

Cheltenham Case Study: continuation of taxi/PH licensing during the Covid-19 pandemic

The coronavirus pandemic presented business continuity challenges for licensing. This was a particular issue for taxi and private hire (PH) licensing throughout the emergency, continuing to the present day. This case study focusses on Cheltenham Borough Council's licensing service's response to the emergency and the actions it took to ensure it was able to maintain essential licensing services, with a focus on taxi and PH licensing.

Taxi & PH licensing in Cheltenham

Taxi and PH licensing in Cheltenham follows national best practice including mandatory safeguarding and equality training, local knowledge tests and English proficiency tests. These assessments along with the usual enhanced criminal records checks, verifying identification and right to work checks require a significant amount of officer contact, often in person, with applicants and licence holders.

Issues faced in maintaining essential licensing services

When the coronavirus pandemic reached a stage in the UK where it was necessary for the UK Government to impose restrictions on people's movement and freedoms, it became immediately obvious that this was going to present a substantial issue for maintaining essential licensing services. Early on, licensing officers from the council undertook a thorough assessment of the taxi and PH licensing process to identify *which* areas of the process would be affected by the Government's restriction regulations, *how* these areas would be affected and *what* possible solutions would be. Our approach from start has been to ensure we are able to continue with licensing services as far as it is possible and practical.

From this assessment, it became immediately clear that a number of critical assessments would be (and already were being) affected; drivers were not able to get appointments to have medical assessments done, licensing officers were not able to see people face to face which affected training, local knowledge tests and document checking for DBS and right to work checks, and MOT testing stations were shutting down or reducing testing capacity.

At the onset of the pandemic and the imposition of the restriction regulations, it became apparent that the licensing section would need to focus on maintaining licensing services for high-risk areas, but this would come at the expense of other areas affected. A decision was made early on to focus on solutions for medical assessments and document checking for DBS and right to work checks. We were not at that stage able to deliver training or invigilate our local knowledge test, and **so a decision was made to suspend new applications for taxi and PH driver licensing.**

We have worked hard since the beginning of the restrictions, and identified solutions to the challenges (detailed below). Cheltenham restarted safeguarding training and knowledge tests at the beginning of August, and were delighted to 'go live' for new applications as a result.

Solutions found

Taxi and PH licensing in Cheltenham is predominantly digital which meant that licence holder's ability to submit applications was not affected in any way.

Other solutions to the immediate problems identified above required swift action to implement and much of it required changes to our licensing policy.

Early in April, an urgent report to Council was approved to implement temporary changes to the licensing policy:

1. **Medical assessments** – “Where a licence holder is unable to obtain a medical assessment through a qualified medical practitioner, the licence holder should complete a medical self-declaration form approved by the authority until such a time when the licence holder is able to obtain a full medical report from a qualified medical practitioner.”

We are expecting to see medicals now, although we may accept a self-declaration form where an applicant cannot obtain a medical. Medical checks should ideally be completed by the applicant’s own GP, but will accept medical checks by any registered medical practitioner with access to a patient’s medical history on new applications. Those who self-certified will be required to provide a medical check within 6 months.

2. **MOT and compliance testing** - Where a vehicle fitness test pass certificate cannot be obtained, the licence holder can temporarily rely on The Motor Vehicles (Tests) (Amendment) (Coronavirus) Regulations 2020 as amended by the Motor Vehicles (Tests) (Amendment) (Coronavirus) (No. 2) Regulations 2020 unless otherwise advised by the authority.
3. **Document checking and verification** - The Home Office [announced](#) on the 30th of March a relaxation of the rules on document checking and verifying identification. For a short period in March, officers were unable to meet the face-to-face checking requirements and for the small group of drivers who were affected, a self-declaration form was relied on until such a time when officers were able to complete the DBS and right to work checks remotely.

We have now started to use an umbrella body to obtain DBS checks through online application, ID is checked by video call as the council offices remain closed to the public. Those given time to complete their DBS checks were given 6 months and we will go through that list to instigate the online process for them. Right to work checks are done by video call if necessary.

The start of this service was delayed to some extent by the time taken up by pavement licence enquiries from June onwards as we had existing tables and chairs permissions.

4. **Licensing committee** – All council meetings were suspended for a time. Members delegated authority to the Chief Executive to make certain decisions until council meetings were resumed. On the 24th of June, the council held its first ever remote licensing committee hearing and we have had virtual committees regularly since. We developed a remote licensing committee protocol and procedure for attendees in response.

More recently we re-launched our mandatory safeguarding and equality training as a digital solution using video conferencing facilities. We have also relaunched the local knowledge test with fewer attendees per session and strictly by appointment to access the offices which are otherwise shut to the public.

A new normal

We are now at a new normal for all our taxi and PH licensing services. The way we delivered the service pre-coronavirus has changed and many of the changes will be permanent. Through the new normal, we will not compromise on public safety but where there are opportunities to do things

differently, we will continue to approach these with a genuine open mind to see if and how things can be delivered differently for our customers and for officers.