

Agenda item	7
Report no	HLC/135/25

THE HIGHLAND COUNCIL

Committee: THE HIGHLAND LICENSING COMMITTEE

Date: 16 September 2025

Report title: Private hire car driver knowledge testing

Report by: The Principal Solicitor – Regulatory Services

1. Purpose/Executive summary

- 1.1 This report provides the Committee with the responses received following public consultation on the possibility of introducing private hire car (PHC) knowledge tests in The Highland Council area.

2. Recommendation

- 2.1 This Committee are invited to:

- (i) note the 44 responses received following the public consultation
- (ii) consider the responses contained in the report and decide whether Members wish to proceed with introducing knowledge testing for PHC drivers

If Members do wish to proceed with introducing knowledge testing for PHC drivers:

- (iii) decide the position in relation to the determining issues at 6.1 of the report
- (iv) note the next steps that would be required should Members decide to proceed with introducing knowledge testing for PHC drivers

3. Background

- 3.1** On 1 November 2016, section 64 of the Air Weapons and Licensing (Scotland) Act 2015 (“the 2015 Act”) came into force providing Licensing Authorities the ability to require applicants for a private hire car knowledge test prior to the grant or renewal of a licence.
- 3.2** Prior to this date, the Civic Government (Scotland) Act 1982 Act (“the 1982 Act”) only allowed licensing authorities to require taxi driver licence applicants to pass such a knowledge test. The Highland Council has long imposed this knowledge testing requirement on applicants for a taxi driver’s licence
- 3.3** The current taxi driver’s knowledge test involves a two part test comprising both a Highland-wide knowledge test and a local knowledge test for the applicant’s local area. The pass mark for the knowledge test is 75% for the Highland section and 85% for the local section. Applicants are permitted a maximum of three attempts to pass both parts of the test.
- 3.4** On 1 November 2016, a report was brought before the Highland Licensing Committee asking the Members at that time whether they wished to introduce knowledge testing of applicants for a PHC driver’s licence.
- 3.5** The Committee at that time agreed to defer the decision on this until further provisions of the 2015 Act relating to taxis came into force and guidance on these provisions had been received from the Scottish Government, particularly in relation to the removal of the 24 hour contract exemption provision. This removal of the contract exemption has not been implemented to date.
- 3.6** At the meeting of the Highland Licensing Committee held on 25 February 2025, Members agreed to go out to public consultation before reaching any decision on whether to reconsider introducing a PHC knowledge test for The Highland Council area.

4. Responses received

- 4.1** 44 responses were received to the public consultation. A copy of the questions and responses are attached as **Appendix 1**.
- 4.2** A comparison chart has also been created comparing the position with other local authorities. A copy of this can be found at **Appendix 2**.

5. Further consultation with the trade

Further consultation was undertaken at the trade meetings held in August. A summary of the responses received are attached as **Appendix 3**.

6. Determining issues

- 6.1** Firstly, it must be determined whether Members wish to introduce a knowledge test for private hire car drivers.

If Members are minded to introduce private hire car knowledge testing, the following matters will also require to be decided:

1. Should knowledge testing be required only in the case of applicants for a new PHC driver's licence? In other words, should existing holders of a PHC driver's licence be exempt from the requirement to pass a knowledge test when they come to renew their licence?

2. Should the knowledge test for PHC drivers be identical to the two part knowledge test used for taxi drivers and should the pass mark and allowance for number of attempts be the same?

3. From what date should the requirement for PHC driver knowledge testing come into effect?

7. Next steps (if introduced)

7.1 If Members are minded to introduce a private hire car knowledge test for private hire car drivers, the following steps would require to be undertaken:

- Updating the taxi and private hire car policy document
- Production of additional knowledge test papers based on the criteria agreed by the Licensing Committee.
- Notification and publication of the policy change on the Council's website and potentially to existing private hire car drivers
- A resourcing and financial assessment (as detailed below)

8. Current PHC driver numbers across The Highland Council area

8.1 Currently, there are 345 licensed private hire car drivers across The Highland Council area. There are 7 area offices which process private hire car drivers licence applications, and the current breakdown of licences per office is as follows:

- Wick - 30
- Golspie – 34
- Dingwall - 23
- Inverness – 190
- Nairn - 28
- Fort William – 13
- Portree - 27

8.2 There are 110 PHC driver licences due to be renewed in 2026, 98 in 2027 and 62 to date due for renewal in 2028.

9. Implications

9.1 The requirement to carry out additional tests would have a staff resource and administration implication. The additional workload would require to be examined and fully costed and reflected in the annual review of civic licensing fees to ensure that the fees set would be sufficient to meet the expenses of the Licensing Authority in exercising their functions.

