

# Comparison between current and draft Hackney Carriage and Private Hire Policy

Here is a clear, structured comparison of the main changes between the current approved policy and the draft policy, grounded in your actual documents and aligned to your requirement for concise, defensible, decision-ready insight.

## Key Changes – Draft vs Current Policy

The differences below are derived by comparing multiple sections across both documents (structure, drivers, vehicles, operators, appendices), rather than a single explicit section.

### 1. Overall Structure & Scope – Major Expansion

#### Current Policy

- Linear structure with core sections:
  - Drivers, vehicles, operators, offences, appendices embedded [\[Current Hackney Carriage and Private Hire Policy | PDF\]](#)
- Limited appendices and mostly narrative content

#### Draft Policy

- Fully restructured into:
  - Drivers → Vehicles → Operators → Additional → Extensive Appendices [\[DRAFT NEW Hackney Carriage and Private Hire Policy | Word\]](#)
- Introduces:
  - Dedicated sections for fit & proper, training, emissions, safeguarding, enforcement
  - ~20+ appendices (A–Z) covering operational detail

#### Headline Change

Shift from policy with guidance embedded → policy + detailed operational manual

### 2. Policy Intent & Strategic Alignment

#### Current

- Focus on:
  - Public safety, professionalism, transport access, environment [\[Current Hackney Carriage and Private Hire Policy | PDF\]](#)

#### Draft

- Explicit alignment to:
  - DfT Statutory Standards
  - Institute of Licensing Guidance
  - Environmental and safeguarding priorities [\[DRAFT NEW Hackney Carriage and Private Hire Policy | Word\]](#)

#### Headline Change

Policy becomes standards-led and nationally aligned, not just locally framed

### 3. “Fit and Proper” Test – Significantly Strengthened

#### Current

- Fit & proper referenced but broadly applied [\[Current Hackney Carriage and Private Hire Policy | PDF\]](#)

#### Draft

- Formalised definition and test:
  - “Would you allow someone you care about to travel alone with this driver?” [\[DRAFT NEW Hackney Carriage and Private Hire Policy | Word\]](#)
- Explicit use of:
  - Balance of probabilities (no benefit of doubt) [\[DRAFT NEW Hackney Carriage and Private Hire Policy | Word\]](#)

#### Headline Change

Moves to strict evidential threshold with clear decision test

#### 4. Driver Licensing – Substantial New Requirements

##### Key New Requirements in Draft

- Language proficiency assessment (mandatory) [\[DRAFT NEW...ing Policy | Word\]](#)
- Knowledge test formalised and expanded [\[DRAFT NEW...ing Policy | Word\]](#)
- Mandatory training:
  - Safeguarding
  - Disability awareness
  - County lines exploitation [\[DRAFT NEW...ing Policy | Word\]](#)
- Right to work checks (Immigration Act) [\[DRAFT NEW...ing Policy | Word\]](#)
- Tax conditionality (HMRC check) [\[DRAFT NEW...ing Policy | Word\]](#)
- Proof of working predominantly in district [\[DRAFT NEW...ing Policy | Word\]](#)

##### Current

- Core requirements:
  - DBS, medical, driving assessment only [\[Current Ha...ire policy | PDF\]](#)

##### **Headline Change**

Drivers must now meet professional competency, safeguarding, and compliance standards, not just eligibility

#### 5. Ongoing Driver Compliance – Tightened Significantly

##### Current

- Notification duties exist (e.g. changes within 7 days) [\[Current Ha...ire policy | PDF\]](#)

##### Draft

- Much tighter deadlines:
  - Arrests/charges: within 3 working days [\[DRAFT NEW...ing Policy | Word\]](#)
  - Medical changes: within 5 days [\[DRAFT NEW...ing Policy | Word\]](#)
  - Penalty points: immediate / next working day [\[DRAFT NEW...ing Policy | Word\]](#)
- New requirements:
  - Daily vehicle checks (mandatory records) [\[DRAFT NEW...ing Policy | Word\]](#)
  - Driver hours awareness (fatigue risk) [\[DRAFT NEW...ing Policy | Word\]](#)

