



Taxi and Private Hire licensing: Consultation on the NVQ/VRQ Review [09-2010]

As one of the Training providers closely involved in the delivery of both the NVQ and VRQ programmes for Taxi and Private Hire drivers for Leeds City Council, we want to thank you for the opportunity to participate in this important consultation exercise.

You identify two primary questions in your consultation:

“to gather your thoughts and feedback on:

- 1) The mandatory requirement to achieve these qualifications
- 2) The deadline of December 2011 for all existing drivers to have achieved the mandatory qualifications and 12 months for new applicants to the trade.”

(from page 3 of the Consultative document)

You then outline five proposals for presentation to the Licensing Committee relating to both new applications for licenses and existing license-holders.

Response A.

We would strongly support **proposal 1**:-

“That new applications for licenses will continue to require the applicant to attain the qualifications within 12 months of the license being granted.”

This 12-month period would allow time for drivers to develop the skills necessary to compete a competence-based qualification such as the NVQ, which requires more than abstract knowledge, but is firmly based on and real life experience and practical ‘know-how’ of driving and meeting the requirements of real life customers (i.e. passengers) on a regular basis.

It might be possible to complete in a shorter period of time the Edexcel Level 2 BTEC award in Transporting Passengers by Taxi and Private Hire, which is the more common of the two main VRQ awards, as long as the recommended guided learning hours are met and sufficient support is given to prepare individual learners to pass the externally validated on-line tests. However, even the more theoretical BTEC award would prefer learners to have some experience of the ‘responsibility to provide a taxi or private hire service for passengers’. In practice, many drivers also find it much easier to understand and answer the questions set in the on-line tests *after* they have developed some experiential knowledge of real work in this sector.

Response B.

We readily understand that the cost of these qualifications may present difficulties to new applicants to the trade, who already face significant financial outlay in attaining a licence. We can therefore fully appreciate the reason why you should want to consider **proposal 2**:-

“That new applications for licences will require the applicant to attain the qualifications within a specified time period, for example within three years.”



We also carefully note your explanatory comment,

"This would allow new applicants to budget for the cost of the qualifications and time to enrol with a suitable training provider."

However, the most significant problem with this proposal has already been clearly stated in your own Report to the Licensing and Regulatory Panel (September 2008), where it is stated:

"there is a need to be alert as some license holders may seek to defer for as long as possible and potentially undermine the value of the training plan."

We would agree. There is a critical need for all drivers to develop relevant skills without undue delay and it is not a good idea to make it easy for them to postpone becoming involved in the formal training process. Training and CPD (possibly even CPC within a driving-related sector) is going to be an essential on-going process for all working people for the future. Timely, well structured training plans are going to become the norm not the exception.

From our own experience as a provider, we are well aware of the potential problems in this area. Working in this sector across the country over the last four years, we have found that many drivers began by rejecting out of hand the offer of training. Some were especially critical of the idea of people from outside the industry trying to teach them how to do their job. They were also very unhappy about losing earnings, as self-employed people, because of increased 'down-time' during training and assessment.

We were able to face these objections head-on, because all our assessors have been active in the industry, have current knowledge and experience, come from a variety of backgrounds and ethnic groups and are able to speak to drivers, person-to-person, on the basis of a wealth of sector experience. We have also always been fully convinced of the critical need for drivers today to upskill themselves across a range of areas from disability awareness to safeguarding and all the other changing legal requirements relating to passenger transport, health and safety and specific driving issues. In addition, we were able to offer a flexible approach to programme delivery that allowed us to minimise down-time, while still delivering focussed quality training.

Our experience of delivering this training has also led us to discover another significant fact, that some drivers feel very lacking in self-confidence, when faced with the 'perceived threat' of having to undertake additional formal testing and assessment, which provides further reasons for them to put off becoming engaged in the learning process. This is hardly surprising in an industry, which has not had the benefit in the past, at least in some parts of the country, of a strong training and development culture. Fortunately, we can report that a large number of those very same 'reluctant learners' have ended up demanding our assessors enrol them on the NVQ programme, once they have seen that training programmes do not need to be threatening but can provide an excellent way of accrediting their work skills and helping them to 'fill in the gaps'. Many of them also came to recognise the value of taking advantage of the highly favourable funding regime, while it lasted, and were keen not to lose a subsidised opportunity for achieving this new qualification.



Your September 2008 Report to the Licensing and Regulatory Panel asked members to consider the "role of licensed drivers in providing ... services to a diverse range of people" and the "increased levels of professional competence requisite' [*to meeting this role*]. We would argue that the driver's role today demands 'increased levels of professional competence' greater than ever before. You only have to look at the way many authorities across the country are finding it necessary to investing in disability awareness programmes to meet DDA (now 'Disability and Equality') legislation) to find ample proof of this.

Response C.

It is good to see you reiterating your **third proposal**:-

"Existing licence holders will continue to be required to attain the qualifications by December 2011."

Like everyone else, we recognise the potential negative effect of changes in funding on programme delivery, not least during a period of recession. There are at least two issues to be considered here.

The VRQ in Transporting Passengers by Taxi and Private Hire has never enjoyed funded status, which actually means that there has been no change in its funding regime (and where Providers have sometimes offered very reasonable rates for VRQ delivery, when undertaken in combination with the NVQ, this may well continue). Bearing in mind the large number of drivers who have already met the December 2011 requirement in the Leeds area, it would seem only fair to maintain this date for all existing licensed drivers at least in relation to the VRQ.