9.2 An Integrated Impact Assessment was undertaken on 26 August 2025 and has concluded that the proposal will generally have a neutral impact on the protected characteristics groups and does not have the potential to impact on any person's human rights. It has been concluded that a full impact assessment is not required.

9.3 Should an applicant have a disability and require reasonable adjustments, they would be asked to make the Licensing team aware when booking a test. If applicants request reasonable adjustments, the adjustments made must be relative to the applicant's disability.

Date: 26 August 2025

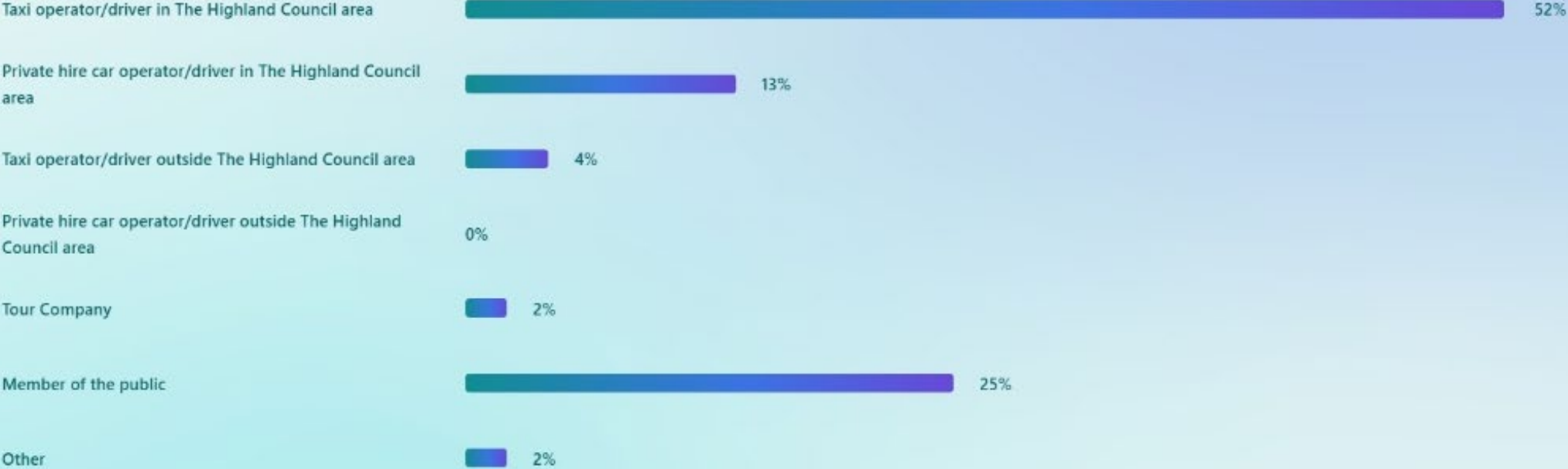
Author: Claire McArthur

Background Papers: Appendix 1 – Public consultation questions and responses
Appendix 2 – Comparison chart with other local authorities
Appendix 3 – Further comments from the trade

Survey results:

- 44 responses to the survey
- 41 of those responses were from postcodes within The Highland Council area
- 3 of those responses from postcodes outwith The Highland Council area

Which of the following is most applicable to you?



44 responses submitted

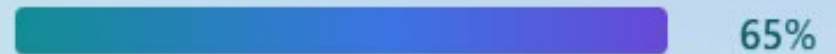
Do you think that knowledge tests should be introduced for private hire car drivers?



44 responses submitted

If knowledge tests were introduced, do you think that all existing private hire car drivers should have to sit the knowledge test?

Yes, existing drivers should be included



No, only new applicants should have to sit a test



I don't agree that any private hire car drivers should have to sit a knowledge test



44 responses submitted

If knowledge tests were introduced, should the test be identical to the taxi test currently used. This consists of two papers (Highland wide section and Local area sec-...



