

**Comments received on proposal to remove the requirement to undertake disability awareness training and driving assessments every three years.**

Hi I have done driving standards assessment and disability awareness Coarse and NVQ I agree with requirement for Driving Assessment as I have been driving taxi /private hire for 25 years on my last badge renewal I had to do DSA I would expect to do this if I had complaints of my driving standard or if I had penalty points in the area I work 6 penalty points my licence is under review as of disability courses if new approaches are beneficial update courses to all in the trade as required

Once a driver has passed the required tests, there should be no need to refresh.

Unfortunately driver standards are woefully poor at times, occasionally verging on the downright dangerous.

Driving standards slacken with time. The initial assessment when the driver first applies for their licence would be like a car driving licence where it is a licence for life.

Regular training and assessments is valid for drivers who are responsible for others safety.

I think that it is important to have a specific requirement. This proposal lowers the current standard and is not helpful to users or to providers.

Drivers need to have continued refresher training as well as an ability and fitness to drive checks.

It's important for all drivers to be safe and up to date with current driving standards frequently as they carry passengers.

Bad habits can spill in three years let alone for ever.

Disability awareness should be maintained not just at the beginning, a driver who has driven for many years will have not carried out any updated training

It's a reduction of standards

Public protection is paramount in this area and to remove all checks after the initial one would seem a step too far for me. Extend the period between checks by all means (5-7 years might not be seen as unreasonable), but we should retain a system which brings the licensee into contact with the Authority at certain points in their driving career.

Remember the bus driver from Coventry still a bus driver at 77 and caused a fatal accident

Updated disability training is a must and at regular intervals. Leaving it to people to complain before needing to undertake such training is watering down and leaving disabled persons at risk

I work with several groups of people who would come under the banner of 'disability', practices move on so quickly nowadays with regards on how to help and encourage people from that group, that it is important that drivers who will be transporting these people, are up to date as possible with new awareness in this group. it is no acceptable to wait until a complaint comes in

Research shows that all drivers take on lazy habits over time. To be safe drivers our cabbies need to show they are able and safe, especially as many are not young and eyesight will deteriorate etc.

Refresher training would ensure that the driver's knowledge is up to date and A Driving Assessment test every three years would help prevent drivers lapsing into bad habits.

Most drivers are likely to respect disability awareness and therefore should not experience the burden of repeated training. I am satisfied that any subsequent complaint can be handled by the Licensing Sub-committee.

The taxi drivers should have to pass an assessment every year or so as I think they get complacent in how they drive and speaking from being an owner if a car you get into bad habits but taxis have members of the public in their care so need to be the best at what they do all the time and should be tested on it regularly as should bus drivers or any job where there is the responsibility to the public.

Given the "lack of consideration to other road user in general;" I would agree personally that the Original refresher training in disability awareness and must pass a Driving Assessment test with Worcestershire County Council at least every three years" must stand!  
Given my experience on the road, the " Complacency in general by both Taxi & Bus companies to other road users, when I travel 20 miles to Worcester there and back every day is a general complaint!

I think with the responsibility of driving paying customers drivers must be assessed regularly for public safety

Unless disability legislation were to change there is no need to reiterate the original training

The behaviour of many taxi drivers is terrible. They need all the training they can get

