limit proposals (as amended by Members where applicable) on the understanding that the matter will return to the Committee for consideration of any responses.

GARY NELSON
DIRECTOR OF LAW AND GOVERNANCE (MONITORING OFFICER)

Background papers: Hackney Carriage and Private Hire Licensing Policy (January 2019)
Author ref: SF
Contact: Simon Fisher
Principal Licensing Officer
Direct Line No: (01609) 767209

ANNEX A – BBC NEWS ARTICLE (July 2018)

Why is my taxi from another city?

By Jessica Labhart, BBC News, 18 July 2018

If you've ever been in a cab and wondered why the driver's taxi licence was issued hundreds of miles away, the answer may lie in Wolverhampton.

The city has found itself at the centre of angry protests from cab drivers, who accuse the local council of making it too easy to enter the trade.

Cabbies from other parts of England and Wales say drivers newly licensed in the West Midlands are operating as far afield as Manchester and Southampton.

On Monday, private hire operators took part in the latest slow-drive through the city, calling on the authority to tighten rules around who gets permission to carry passengers.

They have taken similar action before, as have hackney carriage drivers.

Why are taxi drivers angry?

To date, the Labour-run council has licensed nearly 10,700 private hire minicab drivers. In a city of about 260,000, that's one for every 24 people.

But many are not working there.

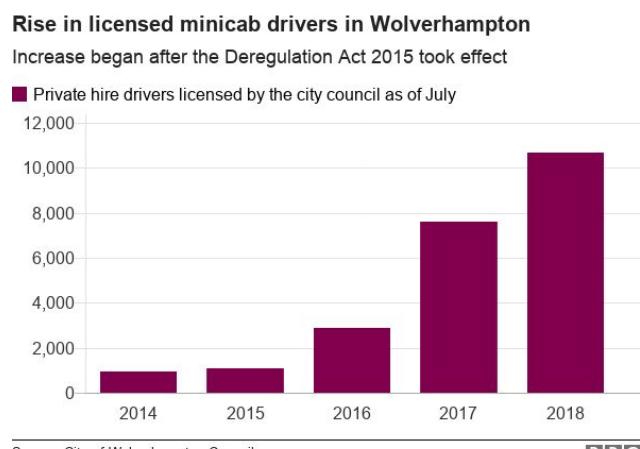
In 2015 the law changed, meaning a private-hire driver does not have to live or operate in the local authority area that grants his or her licence.

And some say it is too easy to pass the test in Wolverhampton. The council strongly disputes this.

Is this a problem?

Many established taxi drivers say the Deregulation Act 2015 is threatening their livelihoods and claim a change in the application process is "risking customer safety".

Before April 2015, there were 852 private hire drivers licensed in Wolverhampton, according to the Department for Transport.



A twelvefold increase since then suggests many are not driving in the city, despite passing their test there.

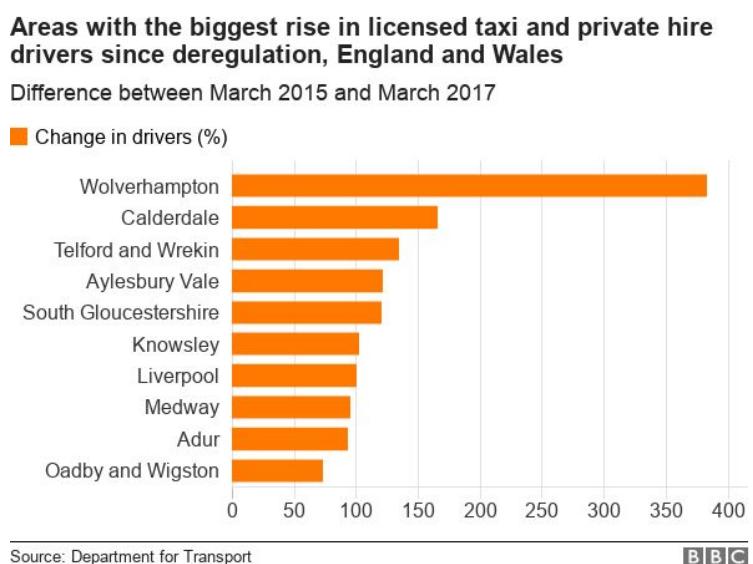
Taxi drivers who have protested in Wolverhampton argue too many cannot speak English and do not have enough local knowledge of the areas they are actually working in.

Is it unusual?