The situation as regards the NVQ in Road Passenger Vehicle Driving is different, of course. Until now, the NVQ has mainly been funded through Train to Gain. With the announced loss of Train to Gain, this funding seems likely to be withdrawn much sooner than was anticipated. However, we would argue that the NVQ should not automatically be left out of consideration solely on the grounds of a withdrawal of funding. Though the VRQ is a valuable theory test, the NVQ focuses much more closely on a driver's *practical competence*. This provides a significant additional benefit, because it tests how drivers *actually carry out* their strongly customer-centred role. To remove support from the NVQ would therefore seem to us to be a retrograde step.

Response D.

As before, we well understand your inclusion of **proposal 4**:-

"Those existing licence holders are given a revised timescale to attain the qualification which is reasonable to their learning needs and financial outlay, for example December 2013"

and we take note of your supplementary comment:

"This would allow existing licence holders to budget for the cost of the qualifications and time to enrol with a suitable training provider."

However, we would want to repeat that all the comments given under C. above apply with equal force.



Response E.

It is probably not our place as a provider to comment at any length on your **proposal 5**:-

"That those applicants who have achieved the qualifications prior to December 2011 be given an incentive upon renewal of their licence, for example a reduction on their renewal fee"

As before, we fully recognise that:-

"this would have a significant impact on the resources within the Taxi and Private Hire Licensing Section and may be difficult to administer" and that "the financial incentive would need to be of a value to make it desirable to achieve the qualifications."

We would merely note that similar schemes operate in other areas and have been found highly successful in promoting programme uptake among self-employer drivers.

Response F.

Proposal 6 states:-

"That the Taxi and Private Hire Licensing Section explore the possibility of procuring one training provider to deliver to all new applicants and existing drivers at one set cost."

As a provider with a successful track record of delivering training in your own geographical area, we would like to highlight several critical priorities. As already stated, we believe it is essential for drivers in this industry to be offered quality training programmes which are implemented in a flexible well-structured way that meets both local conditions and the needs of the individual driver.

It is surprising to read the September 2010 data stating that **of the 60% of licence holders** enrolled on the NVQ programme, **only 43%** have achieved this qualification. Having checked our own database of Leeds learners over the period from February 2009 to the present, we find we have enrolled 266 learners, of which only 7 learners withdrew prior to completion and only 12 learners did not complete 'on time'. This means **259 learners achieved the award**, equalling in percentage terms **97.37% actual achievement rate** and **92.86% timely achievement rate**.

This much more positive achievement rate (specifically recognised in a recent Ofsted report) is fully supported by formal and informal feedback from learners themselves, who speak highly about the benefits of their training and the support they have received in their well targeted programme.

A strong feature of NVQ in general is that they provide practical qualifications for practical people. Along with other quality providers, we make full use of all relevant evidence and assessment methods in the achievement of NVQs and this may help explain our high success rates. The following provides a good example of what this means. We have found a number of drivers, who can communicate directly with their passengers with great success, are, nevertheless, sometimes much less comfortable with providing evidence in written form. These learners are often pleasantly surprised to discover our assessors are able to make effective use of a range of evidence *recorded in audio format*. This simple approach frequently makes evidence-gathering,



possible, when it might otherwise have been quite burdensome.

This is just one of the ways assessors can effectively 'meet the needs of the individual learner'. Evidence recorded in audio format can be validity assessed and verified every bit as successfully as evidence documented using more traditional evidence-gathering methods and fully meets the requirements of quality control. But that is only part of the story. Those who have verified the completed portfolios of learners using the audio method and listened to the resulting CDs of their evidence, often refer to the way they have heard individual drivers audibly growing in confidence during the programme to the degree that they have been able to provide high quality evidence of their competence and knowledge, using this approach. You just have to listen to some driver's account of how they have successfully managed very difficult passengers to hear proof of this.

It should be noted that our use of the audio method while delivering the NVQ programme across the country, has also proved to be of benefit for learners with a wide variety of language skills, including both those with English as their primary language and those with English as their secondary means of communication.

We notice the 2008 Report to the Licensing and Regulatory Panel (2.11) makes specific reference to 'concerns regarding a potential inability to learn because of language or comprehension issues'. In this context, it may be not be insignificant that of the total 266 learners identified in our Leeds data given above, only three were classed as 'white-British/Irish' (according to information provided on the LSC approved Equal Opportunities Monitoring form). This would suggest that our high achievement rate has been maintained, while delivering the NVQ programme to a diverse learner group and confirms that language issues have not proved an insurmountable barrier for the cohort of Leeds learners with whom we have had the pleasure of working so far. We therefore consider it important to re-emphasis that language issues can be taken *fully into account* in the delivery of this award, without any dilution in the quality of delivery, as long as due attention is paid to meeting learners needs.

This, of course, in no way detracts from the priority set by the former Learning and Skills Council in promoting improved communication skills in work-based training and recently confirmed by the Skills Funding Agency, which continues to require the full integration of Key/ Functional Skills in all Apprenticeship Frameworks. In line with this, some local authorities require all their drivers to demonstrate high quality communication skills to prepare them to undertake their customer-focussed role and many training providers successfully deliver dedicated additional programmes to facilitate this. Nevertheless, we feel we can safely report that the above statistics clearly indicates that issues relating to communication skills do not need to provide a major barrier to achievement for most drivers as long as they are handled effectively.

We can only add that, as a provider accredited with both EDI and Edexcel (the main awarding bodies offering the NVQ award in Road Passenger Vehicle Driving), with a solid track record of achievement in the Leeds City area and an equally strong reputation for successfully delivering the BTEC level 2 award in Transporting Passengers by Taxi and Private Hire, we are in a key position to meet all the requirements of this proposal.