<p>I believe we already have some dangerous complacent drivers in Redditch and by taking away the strict training rules they will just get worse</p>
<p>The refresher training seems irrelevant unless there is a change in legislation.</p>
<p>The standard of Taxi driving around the town is poor. Drivers frequently break speed limits, undertake on the left hand side and pull out in front of oncoming traffic. Passenger safety should be the first concern. Some licenses are passed to other drivers and there are too few checks on identity.</p>
<p>I think that if a licence holder passes this assessment and knows that if there are complaints that can be proved then this should be acceptable. Also a log will have to be kept to ensure that the driver does not have several complaints.</p>
<p>I feel as the laws can change all drivers must understand the full awareness of disability and be kept up to date of the changes by refresher courses, as and when needed.</p>
<p>I feel regular refresher training in disability awareness is essential although maybe every 5 years. It is important to know that all drivers are clear on disability legislation which does change relatively regularly. I don't know what the 'driving assessment test' entails so I don't feel I can comment on this aspect.</p>
<p>Driving assessments every three years are reasonable for the safety of the public</p>
<p>I think people who are licensed to carry members of the public from A to B in Hackney carriage or private hire cars should be reassessed as it is now, every three years. I am surprised that more checks are not done on these as I have seen vehicles with broken lights and the drivers smoking, and also no seat belts and being on a mobile phone!</p>
<p>Driver retraining every three years means that they are aware of updates to legislation and that their competence is checked on a regular basis. In industry it is generally a requirement that a CPD (Continuous Professional Development) file is maintained by each individual.</p> <p>Having been in incidents that I would class as near misses but could have resulted in fatal accidents (Including me and the driver amongst the fatalities) twice whilst being driven by Redditch taxi drivers in the last 10 years I would suggest that passing the Driving Test Assessment is essential. Hopefully the test would weed out the bad drivers.</p>
<p>I think it would be reasonable for there to be refresher disability training but every five years would be reasonable</p>

Through past experience I have never been confident that complaints of drivers are logged or followed up.

I believe that as standards, legislation, society and technology changes, the testing should adapt to these changes also, one test when commencing in this area, will not maintain high standards and a failing in the future will occur

Road traffic changes constantly, also when carrying passengers daily cars should be in very good condition

Better standards

All people in service related occupations should have regular in service training and refresher training. This is common in many occupations and if maintained for hackney carriage and private hire drivers would maintain and increase confidence in the service provided.

It is better to equip people with the up to date information, policy etc. then to wait until complaints have been made. Damaging for both parties.

It is important that the drivers are aware of changes on disability aids in use, and should be reminded of them and their ability to carry out their work assessed in a regular basis. If they worked in an office their work would probably be assessed on an annual basis

Drivers are operating in the public service area; by refreshing every 3 years there is less scope for mistakes and the ability to claim ignorance of a requirement (as seen in B'ham recently).

It is also an opportunity to assess the driver's competence and "train" drivers to the required standard so that the expected standards of driving are maintained.

I see occasions when driving is of a poor standard so perhaps 3 years is too long?

If training is only given when a licensing Sub-Committee resolves that an individual needs further training then this is "closing the door after the horse has bolted" - far better to be pro active and avoid offence to anyone or to lapse into poor driving habits.

I feel that there is no need for Disability awareness training to be repeated, but that drivers should still undergo a regular Driving Assessment. However, this could be amended to every 4 or 5 years. (In my experience, people who drive for a living tend to become quite aggressive drivers, especially when they have deadlines to meet.)

Disability legislation and qualification for a disability changes, you need to keep up with this. The fault default of response to complaints is not the best way to have consistency.

Removing this clause will allow standards to drop and they aren't the best as it is.

As long as we are vigilant in ensuring that ALL drivers will have to do this training once, then unless there has been a breach reported or an incident logged that brings their understanding into question, it probably does not require further refreshers.

It would be helpful if a synopsis of the areas covered in the training were put on a web page that the drivers could access should they have any questions or worries about certain areas covered.

Transport and technology is constantly updating, and drivers/operators should be able to confirm that they have kept pace of, and are aware of these changes, though perhaps 5 yearly checks may be a compromise between cost savings and keeping up standards, as is presently the case with PCV & HGV drivers (i.e. driver qualification cards, awarded after completion of a course, renewable every 5 years) These courses cover all transport related issues, including disability awareness, and the most recent traffic legislation etc.

Driving assessments are needed to ensure no deterioration of skills

It's just another cost saving exercise that will not raise standards.

The bit about relevant and verifiable complaints is yet another very detrimental change - a complaint can therefore become (or may become) easier to dismiss - without any further investigation etc. etc.