Department for Transport figures show the number of drivers licensed by Wolverhampton increased by more than twice the rate of any other council in England and Wales between 2015 and 2017.

The overall number of drivers in Wolverhampton - whether private hire or taxi - rose 383% in those two years.

In June, black cab drivers from Coventry protested in Wolverhampton about the number of Uber drivers the authority had licensed.



Only one other council in the West Midlands, Telford and Wrekin, more than doubled the number of licences issued in the first two years since deregulation.

It went from 130 in 2015 to 306 in 2017.

What does it mean for customers?

There is an argument the greater the number of licences issued the better it is for customers, as more competition means cheaper fares.

However, some existing drivers say changes to assessments for new drivers have led to safety being put at risk.

In Wolverhampton, new drivers previously had to pass a practical and theory test which contained a local area knowledge and A to Z route-plotting assessment.

Now they complete a driver training programme, which includes a verbal assessment in English, training on how to spot child sexual exploitation and they undergo a DVLA and criminal records DBS check.

They must prove they are allowed to work in the UK, have had a valid driving licence for 12 months and take a medical. It costs £69 and takes 20 working days.

Raheel Shah, chairman of Wolverhampton Private Hire Drivers' Association and a taxi driver for the past four years, said: "They should have never taken out the A to Z test. People need to be able to trust the drivers and know that they are getting into a car with someone who has passed the best possible tests. The driver needs to know the area and where they are going and be able to speak to customers. People will always go for the easiest and cheapest option. Which is why we say the council has to do something. Most people that get licensed here end up working in Manchester, Leeds, all over."

Scott Baldwin, a taxi driver from Derby who attended the protest in Wolverhampton on Monday, said "There's Wolverhampton-licensed drivers operating as far away as Southampton. This is not going to stop unless it's reined in. It'll carry on until the government intervenes".

What does the council say?

The chairman of City of Wolverhampton Council's licensing committee said drivers should protest against the government rather than the local authority.

Protests by taxi drivers are motivated by a desire to "restrict competition and customer choice, create local cartels and stifle technological innovation", the council claims.

It says though it cannot limit the number of private hire licences it issues, it does set its own assessment criteria.

Wolverhampton council has the cheapest application process in the Black Country and made about £2.2m from licensing in 2017/18.

The authority says private hire driver fees are "recovered for the service provided" and cannot be used for non-licensing matters.

It says digital changes have helped cut the time and cost of applying in Wolverhampton and these factors have made it the "licensing authority of choice". The council claims other authorities should "modernise" and follow its lead.

"The council's rules are robust and fit for purpose. Public safety is of paramount importance; putting artificial obstacles in the way of those wishing to work is simply wrong" a spokesman said.

ANNEX B – BBC NEWS ARTICLE (February 2019)

Wolverhampton taxi drivers accused of serious sex crimes

By Jessica Labhart, BBC News, 14 February 2019

Taxi drivers licensed by a council which is accused of threatening public safety are suspected of serious sexual offences.

Reports of child sexual exploitation are among allegations made against drivers licensed in Wolverhampton, but who also operate across England.

Fears have been raised drivers are "shopping around" to find the easiest way to obtain a licence.

Wolverhampton council said it stripped licences from suspects immediately.

This week, the government said it was tightening taxi safety guidelines and considering stopping drivers from operating hundreds of miles away from where they were licensed.

City of Wolverhampton Council has increased the number of licences it issues eightfold since the Deregulation Act 2015 was introduced, meaning drivers no longer needed to live or work in the area of the local authority that granted them a licence.

The situation has led to a chaotic picture emerging around the country, with authorities unable to control all cabbies working in their area.

Taxi and cab drivers have staged go-slow protests against the current regulations around the country, saying they leave the public at risk.

Wolverhampton licensing bosses have insisted they informed relevant authorities when serious reports of crimes were made, but several councils have told the BBC they were unaware of the allegations.

The BBC has been unable to determine whether the drivers accused of offences have faced criminal proceedings.

The city council added it had been at the forefront of calls for a national database of drivers.

Where have the allegations been made?

The BBC has learned there have been seven allegations of child sexual exploitation (CSE) made, and 16 serious sexual allegations against drivers licensed in Wolverhampton. The report made furthest from the West Midlands city came from a complainant more than 150 miles away.

