

**NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL**

**LICENSING COMMITTEE – 24 NOVEMBER 2010**

Title of report	<b>CONSIDERATION OF THE INTRODUCTION OF A CAB SAFETY RATING SCHEME</b>
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Purpose of report	To consult Members on the introduction of a cab safety rating scheme.
Strategic aims	Strong and Safer Communities Prosperous Communities
<p>Implications:</p> <p>Financial/Staff</p> <p>Link to relevant CAT</p> <p>Risk Management</p> <p>Equalities Impact Assessment</p> <p>Human Rights</p> <p>Transformational Government</p>	<p>All staffing costs associated with the preparation, consultation, adoption and enforcement of the conditions can be met by the existing level of staffing.</p> <p>Safer CAT</p> <p>All proposed conditions relate to the promotion of public, driver or passenger safety.</p> <p>Equality Impact Assessment to be undertaken during 2010/2011.</p> <p>Under Article 8, no unfair hindrance should be set up to the carrying out to the proprietors and drivers of legitimate business.</p> <p>Not applicable</p>
Comments of Head of Paid Service	Report is satisfactory

Comments of Section 151 Officer	Report is satisfactory
Comments of Monitoring Officer	Report is satisfactory
Consultees	All current private hire operators, Leicestershire County Council, Leicestershire Constabulary, NWLDC Staff Disability Focus Group and onward transmission to other disability groups, The British Chambers of Commerce, Arriva Midlands, Campaign for better Transport 2000, Department for Transport, District Councillors, Parish Councils, Leicestershire County Council, Department of Transport., Driver Consultative Forum
Background papers	Taxi and Private Hire Vehicle Licensing Best Practice Guide available from <a href="http://www.dft.gov.uk">www.dft.gov.uk</a> Local Government (Miscellaneous Provisions) Act 1976 available from <a href="http://www.opsi.gov.uk">www.opsi.gov.uk</a> Disability Discrimination Act 2005 available from <a href="http://www.opsi.gov.uk">www.opsi.gov.uk</a>
Recommendations	<b>TO CONSIDER EITHER:</b>  <b>A. SUPPORTING THE CONTINUED DEVELOPMENT OF THE SCHEME; OR</b>  <b>B. SUSPENDING THE FURTHER DEVELOPMENT OF THE SCHEME.</b>

## 1.0 BACKGROUND

- 1.1 During the financial year 2009/2010 only 68% of licensed vehicles passed their scheduled depot inspection first time with monthly pass rates ranging from 53% in October 2009 to 85% in January 2010. In October 2009 19 licensed vehicles were stopped and inspected as part of a multi agency enforcement exercise involving Licensing Enforcement Officers, Council mechanics and Officers from the VOSA. Of the 19 vehicles inspected 9 vehicles had serious defects resulting in their licence plates being removed, 4 vehicles received an advisory note with only 6 vehicles successfully passing the inspection.
- 1.2 As a result of the disappointing standards found, a programme of initiatives was put together which are currently being implemented. So far during 2010, the vehicle inspection standards have been revised and published, the private hire driver conditions have been revised, a £50 re-test fee has been introduced and the private hire operator conditions are currently under revision.
- 1.3 Whilst researching taxi vehicle safety initiatives carried out by other Licensing Authorities around the Country Officers became aware of a scheme called 'Cabsafe' operating in Oldham. The scheme is similar to the Food Hygiene Rating Scheme that operates for food businesses throughout the country. Private hire operators are given a star rating based on their compliance during an audit inspection carried out by Officers.

- 1.4 Officers at Oldham Metropolitan Borough Council confirmed that since the introduction of the scheme in April 2009 the percentage of vehicles that failed their depot test first time fell from 40% to 3%. Officers had also found that both drivers and customers were only willing to use the higher star private hire operators which are driving up the standards in the lower star operators.
- 1.5 Officers believe that a similar scheme could be a viable option to improve standards within our District. A scheme is in the process of being developed.