This is not an onerous requirement, and as an occasional user of local taxis, I would want to be assured that drivers are re-assessed on a regular basis.

Why does RBC consider such a requirement to be unnecessary?

By removing this requirement you are becoming reactive rather than pro-active. Waiting for a complaint before asking someone to undertake refresher training seems wrong. Surely it is far better that people are fully aware of their responsibilities.

Also, it may be that people get upset by certain drivers but don't want to make a formal complaint. Or, based on their level of disability, they may not feel able to make a complaint. This would mean that the individual concerned would carry on without any further training. However, I do think that the three year period mentioned is perhaps too soon, Perhaps every five years would be more appropriate.

A regular test is important to ensure driving standards are maintained

<p>It will save money</p>
<p>Point system already exists</p>
<p>Disability awareness &amp; driving assessment should only be conducted at beginning, when/before licence is granted, as nothing is altered afterwards, unless there is sufficient evidence showing the driver has fallen below the expected standard required to carry out their duties for which the points scheme has also been implemented.</p>
<p>Been driving taxis for 26-27 years, I've never had a problem with the public. With penalty point scheme you can dig out bad drivers. DVLA do not make you do re-test every three years unless you have a medical condition or dangerous driving ban.</p>
<p>We had training so it's enough</p>
<p>As an experienced driver I believe all new applicants must re-take tests as this why complaints are being made. Licensing needs to retained as they are the problem.</p>
<p>Have been taxis for many years always helped customers. Still have a clean licence. Licensing needs to make sure they recruit proper &amp; fit drivers. This is why council get complaints.</p>
<p>Driver standards are best in county, if a driver has done bad then they should be punished, not all drivers.</p>
<p>I have been driving for 29 years as a cabby, never had a complaint and we try our best as cabbys to make sure our customers get the best service. Licencing needs to stop taking brown envelopes who allow bad drivers in, open your eyes.</p>
<p>I have been driving 10 years, never had a problem. DVLA does not make drivers re take test every 3 years unless you have a medical condition or dangerous driving. Make drivers who have complaints against them</p>
<p>We have a penalty point scheme in place therefore any driver who fails to drive properly should be made to do extra tests.</p> <p>Even the DVLA do not make you do a retest every three years.</p>
<p>No need. Point scheme will root out bad drivers in a fair manner.</p>

Point scheme already exists
Points scheme already exists for this purpose
Age restrictions don't mean safer vehicles more tests does not guarantee improved quality. Just more expense for driver, money for tester
Point scheme already does this rooting out bad drivers
No evidence to support this will work. Point scheme already does this.
Point scheme exists
Point system already in place
Point scheme already exists
Point scheme already exists
Points system exists
Re-applying for jobs not fair, even DVLA don't do it. No one in Worcs umbrella does it. Point System targets bad drivers.
System already in place for bad drivers
Do admin staff do GCSE English if Grammar error? No. So why re-test? DVLA don't agree with you, it's so unfair to re-do test, borderline criminal.
Not fair. Have point system for bad drivers.
Points system already exists for bad drivers
Point system will weed out offenders
No point having a point system

In line with Worcs?

No, just bullying Redditch drivers. No test for others under Worcs umbrella or bus drivers, coach drivers, couriers or general public so why Redditch drivers? Because its not fair

Not fair to do test again

No one else does it in Worcs

Not good for job security we have points for bad drivers

No need. We have points to get rid of bad drivers.

Already have point scheme that targets drivers who accumulate points. No evidence to suggest drivers need more training and law does not change every 3 years that would affect taxi trade

No point having a point system

We already have a scheme put in place that targets that have had more points. No law change, so putting training in place every 3 years is inadequately because this does not effect taxi vehicles in their trade anyway.

Reason being we already have point scheme that targets drivers. I also believe there is no evidence that drivers require more training.

Why have points? If we have to do test again. Point system is more fair, targeting bad drivers.