They include:

- A driver working in Southampton when a serious sexual allegation was made against him in October 2017
- A Wolverhampton taxi driver accused of being involved in child sexual exploitation on 16 June 2017 in Bolsover, Derbyshire
- A serious sexual allegation recorded as taking place in Mansfield, more than 70 miles away, on 3 October 2016
- One allegation of CSE made in Shropshire in January 2018 along with two other serious sexual allegations in 2017
- In Telford, where authorities have dealt with a high-profile CSE scandal, a serious sexual allegation was reported in April 2018

Prof Rod Thomson, Shropshire Council's director of public health, said the authority was "concerned that public safety is being threatened and environmental aspirations diluted in cases where drivers and vehicle proprietors 'shop around' to be licensed by local authorities that demand lower standards and then exclusively or predominantly work in an area or areas where standards are higher and licences more difficult to obtain".

He backed plans for a government review into licensing, saying it should "bring it up-to-date and to create a regime that is fit for the 21st Century".

None of the councils for the areas where offences were alleged could confirm whether they had been made aware of the suspect driver operating in their area.

In Birmingham, where there have been four serious sexual allegations against drivers licensed in Wolverhampton, the council said it was concerned the Deregulation Act had "resulted in a situation where there are many vehicles and drivers in the city over whom the council has no enforcement powers".

In Wolverhampton itself, there were four allegations of CSE and four serious sexual allegations.

The licensing authority has been made aware of complaints against drivers via police, other councils and by passengers themselves.

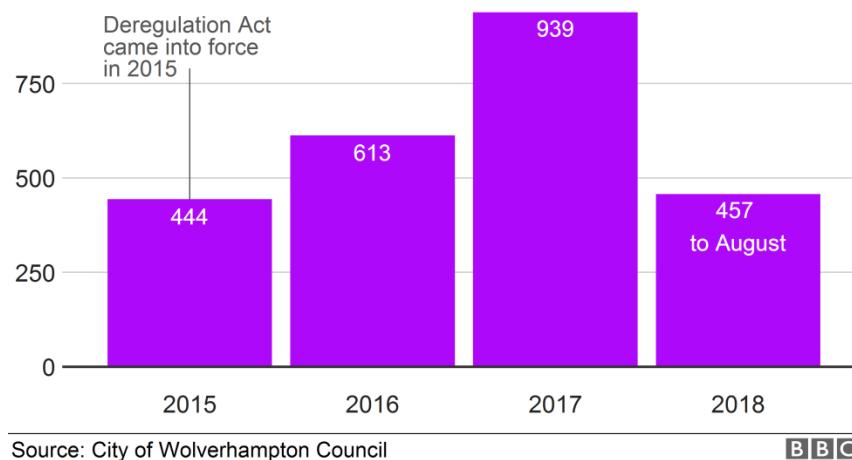
What action has been taken by Wolverhampton council?

The authority said it dealt with complaints robustly, with all safeguarding issues dealt with within a day "regardless of where the driver is in the country".

In one instance, a council officer drove more than 100 miles to a suspect driver's home and "took his licence away from him on his doorstep".

Six of the drivers in the CSE reports had their licences taken from them but the seventh complaint was not upheld. Police were informed in all cases, it said.

Reports about minicabs and taxis licensed by Wolverhampton Council



In May 2017, the chair of Wolverhampton's licensing committee, Alan Bolshaw, wrote to Sajid Javid, who was then Communities and Local Government Secretary, urging him to create a national database of drivers so that adequate background checks could be carried out, even suggesting the council fund it.

However, there remains no official system of ensuring all authorities are aware of suspected criminal activity, although the council "refutes any accusation" of failing to pass on details. But it added: "We are currently developing a referral mechanism that would inform, in writing, all the relevant safeguarding, policing and licensing authorities in an area when we take action in relation to a driver licensed by us, but operating in their area."

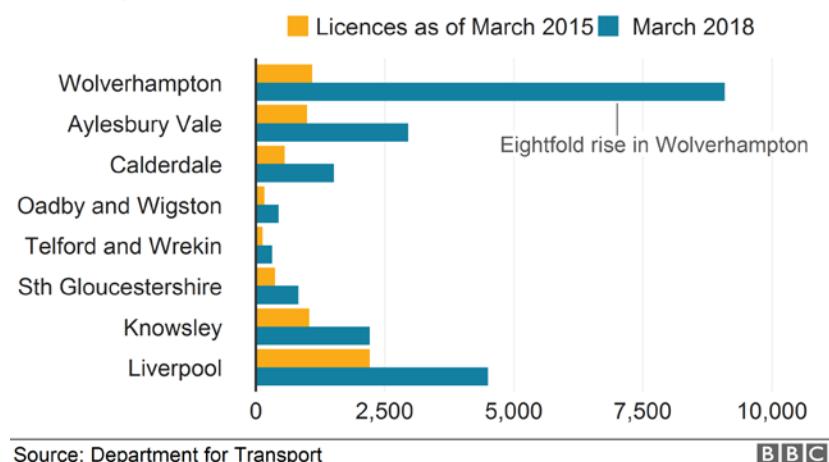
What action is the government taking?