44 responses submitted

If knowledge tests were introduced, when should this take effect?



*survey results may not always add up to 100% due to rounding and the presence of multiple choice selections or incomplete submissions

Please state your reasons on why you think PHC knowledge test should or should not be introduced:

1	When I tooo a taxi the driver didn't know the area
2	I would would expect private hire drivers to to know about the town/area and how to get to the customers destination by the most direct route and be able to speak English to an adequate level
3	Some take the longest routes or do not know address so take you further than needed.
4	If the applicant is either a Scottish Tourist Guides Association Blue Badge or Green Badge Guide they will have extensive knowledge of the area, and so further testing should not be necessary.
5	Used private cabs before and they don't seem to know where they are going or familiar at all With the area, often seen also operating mobile devices whilst driving to use sat nav when lost, thus increasing the fare on passengers
6	I've been taken on some strange routes that a taxi off the rank wouldn't take me ding up costing me more.
7	This is something that should be an expected standard across all PHC and Taxis
8	So many taxi drivers (particularly foreign) do not know areas/directions
9	Yes, as drivers should have to know all the streets and places without using smart phones.
10	Anyone dealing with the public and getting them to their destination should know the quickest and cheapest route to do so
11	I serve a rural community. The nearest taxi test for me covers an area 45miles away that I don't cover. That area has more trade, if I am forced to take a taxi test then I will apply for a taxi licence and work in an area with a high turnover of passenger traffic leaving the rural area I cover without a service. I also signed up as a fit and proper person to hold a

	<p>phc licence, if there is a problem with phc licence holders in Inverness this should be addressed by the licensing department as rules are in place and can already be enforced.</p>
12	<p>Drivers are coming to this area just to work and are getting told just to get a PH license as you don't need anything to get it and have no clue anywhere in the area a knowledge test is a must for all drivers including existing ph drivers.</p>
13	<p>People' should have a better understanding of areas they should be all public as they pay same price as taxi tests</p>
14	<p>Better knowledge of city and area which leads to better customer service</p>
15	<p>For the safety and convenience of the customer.</p>
16	<p>It is THE MOST complained about concern from passengers. Almost every run I get a comment on how well I know the town compared to the last driver...95% of the time it was a PHC they used</p>
17	<p>They are a private hire car, they shouldn't have to know the whole area in the same way as the taxi drivers do, everywhere around the world you get the choice between a taxi driver and a private hire driver which is usually cheaper, let's keep it that way.</p>
18	<p>Private hire should sit knowledge test as then they could apply for taxi driver license instead</p>
19	<p>If a driver wants to be PH Driver I believe it's up to the companies employing these drivers to give them on the job training, not the HC. If every driver becomes a Taxi Driver where will they try & pky there trade. There is not enough spaces on the ranks already never mind possibility hundreds more. There is more than enough drivers cheating, eg, parking outside Rohan's & railway station playing cat & mouse with the traffic wardens. Tensions are very high between the cheating drivers & the drivers being fit & proper license holders. As the council are more than aware from all the complaints.</p>
20	<p>In my opinion to many PHC drivers have little or no knowledge of the area. I get so many people in my taxi complaining about PHC drivers taking them the wrong route and relying on sat nav.</p>