Sounds like discrimination, look at % of others doing it? Why hate Redditch drivers? Make whole county do this? No one else do driving test refresher.

Not fair, no trade, buses, couriers or others re-do driving test, even DVLA don't, victimising Redditch taxi drivers only. Feel bullied. Act like you have a vendetta.

Re-applying for jobs makes it poor motivation which affects quality of service, makes point system obsolete.



<p>We already have a scheme put in place that targets that have had more points. No law change, so putting training in place every 3 years is inadequate because this does not affect taxi vehicles in their trade in anyway.</p>
<p>We already have a scheme put in place that targets drivers that have had more points. Putting drivers in training every 3 years is inadequate.</p>
<p>No point having a point system</p>
<p>Unfair on so many levels. Not fair compared to rest of Worcs. Feel like we being victimised.</p>
<p>Taxi drivers will fall into a 'don't care' or 'forgot' attitude. We came home from a holiday in Spain and the Taxi driver drove at speed of 80. He nearly had us under a massive lorry as we were approaching a motorway or clearway from slip road. When I complained to Taxi Office they replied 'don't ask for driver 8 or some such words. See I can't remember what number not to ask for only 5 months later. Someone has to check them.</p>
<p>Testing every 3 years makes the points system obsolete, and lets be honest, drivers who passed 10, 15 or 30 years ago learned differently, so it's not practical or fair. No other trades do this i.e. bus drivers and some do (Dr), we're not doctors.</p>
<p>I think doing a driving test again is unfair and unreasonable, as we already have a points system in place.</p>
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<p>You only need to be trained once. There is no need for people who comply to standards to be penalised they are doing correctly, and is not fair paying for and been out of pocket for something they don't need to do.</p>
<p>I think if someone put a new vehicle ( such as 2018-2019) they should have one test a year until the vehicle is 6 years old then two tests until 9 years of age and 10 years or over 3 tests per year</p>

My opinion is instead of having a separate age cap for licensing why not just cap the age at 9 years for example if someone put a 8 year old vehicle then they allowed to use only for two years and no more committee

When a driver drives a vehicle regularly his driving skills improve as his driving hours increase resulting him/her being a better driver than before, which I believe is a good step to reduce burden on council/licence holder

Taxis and private hire vehicles (PHVS) and the door to door service they provide are essential for disabled people. In particular, they are essential for the independence of blind and partially sighted people, who are unable to drive or often unable to use public transport. However, accessing taxis and PHVs can be a major challenge for assistance dogs owners: a Guide dog survey found that 42% of assistance dog owners were refused by a taxi or PHV drivers in a one year period because of their dog- despite this being a criminal offence under the equality act 2010. such access refusals can have a significant impact on assistance dog owners' lives, leading to feelings of anger and embarrassment and a loss of confidence and independence.

A Guide dogs survey found that many taxi drivers are unaware of their legal obligations and the impact refusal have on assistance dog owners. The best way to ensure drivers know their legal obligations and how best to offer assistance to their customers with vision impairments is through disability equality training for all taxi and PHV drivers.

Due to the importance of this training, Guide Dogs does not agree with the proposal to remove the requirement for refresher training in disability awareness every three years. Further, holding refresher training every few years is common across other forms of transport - for example office of rail and road have recently proposed for staff to receive 'refresher' disability training every two years.

Considering the significant impact an access refusal can have on assistance dog owners and their communities, it is important that assistance dog owners know that all cases of access refusals are viewed very seriously and re investigated.

It is a criminal offence for any operator or driver to refuse to carry assistance dogs. On conviction for such an offence, drivers can be fined up to £1,000. We therefore recommend a zero-tolerance approach to enforcement of the Equality Act and advise that failure to carry an assistance dog should result in 12 penalty points and immediate revocation of their licence. Requiring a driver to undertake refresher disability training is not proportionate response to an illegal access refusal.