## **2.0 OUTLINE OF THE SCHEME**

2.1 The scheme aims to:

- Provide information about the level of compliance with licence conditions to consumers in a way that is clear and easy to understand.
- Drive up the standard of licensed vehicles and drivers by encouraging licence holders to comply with licence conditions.

2.2 It is intended that the scheme will cover all licensed private hire operators except hotels who are only licensed by virtue of operating courtesy buses. In North West Leicestershire District 27 Private Hire Operators operating 130 Private Hire Vehicles would be included within the scope of the scheme. In addition any hackney carriage working under a Private Hire Operator could also fall within the scope of the scheme. There are approximately 96 hackney carriage vehicles licensed within the District, the majority of which are working under a Private Hire Operator.

2.3 The scheme will work by scoring the business based on an inspection carried out by an Officer. The scoring of the Operator will be based on compliance with licence conditions and the adoption of good practice. The Operator will be given a score for each of the conditions and good practice listed within the assessment framework resulting in the award of a star rating. Each Operator will be allocated a star rating ranging from no stars (Failing) to 4 stars (Excellent). The document entitled 'North West Leicestershire Scheme for Publishing Cab Safety Rating Scheme Information' provides more details on the scheme and is attached as Appendix 1.

## **3.0 CONSULTATION**

3.1 A first draft of a scheme was finalised by Officers in June 2010. This draft scheme was presented to the Hackney Carriage and Private Hire Drivers' Consultative Forum in July with a wider 12 week consultation exercise taking place between 16<sup>th</sup> July 2010 and 8<sup>th</sup> October 2010. The draft scheme was then presented to the Hackney Carriage and Private Hire Drivers' Consultative Forum in October.

3.2 The following is a list of relevant bodies and organisations involved in the consultation process:

- Private hire operators;
- Leicestershire Constabulary;

- NWLDC Staff Disability Focus Group and onward transmission to other disability groups in the District;
- Leicestershire County Council;
- The British Chambers of Commerce;
- Arriva Midlands;
- Campaign for Better Transport 2000;
- Department for Transport;
- All District Councillors;
- All Parish Councils.

Details were also posted on the Council's web site for the duration of the consultation.

- 3.3 Comments were received from Castle Donington Parish Council, Long Whatton and Diseworth Parish Council, the Passenger Transport Unit at Leicestershire County Council and the Disability Working Group at Leicestershire County Council. All were in support of the introduction of the scheme.
- 3.4 Only two comments were received from current private hire operators. Both operators were from the hotels that run courtesy buses and disagreed with the scheme as it was burdensome and would not offer any benefits to their customers based on the nature of their businesses. On this basis, Officers decided that the scheme would not include private hire operators that only offer courtesy buses.
- 3.5 Only two comments were made by the trade at the consultative forum. The first driver questioned the cost of implementing the scheme and second driver suggested the size of the door sticker be smaller than the current private hire vehicle signage.
- 3.6 Since the consultation exercise, amendments have been made to the assessment framework with the aim of improving consistency between inspectors. The revised assessment framework is attached as Appendix 2.
- 3.7 The primary aim of the scheme is to improve consumer confidence. A survey will be undertaken to collate public perception data relating to taxi safety standards in the district. 50 members of the public will be asked questions relating to taxi safety and the proposed cab safety rating scheme. The survey will be undertaken in both Coalville and Ashby town centre.

#### **4.0 COST / BENEFIT ANALYSIS**

- 4.1 Following the introduction in August 2010 of a £50 re-test charge for vehicles failing their annual depot test, the percentage of vehicles passing first time has increased to around 85%. (based on August and September data) Officers question whether the implementation of the £50 charge has driven up the standard of vehicles sufficiently, meaning a cab safety rating scheme is no longer required.
- 4.2 The percentage of vehicles passing their depot inspection first time provides an indicator of standards at the time of a vehicles scheduled inspection only. To obtain a more accurate picture of vehicle standards between depot inspections several ad hoc enforcement initiatives have been planned. This enforcement will commence in November with the results being reported to Members at the Committee meeting.