21	<p>Many times I've ordered a taxi that turned out to be a PHC, and the driver had no idea where to go. I think drivers with a full licence should also have some kind of regular refresher test.</p>
22	<p>Alot of phc drivers have no idea where they are going in inverness, I think a knowledge test would be beneficial for them & the public, they do the same job as fully licensed taxi drivers, so should be tested like us</p>
23	<p>.</p>
24	<p>if PHC drivers have to sitt on the same knowledge test,then they will all go fully licensed,because what is the point of passing the tests and staying on private hire?what will be the problem when all PHC drivers after the test go fully licensed taxi,where and how will they fit in the rank? we have al ready big problem for access to train station,because all taxi's blocked the entrance every single weekend.However,if there is a decision for PHC to sit the test,it would be good for some fully licensed drivers to also sit the same tests again, because they have no idea where and how to get to crown street,darris road and much more,which is unacceptable because they are already fully licensed,but how do they was past this test?this is important question,some of them still asking customers for directions or they still using sat nav?</p>
25	<p>Being a PHC driver you get to know your regular. Customers phone and sometimes request certain drivers. PHC should have the option for sitting a test or not. As a private hire you know where you're going, who you're taking, all before you pick them up. This is a safer option for some drivers and I feel like drivers should be able to choose this as they do now without having to sit a test. There's know room for more cars on the ranks there already full and struggling to park on them. There's also violence a lot of the time on the ranks between drivers so I would not feel safe. PHC have an operator that tracks where you are and where your going also and there's a panic button to let the operator know your in trouble, rank drivers don't have this, I feel this is a lot more safer option being a PHC driver. A lot of the time rank drivers get a lot of runners, also people attacking them and they have no clue where they live and know contact details.</p>
26	<p>If there's a test required then there would be no difference between private hire driver and taxi driver apart from private hire not being able to pick up unless pre booked drivers would be aswell just going for a full taxi license</p>
27	<p>Maybe just a local test so they know at least some of the main streets and hotels and other placing locals and visitors need to go. And the other issue I would have is, if private</p>

	hire then become full plates we definitely don't have enough ranks spaces in town to accommodate that amount of taxis.
28	If all drivers need to take a test, it might as well be for the full license. And the town simply can't support that. If they have to take the test as well as full drivers, they should have some added privileges as a result. Maybe by making room for them around town. Just as full licensed have the ranks
29	Going by past experience they don't know where they are going, or they take you the long route hopping that YOU don't know the right way
30	Whether it is a taxi driver or a private hire driver they may take me home in an exactly the same way so they should be aware of the quickest route available
31	To satisfy most job requirements it is necessary to have qualification or experience. If you are applying for the first time for a PHC license then you do not have experience!! By making applicants sit a knowledge test you are checking to see if they have what is required to fill said position. If they cannot pass this test then they are not fit to hold a private hire license. However if they want this job, they should be willing to study and make an effort to get the knowledge to pass this test and satisfactorily do this job properly. The same stands for a full taxi license. Update a very outdated knowledge test. Mix up the questions, more about your role as a driver, route selection, scenarios and locations. A lot of drivers now cannot even speak English - which is not acceptable when you are customer facing. Reduced the cost of a PHC license by a nominal amount and introduce knowledge testing to ensure the taxi licensing numbers do not increase to a more unmanageable level this would then avoid the obvious backlash the result of this is likely to arise.
32	Licences are given to drivers who have NO knowledge of the area and unfortunately Google Maps, etc don't always get it right. This instigates many many major complaints from customers. Surely if PHC drivers took a knowledge test they would then be Taxi drivers and PHC drivers would no longer exist !!
33	I started as a private hire driver in 2012 and this helped me progress to full taxi. A simpler version of a taxi knowledge test should be implemented for private hire drivers.
34	PHC IS A PRE-ARRANGED SERVICE AND THEREFORE DOES NOT NEED THE KNOWLEDGE TEST.

35	Majority of uk councils not requiring a knowledge test . Will be no dif phv vs taxi
36	<p>In any other industry job candidates have to show that they can do the job being offered unless training is being offered as part of the job. PHC drivers are receiving licences with no prior knowledge of the highlands as stated by one of the Highlands biggest taxi company owners who are employing them! they don't know the basic areas such as Hospital, airport, railway station. Customers are paying Full Taxi Tariff rates and have to direct them where to go which is unacceptable, when customers phone a company for a Taxi a PHC car turns up for them, Tourists arriving at Inverness Airport or Train station should not be expected to tell the driver how to get to their hotel or other destination which gives a poor image of the City. If PHC drivers passed a Knowledge test they would have a fair idea of where they need to go, relying on sat nav's is not practical as there may be multiple pick up and drop off points. Taxi companies are exploiting Highland Council Licencing and Trading Standards laws and legitimate Licenced Taxi drivers by using these PHC cars as Taxis. Taxi companies are confusing the public by adding their standard Taxi logos on their PHC cars with the added words PHC on the Logo, the public are recognising these cars as everyday Taxis PHC Cars should have pre booked hires only on the doors as does every other City in Scotland and nothing else. PHC Cars are also parking up in areas of the town in the evenings where night footfall trade is prevalent and have also been seen offering their services as a Taxi. All Taxis and PHC Cars should also pass a driver enhanced disclosure Scotland as they are being used for Highland Council Home to School runs some of which could have vulnerable young people being carried in the cars.</p>
37	Some sort of a knowlage background would be good
38	They do the same job as a public hire driver go the same places but don't sit a test where we have too
39	We all do the same job and get paid the same. Therefore we should all sit the same test.
40	Because basically they do the same work as a public hire driver only difference is they can't tout for trade on the street
41	I think private hire drivers should be treated the same as those who have taxi licenses.
42	In the eye of the public, private hire is still taxis. Every city gets visitors from other areas of the country that don't know their way around. Often these visitors will use available taxi