Further, drivers who refuse access to a guide dog owner may not have a complaint made about them: while our survey shows that 42% of assistance dog owners have been refused over a one year period, only 54% of respondents said they would 'definitely' or 'very likely' report an access refusal. In part, the underreporting is due to challenges of reporting especially for people with sight loss. However, it is also due to disappointment at the lack of action taken following an access refusal and the low fines issued. Therefore waiting for a complaint before requiring training is insufficient.

The consequences of delayed travel combined with the emotional impact of facing discrimination and confrontation when trying to carry out everyday activities take a significant toll on assistance dog owners. Apart from feelings of anger and embarrassment, refusals can undermine the independence that assistance dogs bring to their owners. Assistance dog owners also reported that the stress of refusals has had a detrimental impact on their mental

health and on whether they feel able to leave the house. This also has a negative impact on their ability to access work and other opportunities. As guide dog owners report:

"Each refusal is crushing, confidence shattering, rejecting and traumatic. I always feel that I don't want to go out after- but work dictates I must" Guide dog owner, Stevenage

"I was left on my own at the side of the road in the dark. I am deaf and unable to phone for help and it made me feel very vulnerable. It makes me feel afraid to go out" Assistance dog owner

"I was very upset, it was dark, raining and 10pm at night. I was scared. I avoid evening invites, as I worry about getting home. I lose out on the chance of socialising with friends, which is bad, as I have no family." Guide dogs owner, Rochester.

"I used to have a very tough two hour commute to work. The taxi part of the journey was the shortest bit travel wise, but it always ended up being the bit that held me up the most because I was having to spend time facing drivers who wouldn't take me with my dog...It's good that my contract was flexi hours otherwise I'm sure I would have been sacked for being late all the time- it happened so often" Guide dog owner, Daventry.

Disability equality training focuses on the concept of people being disabled by society's barriers and attitudes. It highlights the role an organisation and individuals play in the removal of those barriers, while also including awareness elements such as customer care, etiquette and appropriate communication.

Many of the positive experiences disabled people report when using taxis and PHVs come about following disability equality training. Councils that have introduced disability equality training report very positive results with fewer refusals and drivers feeling more confident in assisting passengers with disabilities.

We therefore do not agree that refresher training should only occur when a licensing sub-committee resolves that a driver needs to following receipt of relevant and verifiable complaints, as if a complaint was received in this area, it should result in revocation of license. We also advise being proactive in this area to prevent access refusals from ever occurring, rather than being reactive and only requiring training following an instance of discrimination. We instead recommend that refresher disability awareness training is required every few years.

Already have point scheme that targets drivers who accumulate points. No evidence to suggest drivers need more training and law does not change. Every 3 years that would affect taxi trade.

Already have point scheme that targets us who accumulate points, no evidence to suggest drivers need more training not change every 3 years

Already have point scheme that targets drivers who accumulate points.

No evidence to suggest drivers need more training and law does not change every 3 years that would affect taxi trade.

<p>As there is already a point based system in place, which will automatically pin point drivers that are constant re-offenders there is no need to introduce any new measures. Drivers have to undergo driving assessment when first applying for licence and majority have done the disability awareness when applied for licence, and the disability legislation does not change that often that it has a direct impact on the taxi industry, to require an assessment every three years.</p>
<p>Already have point scheme that targets drivers who accumulate points. No evidence to suggest drivers need more training and law does not change every 3 years that would affect taxi trade.</p>
<p>Already have point scheme that targets drivers who accumulate points. No evidence to suggest drivers need more training and law does not change every 3 years that would affect taxi trade.</p>
<p>There is a point scheme already in place to target drivers who accumulate points. No evidence to suggest drivers need more training and also the law does not change every 3 years that would affect taxi trade.</p>
<p>There is already a point scheme in place which means drivers who accumulate lots of points are dealt with effectively. Further there is no research to suggest that drivers need more training. Also any changes to training should be provided only when the law changes.</p>
<p>We have a penalty point scheme therefore any driver who fails to drive properly made to do extra test. Even DVLA do not make you to do retest</p>