## **5. NEXT STEP**

5.1 Further work is required to finalise a scheme and to successfully launch the scheme. Before this work is undertaken, Members views are sought on the following issues:

1. Would implementing such a scheme be an unnecessary burden on businesses?
2. Given the recent improvement in the percentage of licensed vehicles passing their depot inspection first time, is such a scheme still required?
3. The scheme is primarily about consumer confidence. Do you think that requiring taxi operators to display a safety compliance rating on a vehicle door, visible to customers would improve customer confidence?

5.2 Members are asked to consider either:

- a) supporting the continued development of the scheme with the aim of launching the scheme in Spring 2011; or
- b) suspending further development of the scheme.

# **Cab Safety Rating Scheme**

## **North West Leicestershire Scheme for Publishing Cab Safety Information**

## **1. Aim**

This paper outlines the framework for the development of a scheme within NW Leicestershire for publishing information relating to licensed driver conduct, licensed vehicle standards and Private Hire Operators. The scheme will be known as the 'Cab Safety Rating Scheme'.

## **2. Background**

The need to provide information to the public is being driven by the Freedom of Information Act 2000 and all authorities already respond to requests for information in relation to public safety issues.

There is evidence from over 100 food hygiene rating schemes operating throughout the UK that indicate publicising food hygiene scores can bring about improvement in levels of hygiene. The consumer group 'Which?' has also found in a recent survey that there is a strong public interest for such schemes and consumers welcome information that can help them choose where to eat. Publishing such information has been supported by both the Information Commissioner and Hampton.

It is anticipated that publicising compliance with Private Hire Operator Conditions would increase compliance and will increase safety standards of licensed vehicles. A local authority in Greater Manchester has been publicising compliance levels since April 2009. In the first 12 months, the percentage of vehicles failing the Authority's vehicle test has decreased from 40% failure rate to a 3% failure rate.

## **3. Aims of the scheme**

The aim of the Cab Safety rating scheme is:

- To provide information about the level of compliance with licence conditions to consumers in a way that is clear and easy to understand.
- To drive up the standard of licensed vehicles and drivers by encouraging licence holders to comply with licence conditions.

## **4. Scope of the scheme**

The proposed scheme covers all licensed Private Hire Operators except hotels operating courtesy buses.

The Council will continue to be vigilant in relation to legal issues and will research and address areas as they arise.

It is recognised that any score derived from the Operator Compliance audit report is only a snap-shot at the time of assessment. This will be one of the key messages to put to consumers and licence holders in using the scheme. One of the aims of the scheme is to ensure that licence holders take responsibility for compliance and sustain compliance through out the year, not just as a response to an audit or schedule vehicle inspection.

This scheme acknowledges that consumers need easy access to information through a website facility. The data will be accessible from the North West Leicestershire District Council website.

The legal position is that Publication of scores on web sites is legal, even where a proprietor's or nominated persons name is published in the context of identifying a premises / Operator only. This approach is consistent with the FOI Act and the Information Commissioner has ruled in favour of disclosure of inspection information when local authorities have been challenged for withholding it

## **5. Outline**

### **Scoring**

The scoring of the business will be based on compliance with licence conditions and other good practice indicators listed within an assessment framework. The star rating awarded to a business will be derived by collating the scores and using a majority score method.

Each Operator will be allocated a star rating ranging from no stars (Failing) to 4 stars (Excellent). The 4 star rating equates to fully compliant with evidence of demonstrating good industry practice. The details of the scoring system can be found in appendix 1.

The scores will be taken from the Operator compliance inspection. Quality assurance checks will be made before the information is uploaded into the website. It is anticipated that this will be at monthly intervals.