	<p>services in order to reach their destination efficiently. It's very important for any public or private hire driver to be well educated within the area of which they work. The shortest route is not usually achieved through sat-nav systems. People also often ask these drivers for advice about hotels, restaurants, pubs, clubs, churches, museums, events, etc. The professionalism of these drivers reflects greatly on your city.</p>
43	<p>The test provides the applicant a good geographical awareness of his or hers operating area</p>
44	<p>They would be more aware of the shortest/quickest routes to a destination, also if transporting a disabled person could avoid roads which may be cobbled, bumpy etc.</p>

APPENDIX 2

Comparison across local authorities

Council	Taxi knowledge test	PHC knowledge test
Aberdeen City	Yes	Yes
Aberdeenshire	No	No
Angus	Yes	No
Argyll and Bute	No	No
Clackmannanshire	No	No
Comhairle nan Eilean Siar	No	No
Dumfries and Galloway	No	No
Dundee City	Yes	No
East Ayrshire	Yes	Yes
East Dunbartonshire	No	No
East Lothian	No	No
East Renfrewshire	Yes	Yes
Edinburgh City	Yes	No
Falkirk	Yes	Yes
Fife	No	No
Glasgow City	Yes	No
Inverclyde	No	No
Midlothian	Yes	No
Moray	Driving test	Driving test
North Ayrshire	No	No
North Lanarkshire	Yes	Yes
Orkney Islands	No	No
Perth and Kinross	Yes	Yes
Renfrewshire	Yes	No
Scottish Borders	No	No
Shetland Islands	No	No
South Ayrshire	No	No
South Lanarkshire	Yes	Yes
Stirling	No	No
West Dunbartonshire	Yes	Yes
West Lothian	Yes	No

8 out of 32 local authorities require both PHC and Taxi drivers to sit a knowledge test.

Summary of responses on introducing PHC knowledge tests at the trade meetings:

<p>Wick</p>	<p>Those present were of the view that a knowledge test for all private hire car drivers would be beneficial, stating that PHC drivers also require to have a basic knowledge of the area before being granted a licence, particularly in the rural areas where residential addresses can sometimes not be clear.</p> <p>There was a suggestion that the multiple choice section could be made more difficult.</p>
<p>Inverness</p>	<p>There was mixed views amongst the operators as to whether private hire drivers should be required to sit a knowledge test.</p> <p>There was a suggestion the pass mark could be reduced to 50% and increased to 90% for taxi drivers.</p> <p>A view was given that the introduction of PHC knowledge tests would encourage applicants to apply for a taxi driver's licence rather than a PHC licence as there would be no difference to the application process should a test be introduced which could have a serious impact on existing taxi drivers and there would be insufficient rank spaces to cope with this.</p> <p>A view was given that it could cause difficulties in trying to recruit drivers in rural areas and wasn't necessary as booking systems show the location and route in advance.</p> <p>Subsequent to the meeting, several emails were received with the following views:</p> <ul style="list-style-type: none"> • PHC pass mark should be 75% • PHC pass mark should be 50% and taxi driver pass mark should be 90% • Unsure if taxi driver pass mark needs to be 90% • Current PHC drivers should not be required to sit the test • Current PHC drivers should not be required to sit the test, unless missing their renewal
<p>Fort William</p>	<p>All operators present were of the view that a knowledge test for private hire car applicants would be a welcome addition as this would ensure that they have at least some knowledge of the area before they start.</p>

	<p>The view was that all PHC drivers should be required to sit the test, with existing licence holders having to do this upon renewal of their licence.</p>
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	<p>The view was that the pass mark should be the same as the taxi driver's knowledge test.</p>
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