On Tuesday, the Department for Transport announced new proposals for taxi and private hire drivers to have to pass enhanced criminal record checks before being granted a licence. Every council in England would be told to carry out checks on all applicants. Current guidelines allow councils to set their own driver standards, including whether to make the checks.

Under the plans, those with specific previous convictions would face minimum bans "in all but truly exceptional circumstances".

Rise in taxi and minicab drivers

Areas that more than doubled the number of licences in three years



Source: Department for Transport

BBC

CCTV may also be fitted to cars, with an encrypted system so footage could only be accessed if a crime was reported.

The topic of taxi safety comes after the case of "black cab rapist" John Worboys, who police believe may have carried out more than 100 rapes and sexual assaults on women he picked up in London between 2002 and 2008.

What have victims' groups said?

Predators can use relaxed rules to become taxi drivers and gain access to vulnerable passengers, a victim's charity said.

"The first thing to say is that the majority of taxi drivers out there are working hard to make a living and are trained to actually help vulnerable people," said Phil Ashford, from the National Working Group (NWG) for tackling child sexual exploitation.

"But there are some who will use their position of power and authority to take advantage of vulnerable people, particularly as taxi journeys are often one-on-one situations.

"In terms of my experience working on the front line and from working in some cases, there are some drivers that are predatory.

"They will know for example, that the children live together in residential care homes and become friendly with them, and quite easily take advantage of a particular vulnerability by being approachable by offering a sense of fulfilment to that child by offering things that are perceived to be quite adult or responsible such as alcohol, drugs and gifts, and begin grooming them that way before abusing them."

Mr Ashford welcomed news of the government's proposals for tougher legislation. "At the moment, some drivers can take advantage of a loophole where they can apply to get a licence in an authority that has less stringent assessments and ply their trade in an area which does. What is really important is that we make sure we bring the taxi drivers in on this. I understand they may feel like they're being unfairly targeted but you know this is about protecting children and protecting drivers' business reputation."

What do drivers think?

Established taxi drivers in Wolverhampton have previously protested over what they said was a fall in standards since the Deregulation Act was introduced.

Raheel Shah, chairman of Wolverhampton Private Hire Drivers' Association and a taxi driver himself, said: "We have been protesting for more than three years over this. Since 2015 I know that there have been more complaints over sexual harassment, accidents in taxis and illegal pick-ups, all different things have been going on. We would like to see a return of standards so that public safety is not put at risk."

Ebrahim Suleman, former chairman of West Midlands Private Hire Drivers Association, said "99.9% of drivers" were honest and hard working but a minority used loopholes to get a licence.

He added there should be a cap on the number of drivers that can be licensed by one authority as it would lead to a "safer and more robust system".



TAXI NEWS UPDATE

Issue 56 – February 2019

VEHICLE AGE LIMITS

In 2016, Hambleton District Council introduced a 10-year age limit on licensed vehicles. The age limit was imposed to promote public safety, reliability and improved high standards of hackney carriage and private hire service in the district.

In recent months, the Licensing Team has received a number of applications for driver and vehicle licences from individuals who already hold licences with neighbouring authorities. Several of those applicants have confirmed that they are applying to take advantage of Hambleton's vehicle age policy (i.e. by licensing vehicles with Hambleton District Council when they become too old to be licensed by their current licensing authority).

Some of the vehicles licensed by Hambleton District Council are known to be operating predominantly outside the district and it is believed that the absence of a strict age policy encourages this practice. It is conceivable that this could lead to overcrowding in Hambleton and/or vehicles being used predominantly outside the district almost free from regulation.