Appeals against the scoring system will be dealt with by the Licensing Team Leader and Commercial Services Manager. In the case of risk ratings carried out by the Team Leader, the Commercial Services Manager and Head of Environmental Health will administer the appeal.



### **Secondary Inspections**

The Council is keen to ensure that there is no added burden to the licensing service in terms of additional inspections. Secondary inspections to re-assess the business will not therefore be undertaken.

The frequency of inspection will be determined by the star rating given at the time of the inspection. The Council believe that business compliance with licence conditions should not rely on the inspection regime but is the responsibility of all licence holders to achieve compliance at all times.

### **Frequency of inspections**

0 star: 3 months

1 star: 6 months

2 stars: 12 months

3 stars: 18 months

4 stars: 18 months

### **Consistency of inspections**

Consistency of inspections is a key challenge within the scheme. A consistency framework will therefore be produced. The Consistency Framework is made up of:

- Documented assessment framework and scoring system
- Training programme
- Auditing and review

The scheme incorporates a planned programme of manager and staff training prior and during the implementation of the project. A training package will be available for further refresher training and for new staff. The training programme also incorporates private sector staff used within the local authorities.

A programme of shadowing and peer review will also be developed to aid consistency and ensure robustness of the implementation process.

### **Publishing the information**

The individual Operators scores can be accessed through:

- A certificate/sticker for Operators to put up within their premises. It will be a condition of the licence to display the certificate/sticker.
- Each certificate will detail the premises name, address, a valid from date, a signature from the Commercial services Manager and will be shown on the website.
- A sticker for Operators to display on each licensed vehicle. It will be a condition of the licence to display the sticker.
- Information on a Private Hire Operator will be available through the normal local authority channels (Freedom of Information Act, etc) either directly from environmental health services or through the local authority website.
- Links from the North West Leicestershire District Council website [www.nwleics.gov.uk](http://www.nwleics.gov.uk)

### **Publicity and media**

It is important that the public are well prepared and informed about how to use the information available, the scoring system and how the information can be used to form part of the process of choosing which Private Hire Operator to use. Press releases will be issued at various stages.

Private Hire Operators will also need to be prepared, informed and supported through the implementation of the project. A press release will be issued alerting all licence holders to the introduction of the scheme. In addition a press release will be issued by North West Leicestershire DC to raise the level of public awareness. All Private Hire Operators have been included within a consultation exercise.

The scheme will be launched on DATE. A Press Release will be placed within the 'Vision' magazine, the local authority publication distributed to all businesses within the district. The scheme will continue to be promoted from time to time thereby ensuring that both members of the public and Private Hire Operators are aware of its existence.

### **Evaluation**

This project is seen as a unique opportunity to secure improvements in standards within licence holders. Baseline information will be obtained before the launch and trends on improvements to the scores and rating will be monitored.

## 6. Launch

Details of the launch have yet to be agreed.

### Spread of Operators at time of Launch

4 star:	?%
3 star:	?%
2 star:	?%
1 star:	?%
No star:	?%

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## Appendix 1 - The Scoring System

The principles behind the scoring scheme are:

1. To provide public information on licence holder standards to allow for public choice.
2. To provide positive encouragement for businesses to improve standards. (In line with Hampton Report recommendations).
3. Assessments to be based on primary inspections only.
4. The overall premises score and star rating will be derived by assessing compliance with each of the indicators listed within the assessment framework. The majority score will be used to determine the star rating awarded.
5. A 4 Star/ No Star\* (5 category) approach will be used.
6. Compliance descriptors are required for the star ratings to assist businesses in understanding how they have been judged and rated. Also to assist in understanding the general improvements required.
7. The No Star option reflects a desire from regulators that premises/Operators deemed failing and possibly the subject of formal action should not receive a star rating.
8. Premises with No Star will be those which are clearly failing to comply with licence conditions and are, or potentially will be, presenting a greater public safety risk. It must be made clear that vehicles displaying a 'no star' sticker have all passed a scheduled mechanical examination and were deemed to be safe at the time of the examination.