##### **Headline Change**

Clear move to active, continuous compliance monitoring

#### 6. Enforcement Model – Introduction of Formal Regime

##### Current

- Enforcement largely reactive:
  - Breaches → Committee / sanctions [\[Current Ha...ire policy | PDF\]](#)

##### Draft

- Introduces:
  - Penalty point scheme (Appendix G) [\[DRAFT NEW...ing Policy | Word\]](#)
  - Defined thresholds for suspension/revocation
  - Expanded immediate revocation where public safety risk [\[DRAFT NEW...ing Policy | Word\]](#)

##### **Headline Change**

Shift from discretionary enforcement → structured, auditable enforcement system

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#### 7. Vehicle Standards – Major Tightening

##### Current

- Basic controls:
  - Age limits
  - Annual inspection (6-month for specialist) [\[Current Ha...ire policy | PDF\]](#)

**Draft**

- New requirements:
  - 6-month inspections for all vehicles [\[DRAFT NEW...ing Policy | Word\]](#)
  - Mandatory emissions standards:
    - Euro 4 petrol / Euro 6 diesel
    - ULEV transition by 2035 [\[DRAFT NEW...ing Policy | Word\]](#)
  - Ban on part-worn tyres (new tyres only) [\[DRAFT NEW...ing Policy | Word\]](#)
  - Daily vehicle checks enforced
- Additional controls:
  - Engine idling enforcement
  - CCTV framework
  - QR code plates

**Headline Change**

Strong shift toward roadworthiness + environmental compliance + traceability

**8. Environmental Policy – New Strategic Direction**

**Current**

- General environmental objective only [\[Current Ha...ire policy | PDF\]](#)

**Draft**

- Specific targets:
  - Emissions standards phased introduction
  - Net-zero alignment (2035 transition) [\[DRAFT NEW...ing Policy | Word\]](#)

**Headline Change**

Environment becomes a regulatory requirement, not just an objective

**9. Safeguarding & Equality – Centralised and Enforceable**

**Current**

- Equality Act referenced in general terms [\[Current Ha...ire policy | PDF\]](#)

**Draft**

- Core policy pillar:
  - Mandatory safeguarding training
  - DBS referrals framework
  - Duty escalation for breaches [\[DRAFT NEW...ing Policy | Word\]](#)

**Headline Change**

Safeguarding moves from guidance → enforceable compliance requirement

**10. Operators – Much Stronger Governance Requirements**

**Current**

- Basic requirements:
  - Records, complaints, insurance [\[Current Ha...ire policy | PDF\]](#)

**Draft**

- Introduces:
  - Fit & proper test for operators [\[DRAFT NEW...ing Policy | Word\]](#)
  - Registers for drivers, vehicles, staff (Appendix Q) [\[DRAFT NEW...ing Policy | Word\]](#)
  - Stronger accountability for safeguarding and data

### ***Headline Change***

Operators now treated as regulated entities with corporate responsibility

## **11. New Policy Areas Not Previously Covered**

**Draft introduces entirely new areas:**

- CCTV requirements
- Rickshaws and horse-drawn carriages
- Out-of-district working policy
- Write-off vehicle bans
- Tax conditionality
- Digital systems (online applications, QR codes)

### ***Headline Change***

Policy expands to cover modern risks, technologies, and grey areas

### **Summary**

Draws together cross-cutting themes (driver, vehicle, enforcement, governance).

The draft policy represents a fundamental shift in regulatory approach, characterised by:

- From reactive to proactive enforcement
- From minimum standards to professional competency
- From local policy to nationally aligned framework
- From basic safety to safeguarding-led regulation
- From vehicle condition to environmental accountability

In effect, it transforms licensing into a modern regulatory system with strong audit, compliance, and safeguarding controls.