In order to address this matter, the council must consider its age policy in relation to licensed vehicles. At present, all vehicles must generally be under the age of 10 years in order to be licensed with Hambleton District Council. This is in contrast with our neighbouring authorities, the age policies for which are shown in the table below:

	Grant applications	Renewal Applications
Hambleton	10yrs	10yrs
Darlington	3yrs	6yrs
Redcar and Cleveland	3yrs	6yrs
Middlesbrough	3yrs	8yrs
Scarborough	4yrs	8yrs
Harrogate	5yrs	9yrs
Ryedale	5yrs	10yrs
York	8yrs petrol, 3yrs diesel	8yrs petrol, 3yrs diesel
Stockton	5yrs	12yrs
Richmondshire	5yrs	7yrs

Annex C

All drivers, proprietors and operators are therefore encouraged to share their views on this matter in order for the Licensing Team to present a balanced summary to the Licensing Committee in due course. Any recommendations or suggestions would be taken into consideration and, in any case, further consultation will take place before any decision is made in this regard.

HACKNEY CARRIAGE AND PRIVATE HIRE LICENSING POLICY

Following the council's consultation exercise in relation to the revised Hackney Carriage and Private Hire Licensing Policy, the policy has now been published and took effect from 1st January 2019. The policy can be viewed on the council's website at:

www.hambleton.gov.uk

COMMITTEE

The council's Licensing and Appeals Hearings Panel has been responsible for a number of decisions relating to new and existing drivers over the last six months. Four new applicants have been refused a licence on the basis of their suitability while two licensed drivers have had their licences revoked following concerns over their conduct.

CONVICTIONS

All licensed drivers must disclose the details of any convictions or fixed penalties in writing to the council within seven days. This applies to all offences (including motoring offences) and any failure to comply may raise concerns as to the licence holder's suitability to act a licensed driver. Two licensed drivers have been referred to the Licensing Committee recently following their failure to comply. Appropriate action will continue to be taken in the event of any future breaches.

CONTACT DETAILS

For further information in relation to any of the content of this newsletter, contact:

Hambleton District Council

Licensing Team

Legal Services

Civic Centre

Stone Cross

Northallerton

DL6 2UU

Tel: 01609 767079 or 767017

Email: licensingteam@hambleton.gov.uk

From: [REDACTED]
Sent: 26 February 2019 10:54
To: Licensing Team
Subject: Age policy

Hello I have no problem with grant at 3 years and renew at 8 years as you normally take finance over 5 years which gives you chance to pay the car off

Regards [REDACTED]

Sent from Samsung tablet.

From: [REDACTED]
Sent: 26 February 2019 17:25
To: Licensing Team
Subject: Taxi Age Limit

Hi team,

After reading the news letter and speaking with Linda, I can only see it as a positive to lower the age limit on vehicles.

In my opinion the current age limit is being abused. I'm aware of at least 3 vehicle and drivers coming to northallerton at 23.50 every Saturday and that's the only time they are seen.

I think it would be a great idea to drop the limit to 5 years, with additional benefits for hybrid vehicles to help the environment.

Regards

[REDACTED]

LICENSING

[REDACTED]

[REDACTED]

ON THE AGE OF CARE

NO OLDER THAN 3 yrs

AND COMES OFF AT 6 yrs

HAMBLETON D.C.		
REC'D	28 FEB 2019	
PES	RES	CX
		ACK

From: [REDACTED]
Sent: 21 March 2019 14:01
To: Licensing Team
Subject: Vehicle age limit

- 1) If the age limit was introduced to promote public safety, why have vehicles older than 10 years been relicensed? Is it an age or mileage policy. Don't you think it should be one or the other? Also you allow old unsafe vehicles to transport disabled passengers with no regard for their safety. Both these issues will be addressed in due course.
- 2) Previously, before the new age policy was introduced, there wasn't a problem with applications from other licensing authorities, so why should there be one now? It doesn't make any logical sense.
- 3) Why can't the principal licensing officer do his job and vet applications from outside HDC, especially when they have blatantly admitted to taking advantage of the age limit. A simple question on the application form asking the applicant if the majority of their work will be undertaken within HDC. If the answer is yes & they clearly don't, then they have obtained a license through false pretences.
- 4) In hindsight ,the ill informed and dubious methods by which the age limit policy was contrived has now put members of the branch in more financial trouble. After forcing operators to buy newer vehicles, less than three years later you intend to burden us with more unreasonable financial expense.
- 5) in 2016, operators manipulated into purchasing new vehicles because of the incompetence of HDC licensing policy must be allowed to relicense their vehicles, until they reach the 10 year age limit that was then policy. Anything less than that would be totally unacceptable.

I will be contacting all members of the branch.

[REDACTED]