We anticipate there will be a particular media and public interest in this category.

9. Guidance and training will accompany the launch of the scheme.

<b>Majority Indicator Score</b>	<b>Summary Descriptor</b>	<b>Compliance General Guidance</b>	<b>Star Rating</b>
20	Excellent	Full level of compliance with conditions plus demonstrate areas of good practice.	★★★★ 4 Star
15	Good	Full level of legal compliance/conditions. Only minor issues not addressed.	★★★ 3 Star
10	Satisfactory	Broadly compliant with legislation/conditions. Standards being maintained or being improved.	★★ 2 Star
5	Poor	Some non compliance with legislation/conditions – more effort required.	★ 1 Star
0	Failing	A general failure to comply with legal requirements/licence conditions.	○○○ No Star

## CAB SAFETY RATING SCHEME ASSESSMENT FRAMEWORK

Licence Condition	Indicators	Score
<b>RECORDS</b>		
<b>1a</b>	<b>Suitable book with consecutively numbered pages or on computer system that can print off details of booking.</b>	
Fully compliant with condition		10
Record kept but not consecutive pages or not able to print copy off		5
No book		0
<b>1b</b>	<b>Booking details entered should include:</b> a) day, time and date of booking; b) the details of hirer; c) the day, time, date and location of the pick up points; d) the location of the destination; e) the registration number, plate number or call sign and the name of the driver allocated to the booking; f) remarks; g) the fare quoted for the journey; h) all modified, cancelled and no show jobs recorded; i) able to prove the whereabouts of any driver at any time if required to do so.	
A-I		20
A-H		15
A-G		10
Some details entered but not all entered/evidence of illegal sub-contracting/kept for less than 3 months/evidence not entered before journey.		5
No records kept		0
<b>1c</b>	<b>Record of all private hire vehicles to be kept including:</b> a) make; b) model; c) manufacturer; d) registration number; e) proprietor and driver(s) of the vehicle; f) any radio call sign; g) private hire vehicle licence number; h) the date of expiry of the private hire vehicle licence; i) details of insurance; j) MOT expiry details; k) service date of vehicle for 3 years	
A-K		20
A-I		10
Inaccurate or incomplete records		5
No records kept		0
<b>1d,e</b>	<b>Up to date operator driver schedule;</b> a) name; b) address; c) contact details; d) date of expiry of PHD licence; e) date of next medical; f) date when CRB will be 3 years old;	

## CAB SAFETY RATING SCHEME ASSESSMENT FRAMEWORK

	<b>g) date of expiry of DVLA driving licence.</b>	
A-G , records for two years and readily available		20
A-G, records for 1 year and readily available		15
A-G, records for 6 months and readily available		10
Inaccurate or incomplete schedule		5
No records		0
<b>Good Practice</b>	<b>Lost property system and log in place.</b>	
Lost property system in place (formal and documented)		20
Lost property system in place (informal and documented)		15
Aware of requirements in PHD conditions		10
Unaware of what required to do		0
<b>NOMINATED PERSON</b>		
<b>2a,b</b>	<b>Nominated Person</b>	
Notified within 7 days in writing		20
Not notified of change in writing		0
<b>STANDARDS OF SERVICE</b>		
<b>3</b>	<b>Provide prompt, efficient and reliable service in particular:</b>	
	<ul style="list-style-type: none"> <li>a) All private hire vehicles to attend punctually and at the appointed time and place;</li> <li>b) Premises are adequately heated, ventilated and lit and in clean and tidy condition and seating adequate;</li> <li>c) Telephone and radio equipment in good condition and defects repaired promptly in line with statutory requirements (copy of OFCOM licence required);</li> <li>d) Operator to ensure that no more than agreed fare is paid;</li> <li>e) If private hire vehicle not fitted with meter, customers to be notified of the price of the journey;</li> <li>f) Reasonable assistance will be given disabled people including assisting them to enter and exit operator offices and vehicles, make bookings for particular vehicles and carry any disabled aids they may have.</li> </ul>	
No complaints received		20
1 or 2 complaints in last 3 years		15
1 or 2 complaints in last year		10
More than 3 complaints in last year		5
6 or more complaints in last year		0
<b>Good Practice</b>	<b>Driver's written code of conduct</b>	
Corporate dress code agreed by LO, log of checks and actions taken		20
Checks carried out to ensure compliance		15
Aware of code and implemented by PHO		10
Aware but no action to implement taken		5
Not aware of code		0
<b>Good Practice</b>	<b>Customer Service Charter</b>	
Written charter and displayed and customers aware		15
Written charter in place		10
No service charter in place		0
<b>Good Practice</b>	<b>Price List</b>	
Widely available		15

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Documented price list		10
No documented price list		0
<b>COMPLAINTS</b>		
<b>4a</b>	<b>Complaint Notice</b>	
Notice displayed in line with requirements		10
Displayed but not all requirements or out of date		5
Not displayed		0
<b>4b</b>	<b>Suitably bound book or any other approved system for complaints to include:</b> a) date and time of complaint; b) contact details of complainant; c) name of driver(s); d) badge number of driver; e) vehicle registration number; f) details of allegation; g) date investigation completed; h) action taken.	
A-H, 2 years, unresolved referred to LA after 7 days, corrective action taken		20
A-H, 2 years, unresolved referred to LA after 7 days		15
A-H, 1 year, available for inspection, unresolved referred to LA after 7 days		10
Book but not all details included/not referred		5
Complaints not recorded		0
<b>CHANGE OF ADDRESS</b>		
<b>5</b>	<b>Change of address</b>	
Notified in advance of change		15
Notified within 7 days		10
No notification		0
<b>CONVICTIONS</b>		
<b>6</b>	<b>Notify in writing within 7 days to the Council regarding any interview, arrest, conviction, caution, ASBO and fixed penalty notice.</b>	
Notified within 7 days		10
Certain information within 7 days / late notification		5
No notification (only through enforcement/renewal)		0
<b>STAFF</b>		
<b>7a,b,c</b>	<b>Notify within 7 days of any commencement or termination of employment or operation of any private hire vehicle or private hire driver including self-employed private hire driver.</b>	
Notified within 7 days		10
Certain information within 7 days / late notification		5
No notification (only through enforcement/renewal)		0
<b>7d</b>	<b>Encourage and assist drivers in reporting racist or homophobic behaviour, verbal and physical assaults on drivers to the Police and Council.</b>	
Regularly update staff, actively report incident to Police/Council on receipt		20
Policy to let staff know how to report and advertise		10



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Aware of condition but onus on PHD to report		5
Not aware of condition and nothing done		0
<b>Good Practice</b>	<b>Level 2 BTEC Award in Transporting Passengers by Taxi and Private Hire</b>	
More than 75%		20
More than 50%		15
More than 25%		10
Up to 25%		5
No drivers trained		0
<b>Good Practice</b>	<b>Staff training nuisance customers and conflict resolution.</b>	
More than 75%		20
More than 50%		15
More than 25%		10
Up to 25%		5
None trained		0
<b>Good Practice</b>	<b>Disciplinary Policy</b>	
3 plus referred to LA for action		20
Policy maintained and always followed		15
Policy in place and generally followed		10
No policy in place but action taken on complaints		5
No action taken on complaints		0
<b>Good Practice</b>	<b>First aid training</b>	
All WAV drivers to be trained		20
Minimum 50% of all divers		10
None trained		0
<b>VEHICLE INSURANCE</b>		
<b>8</b>	<b>If fleet insurance is renewed on weekly basis, submit a weekly log (or lesser frequency as agreed by LO) to the Council of all vehicles and drivers covered by the insurance.</b>	
Annual insurance/ within 7 days (or agreed lesser frequency) with no prompts		20
Within 7 days (or agreed lesser frequency) but some prompts		10
<b>COPY OF CONDITIONS</b>		
<b>9</b>	<b>Copy of private hire operator conditions</b>	
Available and kept at premises		10
No copy available		0
<b>VEHICLES LICENCES</b>		
<b>10a</b>	<b>Report in writing any vehicle damage within 72 hours and the damage to be repaired within agreed timescale. (records from last year)</b>	
All reported and all repairs within agreed timescale		20
All reported within 72 hours and generally completed within timescale		10
Fail to report or repairs not completed within timescale		0
<b>10b</b>	<b>All private hire vehicles are kept in a clean and tidy condition at all times and meets all statutory requirements.</b>	
No complaints received		20
1 or 2 complaints in last 3 years		15
1 or 2 complaints in last year		10
More than 3 complaints in last year		5
6 or more complaints in last year		0

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<b>10c</b>	<p>All vehicles to be inspected visually on daily basis and a record of inspections kept for 6 months. All defects identified are repaired within a reasonable amount of time. Checks to include:</p> <ul style="list-style-type: none"> <li>a) tyres;</li> <li>b) lights;</li> <li>c) bodywork;</li> <li>d) brakes;</li> <li>e) cleanliness inside and outside;</li> <li>f) copy of insurance is on board;</li> <li>g) window screen;</li> <li>h) horn;</li> <li>i) window wipers and washers;</li> <li>j) drivers wearing their badges;</li> <li>k) internal signage;</li> <li>l) exhaust;</li> <li>m) external signage;</li> <li>n) plates fitted on outside and secure;</li> <li>o) first aid kit complete and readily available;</li> <li>p) fire extinguisher in working order and readily available.</li> </ul>	
	100% of vehicles checked	20
	75%	15
	50%	10
	25%	5
	No checks carried out/evidence of falsifying	0
<b>10e</b>	<p><b>Internal and external mandatory door signs should be displayed on all vehicles at all times and the signs should be of the same design and style.</b></p>	
	Corporate design in place agreed and approved by LO	20
	Compliant signage and format agreed and approved by LO	10
	Not displayed or non-compliant signage	0
<b>Good Practice</b>	<b>Wheelchair accessible vehicle (Operators with less than 10 vehicles exempt)</b>	
	More than one WAV in fleet	20
	One WAV in fleet	10
	No WAV in fleet	0
<b>MANAGEMENT</b>		
<b>Good Practice</b>	<b>Management Performance</b>	
	Good record of compliance – last 3 years	20
	Satisfactory record of compliance	15
	Reasonable record of compliance.- last 3 years	10
	Poor record of compliance – last 3 years	0
<b>Good Practice</b>	<b>All reasonable precautions will be taken to ensure that activities on the operator’s office and from vehicles do not create an unreasonable noise, disturbance or other nuisance.</b>	
	No complaints received	20
	1 or 2 complaints in last 3 years	15
	1 or 2 complaints in last year	10
	More than 3 complaints in last year	5
	6 or more complaints in last year	0
<b>Good Practice</b>	<b>Public Liability Insurance</b>	

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Displayed at premises	10
Policy in place but not displayed	5
No policy in place	0
<b>Good Practice</b>   <b>Risk assessments for violence to office staff and drivers</b>	
Adequate control measures in place	20
Suitable and sufficient RA undertaken	10
No risk assessments in place	0
<b>Good Practice</b>   <b>Adverts</b>	
All adverts approved e.g. car signage/newspapers/leaflets/cards/website	15
No 3 <sup>rd</sup> party advertising	10
3 <sup>rd</sup> party advertising on PHV	0
<b>Good Practice</b>   <b>Trade Forum</b>	
Attended last 3 forums	20
Attended last 2 forums	15
Attended last forum	10
Not attended last forum but has attended in past	5
Never attended forum	0